

Title VI Limited English Proficient (LEP) Environmental Justice (EJ) Policy



Lower Rio Grande Valley Development Council
Regional Transit Services Department
(Valley Metro)

June 25, 2025



Table of Contents

1. Nondiscrimination Service Statement	4
2. Title VI Coordinator	4
3. Public Notice	4
4. Procedure for Addressing Title VI Complaints	4
5. Demographic Data	6
6. LEP Analysis	6
7. LEP Activities.....	6
8. Public Participation Plan-Process	7
9. Environmental Justice Analysis.....	7
10. Service Monitoring	8
11. Discriminatory Impact	8
12. Subrecipient Compliance	8
13. Composition of Boards, Councils, and Committees	8
Introduction.....	24
Analysis Using Four-Factor Framework	24
Fact 1: Number and Proportion of LEP persons Served or Encountered in the Eligible Service Population	24
Factor 2 – The Frequency with which LEP Individuals Come into Contact with Programs, Activities, and Services	28
Factor 3 – The Importance to LEP Persons of Your Program, Activities and Services	29
Factor 4 – The Resources available to the Recipient and Cost.....	30
Task 1: Identifying LEP individuals who need language assistance	31
Task 2: Language assistance measures	31
Task 3: Training Staff.....	32
Task 4: Providing notice to LEP persons.....	33
Task 5: Monitoring and updating the LEP Plan.....	33
Appendix A – Language Spoken at Home	35
INTRODUCTION	45
PURPOSE	45
AUTHORITIES AND GUIDANCE.....	45
STATE OF THE STATE.....	46
SECTION 1 – FOUR FACTOR ANALYSIS	46
STATEWIDE ASSESSMENT USING THE FOUR-FACTOR ANALYSIS.....	46
SECTION 2-LANGUAGE ASSISTANCE PLAN	48
INTERPRETATION.....	48
TRANSLATION.....	49
VITAL DOCUMENTS.....	49
PROVIDING NOTICE TO LEP PERSONS.....	50
TRAINING STAFF	50
COMPLAINTS	51
TECHNICAL ASSISTANCE.....	51
LANGUAGE ASSISTANCE RESOURCES	51
BILINGUAL STAFFING.....	51
General Service Guidelines.....	67
Service Standards.....	68
Performance Measures.....	69

Title VI

Limited English Proficient (LEP)

Environmental Justice (EJ)

Policy



Lower Rio Grande Valley Development Council
Regional Transit Services Department
(Valley Metro)

June 25, 2025
As approved by the LRGVDC
Board of Directors

1. Nondiscrimination Service Statement

LRGVDC will not exclude from or deny the benefits of its services to any person on the basis of race, color, national origin, age, disability, gender, religion, sexual orientation, ethnicity, or veteran's status. LRGVDC will comply with Title VI of the Civil Rights Act of 1964 and all applicable statutes and regulations.

2. Title VI Coordinator

The Director of Regional Transit Services will be responsible for the coordination of the Title VI program, LEP program, and environmental justice assessment for the transit department. The Director will ensure preparation of the Title VI Program submissions and updates for the Federal Transit Administration (FTA).

3. Public Notice

The public will be informed regarding the LRGVDC's obligations and their protections against discrimination under Title VI. Information will be distributed in at least the following ways:

- a. Placards carried inside transit vehicles.
- b. On the transit website.
- c. Posters at the transit administrative office; and
- d. Within notices posted for public meetings.

The following information will be included on all materials: "Title VI is the Law. Title VI of the Civil Right Act of 1964 requires that no person in the United States be excluded from, denied the benefits of, or subject to discrimination under any program or activity receiving federal financial assistance on the grounds of race, color, or national origin. The Lower Rio Grande Valley Development Council operates in compliance with Title VI. Any person who believes that they have been excluded from, denied the benefits of, or been subjected to discrimination may file a written complaint with the LRGVDC Office of Human Resources within 180 calendar days of the alleged incident. To obtain more information about the LRGVDC's Title VI Program or file a complaint, contact the LRGVDC Transit Department at 510 S. Pleasantview Dr., Weslaco, Texas 78596, (956) 969-5761, www.lrgvdc.org."

4. Procedure for Addressing Title VI Complaints

All complaints relating to Title VI will be immediately addressed through the process described here. All transit staff who record complaints as part of their normal duties will be directed to transfer communication alleging any form of discrimination to the Director of Regional Transit Services. All complaints alleging discrimination under this policy will be made in writing on the form given for this purpose under [Appendix A](#). The form will be submitted to the Director of Regional Transit Services. The Director will notify the complainant that the complaint has been received within one (1)

calendar week of receipt. Notification will be made through standard mail or email if an email address has been given.

The transit department has the sole responsibility for accepting, investigating, and addressing transit discrimination complaints. All transit staff will be made aware, through a memo distributed at least annually that discusses how a discrimination complaint may be identified, that any discrimination complaint must be forwarded directly to Director of Regional Transit Services. No other employees are allowed to accept complaints alleging discrimination from clients. Employees will be made aware that if they have any doubt about whether a complaint is alleging discrimination, they should err on the side of caution and instruct the complainant to seek direct resolution from Director of Regional Transit Services.

After receipt of a complaint, the Director of Regional Transit Services or designee will review the complaint using the form in [Appendix B](#) and determine whether further investigation is warranted. If further investigation is warranted, the Director will conduct an investigation that may include staff interviews, review of records, and other fact-finding activities. If no further investigation is warranted, the Director will note the reasons on the form.

In all cases, the Director of Regional Transit Services will submit a determination letter, on LRGVDC letterhead, to the complainant indicating what steps, if any, were taken to address the issue noted in the complaint. The Director will respond to the complaint via certified mail within ten (10) business days (postmark deadline) of receipt of the complaint. The determination letter will state that the client has the right to appeal the determination to the Executive Director or, if dissatisfied with the determination or any aspect of the complaint process, has a right to submit the complaint at any time to the Federal Transit Administration for an investigation. The address for FTA will be noted in the letter: *Title VI Program Coordinator, FTA Office of Civil Right, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, D.C. 20590.*

The complainant will be given the option to appeal any findings to the Executive Director of the LRGVDC. The appeal must be submitted within 60 calendar days (postmark deadline) of the receipt of the determination letter. The Executive Director will review any appeals in accordance with the form in [Appendix C](#) and will send his determination via a letter on LRGVDC letterhead. The Executive Director will notify the appellant that the appeal has been received within one (1) calendar week of receipt, through standard mail or email, if an email address has been given. The Executive Director will respond to the complaint via certified mail within ten (10) business days (postmark deadline) of receipt of the complaint. The Executive Director's determination letter will state that the client has the right to contact the FTA for an investigation at any time if dissatisfied with the determination or any aspect of the complaint process. The address for FTA will be noted in the letter: *Title VI Program Coordinator, FTA Office of Civil Right, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, D.C. 20590.*

All records of complaints, investigations, and lawsuits, including complaint forms, review forms, supporting materials, and determination letters will be kept in a single location in the Transit department, organized by date. A table listing any Title VI related investigations, lawsuits, and complaints is contained in [Appendix D](#) and will be updated whenever a change is made.

5. Demographic Data

All data used as part of any Title VI-related analysis will be taken from the following sources where available:

- a. Latest available U.S. Census data for the counties of Cameron, Hidalgo, Starr, Willacy and Zapata Counties;
- b. Local data available from the Metropolitan Planning Organizations (MPOs), local governments, the state of Texas, and community organizations; and
- c. Latest available annual rider surveys administered by the LRGVDC.

A demographic profile of clients, including maps and charts, will be created after each decennial census or prior to a proposed service reduction or elimination in Hidalgo County.

6. LEP Analysis

The LRGVDC will ensure meaningful access to its benefits, services, information, programs, and activities to people who are limited English proficient (LEP). Each year, transit staff will conduct a four-factor analysis to determine what steps are necessary to provide meaningful access to the LEP population. The four factors are:

- a. The number and proportion of LEP persons served or encountered in the eligible service population; and
- b. The frequency with which LEP individuals come into contact with transit services, programs, and activities; and
- c. The nature and importance of transit services, programs, and activities; and
- d. The resources available to the recipient and costs.

Meaningful access will be ensured for all services, programs, and activities intended for the general public, regardless of their nature or importance, where this intention is determined by whether the activity is one in which at least one member of the general public may be reasonably expected to attend. The final determination on whether a particular LEP activity will be undertaken will rest with the Director.

7. LEP Activities

Given that the LRGVDC operates in deep South Texas, adjacent to the Mexican border, it will be standard operating practice that communication to the general public be done through English and Spanish. A member of the transit department will be designated for translation and interpretation activities, with another staff person serving as a check to ensure the accuracy of the language service. Moreover:

- a. All public meetings will be held in both English & Spanish;
- b. All marketing materials meant for a general audience, including newspaper advertisements flyers, signs, public notices, and other written materials, will be in both English & Spanish;
- c. All route maps & brochures will be in both English & Spanish;

d. Drivers, dispatchers, planners, and other transit staff who regularly communicate with the public will be able to communicate with passengers in both English & Spanish. If a staff member is not proficient in both English and Spanish, he or she will be instructed to refer questions or issues to another staff member who is proficient. For drivers who are not bilingual, they will be instructed to refer issues to dispatchers or the Program Administrator for Operations.

The policy will be translated upon client request.

The need for LEP services in languages other than Spanish will be determined through the LEP analysis. A copy of the most recent Four-Factor Analysis and Language Assistance Plan is attached as [Appendix E](#). These documents will be updated as required by regulation.

8. Public Participation Plan-Process

The LRGVDC will continuously seek out and consider the viewpoints of minority, low-income, and LEP populations in all its public outreach and involvement activities, in accordance with its *Transit Service Policy* (approved June 25, 2025), attached here as [Appendix F](#). A list of all public involvement activities will be maintained by Valley Metro. An updated list is attached as [Appendix G](#) and is updated continuously.

All projects listed or considered in the Transportation Improvement Program (TIP) in the urbanized areas of Hidalgo County and Harlingen will follow the public participation policies of the Rio Grande Valley Metropolitan Planning Organization (RGVMPO). Those documents are included as [Appendix H](#). The TIP includes operations, capital, maintenance, planning, administration, and other projects.

In addition, “changes in service, whether through the addition of new routes, the expansion of existing route structures, the deletion of service, or any other changes, will be based on extensive public input in the relevant service area. The LRGVDC will solicit input through surveys, letters from the public, petitions, public meetings, and assessments and analyses, among other means.”

9. Environmental Justice Analysis

For any construction project requiring an Environmental Assessment (EA) or Environmental Impact Statement (EIS) the LRGVDC will incorporate an environmental justice analysis into the National Environmental Policy Act (NEPA) documentation. This analysis will include:

- a. A description of the low-income and minority population within the area affected by the project, and a discussion of the method used to identify this population; and
- b. A discussion of all adverse effects of the projects both during and after construction that would affect the identified minority and low-income population; and
- c. A discussion of all positive effects that affect the identified minority and low-income population; and
- d. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects; and

- e. a discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- f. A comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority and non-low-income areas.

10. Service Monitoring

The LRGVDC will monitor its service to identify any disparities in the level and quality of service provided to different demographic groups. This monitoring will be accomplished through an analysis of the bi-annual survey given to transit customers. In addition, the criteria for service provided in the *Transit Service Policy* (chapter 2), including load factors, service frequency, placement of amenities such as bus shelters, service types, bus type, and headways, will be monitored by route at least annually to ensure that service quality and quantity is provided at the same level throughout the entire transit system.

If any disparity exists, an action plan will be created showing how the disparity will be addressed within the following 6 months.

11. Discriminatory Impact

Whenever any fare increases or major service change occurs (defined as a change in service of at least 25% of the hours or mileage of any given route), an impact statement for internal use will be prepared for analyzing whether the proposed change will result in any discriminatory impact. The statement will include steps that the LRGVDC will take to minimize, mitigate, or offset any adverse effects.

12. Subrecipient Compliance

As part of its annual review, the LRGVDC will examine the Title VI policy and activities of its subrecipients to ensure compliance. Deficiencies will be noted and a plan for correction will be developed within the time period given during the review.

13. Composition of Boards, Councils, and Committees

The LRGVDC does not maintain a transit-related, non-elected planning board, advisory council, or committee. If such a body were established, LRGVDC would comply with Title VI regulations to ensure that no person is denied participation as a member of such a body on the basis of race, color, or national origin.

14. Title VI Assurances

The Lower Rio Grande Valley Development Council (LRGVDC) - Valley Metro (hereinafter referred to as the *Recipient*) affirms its commitment to uphold the principles and requirements of Title VI of the Civil Rights Act of 1964, along with related nondiscrimination statutes and regulations. As a condition for receiving Federal financial assistance from the U.S. Department of Transportation (DOT), including through the Federal Highway Administration (FHWA), the Recipient agrees to ensure that no person in the United States shall—on the grounds of race, color, or national origin—be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity it administers. This commitment is further reinforced by the Civil Rights Restoration Act of 1987, which ensures that the nondiscrimination obligations extend institution-wide to all programs and activities receiving federal support. The Recipient hereby provides this assurance and commits to complying with all applicable statutes, regulations, and guidelines to guarantee equitable access and participation across its services.

As part of its compliance obligations, the Recipient further agrees to include and implement the Title VI Assurance Form as outlined in *Appendix I* of this document. This form serves as a formal attestation of the Recipient's commitment to nondiscrimination and outlines the responsibilities of all sub-recipients, contractors, and other program participants receiving federal financial assistance under U.S. DOT programs. The assurance form must be signed by the authorized official and retained as part of the Recipient's official compliance records. This inclusion affirms Valley Metro's dedication to upholding Title VI provisions and ensuring equitable treatment in all services and federally assisted activities.

Appendix A. Discrimination Complaint Form

Title VI Complaint Form

(Rev. 04/20)
Page 1 of 2



Please submit completed form to:

LRGVDC - Valley Metro
510 S. Pleasantview Drive
Weslaco, Texas 78596

Attn: Sandra Carrizales, Director of Valley Metro

Last Name:

First Name:

Mailing Address:

City:

State:

Zip Code:

Main Phone Number:

Alternat

ive Phone Number: Email Address:

Please indicate the basis of your complaint:

Race _____

National Origin _____

Color _____

Other Class _____

Date and place of alleged discriminatory action(s). Please include the earliest date of discrimination and the most recent date of discrimination.

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional pages, if necessary).

The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of individuals responsible for the discriminatory action(s):

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint *(attach additional pages, if necessary)*:

Name	Address	Telephone
1. _____ _____	_____	_____
2. _____	_____	_____
3. _____ _____	_____	_____
4. _____	_____	_____

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- U.S. Department of Transportation Date Filed: _____
- Federal Highway Administration Date Filed: _____
- Federal Transit Administration Date _____
- Filed: Office of Federal Contract Compliance Programs _____
Date _____
- Filed: Texas Department of Transportation Date _____
- Filed: _____ Date Filed: _____
- U.S. Equal Employment Opportunity Commission Date Filed: _____
- U.S. Department of Justice Date Filed: _____

Other: _____ Date Filed: _____

Have you discussed the complaint with any _____ (Name of Recipient) representative?

If yes, provide the name, position, and date of discussion.

Briefly explain what remedy, or action, you are seeking for the alleged discrimination.

Please provide any additional information and/or photographs, if applicable, that you believe will assist with an investigation.

We cannot accept an unsigned complaint. Please sign and date the complaint form below.

Complainant's Signature Date

COMPLAINT FORM IN SPANISH: FORMA EN ESPANOL

Formulario de Queja del

(Rev. 04/20)
Página 1 de



Envíe el formulario completo a:

LRGVDC - Valley Metro
510 S. Pleasantview Drive
Weslaco, Texas 78596
A la atención de: Sandra Carrizales, Director de Valley Metro

Apellido: Nombre:

Dirección postal:

Ciudad: _____ Estado: _____ Código postal: _____
Número de teléfono principal: _____ Número de teléfono
alternativo: Dirección de correo electrónico: _____

Sírvase indicar el fundamento de su reclamación:

- Raza _____ Origen Nacional _____

- Color _____ Otra Clase _____

Fecha y lugar de las presuntas acciones discriminatorias. Incluya la fecha más temprana de discriminación y la fecha más reciente de discriminación.

¿Cómo fue discriminado? Describa la naturaleza de la acción, decisión o condiciones de la supuesta discriminación. Explique lo más claramente posible lo que sucedió y por qué cree que su estado protegido (base) fue un factor en la discriminación. Incluya cómo otras personas fueron tratadas de manera diferente a usted. (Adjunte páginas adicionales, si es necesario).

La ley prohíbe la intimidación o las represalias contra cualquier persona que haya tomado medidas, o haya participado en ellas, para garantizar los derechos protegidos por estas leyes. Si cree que ha sido objeto de represalias, aparte de la discriminación alegada anteriormente, explique las circunstancias a continuación. Explique qué acción tomó que cree que fue la causa de la supuesta represalia.

Nombres de las personas responsables de la(s) acción(es) discriminatoria(s):

Nombres de personas (testigos, compañeros de trabajo, supervisores u otros) con quienes podemos comunicarnos para obtener información adicional para respaldar o aclarar su queja (*adjunte páginas adicionales, si es necesario*):

Nombre	Dirección	Teléfono
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____

¿Ha presentado, o tiene la intención de presentar, una queja con respecto al asunto planteado con cualquiera de los siguientes? En caso afirmativo, sírvase indicar las fechas de presentación. Marque todo lo que corresponda.

- Departamento de Transporte de EE. UU. Fecha de presentación: _____
- Administración Federal de Carreteras Fecha de presentación: _____
- Administración Federal de Tránsito Fecha _____
- de presentación: Oficina de Programas de _____
- Cumplimiento de Contratos Federales Fecha _____
- de presentación: Departamento de Transportación de _____
- Texas Fecha _____
- de presentación: _____
- Comisión para la Igualdad de Oportunidades en el Empleo de EE. UU. Fecha de presentación: _____
- Departamento de Justicia de EE. UU. Fecha de presentación: _____
- _____

Otro: _____ Fecha de presentación: _____

¿Ha discutido la queja con algún _____ (Nombre del destinatario) ¿representante?

En caso afirmativo, proporcione el nombre, el cargo y la fecha de la discusión.

Explique brevemente qué remedio o acción está buscando para la supuesta discriminación.

Proporcione cualquier información adicional y/o fotografías, si corresponde, que crea que ayudarán con una investigación.

No podemos aceptar una queja sin firmar. Por favor, firme y feche el formulario de queja a continuación.

Firma del demandante

Fecha

Appendix B. Discrimination Determination Form

LOWER RIO GRANDE VALLEY DEVELOPMENT COUNCIL TITLE VI DISCRIMINATION DETERMINATION FORM

Complainant's Name: _____
Street Address: _____
City/State/Zip: _____
Phone: _____

Discrimination because of:

- RACE COLOR NATIONAL ORIGIN SEX AGE RELIGION RETALIATION
 SEXUAL ORIENTATION SEXUAL HARASSMENT DISABILITY

When (date & time) did the event occur? _____

Where did the event occur? _____

1. Upon review of the complaint, is further investigation warranted? YES NO

If 'NO', provide a justification/ reasons for why not: _____

If 'YES', obtain a written statement from the employee who is alleged to have discriminated. Obtain written statements from witnesses (if any) of the incident. (Attach the statements to this form.)

2. Based on the information obtained, was an act of discrimination committed?

YES NO INDETERMINATE (Reason: _____)

If 'NO', provide a justification/ reasons for why not: _____

If 'YES', indicate how the discrimination was addressed/corrected: _____

LOWER RIO GRANDE VALLEY DEVELOPMENT COUNCIL
TITLE VI DISCRIMINATION DETERMINATION FORM

Is there enough evidence to continue with the Title VI Complaint? YES NO,
what action was taken or to what department was this complaint sent to:

If yes, provide a determination of the case in question. List any corrective actions.

Signature: _____ Date: _____

Determination Made By: _____
Date of determination: _____
Date client response letter sent: _____
If determination letter is forwarded, indicate to whom: _____

Appendix C.

Discrimination Determination Appeal Form

LOWER RIO GRANDE VALLEY DEVELOPMENT COUNCIL TITLE VI DISCRIMINATION DETERMINATION APPEAL FORM

Appellant's Name: _____
Street Address: _____
City/State/Zip: _____
Phone: _____

Discrimination because of:

- RACE COLOR NATIONAL ORIGIN SEX AGE RELIGION RETALIATION
 SEXUAL ORIENTATION SEXUAL HARASSMENT DISABILITY

When (date & time) did the event occur? _____
Where did the event occur? _____

1. Upon review of the complaint, is further investigation warranted? YES NO

If 'NO', provide a justification/ reasons for why not: _____

If 'YES', obtain a written statement from the employee who is alleged to have discriminated. Obtain written statements from witnesses (if any) of the incident. (Attach the statements to this form.)

2. Based on the information obtained, was an act of discrimination committed?

YES NO INDETERMINATE (Reason: _____)

If 'NO', provide a justification/ reasons for why not: _____

If 'YES', indicate how the discrimination was addressed/corrected: _____

LOWER RIO GRANDE VALLEY DEVELOPMENT COUNCIL
TITLE VI DISCRIMINATION DETERMINATION APPEAL FORM

Is there enough evidence to continue with the Title VI Complaint? YES NO,
what action was taken or who was assigned as the investigator:

If yes, provide a determination of the case in question. List any corrective actions.

Signature: _____ Date: _____

Determination Made By: _____

Date of determination: _____

Date client response letter sent: _____

If determination letter is forwarded, indicate to whom: _____

Appendix D. List of Investigations, Complaints, and Lawsuits

LOWER RIO GRANDE VALLEY DEVELOPMENT COUNCIL LIST OF TITLE VI INVESTIGATIONS, COMPLAINTS, LAWSUITS

Summary: There have been no Title VI investigations, complaints, or lawsuits in the given time period.

	Date (Month, Day, Year)	Summary (Includes basis of complaint: race, color, national origin)	Status	Action Taken
Investigations				
Lawsuits				
Complaints				

Lower Rio Grande Valley Development Council Title VI Program Review-Recipient ID 1886

General Requirements (from Chapter III of Circular):

List of transit-related Title VI investigations, complaints, and lawsuits.

- None

LRGVDC-Valley Metro Director of Regional Transit

Date

Appendix E.
LEP Four-Factor Analysis & Language Assistance Plan

Limited English Proficient Persons Four Factor Analysis & Language Assistance Plan



Lower Rio Grande Valley Development Council
Regional Transit Services Department
(Valley Metro)



Update – June 25, 2025

Introduction

The purpose of this analysis is to meet the requirements of the Federal Transit Administration's Limited English Proficient (LEP) program under Title VI, which states that no person shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the FTA. Valley Metro will fulfill all requirements required by law and FTA regulations.

Analysis Using Four-Factor Framework

Fact 1: Number and Proportion of LEP persons Served or Encountered in the Eligible Service Population

Task 1, Step 1: Examine prior experiences with LEP individuals

Valley Metro has an extensive history of interaction with LEP individuals, almost exclusively with those who speak Spanish as a primary language. Since the Service area is located at the southernmost region of Texas and abuts the Mexican border, there is a constant vehicular and foot traffic from Mexico. Moreover, the ethnicity of the population is primarily Hispanic. Contact with LEP persons is made on a daily basis, on all routes and services. Customer service calls are often received in Spanish. Public meetings feature persons who request Spanish translations. It is a common assumption that everyone be able to speak and communicate in Spanish in a public setting – this is typical of business establishments, social service agencies, medical public facilities, and in many other contexts. Interaction or experience with languages other than Spanish has been uncommon.

Race in Service Area

County	Population	Hispanic or Latino Population	Percent Hispanic or Latino
Hidalgo County	880,356	815,209	92.6%
Cameron County	423,029	380,726	90.0%
Willacy County	20,316	17,898	88.1%
Starr County	66,049	63,605	96.3%
Zapata County	13,908	13,227	95.1%

Source: U.S. Census Bureau, 2021 Census

Task 1, Step 2 : Become familiar with data from the U.S. Census

U.S. Census data indicates that Spanish is spoken by the great majority of those speaking languages other than English. All other languages combined total approximately 1% of the total languages spoken.

Languages Spoken in Service Area

County	Population Over 5 Yrs Old	Percent
Hidalgo County	728,707	100%
English Only	109,638	15%
Spanish or Spanish Creole	610,764	83.8%
Other Indo-European Languages	2,420	0.3%
Asian & Pacific Island Languages	5,427	0.7%
Other Languages	458	0.1%
Cameron County	378,636	100%
English Only	98,361	26%
Spanish or Spanish Creole	276,683	73.1%
Other Indo-European Languages	1,336	0.4%
Asian & Pacific Island Languages	1,604	0.4%
Other Languages	652	0.2%
Willacy County	20,613	100%
English Only	9,942	48.2%
Spanish or Spanish Creole	10,517	51%
Other Indo-European Languages	96	0.5%
Asian & Pacific Island Languages	55	0.3%
Other Languages	3	0%
Starr County	55,883	100%
English Only	3,126	5.6%
Spanish or Spanish Creole	52,471	93.9%
Other Indo-European Languages	121	0.2%
Asian & Pacific Island Languages	161	0.3%
Other Languages	4	0%
Zapata County	12,673	100%
English Only	1,682	13.3%
Spanish or Spanish Creole	10,989	86.7%
Other Indo-European Languages	2	0%
Asian & Pacific Island Languages	0	0%
Other Languages	0	0%

Source: U.S. Census Bureau, 2020 American Community Survey

More detailed information is attached as Appendix A.

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves.

The Lower Rio Grande Valley Development Council provides public transportation under the Valley Metro name in the Texas counties of Hidalgo, Cameron, Willacy, Starr and Zapata Counties. It provides both urban and rural service. Small urban service is provided in the McAllen urbanized area. Connections to the Brownsville urbanized area are made through rural routes. Service is provided through flexible and commuter routes in Hidalgo, Cameron, Starr and Zapata Counties. Demand response service is offered in Willacy, Starr, and Zapata Counties. The service area is 5,930 square miles. A map is attached as Appendix B.

Task 1, Step 2B: Obtain census data on the LEP population in your service area.

Census data on LEP individuals is attached in Appendix A.

Task 1, Step 2C: Analyze the data you have collected.

Based on the data collected, we can draw the following conclusions about LEP population:

- a. Those persons who speak English less than very well and who are therefore defined as LEP persons is 615,164 or 49.87% of the population.
- b. Of the LEP population, most of those persons (607,342 or 98.73%) speak Spanish; the rest speak non-Spanish languages. (1.27%)

Task 1, Step 2D: Identify any concentrations of LEP persons within your service area.

A map of the distribution of LEP persons in the service area is attached as Appendix C. The census tracts with the highest concentrations of LEP persons are in the rural areas on the far west side of the service area and the east side approaching the coast. There is also a heavy concentration south of Expressway 83 in Hidalgo County and along Highway 281 north of Expressway 83. These areas are characterized by low population densities and large distances separating towns.

Task 1, Step 3: Consult state and local sources of data

Other sources of data are consistent with U.S. Census Bureau data. The Texas Education Agency cites the number LEP individuals enrolled in public schools in the service area at 35%.* The distribution of these students holds across different school districts, with the proportion lower as income level rises.

The Lower Rio Grande Valley's Criminal Justice program's most current Community Plan for Hidalgo County also shows a similar rate of LEP persons in the area, at 50% although the methodology for determining LEP persons may be different for that program.^

Anecdotal evidence from local organizations and common experience suggest that proportion of LEP persons encountered is the same as the Census indicates.

*Source: "Status of Education and College Readiness in the Rio Grande Valley of Texas", p. 2 at https://www.getencore.org/docs/White_Paper_11_19_10.pdf.

^ <https://www.lrgvdc.org/downloads/criminal-justice/2011-2012%20Hidalgo%20Co%20Community%20Plan.pdf>

Task 1, Step 4: Community Organizations that serve LEP persons

There are numerous community organizations that serve LEP populations in the area, either directly or indirectly. As has been previously mentioned, LEP persons can be found in greater concentrations in rural areas. They are also highly concentrated in colonias, which are unincorporated areas that lack basic infrastructure and are populated heavily by recent immigrants. These colonias are typically found in rural areas. Valley Metro works extensively with many of these organizations individually or as part of the Lower Rio Grande Valley Public Transportation Advisory Panel (RTAP), the regional public transit group that coordinates human services transportation in the three-county area.

Task 1, Step 4A: Identify community organizations

Agencies that assist LEP persons include Proyecto Azteca, Migrant Health Promotion, and La Union de Pueblo Entero (LUPE). These organizations utilize the resources of promotoras/promotores, who are individuals specifically trained to work in low-income, Spanish-speaking communities such as colonias. In addition, Valley Metro works with the local Workforce Boards, the Health and Human Services Commission, and local colleges and universities on developing and monitoring routes. These agencies are subject to the same federal guidelines under Title VI.

Task 1, Step 4B: Contact relevant community organizations

Valley Metro constructed an LEP survey (attached here as Appendix D) and distributed it in late October and early November 2011 to the following organizations that were either on existing mailing list or that we recommended by organizations that Valley Metro had worked with in the past:

- Community Council RGV
- Mujeres Unidas
- Texas A&M University (Rural Affairs)
- ARISE
- LUPE
- Texas Housing Commission
- United Way
- Tropical Texas Behavioral Health
- Are Agency on Aging
- Migrant Health Promotion
- Valley Association for Independent Living
- Industrial Family Clinic
- Start Venter
- Proyecto Azteca
- Family Crisis Center
- Buckner Community Transformation Center
- Hidalgo County Health & Human Services

The text of the survey solicitation was as follows:

“Good afternoon fellow agencies,

Valley Metro is fulfilling Title VI requirements as part of our grant application, and we are requesting some input from other agencies that work Limited English Proficient (LEP) persons. This information will help us

identify individuals who speak Spanish and other languages, the areas that these individuals are located, and how we can access them to provide them with information regarding public transportation. Under these regulations, Valley Metro conducts an analysis back with U.S. Census Maps to sustain our findings and consequently the Federal Transit Administration thoroughly reviews for approval/rejection of changes.

It would be of great help if you could assist us with the questionnaire attached. In addition, we would like to conduct 2-3 meetings with LEP persons in the region to offer information about our public transportation services, whether they are aware of the types of language assistance our agency provides and which one works best and what, if any, additional language assistance measures would be most beneficial.

If your agency is interested in coordinating a meeting, please let me know by the end of tomorrow to schedule the meeting for next week. If you have any questions, please email me at nsanchez@lrgvdc.org or Claudia Olmedo, at colmedo@lrgvdc.org. Or give us a call at (956) 969-5761, ext 328 (Nancy) or ext 330 (Claudia).

Thank you,

Nancy G. Sanchez,
Program Supervisor II of Planning and Mobility

Task 1, Step 4C: Obtain information

Survey results were obtained from the following organizations:

- Proyecto Azteca
- Family Crisis Center
- Buckner Community Transformation Center
- LUPE
- Mujeres Unidas
- Migrant Health Promotion
- Community Council RGV
- Hidalgo County HHS

The survey results indicate that most immigrants with whom the organizations interact come from Mexico and Central American counties, with a few persons coming from Nigeria, Philippines, and some Asian counties, such as Vietnam and China. Most clients live in rural areas and are Spanish speakers, although some Asian languages were also encountered. Generally, the clients had no more than a high school education.

Several ideas were given for how to reach clients and transit users. One was to utilize townhall meetings and use community organizers with face-to-face contact. It was recommended that meetings be held in individual homes, providing door-to-door communication. In the past, Valley Metro has held some public meetings in individual homes; this facilitates more participation. One survey recommended that the 211 phone system be utilized to disseminate information.

Factor 2 – The Frequency with which LEP Individuals Come into Contact with Programs, Activities, and Services

Task 2, Step 1: Review the relevant programs, activities, and services you provide

As previously mentioned, Valley Metro provides flexible routes and demand response service. LEP individuals come into contact with these programs, activities, and services on a daily basis (i.e., very frequently). They also frequently meet dispatchers, drivers, office staff, printed materials such as route schedules, and the Valley Metro website. Public outreach activities are frequent as well. On average, Valley Metro staff attend at least 1 public outreach event(s) per quarter – these include informational fairs, health fairs, workforce fairs, presentation to secondary and university students, and similar events. LEP individuals come into contact with these events on a frequent basis.

Task 2, Step 2: Review information obtained from community organizations

According to the community surveys, transportation service was used and needed for medical appointments, GED classes, grocery, legal services, social service agencies, and employment locations. Some service was also needed for university access and schooling. LEP person consistently used the bus for these services.

Task 2, Step 3: Consult directly with LEP persons

Valley Metro conducted a survey in October 2011 of LEP persons at two events held by the nonprofit groups ARISE and Migrant Health Promotion. 23 surveys were received. The survey consisted of questions asking whether patrons used public transportation, whether they were satisfied with the services, and how the system could work better for them, among other things. A sample survey is attached as Appendix E.

It is important to note that LEP persons in the service area are often suspicious of formal surveys, and so anecdotal evidence from promotoras/promotores who work directly with these populations is often as important as quantifiable data in making determinations about the needs of these persons. LEP persons may feel threatened by survey-takers who they perceive as immigration officials or local law enforcement.

Factor 3 – The Importance to LEP Persons of Your Program, Activities and Services

Task 3, Step 1: Identify your agency's most critical services

Valley Metro's most critical services are the following:

- Fixed route service
- Demand response service
- Discounted fares (1/2 fares for the elderly, disabled, students, veterans, and Medicare recipients).

The consequences of a language barrier is accessing these services can be dire, since the region experiences a high level of poverty and low educational attainment. Access to health and human services, such as food stamps, child nutrition funds, job training sites, daycare, and clinics can be limited if LEP persons do not have information about the following:

- Routes and schedules
- Fares and fare payment information
-
- Public announcements
- System rules
- Basic riding information
- Emergency or safety messages

Task 3, Step 2: Review input from community organizations and LEP persons

Input from community organizations indicates that Spanish is most commonly spoken language of those who are LEP persons and that rural areas see higher concentrations of these persons.

Factor 4 – The Resources available to the Recipient and Cost

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associate costs

Valley Metro currently translates all public information into Spanish. This includes:

- Public announcements
- Timetable information
- Route alignment information
- Public meetings notices
- Public meeting audio
- Presentations (PowerPoint, etc..)
- Notices/posters/flyers on buses

Translation of Valley Metro website and associate social media accounts is available through Google.

In addition, all Valley Metro personnel, with the exception of two bus drivers, are bilingual (English/Spanish). This means that 60 out of 62 staff members are bilingual. (95%) All personnel who attend public events are bilingual. Two staff members who are native speakers of Spanish in the service are assigned to translate all printed materials for public consumption. The two bus drivers who are not bilingual are able to speak basic phrases, such as how to call Valley Metro's 1-800 information line, what time the bus passes through a particular stop, and so on. These drivers have been instructed to seek assistance from the dispatch center if they do not understand or cannot communicate with a passenger.

The cost for all of these measures is trivial.

Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.

A comprehensive system is already in place to provide meaningful access for LEP persons speaking Spanish, since that language is so common in the service area. Additional services may include ensuring that upcoming Intelligent Transportation System upgrades, such as real-time bus information, is also translated into Spanish.

If there is enough of a need for translation of languages other than English, Valley Metro will investigate whether translation services are readily available from one of the community groups with which it works. There are institutions of higher learning in the area that may also be able to assist at low cost – The

University of Texas Rio Grande Valley, Texas State Technical College, Texas Southmost College, and South Texas College.

Safe Harbor Provision: Valley Metro will provide a written translation of all eligible LEP languages that constitute five percent (5%) or 1,000 persons, whichever is less, of the total population of person eligible to be served or likely to be affected or encountered. Currently, contact with speakers of Tagalog is the only language readily identified in rural areas of service area, as described in the Texas Department of Transportation's 4-Factor Analysis for rural areas (attached as Appendix F – see page 18 of that plan).

Task 4, Step 3: Analyze your budget

Valley Metro is funded entirely by federal and state grants, and local match for cities in the service area. It is unlikely that LEP services would cause a strain on the budget. In the future, if a language other than Spanish becomes prevalent, a cost/benefit analysis would have to be completed to determine the extent of the services that could be provided.

Task 4, Step 4: Consider cost effective practices for providing language assistance

Language assistance measures are already very cost-effective and future augmentations can be done easily because of the number of staff who are bilingual. Translation services are accomplished as a "value-added service" that cost nothing. The opportunity cost is negligible, since staff time is effectively organized.

Language Assistance Plan

Valley Metro Transit Services has developed the following implementation plan to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person shall, on the ground 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 from the Federal Transit Administration.

Task 1: Identifying LEP individuals who need language assistance

The four-factor analysis shows that of those LEP persons living in the service area, the great majority speak Spanish and are located in rural areas, low-income areas, and colonias. Only about 1% of all persons in the service area speak a language other than Spanish. The frequency of contact with these LEP persons is constant, with all aspects of service requiring access to Spanish translation.

Task 2: Language assistance measures

Valley Metro currently translates all public information into Spanish. This includes:

- Public announcements
- Timetable information

- Route alignment information
- Public meetings notices
- Public meeting audio
-
- Presentations (PowerPoint, etc..)
- Notices/Posters/flyers on buses

Translation of Valley Metro website and associate social media accounts is available through Google.

In addition, all Valley Metro personnel, with the exception of two bus drivers, are bilingual (English/Spanish). This means that 60 out of 62 staff members are bilingual. (95%) All personnel who attend public events are bilingual. Two staff members who are native speakers of Spanish in the service area are assigned to translate all printed materials for public consumption. The two bus drivers who are not bilingual are able to speak basic phrases, such as how to call Valley Metro’s 1-800 information line, what time the bus passes through a particular stop, and so on. These drivers have been instructed to seek assistance from the dispatch center if they do not understand or cannot communicate with a passenger.

Translation services for oral communication such as phone calls or email messages are accomplished in real-time by dispatchers or administrative personnel. In case a language other than Spanish or English is communicated, staff are instructed to gather as much information as is feasible to determine the language. In practice, this has never occurred.

Task 3: Training Staff

Task 3, Step 1: Identify agency staff that are likely to come into contact with LEP persons as well as management staff

All Valley Metro staff, including management, are likely to meet LEP persons on a daily basis. They are all required to be bilingual as part of their job duties. Speaking ability is a necessity and is measured/determined at intake. Writing ability is not a required except for those staff assigned to written translation duties.

Task 3, Step 2: Identify existing staff training opportunities

Because staff are required to be bilingual, training regarding language instruction is minimal. Those staff who are not bilingual (they gained exceptions for some reason), are trained to reger questions that are unintelligible to the dispatcher on duty.

Other training activities include the following:

- A bi-annual training session of all drivers and operations staff regarding notices, customer service skills, safety, and related topics.
- Rural Transit Assistance Program (RTAP) customer service training of all staff.
- Passenger Assistance (PASS) training of all operations staff.
- Safe driving training.

Task 3, Step 3: Design and implement LEP training for agency staff

LEP training will be incorporated into the semi-annual staff training sessions to ensure compliance with all applicable regulations. This training will include the following:

- An overview of Title VI and LEP requirements
- How to address non-Spanish languages
- Providing superior customer service to LEP persons.

Task 4: Providing notice to LEP persons

Task 4, Step 1: Inventory the existing public service announcement and community outreach the agency currently performs

Valley Metro incorporates a variety of methods to communicate with transit users and the public. These include route schedules, on-board signs in vehicles, a web site, a 1-800 information line, advertisements, and numerous public involvement activities such as public meetings. Outreach will continue in English and Spanish as currently done.

Task 4, Step 2: Incorporate notice of the availability of language assistance into existing outreach methods

As part of its public outreach, Valley Metro will publicize that language assistance is available via flyers and posters on its buses.

Task 4, Step 3: Conduct targeting community outreach to LEP populations

Valley Metro already targets outreach activities to LEP populations. The Program Administrator for Planning keeps a log of all public outreach activities and ensures that representation is given across the coverage area. In addition, Valley Metro works with various community groups to set up public meetings in conjunction with other events, such as health fairs and workforce fairs.

Task 5: Monitoring and updating the LEP Plan

Task 5, Step 1: Establish a process to obtain feedback on your agency's language assistance measures

Public notice will be given about Valley Metro's LEP program through flyers and posters on buses and through printed brochure available at all transit facilities. Any communication received in response to those notices will be addressed by Valley Metro's planning department. One planner will be assigned to these duties.

Task 5, Step 2: Obtain feedback from community members and from agency staff

Feedback will continue to be obtained from community partners on an ongoing basis. In addition, Valley Metro will conduct the LEP survey on an annual basis. Internal input from agency staff will be obtained through the semi-annual training meetings.

Task 5, Step 3: Conduct internal monitoring

The planning division will be assigned to conduct internal monitoring. LEP issues will be addressed in the annual review that is undertaken as part of Valley Metro's system-wide audit that also includes grants, maintenance, and other Title VI issues, among other concerns.

Task 5, Step 4: Make changes to the language assistance plan based on feedback received

Valley Metro will make change to this plan based on any feedback received from clients, other agencies, internal correspondence, and other sources of communication.

Task 5, Step 5: Consider new language assistance needs when expanding service

Language assistance needs will be taken into account when expanding service. Activities will include:

- Continuing to provide all notices of planning activities in Spanish
- Holding public meetings in areas that are accessible to LEP persons
- Creating draft printed materials that are subject to review in Spanish
- Ensuring that staff who present about service changes are knowledgeable in key technical terms and jargon.

Appendix A – Language Spoken at Home

LANGUAGE SPOKEN AT HOME 2014 American Community Survey 1 – Year Estimates

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for the 2014, the 2014 Census provides the official counts of the population and housing units for the nation, states, counties, cities and towns.

HIDALGO COUNTY, TEXAS	Total	Percent of specified language speakers		
SUBJECT	ESTIMATE	MARGIN OF ERROR	PERCENT	PERCENT OF MARGIN OF ERROR
Population 5 years and over	728,707	+/-165	100%	(x)
Speak only English	109,638	+/-3,077	15.0%	+/-0.4
Speak a language other than English	619,069	+/-3,036	85.0%	+/-0.4
Speak English less than “very well”	231,908	+/-4,372	31.8%	+/-0.6
Spanish	610,764	+/-3,047	83.8%	+/-0.4
Speak English less than “very well”	229,152	+/-4,427	31.4%	+/-0.6
Other Indo-European languages	2,420	+/-516	0.3%	+/-0.1
Speak English less than “very well”	812	+/-314	0.1%	+/-0.1
Asian and Pacific Islander languages	5,427	+/-403	0.7%	+/-0.1
Speak English less than “very well”	1,884	+/-385	0.3%	+/-0.1
Other languages	458	+/-198	0.1%	+/-0.1
Speak English less than “very well”	60	+/-46	0.0%	+/-0.1

Explanation of symbols:

1. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
2. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
3. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
4. An '(X)' means that the estimate is not applicable or available.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2017, the 2017 Census provides the official counts of the population and housing units for the nation, states, counties, cities and towns.

CAMERON COUNTY, TEXAS	Total	Percent of specified language speakers		
SUBJECT	ESTIMATE	MARGIN OF ERROR	PERCENT	PERCENT OF MARGIN OF ERROR
Population 5 years and over	378,636	+/-89	100%	(x)
Speak only English	98,361	+/-2,413	26.0%	+/-0.6
Speak a language other than English	280,275	+/-2,419	74.0%	+/-0.6
Speak English less than "very well"	113,267	+/-2,786	29.9%	+/-0.7
Spanish	276,683	+/-2,377	73.1%	+/-0.6
Speak English less than "very well"	112,264	+/-2,749	29.6%	+/-0.7
Other Indo-European languages	1,336	+/-315	0.4%	+/-0.1
Speak English less than "very well"	380	+/-131	0.1%	+/-0.1
Asian and Pacific Islander languages	1,604	+/-275	0.4%	+/-0.1
Speak English less than "very well"	490	+/-161	0.1%	+/-0.1
Other languages	652	+/-332	0.2%	+/-0.1
Speak English less than "very well"	133	+/-70	0.0%	+/-0.1

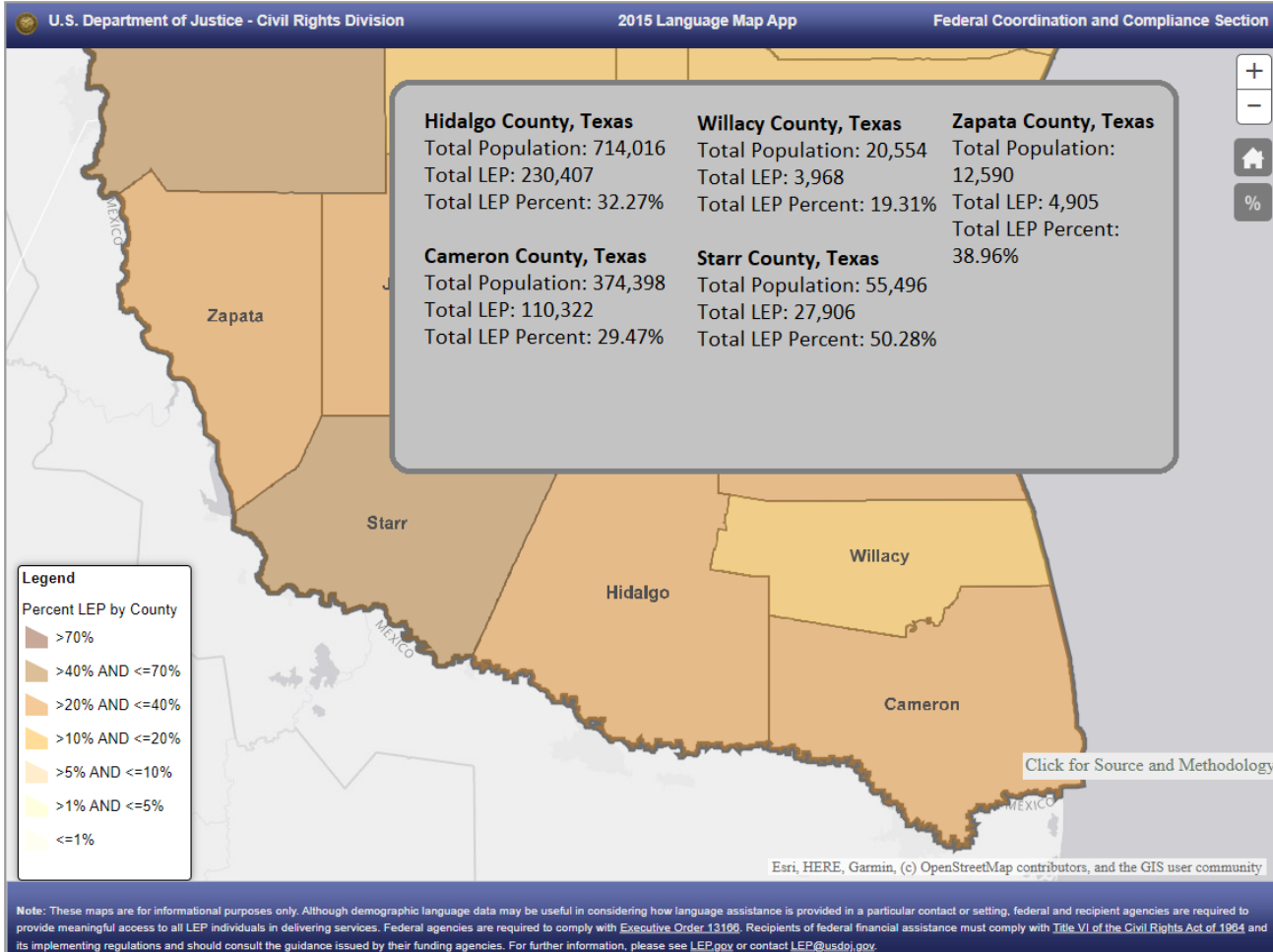
Appendix B – Service Area Map

VALLEY METRO SYSTEM MAP



CONNECTING THE VALLEY ONE RIDE AT A TIME

Appendix C – LEP Persons Distribution Map



Appendix D – Sample Client Survey

Valley Metro

Transportation Services Customer Satisfaction Survey

1. Overall, how satisfied are you with your Transportation Services experience?

- Extremely satisfied Very satisfied Somewhat satisfied Not satisfied

2. How knowledgeable was our staff who assisted you?

- Extremely Knowledgeable Very Knowledgeable Somewhat Knowledgeable Not at all Knowledgeable

3. How respectful was our staff who assisted you?

- Extremely respectful Very respectful Somewhat respectful Not at all respectful

4. How much time did it take us to address your questions and concerns?

- Extremely satisfied Very satisfied Somewhat satisfied Not satisfied

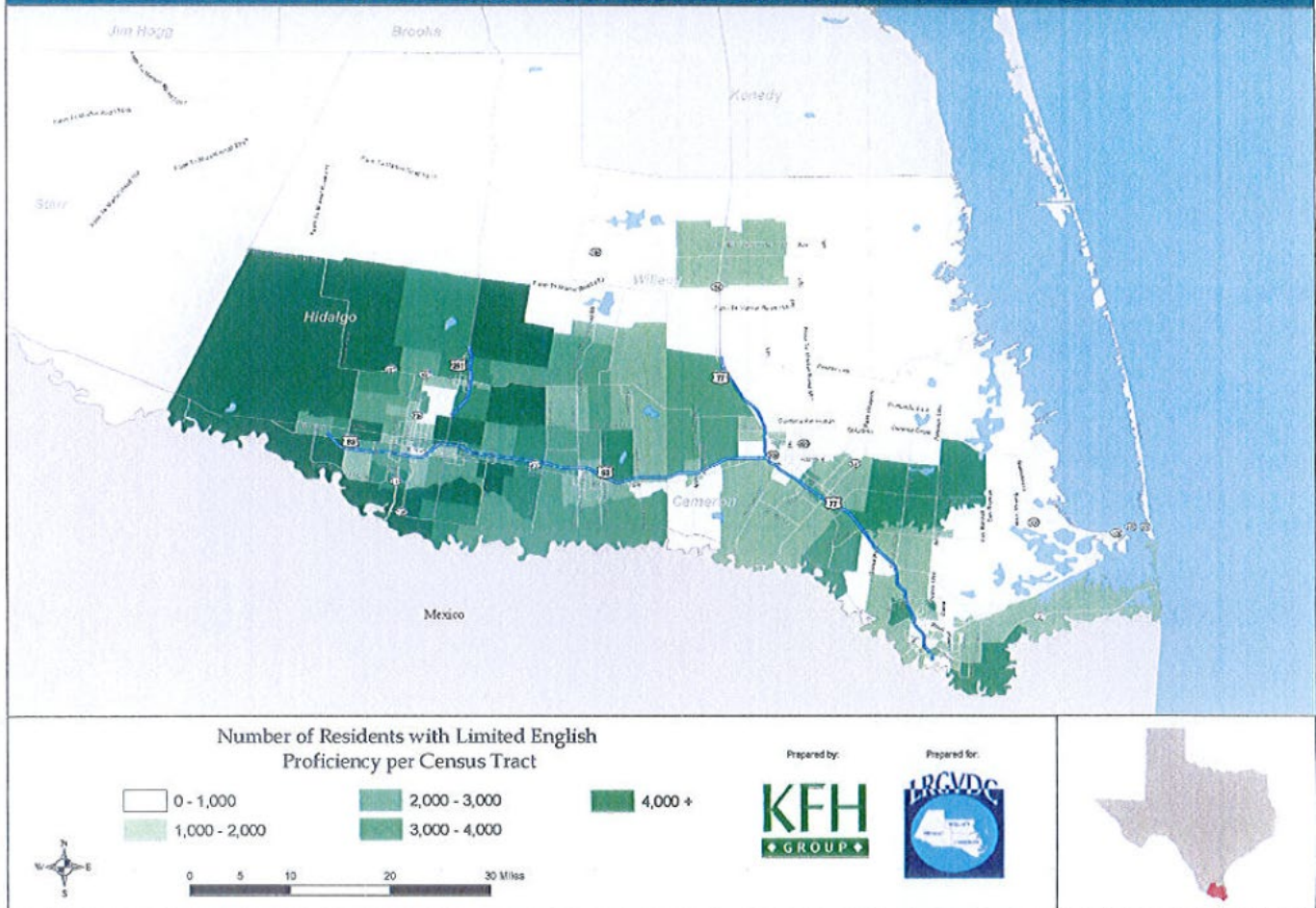
5. Was your question or concern completely resolved?

- Yes No

6. Is there anything that could make your Transportation experience better?

Appendix E – TxDOT LEP Analysis & Plan

**FIGURE 3-3:
LOWER RIO GRANDE VALLEY REGIONAL PUBLIC TRANSPORTATION COORDINATION PLAN
NUMBER OF RESIDENTS WITH LIMITED ENGLISH PROFICIENCY**



3-17



Limited English Proficient (LEP) QUESTIONARE –

1. Do you use public transportation? ¿Utiliza transporte publico?

If yes, answer questions 2-6, if no, answer questions 7-8: Si utiliza transporte publico, por favor de contestar las preguntas del 2 a 6, si no lo utiliza, por favor de contestar preguntas del 7 al 8.

2. How often do you use public transportation? ¿Que seguido usa el transporte publico?

3. What kinds of public transportation do you use – trains, buses, the city subway? ¿Que tipo de servicio utiliza – camion, tren, or metro subterraneo?

4. When do you use public transportation? For what purpose? ¿Cuando utiliza el servicio? ¿Para que razones?

5. Are you satisfied with the transportation you use? ¿Esta satisfecho/satisfecha con el servicio de transporte publico?

6. Do you have any suggestions how the people who run the transportation services could improve it to make it work better for you? Please be as specific as you can. ¿Tiene recomendaciones especificas para los operadores del transporte publico de como pueden mejorar el servicio, por facor sea detallado/detallada con sus recomendaciones?

7. How do you travel if you have to go somewhere in your area? ¿Que modo de transporte utiliza cuando tiene que viajar en su área?

8. Would you use public transportation if the trains or buses were set up differently? ¿Utilizaria el transporte publico se los trenes o camiones operarian diferente?

If you answered yes, answer questions 9-10, if no please submit your survey: Si contestó "si" en la pregunta anterior, por favor siga con la encuesta, si "no", ya ha terminado:

9. Which transit systems would you use? ¿Que Sistema de transporte usaria?

10. How can the people who run that system improve it to make it work better for you? ¿Que sugercencias les daria a los operadores de transporte para que te pueda servir major?



AGENCY QUESTIONNAIRE – Limited English Proficient (LEP)

- 1. What geographic area does your agency serve?**
- 2. How many people does your agency provide services to?**
- 3. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?**
- 4. What are the countries of origin from which your population has immigrated?**
- 5. Does your population come from an urban or rural background?**
- 6. What are the languages spoken by the population you serve?**
- 7. What is the age and gender of your population?**
- 8. What is the education and literacy level of the population you serve?**
- 9. What needs or expectations for public services has this population expressed?**
- 10. Has the population inquired about how to access public transportation or expressed a need for public transportation service?**
- 11. What are the most frequently traveled destinations?**
- 12. Are there locations that the population has expressed difficulty accessing via the public transportation system?**
- 13. Do the transit need, and travel patterns of the population vary depending on the age or gender of the population members?**
- 14. What is the best way to obtain input from the population?**
- 15. Who would the population trust most in delivering language appropriate messages?**

INTRODUCTION

Limited English Proficient (LEP) Individuals are those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English, as a result of national origin. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Executive Order 13166, entitled "Improving Access to Services by Persons with Limited English Proficiency" requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to limited English proficiency, cannot fully and equally participate in or benefit from those programs and activities. The DOJ LEP Guidance from the U.S. Department of Justice advises each Federal department or agency to "take responsible steps to ensure 'meaningful' access to LEP individuals to the information and services they provide."

The DOJ LEP Guidance explains that the identification of "reasonable steps" to ensure meaningful access will be contingent of a number of factors. Among the factors to be considered are the number or proportion of LEP person in the eligible service population; the frequency with which LEP individuals come in contact with the program the importance of the service provided by the program; and the resources available to the agency.

PURPOSE

The Texas Department of Transportation does not directly provide any transit service. It's mission in regard to transit mirrors that of the department as a whole, "to work with others"... in this case, "to ensure access to a system of public transportation options for individuals in rural and small urban areas of Texas, who, by circumstance or choice, require assistance with their mobility needs". The department will fulfill its Title VI responsibility of ensuring access to public transportation services to person with limited English proficiency by assisting and monitoring the actions of the local agencies that do provide the service.

The Texas Department of Transportation Public Transportation Division's (TxDOT PTN) Language Assistance Plan (LAP) is designed to assist the local public transit agencies in communities of 200,000 population or less, understand the necessity of providing services to those potential riders that may not be proficient in speaking English. This plan outlines the statewide identification of person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP person that assistance is available.

The first priority of the LAP is to improve access for LEP individuals to critical services or activities. The LAP will also help focus on improving access to programs and services, in general, particularly in those areas with regular contact with LEP persons.

AUTHORITIES AND GUIDANCE

TxDOT-PTN, as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statues, ensures that no person shall on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Department programs or activities

Title VI of the Civil Rights Act of 1964

Section 601 of Title VI of the Civil Rights Act of 1964 provides that no person shall “on the ground of race, color, or nation 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.”

Lau v. Nichols 1974

The United States Supreme Court in Lau v. Nicholas 1974, stated that one type of national origin discrimination is discrimination based on a person’s inability to speak, reach, write, or understand English.

STATE OF THE STATE

TxDOT-PTN takes seriously its responsibility to ensure subrecipients comply with Title VI requirements and that language barriers are eliminated whenever possible. Department subrecipients undergo a yearly monitoring by TxDOT-PTN Public Transportation Coordinators for compliance with a myriad of federal and state regulations, LEP being one of those areas. The current compliance level is attributable to this effort. For the future, TxDOT-PTN has a detailed template the Public Transportation Coordinators can use to ensure continued Title VI LEP Compliance.

To assist Texas Transit agencies with meeting LEP criteria in the revised Title VI circular, TxDOT engage the Small Urban and Rural Transit Center from North Dakota State University to prepare a class on developing LEP plans and how to implement them. FTA vetted the class, and approximately 100 Texas transit agencies took advantage of this free, one-day, offered at various locations around the state. Among the attendees were representatives of intercity bus companies concerned with their efforts to reach and engage this customer base.

Armed with this knowledge, the agencies then prepared new LEP plans and submitted them to TxDOT for review. The plans clearly demonstrate the agencies have increased their awareness to resources for engaging the LEP community and the methods for doing so.

TxDOT-PTN also surveyed 123 transit agencies asking more specific questions about local demographics and engagement techniques. The survey results confirmed assumptions about the importance of Spanish language communication for public transit riders, how agencies are responding, and what types of technical assistance may be needed in the future.

SECTION 1 – FOUR FACTOR ANALYSIS

As a recipient of fender financial assistance, TxDOT-PTN and its subrecipients must comply with Title VI of the Civil Rights Act of 1964, its implementing regulations, and E.O. 13166. Again, because TxDOT’s compliance with transit LEP requirements is met by the actions of our subrecipients, much of the text that follows discusses what the agencies have done, or will do, to meet LEP requirements.

STATEWIDE ASSESMENT USING THE FOUR-FACTOR ANALYSIS

TxDOT-PTN must take reasonable steps to ensure meaningful access to the information and services the Texas small urban, rural transit and elderly and disable program agencies provide. In determining

reasonable steps there are four factors to be considered. The four factors described below are derived from LEP guidance issued by the U.S. Department of Justice.

The Guidance explains that the obligation to provide meaningful access is face-dependent and starts with an individualized assessment that balances four factors. TxDOT-PTN provided training to Texas transit agencies during FY2012. Every agency that has an active contract with TxDOT-PTN should have turned in an LEP Four Factor Analysis and Language Assistance Plan August 31, 2012. The data collected in those plans as well as data analysis of American Community Survey and independent survey of 123 Texas transit agencies in the source of data below.

1. Factor 1 – Demographics – Statewide (Appendix A) Agency Specific (Appendix B)

The decision to provide language assistance services should include an assessment of the number of proportion of LEP persons from a particular language group served or encountered in the Texas transit agency service areas and statewide, The greater number of proportion of LEP persons served or encountered, the more likely language services are needed.

For a statewide overview, TxDOT-PTN staff reviewed the 2010 American Community Survey U.S. Census Report and determined that approximately 7.5 million persons in the State of Texas [34% of the population] speak a language other than English (appendix A). Of those 7.5 million person approximately 50% have limited English proficiency; they speak English “not well” or “not at all.” TxDOT=PTN has created maps of all of the 5311 and 5307 transit agencies service areas to illustrate the variety of languages spoken (Appendix B) in each distinct transit area.

According to the language breakdown for Texas in Appendix A; thirty percent of the State speaks Spanish, after that Vietnamese and Chinese are the next major language groups (approximately 2%). Based on the breakdown for the individual agencies, all agencies, small urban, rural and elderly and disabled agencies should have their vital documents translated into Spanish. Approximately 30% of the transit agencies need to have vital documents translated into Spanish. Approximately 30% of the transit agencies need to have vital documents translated into Vietnamese or Chinese.

FY2013 is the first year TxDOT-PTN Collected LEP Four Factor Analysis and Language Assistance Plans from the Texas Transit agencies. Approximately 73% of the agencies surveyed have their vital documents and schedules translated into Spanish; the rest of the agencies plan to have their documents translated by various deadlines in 2013.

The Table in Appendix C, “AGENCY SAFE HARBOR LANGUAGES and FREQUENCY OF ENCOUNTER” indicates there are 25 Texas transit agencies that may need additional translation of services for the vital documents the agency produces. TxDOT-PTN can provide technical assistance to agencies that do not have resources for written translation of vital documents to ensure the agency is complying with Federal LEP regulations. This is an excellent start to achieving uniform compliance with the vital document/schedule translations requirements.

2. Factor 2-Frequency of Contact

The more frequent the contact, the more likely enhanced language services will be needed. TxDOT-PTN staff reviewed the frequency with which transit agency staff and bus/van drivers have, or could have, contact with LEP persons. According to the data in Appendix C: “AGENCY SAFE HARBOR LANGAUGES and FREQUENCY OF ENCOUNTER:” all Texas small urban, rural and elderly and disabled program transit agencies have the potential for frequent contact with English and Spanish speakers based on the populations living in their service areas.

To date, TxDOT-PTN subrecipient transit agencies have had the maximum contact and request for Spanish language interpretation and few to no contact or request for translated program documents into languages other than Spanish. Primary contact throughout the state is with person that are native Spanish speakers who speak limited English.

3. Factor 3 – Nature and Importance

The more important the activity, information, service, or program, or the greater the possible consequences of contact with LEP individuals, the more likely language services will be needed. In many of the rural Texas communities the public bus service is the primary means of transportation for low income, older adults, and person with disabilities. Many of the individuals of the transit dependent populations are also limited English speakers.

Based on the various agency analyses it is clear that some Texas transit agencies may need assistance as they translate vital documents into other languages (in addition to Spanish) based on the safe harbor provision. Review of the agency LEP plans indicated very limited request for translation to languages other than Spanish. TxDOT can provide technical assistance to those agencies that have multiple languages to accommodate.

4. Factor 4 – Available Resources and Cost

In the TxDOT-PTN review of the transit agency information many of the agencies have already expended the resources to have information translated to Spanish. By virtue of the transit agencies being public service agencies, they have hired bi-lingual staff and many of the agencies have access to the language line and "I Speak" cards. The cost has been absorbed into the cost of doing business and paid for using FTA grant funds. Some of the smaller agencies have indicated that additional translations may be burdensome to them. TxDOT-PTN is able to offer technical assistance to those agencies that are financially unable to provide translation of vital documents; in addition to other aspects of compliance to the LEP guidance.

SECTION 2-LANGUAGE ASSISTANCE PLAN

Language assistance should be provided for LEP individuals through the translation of the most vital materials, as well as through oral language interpretation when necessary and possible. LEP persons are not obligated to provide their own interpreter. In the event review of the agency LEP data all of the larger agencies, small urban and rural, have the capacity to translate languages, especially Spanish using interpreters, bi-lingual staff or use of the language line. Only a very few small elderly and disabled program agencies have no mechanism for translation. The indication is that limited funding and/or lack of knowledge of resources is the reason for translation services not being available. TxDOT-PTN can offer technical assistance to those agencies to bring them into compliance with the LEP guidance.

INTERPRETATION

Interpretation is the immediate rendering of oral language from the source language into target language. One way to determine the native language of LEP persons is to use the language identification cards, which invite LEP persons to identify their language needs to staff.

The following steps are examples of how to communicate with LEP customers in person or over the phone. Review and discussion of these steps was part of the LEP training TxDOT-PTN offered in January and February 2012 to Texas transit agencies.

Walk-in LEP Customers

1. Attempt to communicate in English first to determine if the customer can understand English sufficiently enough to be understood.

2. If the customer cannot understand or effectively communicate in English, determine the language they are speaking. If you cannot recognize the language the customer is speaking, show them the Language Identification Card so the customer can point his/her language.
3. Quickly determine if any of the employees working nearby speak the necessary language and are willing to interpret.
4. The interpreter is to determine the customer's need.
5. Make every effort to provide the LEP customer the same level of service as an English-speaking customer.

Phone-Lin LEP Customers

A transit agency should develop procedures to respond in a timely and effective manner if it receives calls from LEP individuals who are seeking assistance or information. Review discussion of these steps was part of the LEP training TxDOT-PTN offered in January and February 2012 to Texas transit agencies.

1. Attempt to communicate in English first. If it is not possible to effectively communicate in English, determine the language being spoken.
2. Determine if an employee working nearby speaks the necessary language and ask them to interpret. Ask interpreter to come to the phone or transfer the call.
3. The interpreter determines the customer's need and relays it to the appropriate contact person to ensure response is relayed to the LEP customer.
4. Make every effort to provide the LEP customer the same level of service as an English-speaking customer.

TRANSLATION

Translation is the rendering of written text from one language (source language) into another language (target language). Ideally, the translate version of a document should be released when the English language version is released. If this is not possible or would substantially delay release of the English version, the translated version should be distributed as soon as possible after the distribution of the English language version.

VITAL DOCUMENTS

It is important to make an assessment of the population percentage and the frequency and importance of contact when considering the potential for translating vital documents. Whether or not a document (or the information it solicits) is "vital" will depend on the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information is not provided accurately. According to the FTA "Safe Harbor" Provision: "The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) of 1,000 persons, whichever is less, of the total population of the persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations."

Examples of vital documents that require consideration for translation are:

- Violation of deficiency notices
- Emergency transportation information
- Notices of proposed public meetings and hearings regarding proposed transportation plans, project, or changes
- Notices of reduction, denial, or termination of services or benefits
- Signs in reception areas and other points of initial entry

- Statements about the services available and the right to free language assistance services in brochures, booklets, outreach and recruitment information and other materials routinely disseminated to the public
- Applications or instructions or how to participate in a program or activity or to receive benefits or services
- Consent forms
- Notices advising LEP persons of free language assistance

Awareness of rights and services is an important part of “meaningful access,” as a lack of awareness may effectively deny LEP individual’s meaningful access. As noted earlier, a majority of Texas transit agencies already have translators and documents available in Spanish – the most common language of those potential riders that are limited English proficient. As requested, TxDOT-PTN will assist the remaining agencies to achieve compliance. Another important activity is to determine exactly where translation services and documents in other languages are needed and to locate the technical resources to accomplish this.

PROVIDING NOTICE TO LEP PERSONS

When it has been determined that services must be provided in languages other than English, it is important to let LEP persons know that those services are available and that they are free of charge. Cost for providing language assistance may not be passed on to the customer.

This information should be provided in a language that LEP persons will understand. Some examples of notification ideas include the following which were rereviewed as part of TxDOT-PTN sponsored class on LEP compliance:

- Posting signs in waiting areas to notify LEP individuals of available services and how to obtain these services
- Stating in outreach documents (brochures, booklets, pamphlets, and flyers) that language services are available
- Including notices in local newspapers in languages other than English
- Providing notices in non-English language radio and television stations about the availability of language assistance services for important events
- Presentations and/or notices at schools and religious organizations in languages other than English for important events or where community involvement is critical
- Using a telephone voice mail menu (if available) in the most common languages encountered.

TRAINING STAFF

Texas small urban, rural and elderly and disabled program transit agencies have obligation to provide meaningful access to information and services for LEP person and employees in public contact positions should be properly trained. Training staff on the procedures or providing language assistance and how to determine whether and what type of language services a customer needs is essential to bridging the GAP between policies or procedures and actual practices. Training should include how to obtain language assistance services and how to communicate needs to interpreters and translators. Transit agencies can request specific training for their staff to be better prepared to serve the LEP riding public. TxDOT-PTN

maintains a monthly calendar of training opportunities that may include training for staff on providing meaningful access to public transportation services for persons with limited English proficiency. TxDOT-PTN

will be offering training during this coming year which will include among other topics follow-up to the LEP Plan training offered this year.

COMPLAINTS

The TxDOT OCR is charged with the primary responsibility of processing Title VI complaints received by the Department. Any person who, based on race, color, national origin, sex, age, retaliation, or disability believes that he/she/they has been excluded from participation in, denied benefits or services of any program or activity administered by the Department may file a discrimination complaint under Title VI. Only complaints of discrimination based on the complaint's protected status will be considered under Title VI.

General complaints regarding LEP services are handled by the TxDOT-PTN. However, discrimination complaints filed on the basis of national origin are forwarded to the TxDOT OCR within 10 calendar days.

TECHNICAL ASSISTANCE

TxDOT-PTN is available to provide technical assistance to the Texas transit agencies to ensure compliance with LEP requirements. The list of the local Public Transportation Coordinators including their contact information can be found in Appendix D.

LANGUAGE ASSISTANCE RESOURCES

BILINGUAL STAFFING

From independent survey of 123 transit agencies including small urban, rural, and elderly and disabled program agencies, 108 agencies currently have bi-lingual staff. To better assist LEP customers, TxDOT-PTN may consider encouraging agencies to hire bilingual staffing, when feasible and when the percentage of LEP customers or potential customers is statistically significant, or where the frequency of contact with such persons will provide for efficient and effective communication.

UTILIZATION OF THE LANGUAGE LINE

Based on the survey results referenced above, 41 transit agencies already use the service of the language line. TxDOT-PTN also has the resources available to provide Texas small urban, rural, and elderly and disabled program agencies access to the "I Speak" cards or the language Line upon request.

WRITTEN TRANSLATION OF VITAL DOCUMENTS

According to the data in Appendix C "AGENCY SAFE HARBOR LANGUAGES and FREQUENCY OF ENCOUNTER" 25 transit agencies have been identified with safe harbor languages other than Vietnamese and Mandarin as referenced in Appendix A: "TEXAS STATEWIDE LANGUAGE DATA." TxDOT-PTN can provide agencies that do not have resources for written translation of vital documents technical assistance to ensure the agency is complying with Federal LEP regulations.

OTHER USEFUL RESOURCES

The Website www.lep.gov includes links to Executive Order 13166, several guidance documents and a section for frequently Asked Questions.

MONITORING AND CONTINUOUS ASSESSMENT

TxDOT-PTN has been monitoring the transit agencies on LEP regulation compliance for many years. The following questions are what the Texas transit agencies currently must respond to and discuss during the annual compliance monitoring:

- "Are written materials (schedules, brochures, etc..) provided in languages other than English?
- How are non-English languages (that are likely to be encountered in the service delivery are) identified?
- How are minority organizations/communities notified of public meetings, program opportunities, new or a change in service (i.e., hours of service, delivery points) using the media, city, and council representatives, etc.?

Additional questions could be included, for example:

- How many LEP person contacts other than Spanish are encountered annually?
- Was there a determination made as to whether the need for translation services has been changed?
- Have the agency's language assistance programs been effective and sufficient to meet the need of the agency's LEP population?
- Does the agency have necessary financial resources to fund language assistance resources needed?
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

TxDOT-PTN annually updates the PTN 129 "Fiscal Year Compliance Review" based on data collected for this analysis; questions regarding agency engagement of the LEP population may be updated. Based on the results of the annual agency monitoring, TxDOT-PTN may ask the agency to update its service plan for persons who speak limited English.

TxDOT-PTN will publish this Language Assistance Plan on the TxDOT website and provide all Texas transit agencies a copy. TxDOT-PTN will follow the dissemination of this plan with training for the Public Transportation Coordinators to ensure they are provided with the most recent, up to date information on this subject.

APPENDIX A

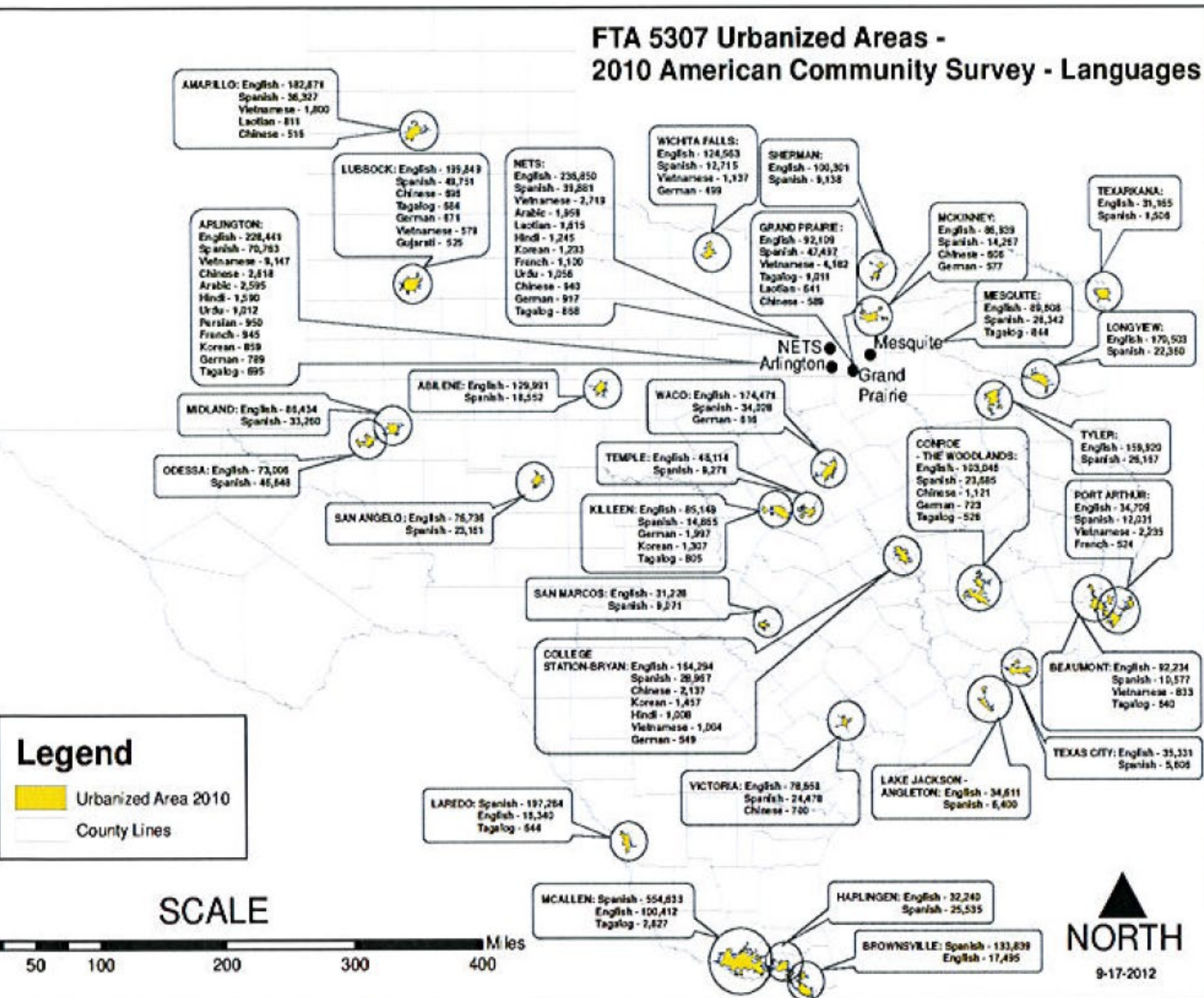
FACTOR 1 TEXAS STATEWIDE DEMOGRAPHIC DATA

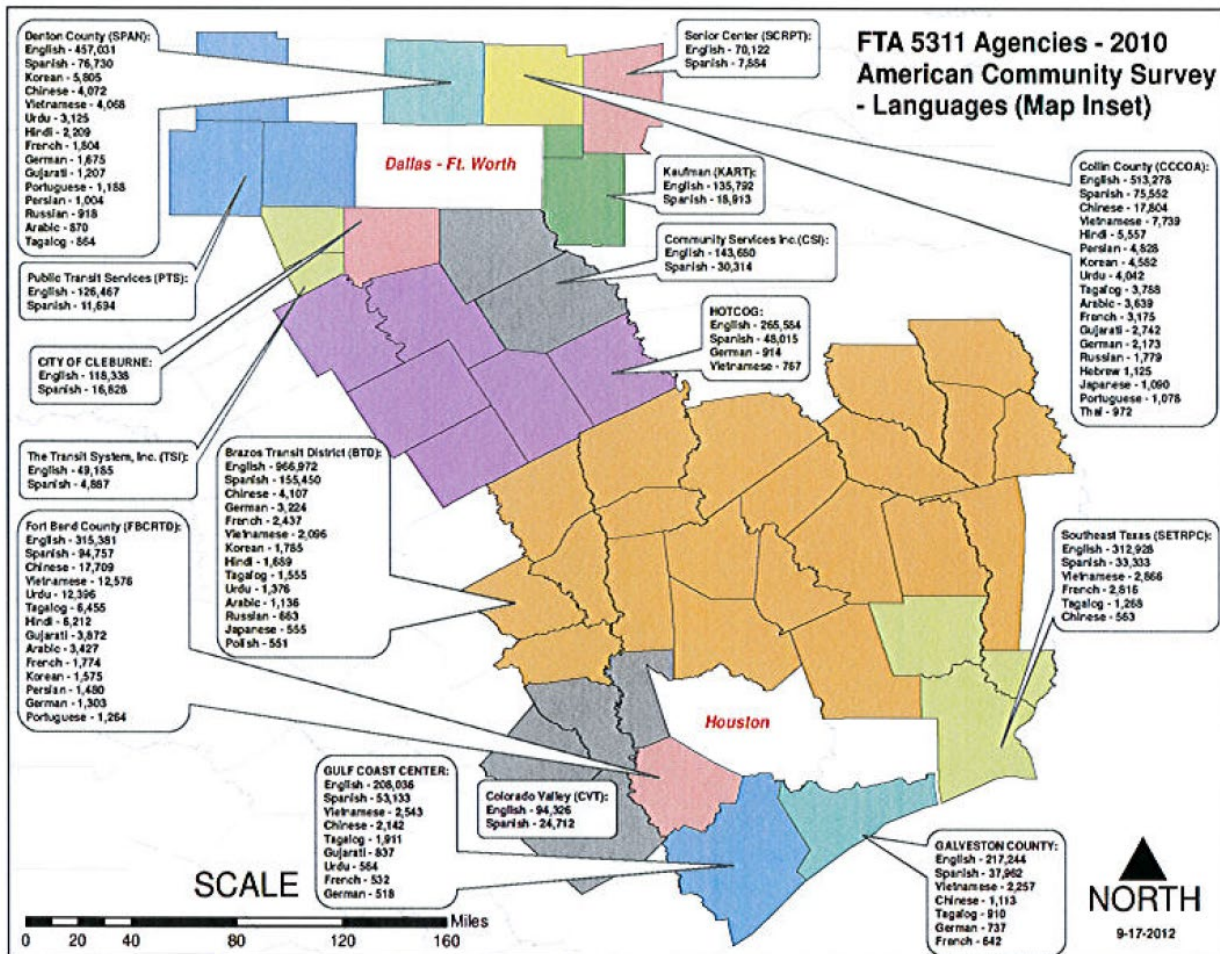
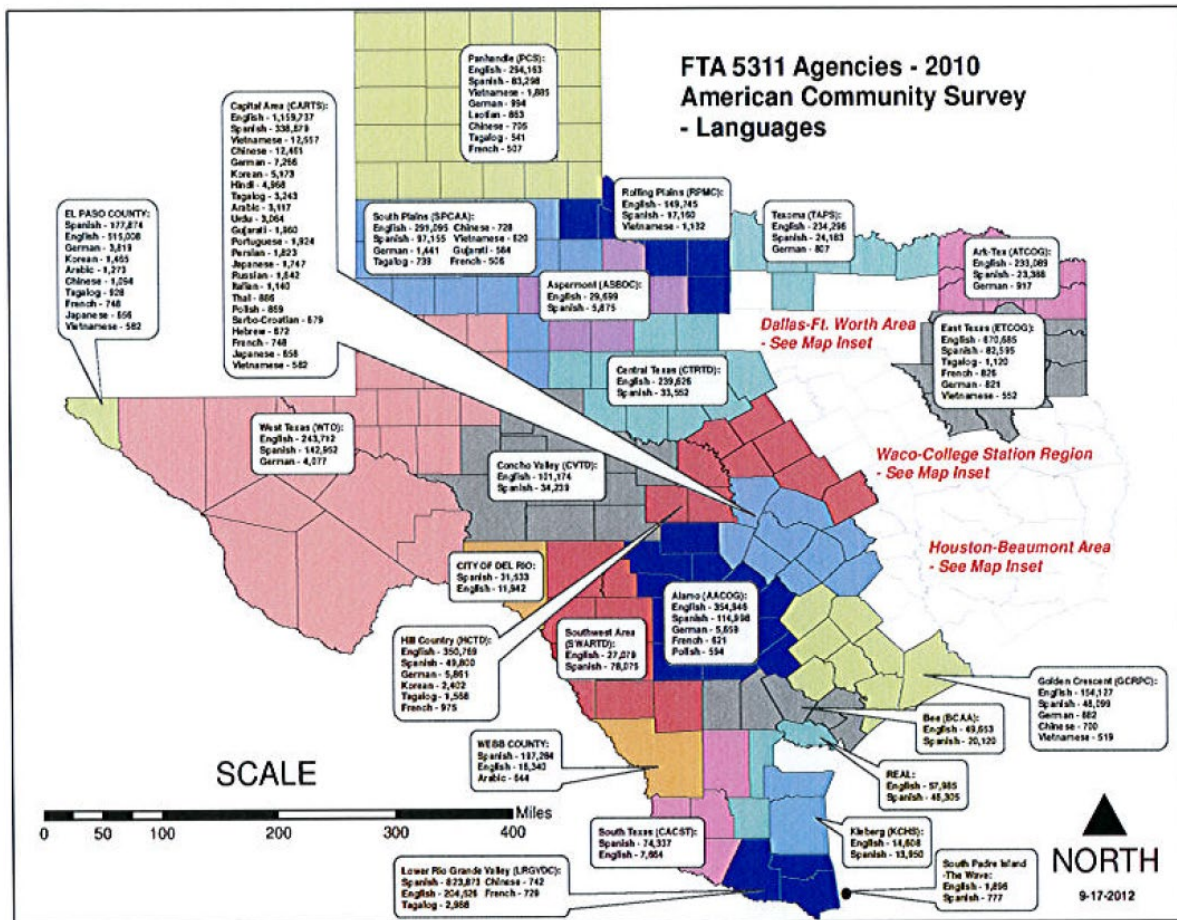
STATE OF	TEXAS
TOTAL POPULATION	
(2010)	
Total Population Estimate	22,408,337
LANGUAGE	POPULATION OF SPEAKERS
English	14,740,304
Spanish	6,547,178
Vietnamese	174,877
Chinese	128,374
German	72,338
Tagalog	63,184
French	58,931
Korean	52,700
Urdu	52,684
Hindi	50,988
Arabic	47,503
Gujarati	27,625
Persian	21,671
Russian	16,903
Portuguese	16,098
Japanese	15,175
Laotian	12,315
Italian	11,384
Thai	10,818
Mon-Khmer/Cambodian	10,043
Polish	8,688
Serbo-Croatian	8,270
Greek	6,099
Hebrew	5,189
French Creole	4,263
Hungarian	2,030
Armenian	1,451
TOTAL SPECIFIED	22,167,083
TOTAL UNSPECIFIED	241,254
<p>SOURCE: U.S. Census Bureau Language Spoken At Home By Ability To Speak English For The Population 5 Years and Over 2006-2010 American Community Survey 5-Year Estimates</p>	

APPENDIX B

FACTOR 1

TRANSIT AGENCY DEMOGRAPHIC DATA





**APPENDIX C
FACTOR 2
TRANSIT AGENCY DATA
SAFE HARBOR LANGUAGES
FREQUENCY OF CONTACT**

NOTE: ** Indicates more than 1,000 speakers of English and Spanish

TxDOT DISTRICTS	Agency	Safe Harbor Languages at 5307 Agencies	Safe Harbor Languages at 5311 Agencies	Estimated Frequency of Contact With LEP Populations
ABILENE	City of Abilene	**		Frequently
	ASBDC		**	Never
AMARILLO CHILDRESS	City of Amarillo	** Vietnamese		Never
	PCS		** Vietnamese	Never
ATLANTA	City of Texarkana	**		Limited
	Ark-Tex		**	Limited
AUSTIN	CARTS	** Vietnamese Chinese German Korean Hindi Tagalog Arabic Urdu Gujarati Portuguese Persian Japanese Russian Italian		Never
BEAUMONT	City of Beaumont	**		n/a
	City of Port Arthur	**		Never
	SETRPC		** Vietnamese French Tagalog	Never
BROWNWOOD	CTRTD		**	Frequently
BRYAN LUFKIN	College Station	** Chinese Korean Hindi Vietnamese		n/a
	Conroe-The Woodlands	** Chinese		Never
	BTD		** Chinese German Vietnamese Korean Hindi Tagalog Urdu Arabic	Never
CORPUS CHRISTI	REAL		**	Never
	BCAA		**	Limited
	KCHS		**	Limited

NOTE: ** Indicates more than 1,000 speakers of English and Spanish

TxDOT DISTRICTS	Agency	Safe Harbor Languages at 5307 Agencies	Safe Harbor Languages at 5311 Agencies	Estimated Frequency of Contact With LEP Populations
DALLAS	Grand Prairie	** Vietnamese Tagalog		Frequently
	McKinney	**		Frequently
	Mesquite	**		Limited
	SPAN		** Korean Chinese Vietnamese Urdu Hindi French German Gujarati Portuguese Persian	Limited
	CCCOA		** Chinese Vietnamese Hindi Persian Korean Urdu Tagalog Arabic French Gujarati German Russian Hebrew Japanese Portuguese	Frequently
	STAR Transit		**	Limited
	Senior Center		**	Limited
	CSI		**	Never
	EL PASO	El Paso County		** German Korean Arabic Chinese

TxDOT DISTRICTS	Agency	Languages at 5307 Agencies	Languages at 5311 Agencies	Contact With LEP Populations
FORT WORTH	Arlington (Handitran)	** Vietnamese Chinese Arabic Hindi Urdu		Frequently
	NETS	** Vietnamese Arabic Laotian Hindi Korean French Urdu		Frequently
	City of Cleburne		**	Limited
	PTS		**	Frequently
	TSI		**	Frequently
HOUSTON	Texas City	**		Frequently
	Lake Jackson-Angleton	**		Frequently
	Fort Bend County		** Chinese Vietnamese Urdu Tagalog Hindi Gujarati Arabic French Korean Persian German Portuguese	Limited
	Galveston County		** Vietnamese Chinese	Limited
	Gulf Coast Center		** Vietnamese Chinese Tagalog	Limited
LAREDO	City of Laredo	**		Frequently
	City of Del Rio		**	Frequently
LUBBOCK	City of Lubbock	**		Limited
	SPCAA		** German	Never

ODESSA	EZ-Rider	**	Frequently
	WTO		Frequently
		German	
PARIS	Sherman-TAPS	**	Frequently
	TAPS		Frequently
PHARR	City of McAllen	**	Frequently
		Tagalog	
	City of Brownsville	**	Frequently
	City of Harlingen	**	n/a
	LRGVDC		Frequently
		Tagalog	
	CACST	**	Frequently
	Town of South Padre Island	English	Frequently
SAN ANGELO	City of San Angelo	**	Limited
	CVTD		Limited
SAN ANTONIO	AACOG	**	Frequently
		German	
	SWARTD	**	Frequently
TYLER	City of Tyler	**	Frequently
	City of Longview	**	Never
	ETCOG	**	Limited
		Tagalog	
WACO	City of Killeen	**	Frequently
		German	
		Korean	
	City of Waco	**	Limited
	City of Temple	**	Frequently
	HCTD	**	Limited
	German		
	Korean		
	Tagalog		
	HOTCOG	**	Limited
WICHITA FALLS	City of Wichita Falls	**	Never
		Vietnamese	
	RPMC	**	Never
		Vietnamese	
YOAKUM	City of Victoria	**	Frequently
	CVT	**	Limited
	GCRPC	**	Limited

APPENDIX D

TECHNICAL ASSISTANCE LOCAL AREA PUBLIC TRANSPORTATION COORDINATORS

DISTRICT	NAME	OFFICE	E-MAIL
AMARILLO CHILDRESS	SUSAN STOCKETT	(806) 356-3252	susan.stockett@txdot.gov
ATLANTA	SONYA HUDSON	(903) 799-1310	sonya.hudson@txdot.gov
AUSTIN	VANESSA OWENS	(512) 374-5223	vanessa.owens@txdot.gov
BEAUMONT	ANTHONY COCHRAN	(409) 896-0270	anthony.cochran@txdot.gov
BRYAN LUFKIN	DARLA WALTON	(979) 778-9668	darla.walton@txdot.gov
CORPUS CHRISTI	STEPHEN NDIMA	(361) 808-2351	stephen.ndima@txdot.gov
DALLAS FT. WORTH	ANNE POLK TOMMIE FUGATE BOBBY SHARPE	(214) 320-6153 (214) 320-4471 (214) 320-4467	anne.polk@txdot.gov tommie.fugate@txdot.gov robert.sharpe@txdot.gov
EL PASO	ARMIDA SAGARIBAY	(915) 790-4234	armida.sagaribay@txdot.gov
HOUSTON	TRAVIS MADISON	(713) 802-5315	travis.madison@txdot.gov
LAREDO SAN ANTONIO	BOLIVAR BOLANOS LAURA MORALEZ ELBA MARTINEZ	(210) 731-5216 (210) 731-5217 (210)-731-5229	bolivar.bolanos@txdot.gov laura.moralez@txdot.gov elba.martinez@txdot.gov
LUBBOCK	LYNN CASTLE	(806) 748-4480	lynn.castle@txdot.gov
ODESSA ABILENE	ALFREDO GONZALES DEANNE HAMILTON	(432) 498-4766 (432) 498-4767	alfredo.gonzales@txdot.gov deanne.hamilton@txdot.gov
PARIS WICHITA FALLS	DAVID MERRITT	(903) 737-9372	david.merritt@txdot.gov
PHARR	GRACIELA CANTU IVONNE GARZA IRMA FLORES	(956) 702-6147 (956) 702-6129 (956) 702-6314	graciela.cantu@txdot.gov ivonne.garza@txdot.gov irma.flores@txdot.gov
HOUSTON	TRAVIS MADISON	(713) 802-5315	travis.madison@txdot.gov
LAREDO SAN ANTONIO	BOLIVAR BOLANOS LAURA MORALEZ ELBA MARTINEZ	(210) 731-5216 (210) 731-5217 (210)-731-5229	bolivar.bolanos@txdot.gov laura.moralez@txdot.gov elba.martinez@txdot.gov
LUBBOCK	LYNN CASTLE	(806) 748-4480	lynn.castle@txdot.gov
ODESSA ABILENE	ALFREDO GONZALES DEANNE HAMILTON	(432) 498-4766 (432) 498-4767	alfredo.gonzales@txdot.gov deanne.hamilton@txdot.gov
BROWNWOOD (W) SAN ANGELO	DELMA CHILDRESS	(325) 947-9335	delma.childress@txdot.gov
TYLER	MARTY ALLEN	(903) 510-9114	marty.allen@txdot.gov
WACO BROWNWOOD (E)	GREG DAVIS	(254) 867-2877	greg.davis@txdot.gov
YOAKUM	WANDA CARTER- DYER	(361) 293-4395	wanda.carterdyer@txdot.gov
BROWNWOOD (W) SAN ANGELO	DELMA CHILDRESS	(325) 947-9335	delma.childress@txdot.gov

Appendix F. Transit Service Policy

Transit Service Policy



Lower Rio Grande Valley Development Council
Regional Transit Services Department
(Valley Metro)



June 25, 2025
As Approved by the LRGVDC
Board of Directors

Preface

This service policy has been adopted by the Lower Rio Grande Valley Development Council's (LRGVDC) Board of Directors as a planning and decision-making guide, and not a rigid set of rules for Regional Transit Services. It does not limit the discretion of LRGVDC to approve, deny, or modify any proposed or existing service. It may be necessary, from time to time, to revise this document as a local, state, or deferral guidelines may dictate. Management and staff will monitor these service standards and jointly review the criteria as necessary with the Board.

General Service Guidelines

1.01 Policy Statement

The purpose of this service policy is to guide LRGVDC transit staff in making recommendations to the Board about transit routes and services, including changes to the routes such as: alignments, hours of service, coverage areas, and fare structure. The LRGVDC transit department aims to provide the best quality public transportation service possible within the limits of its financial resources.

1.02 Mission Statement

To expand transit services and programs by increasing awareness, improving service availability, and developing a seamless transit network within the community.

1.03 Service Features

Service shall be designed, operated, and maintained to meet the needs of the service area. In doing so, LRGVDC transit hopes to attract patrons in such numbers as to ensure its continuing viability as a reasonable alternative to the private automobile. LRGVDC transit strives to maintain and offer the following features to its customers:

- a. High quality services
- b. Sufficient quality of service interfacing with other modes of transportation
- c. Convenient and easy to read materials
- d. Affordable fares
- e. Maximum service area coverage
- f. Shelters and bus

1.04 Target Population

The system will be designed to serve those whose transportation needs may be only served by public transportation and other target populations include:

- a. Low-income residents of colonias, public housing, and areas of low car ownership
- b. High density areas
- c. Transit dependent citizens
- d. The Elderly
- e. Persons with Disabilities
- f. Students
- g. Population seeking transportation to medical care
- h. Population seeking transportation to employment centers

1.05 Planning Process

Changes in service, whether through the addition of new routes, the expansion of existing route structures, the deletion of service, or any other changes, will be based on extensive public input in the relevant service area. The LRGVDC will solicit input through surveys, letters from public, petitions, public meetings, and assessments and analyses, among other means. The transit system will be designed to serve existing patterns of development and will be consistent with the planning processes of the local Metropolitan Planning Organizations (MPOs)

1.06 PUBLIC NOTICE REQUIREMENTS

Before service is added or deleted that affects at least 25% of the hours or mileage of any route, at least one (1) public meeting will be held in the service area at least one (1) month before the date of the anticipated change. The meeting will be advertised in the local paper, the LRGVDC website, and flyers within buses, among other means. Notice of changes will be given to the public at least two (2) weeks before the actual change takes place and will be distributed through route brochures, ads in newspapers and on the board of buses, through announcements at terminals and local municipalities, the internet, through the Citizens Transit Advisory Committee (CTAC), and word of mouth via local grassroots organizations, other nonprofit agencies, and Health and Human Services outreach.

1.07 Funding

LRGVDC will aggressively seek out funding opportunities for its programs and services. Funding may take many forms, including grants, local match provided by cities and towns, and private revenue streams such as advertising dollars. All service decisions will be based on available funds. A priority will be placed on cities that provide local funding through their general funds, grants, or other sources.

1.08 Information & Marketing

LRGVDC will distribute information and market its services to encourage existing riders to increase their use of services and programs, educate potential customers and employers as to the benefits of using transit, and encourage trial ridership (promotional campaigns) in order to create regular transit users. Easy-to-use informational materials about routes and services in both English and Spanish will be provided to the public in accessible locations.

1.09 Safety

An important focus of transit service is the safety of passengers and employees. Maximizing safety will allow the system to maintain reliability, provide excellent customer service, and reduce cost. At least 1% of federal funds allocated to transit services will be used for safety purposes.

1.10 Vehicle Design

New developments and improvements in transit vehicle designs will be sought and utilized whenever feasible. Vehicles shall be safe, climate controlled, easy to board and alight, well-lit, and clean.

Service Standards

The Public operation of a mass transit system requires regular justification of the distribution of resources and the level of service that it provides. To maintain crucial public support, the public transportation system must be able to demonstrate that the transit system is operating within established and accepted standards. These standards will be used to develop goals, set plans, and identify areas which may need improvement.

1.11 Service Area

LRGVDC serves: Hidalgo, Cameron, Willacy, Starr, and Zapata Counties; urban areas where an agreement is established for such services, and all rural areas, unless prohibited by federal or state regulations.

1.12 Hours of Service

Service hours will be determined based on demand, and may include all days of the week, night service, and irregular service patterns.

1.13 Flexible Routing

LRGVDC will operate a flexible route service, which allows a bus to deviate up to .5 miles in any direction on its route to pick up passengers. Passengers must make a reservation for this service at least one business day in advance. Passengers will be picked up by the bus as close to the time requested, with a window of fifteen (15) minutes before or after the time of which the bus is closest to the pick-up point along the route.

1.14 Route Alignments

Routes will be aligned to serve as many generators/attractors as possible, Routes should service high density areas and structured to serve small business corridors within each city where service is provided. The structure should limit headways and maximize frequency: service shall be designed to minimize the origin to destination travel time for present and potential customers by improving the walk, wait, ride and transfer times of the total transit journey. Headways and frequencies should be no longer than (1) hour (in addition to route deviation time).

1.15 Schedule Adherence

Buses should never run early on a route (i.e., arrive at a location before the time printed on the published schedule). They should run no more than 10 minutes behind schedule (late). If a route runs consistently late, transit staff will evaluate the route for a period of one week to determine and address the cause.

1.16 Transfers

LRGVDC routes should connect to routes served by other transit agencies whenever possible. These connections should yield transfers that limit passenger wait time and inconvenience. Within the LRGVDC network of routes, passengers should need to transfer three (3) times, at most, to move from any origin point to any destination point.

1.17 Bus-Stop Signs & Shelters

The LRGVDC maintains a flexible bus stop policy-passengers may be picked up or dropped off anywhere along a route if it is safe to do so. Nevertheless, bus stop signs and covered bus shelters enhance the customer travel experience by providing information and a comfortable place to wait for the bus away from poor weather. Therefore, their presence on all routes is a priority. Bus stop signs should be placed every ½ mile (urban) or every ¾ mile (rural). Signage should have a consistent design and appearance to enable passengers to readily identify the presence of transit service, Bus shelters should be placed as determined by demand, the presence of major attractors/generators, and other key factors in a particular service area. Cities who provide local match for bus service will have priority. Shelters should be comfortable and include seating and informational materials, such as route maps. Placement of shelters within local right of way is a priority.

Performance Measures

1.18 Reporting

In order to monitor performance, The transit department will produce statistical reports of all system activity on a monthly basis.

1.19 Ridership Goal

The goal of maximizing the number of citizens who use public transportation is primary.

The transit department will aim to increase annual ridership by 5%, system-wide (accounting for all routes).

1.20 Efficiency Goals

In order to make the best use of funding, the number of passengers per revenue mile and the number of passengers per revenue hour should be no more than 10% below the statewide averages for transit systems with a similar service design. Rural routes and urban routes will be treated differently, as will intercity urban routes and intercity rural routes.

1.21 Service Evaluation

Individual routes and other services will be monitored based on ridership and efficiency goals. However, evaluations will be made not only using economic and efficiency considerations, but also by taking into account the human need to impact of proposed changes, and the desire of funding sources to continue the routes they support. After an evaluation is performed, actions may include, but are not limited to, modification of service hours or alignment, changes in frequency, or deletion of a route.

Appendix G.

Public Involvement Activities Maintained by Valley Metro

1. Public meetings
2. Community workshops
3. Stakeholder interviews
4. Focus groups
5. Online surveys and comment forms
6. Social media engagement
7. Participation at community events
8. Outreach to traditionally underserved populations
9. Newsletters and project updates
10. Media relations and press releases
11. Dedicated project website updates
12. Email and phone hotlines for public input
13. Collaboration with local municipalities and agencies

Appendix H.

Public participation policies of the Rio Grande Valley Metropolitan Planning Organization (RGVMPO)

Valley Metro works in coordination with the Rio Grande Valley Metropolitan Planning Organization (RGVMPO) to ensure that the Transit Transportation Improvement Program (TIP) and the Program of Projects (POP) align with Title VI of the Civil Rights Act of 1964. Together, they strive to provide equitable access to transportation planning and services, guaranteeing that no individual is excluded from participation or subjected to discrimination based on race, color, or national origin. Through a joint commitment to community engagement, public outreach efforts for the TIP and POP are designed to reach and include underserved communities across the region. These activities are continuously documented to promote transparency, accessibility, and compliance with federal civil rights requirements.

Appendix I.

Title VI Assurances

The United States Department of Transportation (USDOT)
Standard Title VI/Nondiscrimination Assurances

(Rev. 04/20)
Page 1 of 5

DOT Order No. 1050.2A

The LRGVDC - Valley Metro (herein referred to as the "Recipient"), HEREBY

AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration (FHWA), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.P.R. Part 21 (entitled Non-discrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964);
- 28 C.P.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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," for which the Recipient receives Federal financial assistance from U.S. DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally-assisted U.S. DOT programs:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) or 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests for

Proposals for work, or material subject to the Acts and the Regulations made in connection with

all Federal/State procurements and, in adapted form, in all proposals for requirements

negotiated agreements regardless of funding source:

"The Recipient, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and Appendix E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
 4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
 5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
 6. That where the recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
 7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other
-

parties:

- a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods.
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this assurance, the Recipient also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the U.S. DOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the U.S. DOT. You must keep records, reports, and submit the material for review upon request to U.S. DOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Recipient gives this assurance in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. DOT under all Department of Transportation Programs. This assurance is binding on Texas, other recipients, subrecipients, sub-grantees, contractors, subcontractors and their

subcontractors, transferees, successors in interest, and any other participants in all Department of Transportation programs. The person(s) signing below is/are authorized to sign this assurance on behalf of the Recipient.

Director of Regional Transit

Title of Recipient

Signature of Authorized Official

06/25/25

Date