Limited English Proficient Persons
Four Factor Analysis
&
Language Assistance Plan

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

Update – August 31, 2022

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 date 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 are 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 cities 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 fares, 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 property and low educational attainment. Access to health and human services, such as food stamps, child nutrition funds, job training sites, daycare, and clinics ca 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 revived 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.

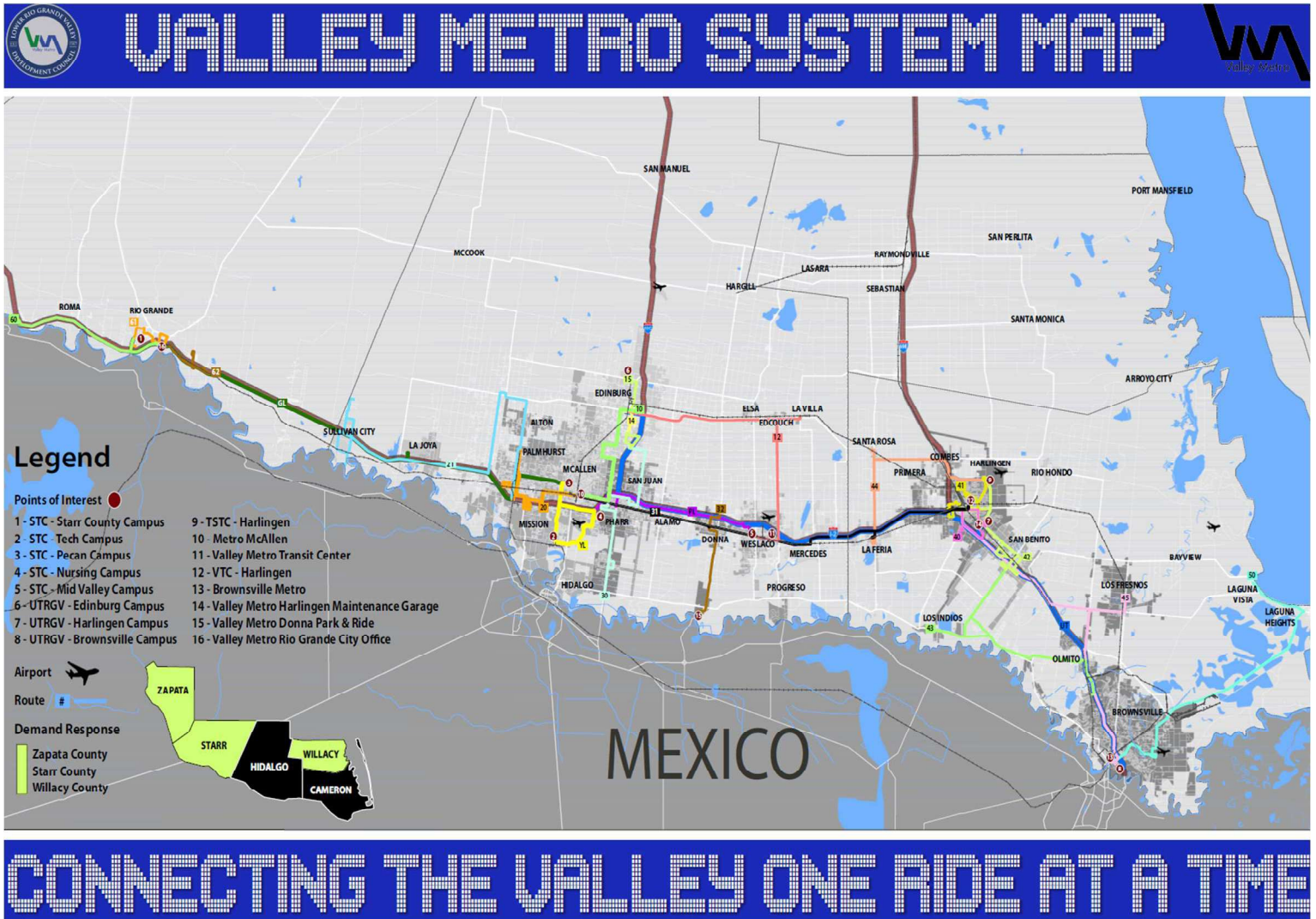| HIDALGO COUNTY, TEXAS	Total	Percent of specified language speakers		
SUBJECT	ESTIMATE	MARGIN OF ERROR	PERCENT	PERCENT OF MARGIN OF ERROR
Population 5 years and over	728,707	+/-165	100%	(x)
Speak only English	109,638	+/-3,077	15.0%	+/-0.4
Speak a language other than English	619,069	+/-3,036	85.0%	+/-0.4
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

Appendix C – LEP Persons Distribution Map

U.S. Department of Justice - Civil Rights Division   2015 Language Map App   Federal Coordination and Compliance Section

Hidalgo County, Texas
Total Population: 714,016
Total LEP: 230,407
Total LEP Percent: 32.27%

Cameron County, Texas
Total Population: 374,398
Total LEP: 110,322
Total LEP Percent: 29.47%

Willacy County, Texas
Total Population: 20,554
Total LEP: 3,968
Total LEP Percent: 19.31%

Starr County, Texas
Total Population: 55,496
Total LEP: 27,906
Total LEP Percent: 50.28%

Zapata County, Texas
Total Population: 12,590
Total LEP: 4,905
Total LEP Percent: 38.96%

Legend
Percent LEP by County
- >70%
- >40% AND <=70%
- >20% AND <=40%
- >10% AND <=20%
- >5% AND <=10%
- >1% AND <=5%
- <=1%

Click for Source and Methodology

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

Note: These maps are for informational purposes only. Although demographic language data may be useful in considering how language assistance is provided in a particular contact or setting, federal and recipient agencies are required to provide meaningful access to all LEP individuals in delivering services. Federal agencies are required to comply with Executive Order 13166. Recipients of federal financial assistance must comply with Title VI of the Civil Rights Act of 1964 and its implementing regulations and should consult the guidance issued by their funding agencies. For further information, please see LEP.gov or contact LEP@usdoj.gov.

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

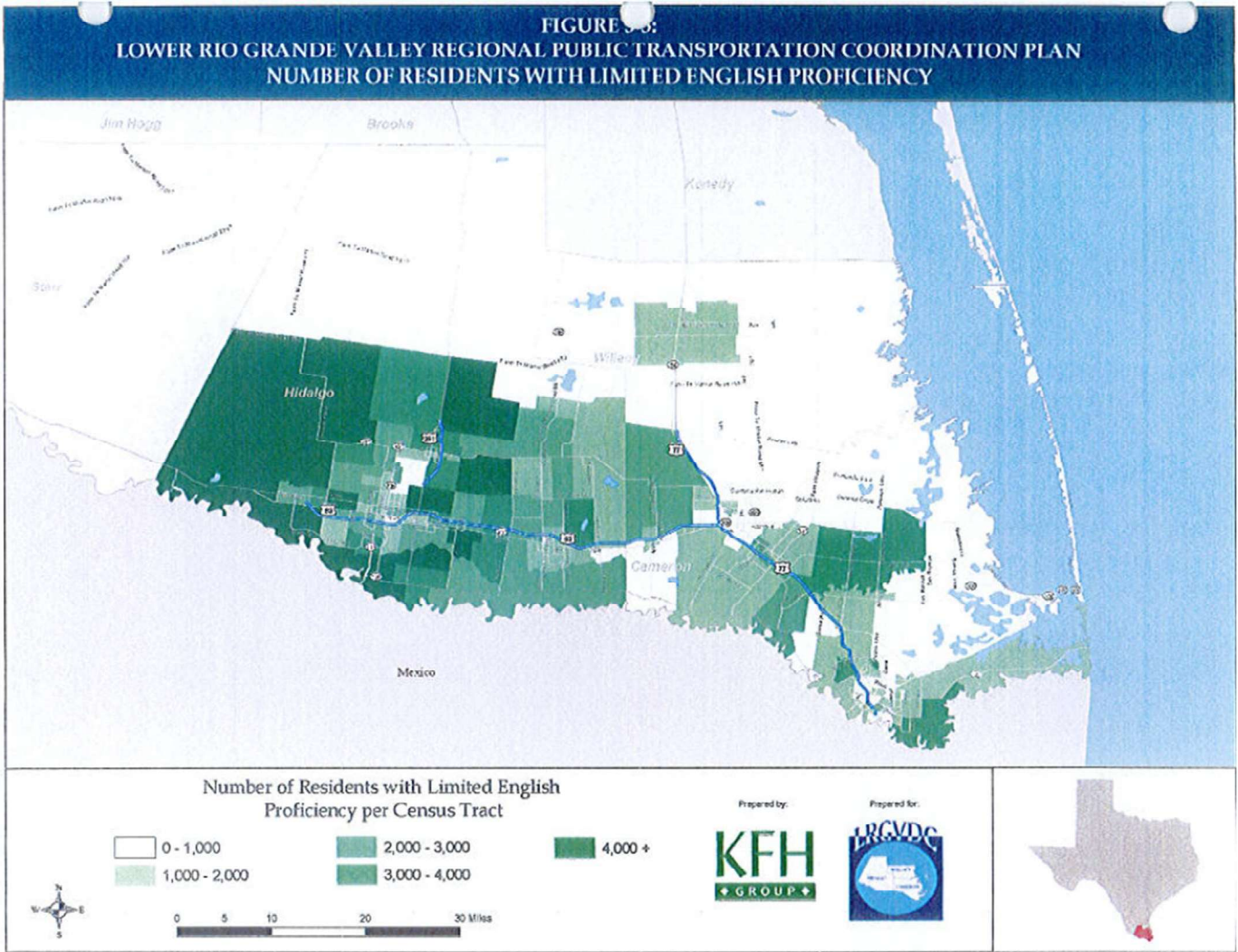**5.   Was your question or concern completely resolved?**

◯ Yes   ◯ No

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

_____

_____

_____

_____

_____

Appendix E – TxDOT LEP Analysis & Plan

FIGURE 3-8:
LOWER RIO GRANDE VALLEY REGIONAL PUBLIC TRANSPORTATION COORDINATION PLAN
NUMBER OF RESIDENTS WITH LIMITED ENGLISH PROFICIENCY

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 contester 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 sigua 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 QUESTIONAIRE – 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 of 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?

LANGUAGE

assistance PLAN

Texas Department of Transportation

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, entitle "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.

AUTHROTIES 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 SAGE HARBOR LANGUAGES and FREQUNCY 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 FREQUNCY 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 targe 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 proving 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 rand 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 complains 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 FREQUNCY OF ENCOUNTER" 25 transit agencies have been identified with safe harbor languages other than Vietnamese and Mandarin as referenced in Appendix A: "TEXAS STATEWIDE LANAGUAGE 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

SOURCE: U.S. Census Bureau
Language Spoken At Home By Ability To Speak Engligh For
The Population 5 Years and Over
2006-2010 American Community Survey 5-Year Estimates

APPENDIX B

FACTOR 1
TRANSIT AGENCY DEMOGRAPHIC DATA

FTA 5307 Urbanized Areas -
2010 American Community Survey - Languages

Dallas - Ft. Worth

Denton County (SPAN):
English - 457,031
Spanish - 76,730
Korean - 5,805
Chinese - 4,072
Vietnamese - 4,068
Urdu - 3,125
Hindi - 2,209
French - 1,804
German - 1,675
Gujarati - 1,207
Portuguese - 1,188
Persian - 1,004
Russian - 918
Arabic - 870
Tagalog - 864

Senior Center (SCRPT):
English - 70,122
Spanish - 7,884

Kaufman (KART):
English - 135,792
Spanish - 16,913

Collin County (CCCOA):
English - 513,278
Spanish - 75,552
Chinese - 17,804
Vietnamese - 7,739
Hindi - 5,557
Persian - 4,528
Korean - 4,582
Urdu - 4,042
Tagalog - 3,788
Arabic - 3,639
French - 3,175
Gujarati - 2,742
German - 2,173
Russian - 1,779
Hebrew 1,125
Japanese - 1,090
Portuguese - 1,078
Thai - 972

Public Transit Services (PTS):
English - 126,467
Spanish - 11,694

Community Services Inc.(CSI):
English - 143,680
Spanish - 30,314

HOTCOG:
English - 265,554
Spanish - 48,015
German - 914
Vietnamese - 767

CITY OF CLEBURNE:
English - 118,338
Spanish - 16,828

The Transit System, Inc. (TSI):
English - 49,185
Spanish - 4,887

Brazos Transit District (BTD):
English - 966,972
Spanish - 155,450
Chinese - 4,107
German - 3,224
French - 2,437
Vietnamese - 2,096
Korean - 1,785
Hindi - 1,689
Tagalog - 1,555
Urdu - 1,376
Arabic - 1,136
Russian - 663
Japanese - 555
Polish - 551

Fort Bend County (FBCRTD):
English - 315,381
Spanish - 94,757
Chinese - 17,709
Vietnamese - 12,576
Urdu - 12,396
Tagalog - 6,455
Hindi - 6,212
Gujarati - 3,872
Arabic - 3,427
French - 1,774
Korean - 1,575
Persian - 1,480
German - 1,303
Portuguese - 1,264

Southeast Texas (SETRPC):
English - 312,928
Spanish - 33,333
Vietnamese - 2,866
French - 2,815
Tagalog - 1,268
Chinese - 563

Houston

GULF COAST CENTER:
English - 206,036
Spanish - 53,133
Vietnamese - 2,543
Chinese - 2,142
Tagalog - 1,911
Gujarati - 837
Urdu - 564
French - 532
German - 518

Colorado Valley (CVT):
English - 94,326
Spanish - 24,712

GALVESTON COUNTY:
English - 217,244
Spanish - 37,962
Vietnamese - 2,257
Chinese - 1,113
Tagalog - 910
German - 737
French - 642

SCALE

0 20 40 80 120 160 Miles

NORTH

9-17-2012

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

Title VI Program
Last Update on 8/2022

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	Frequently

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

District	Provider			Frequency
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
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