

BRAZOS TRANSIT DISTRICT TITLE VI PROGRAM

DECEMBER 2017

UPDATED FEBRUARY 2020



Brazos Transit District (BTD) assures that no person shall, based on 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 receiving Federal financial assistance, as required by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons, limited English individuals, minority or low-income populations will be discriminated against with regard to fares, routing, scheduling, quality of transportation service, frequency of service, age and quality of transit vehicles assigned to routes, quality of stations and location of routes will not be determined on the basis of race, color, national origin, age or disability.

BTD offers a variety of resources/services in languages other than English, free of charge. Services include but are not limited to, oral interpreters, written language services, and interpretations of vital documents as described in this program plan.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding BTD's program has a right to file a formal complaint. Any such complaint should be in writing and submitted to BTD's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints or if information is needed in another language, please contact:

Brazos Transit District Title VI Coordinator 1759 N Earl Rudder Frwy. Bryan, Texas 77803

Phone: 979.778.0607 Email: <u>titlevi@btd.org</u> Website: <u>www.btd.org</u>

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinate de BTD del Título VI al 979.778.0607.

Of a male	12/01/2017
John McBeth //	Date
President & CEO	
Brazos Transit District	

TITLE VI PUBLIC NOTICE ON RIGHTS AND PROTECTIONS TO BENEFICIARIES

The following notice is posted (in English and Spanish) on the BTD website at www.btd.org, and posted at the locations listed below:

<u>Location Name</u>	Address	City
BTD Main Office	1759 N. Earl Rudder Frwy.	Bryan
Roy Kelly Parking Garage	301 E. 26 th St.	Bryan
BTD Transfer Point	3350 S. Texas Ave.	Bryan
Jennings Station	302 S. First St.	Lufkin



Title VI Policy

The Law

Brazos Transit District (BTD) hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes and regulations in all programs and activities. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person on the grounds of race, color and 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.

Filing a Complaint

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding BTD's Title VI Program has a right to file a formal complaint. Any such complaint must be in writing and submitted to BTD's Title VI Coordinator within 180 days following the date of the alleged occurrence. A person may also file a complaint directly with the Office of Civil Rights for the Federal Transit Administration. For more information regarding civil rights complaints or if information is needed in another language, please contact:

Brazos Transit District Title VI Coordinator 1759 N Earl Rudder Fwy. Bryan, Texas 77803 979-778-0607 ext. 4552 Email: TitleVI@btd.org Federal Transit Administration Office of Civil Rights Attention: Complaint Team East Building, 5th Floor - TCR 1200 New Jersey Avenue, SE Washington, DC 20590

La Ley

Brazos Transit District (BTD) da aviso al público que es la norma de esta agencia asegurar cumplimiento total con el Titulo VI de la Ley de los Derechos Civiles de 1964 y artículos relacionados y regulaciones en todos los programas y actividades. El Título VI requiere que ninguna persona será discriminada por razón de raza, color y país de origen será excluida de participar en, denegar servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

Presentando una Queja

Cualquier persona que crea que se ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito con la Coordinadora de Título VI de BTD dentro de los ciento ochenta (180) días de la fecha en que se alega que la discriminación ocurrió. La persona también puede presentar una queja con la Oficina de Derechos Civilices de Federal Transit Administración. Para más información con respecto a quejas de derechos civiles o si se necesita información en otro idioma, por favor póngase en contacto con:

Brazos Transit District Title VI Coordinator 1759 N Earl Rudder Fwy. Bryan, Texas 77803 979-778-0607 ext. 4552 Email: TitleVI@btd.org Federal Transit Administration Office of Civil Rights Attention: Complaint Team East Building, 5th Floor - TCR 1200 New Jersey Avenue, SE Washington, DC 20590

TITLE VI COMPLAINT PROCEDURES

All formal complaints under BTD's Title VI Program will be filed in accordance with the following complaint procedures. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest organizational level possible. The Title VI Coordinator will make every effort to pursue a resolution of the complaint.

Any individual, group of individuals or entity that believes they have been subjected to discrimination based on race, color or national origin, as prohibited by Title VI nondiscrimination provisions by BTD, may file a written complaint. A formal complaint must be received within 180 days following the date of the alleged incident. BTD will only process complaints that are complete.

A Title VI Complaint Form is available upon request; however, a complaint may be filed in any written form and mailed to BTD's main office located at 1759 N. Earl Rudder Frwy., Bryan, Texas 77803. The complainant may also access the Title VI Complaint Form via our website at www.btd.org. The BTD Title VI Coordinator may complete the Complaint Form and attach a letter or other statement from the complainant. Written complaints must be signed by the complainant or representative, include the complainant's name, address and telephone number or other means by which the complainant may be contacted and identify the individual(s) and/or organization(s) responsible for the alleged discrimination. Signed allegations of discrimination received by facsimile or email will be acknowledged and processed.

A verbal complaint may be made either in person, by telephone at 979.778.0607 ext. 4552 or via a recording to the Title VI Coordinator. The Title VI Coordinator will include the fullest possible description of the verbal allegations to writing and provide the complainant with the written document for confirmation, revision and signature (or equivalent mark) before processing. In cases where the complainant is assisted in converting an oral complaint into a written complaint, the complainant is required to sign the written complaint.

Individuals will never be discouraged from filing a complaint. All complainants and parties making informal inquiry will be advised of their right to seek recourse within appropriate federal and/or state agencies that have authority to resolve the matter presented.

The Title VI complaints will be referred to the Title VI Coordinator for initial review and processing. Upon receiving a written complaint, The Title VI Coordinator will date-stamp it and review it to ensure that it includes the required information, is timely and is within the appropriate jurisdiction. The complaint will be accepted unless; it is withdrawn, is not filed within the required interval of time, or fails to provide the required information after a written follow-up request for additional or missing information. If the complaint is found to be valid, immediate measures will be taken to resolve the complaint. BTD has 15 working days to begin researching the complaint. BTD will contact the complainant in writing no later than 30 working days after receiving the complaint with an acknowledgement that the complaint is being researched. If more information is needed to resolve the case, BTD may contact the complainant to obtain the additional information. If additional time is needed, the complainant will be notified in writing of the need to extend the timeframe to complete the review of the complaint.

If a complaint is deemed incomplete, additional information will be requested, and the complainant will be given 30 working days to submit the required information. If the complainant does not provide the additional information within 30 working days, BTD can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the complaint. If the Title VI Coordinator finds the complaint to be invalid, the Title VI Coordinator may close the case.

After the Title VI Coordinator reviews the complaint, he/she will issue one of two letters to the complainant; a Closure Letter or a Letter of Finding (LOF). A letter will be sent out within 90 days of the receipt of the complaint, unless additional time to complete the research is needed. A Closure Letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. If there is a finding the Title VI Coordinator will consult with the Vice President for Administration for appropriate remedy. An LOF summarizes the findings regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member or other action to remedy the complaint will occur. If the complainant wishes to appeal the Title VI Coordinator's decision, the complainant has 60 working days after the date of the letter to request an appeal. The appeal request will be given to the Executive Vice President, who will not have had a role in the initial findings to review the appeal request and render a final decision.

A person may also file a complaint directly with the Texas Department of Transportation (TxDOT) Civil Rights Division or with the Federal Transit Administration (FTA) within 180 days of the alleged offense. If the complainant chooses to file with TxDOT, they may send a written complaint to TxDOT Civil Rights Division, 125 E. 11th Street, Austin, Texas 78701. If the complainant chooses to file with FTA, they may send a written complaint to FTA Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

TITLE VI COMPLAINT LOG - INVESTIGATIONS, COMPLAINTS AND LAWSUITS

BTD will maintain a complaint log on all Title VI complaints filed and investigated by BTD. The log will include the date of the investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by BTD in response to the investigation, lawsuit, or complaint. Any Title VI complaints or lawsuits must be included with the Title VI submission to FTA every three years.

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigati	ons			
1	None			
2				
3				
Lawsuits				
1	None			

2			
3			
Complaint	S		
1	None		
2			
3			

PUBLIC PARTICIPATION PLAN

BTD takes pride in its work to maintain a collaborative relationship with community and municipal stakeholders and has strategically developed this Public Participation Plan (PPP) to foster collaboration in an all-inclusive manner. BTD's public outreach effort rests on utilizing multiple communication channels to distribute information to, and solicit input from, affected populations. The PPP for BTD emphasizes the importance of early, on-going public involvement in the transit planning process. Early public involvement enables BTD to make more informed decisions, improve quality through collaborative efforts, as well as, build mutual understanding and trust between BTD and the public.

It is the intent of BTD that the PPP provide the greatest possible involvement in the transit planning process. Moreover, BTD intends that the PPP be implemented in a continuous, proactive manner.

PUBLIC PARTICIPATION GOALS AND OBJECTIVES

BTD Goal: To develop and provide public transit services in its 16 counties by engaging in comprehensive planning activities to include public involvement and consultation with public officials.

The following objectives will enable BTD to meet its overall goal for public participation:

- 1) Identify target audiences/stakeholders and encourage their involvement in the planning process. These include but are not limited to:
 - a. General public/citizens
 - b. Minorities (with consideration of LEP persons)
 - c. People who classify as lower-income
 - d. Private business/organizations
 - e. State and Local Governmental entities
 - f. Publicly funded organizations and agencies
- 2) Provide notification of meetings and forums in languages understood by targeted audiences and at locations in which they frequent. This will include visual techniques such as charts, pictures and maps when necessary.
- 3) Follow the procedures and standards established in the BTD LEP Program in an effort to reach and communicate with persons speaking a language other than English.
- 4) Establish meeting opportunities at time and locations that maximize public engagement and participation. Phone calls and emails are also encouraged for personas who are unable to attend a forum.

PUBLIC PARTICIPATION PLAN ELEMENTS

The PPP is intended to provide direction for public involvement activities to be conducted by BTD and contains the goals, objectives and techniques used by BTD for public engagement. In its public participation process BTD will:

- Provide timely information via our website at www.btd.org. about transit issues, process and plans to stakeholders, interested parties, and the general public.
- Upon request, provide the public notice in ADA accessible format and LEP identified alternate language(s).
- Give adequate public notice of participation activities and allow time for public review and comment at key decision points. If the final draft of any plan differs significantly from the one available for public comment and raises new material issues an additional opportunity for public comment on the revisions will be made available.
- BTD logs all comments received from any outreach activities performed. Comments are reviewed by our Complaints Resolution Officer (CRO) and determines what action the comments require, if any.
- Include interpreters in the LEP identified language, if needed.
- Solicit needs and input from historically under-served communities and entities that provide services to the same.

PUBLIC PARTICIPATION OUTREACH

Public participation is an ongoing and integral part of the BTD planning process. BTD uses one or more of the following public participation tools:

<u>BTD</u> website – BTD will announce public participation opportunities via our website at <u>www.btd.org</u>. The website will also contain additional information about projects and plans about the BTD system. BTD will follow its Language Assistance Plan (LAP) to provide information in the identified alternate language.

<u>Public media</u> – Legal notices are published in local newspapers. If the project has an impact on low income or minority populations, an effort is made to place notices in media that serves local, minority and non-English communities as identified in the LAP.

<u>Press releases</u> – BTD utilizes local channels and the news broadcasts to provide public announcements to the general public.

<u>Notices and/or Flyers</u> – Will be used to announce meetings and events. These are distributed in public places including those frequented by low-income, minority, and disabled persons.

<u>Public meetings</u> – Will be used to solicit public comments and opinions about transit projects and plans. Advanced notices will be distributed, and accessible times and locations will be considered to accommodate the greatest public input and attendance. BTD will hold public hearings, meetings and open houses in ADA accessible facilities that are, wherever possible, at locations closest to or served by fixed-route transit service.

Public meetings in Coordination with the Metropolitan Planning Organization (MPO) - BTD will coordinate public meetings for transit operational and demographic studies with the MPO. On behalf of BTD, the MPO will retain a consultant for such studies. The MPO consultant may conduct an analysis of the demographics of the area where the meeting is to be held to determine whether notices should be translated into languages other than English. The availability of handout materials in alternative formats—Braille, large print, and/or audio cassette and languages other than English—as well as other accommodations (language interpreters, sign language interpreters, CART translators, etc.) must be indicated in the meeting notices along with specific information on how to request these accommodations. Consultants will research and make every effort to select the location, size, and setup of meeting facilities based on the specific characteristics of the audience and the type of information to be presented. Whenever possible, hearings and meetings will be held in places that are centrally located to the project and likely to attract a cross section of the people and businesses representative of the community stakeholders. Public libraries, public schools and community centers are often used. Consultants will strive to create a welcoming environment. The staff members charged with the coordination of the meeting are responsible for providing resources, including free accessibility assistance and language assistance, to ensure that the event is accessible to all people and to provide the greatest opportunity for participation by interested parties.

<u>Surveys</u> – Survey instruments may be utilized when a very specific input is desired.

BTD LEP AND LAP PROGRAM PLAN

Introduction

This Language Assistance Plan (LAP) incorporates the needs of the Limited English Proficiency (LEP) individuals who use BTD transit services. This LAP is prepared to address the BTD responsibilities as a recipient of FTA federal financial assistance, as they relate to the needs of individuals with limited English proficiency language skills. The LAP has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 USC 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination based on race, color or national origin.

Executive order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicated that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including programs administered by BTD.

Plan Summary

Brazos Transit District has developed its LAP to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to participate and obtain the benefits of the transportation planning and transit service process. As defined within Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a 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 persons that free language assistance is available.

To identify if language assistance is needed at BTD, BTD used the Four Factor LEP Analysis which considers the following factors:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by BTD.
- 2. The frequency with which LEP persons come into contact with BTD administrative staff, office staff, dispatchers, vehicle operators and Board members.
- 3. The nature and importance of the program, activity or service provided by BTD to the LEP population.
- 4. The interpretation services available to BTD for LEP outreach, as well as the costs associated with that outreach.

MEANINGFUL ACCESS: FOUR FACTOR ANALYSES

Awareness of rights and services is an important part of "meaningful access," as a lack of awareness may effectively deny LEP individuals' meaningful access. The Four Factor Analysis will assist BTD to determine meaningful access to LEP persons.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by BTD.

BTD provides service in 16 Texas counties. BTD staff reviewed the 2012-2016 U.S. Census Bureau databases on American Fact Finder, www.factfinder.census.gov and compiled the following statistics to identify the number or proportion of LEP persons eligible to be served or likely to be encountered by BTD:

BTD's Title VI Coordinator reviewed the 2012-2016 American Community Survey data for Table S1601: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over for each of the 16 counties in the BTD service area. In our service area, Spanish-speaking individuals who reported speaking English "less than well" consistently meets the safe harbor threshold of either 1,000 individuals or 5% of the total population. In the Bryan/College Station Urbanized Area (a subset of Brazos County), Chinese-speaking individuals who reported speaking English "less than well" met the 1,000 individuals' threshold. However, the Chinese-speaking individuals in the Bryan/College Station Urbanized area attend or are family members of those who attend Texas A&M University. The likelihood of the students and family members using BTD services is minimal due to the fact the university provides transit service to its students. Therefore, the number of Chinese individuals to actually use BTD is less than 1000. The chart depicting this data is below:

	Total	# of Spanish Speaking	% speak English less than	# of Asian Language Speaking	% speak English less than
County	Population	Individuals	"very well"	Individuals	"very well"
Angelina	81,577	5267	6%	289	0%
Brazos	196,661	13056	7%	3800	2%
Burleson	16,388	804	5%	33	0%
Grimes	25,739	1822	7%	23	0%
Houston	21,631	824	4%	78	0%
Leon	15,831	973	6%	21	0%
Liberty	73,248	4709	6%	237	0%
Madison	13,400	946	7%	44	0%
Montgomery	482,971	33,897	7%	2197	0%
Nacogdoches	61,029	4158	7%	335	1%
Polk	44,063	1902	4%	62	0%
Robertson	15,453	797	5%	30	0%
San Jacinto	25,697	1071	4%	11	0%
Trinity	13,712	340	2%	29	0%
Walker	66,865	3205	5%	258	0%
Washington	32,450	1199	4%	215	1%

Based on the data chart, BTD will provide language assistance, interpretation and translation of the identified vital documents in Spanish.

2. The frequency with which LEP persons come into contact with BTD programs, activities or services.

BTD staff reviewed the frequency with which the board, office staff, dispatch and bus drivers have, or could have, contact with LEP persons. This includes documenting the frequency in which transit riders request language assistance, through phone inquiries, vehicle operators, complaints and office visits. The most frequent contact between LEP persons is with bus drivers, dispatchers and front office staff. BTD has adequate Spanish speaking employees that can offer Spanish interpretation assistance.

BTD bus drivers, reservationists and other front-line staff will document their experience concerning frequency of contacts with LEP persons using the "Record of Language Assistance Form" (see Appendix F). They will turn this form in to the Title VI Coordinator on a monthly basis. The Title VI Coordinator will gather and input all received data into a spreadsheet log that will be updated throughout the year.

3. The nature and importance of the program, activity, or service provided by BTD to the LEP population.

The transit system and transportation planning are very important services that BTD provides to the public. BTD provides transit services in 16 counties. As evidenced by the data table, the fixed route system and paratransit system will encounter Spanish speaking individuals who do not speak

English very well. BTD will provide this community with language assistance through oral interpretation and translation of the identified vital documents.

4. The resources available to BTD for LEP outreach, as well as the costs associated with that outreach.

BTD has assessed the resources that could be used to provide LEP assistance. BTD has staff that have the ability to interpret oral conversations as well as prepare simply written translation of documentation from English to Spanish and vice versa. Language assistance training will be provided in conjunction with other staff training to identify resources and procedures when encountering and communicating with LEPs. BTD will translate vital documents such as complaint forms, maps, schedules and rider guides into the identified LEP language(s). BTD maintains access to a language line to facilitate communications (Language Line Personal Interpreter Service) with LEP persons. There is a fee associated with the language line service, however the use of it has been very rare so the cost has been minimal. BTD will also provide an interpreter to LEP persons if a request is made for language assistance, or it is evident that such assistance will be needed at a public meeting.

BTD determined that the staff time utilized in translating the identified vital documents is estimated to cost between \$500 and \$1,000. The costs of printing the identified vital documents into Spanish is estimated to cost between \$1,000 and \$2,000. These listed efforts and other LEP-related efforts are estimated to be between \$1,500 and \$3,000 a year and costs are rolled into administrative costs in the annual budget.

To supplement the internal resources, BTD has partnered with Brazos Valley Center for Independent Living (BVCIL) located at 1869 Briarcrest Dr., Bryan, Texas 77802. BTD will continue to identify other organizations and/or entities for outreach and interpretation efforts.

LANGUAGE ASSISTANCE

A person who does not speak English well and who has a limited ability to read, write or understand English may be a limited English proficient person and is entitled to language assistance with respect to BTD programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language. BTD will determine when interpretation and/or translation are needed and are reasonable.

How BTD determines when to provide language assistance:

- Assess the frequency of the requests and type of language assistance has been requested and provided. The records examined will include past meetings in which language assistance is provided; bus operators providing language assistance; language line and over the phone usage.
- Have Language Identification ("I Speak") Flashcards (Appendix C) available for the inperson encounters. The card will be available at the customer service desk, transit vehicles and station facilities.

• BTD bus drivers, reservationists and other front-line staff will document their experience concerning frequency of contacts with LEP persons using the "Record of Language Assistance Form". They will turn this form in to the Title VI Coordinator on a monthly basis. The Title VI Coordinator will gather and input all received data into a spreadsheet log that will be updated throughout the year.

Language Assistance Measures

There are several language-assistance measures available to LEP persons, including both oral and written services. There are also various ways in which BTD staff may respond to LEP persons, whether in person, by telephone or in writing. A notice to LEP individuals has been posted to inform them that we will provide translation and interpretation services free of charge. (Appendix B)

- BTD will provide translation and interpretation services free of charge upon request by simply calling 979.778.0607.
- BTD has Spanish speaking bilingual staff on duty during office hours.
- BTD will use a translation service such as Language Line to provide language assistance when bilingual staff are not available.
- A LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by BTD. Informal interpreters may include family members, friends, legal guardians, service representatives or advocates of the LEP person.
- BTD will continually monitor to determine the frequency of language assistance for other languages besides Spanish. If there is a need for documents to be translated in other languages, based on frequency, BTD will do so.

Dissemination of the BTD LEP Plan

BTD's Title VI Plan contains the Language Assistance Program/LEP Plan. The Title VI Plan is on the website at www.btd.org. Any person or agency may request a copy of the LEP plan via telephone, fax, mail or in person and a copy will be provided at no cost. LEP individuals may request a copy of the plan in Spanish. Plan contents can be interpreted in another language for the requester using the Language Line.

Questions concerning the LEP Plan may be submitted to BTD at:

Brazos Transit District

Attn: Title VI Coordinator 1759 N Earl Rudder Frwy. Bryan, Texas 77803 Phone 979.778.0607 Fax 979.778.3606

Email: titlevi@btd.org

Monitoring

BTD will update the LEP Plan every three years in conjunction with updating the Title VI Plan. Or, when it is clear that since the last update a new concentration of LEP individuals, not previously identified, are present in the BTD service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation or interpretation services have changed.
- Determine whether the existing language assistance program has been effective and sufficient to meet the need.
- Determine whether BTD's financial resources are sufficient to fund language assistance resources needed.
- Determine whether complaints have been received concerning BTD's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP complaints to determine issues and basis of complaints.

Staff Training

Training on the following topics will be provided to BTD staff during new employee orientation, and as needed at quarterly BTD safety meetings and supervisor meetings:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification ("I Speak") flashcards (Appendix C).
- How to document language assistance requests.
- How to handle a potential Title VI/LEP complaint.

Title VI information shall be distributed to BTD employees annually via the Employee Education form (see Appendix D) in employee payroll envelopes. This form reminds employees of BTD's policy statement, and of their Title VI responsibilities in their daily work and duties.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt form (see Appendix E) upon receiving the BTD Employee Handbook.

Translation of Documents

It is important to make an assessment as to the population percentage and the frequency and importance of the contact while considering the potential for translating vital documents. The program areas most likely to encounter the need to translate vital documents are transit services and at public involvement. Examples of vital documents for translation or interpretation include and are available upon request:

• Maps, ADA Paratransit eligibility application, Senior and Disabled Pass applications, Riders Guides and Title VI complaint form.

- Information on the right to file complaints of discrimination and instructions on how to file.
- Information on the provision of services to individuals with disabilities. The ADA Paratransit riders guide is available to be interpreted.
- Notices advising LEP persons of the availability of free language assistance.
- Notices of proposed public meetings regarding proposed projects or changes to services and or fares.
- Title VI know your rights signs.

BTD publicizes its free language assistance for transit services through the Title VI policy and LEP notice both available on the website at www.btd.org and posted at the four facilities.

In addition, when and if the need arises for LEP outreach, BTD will apply one or more of the following measures:

- When staff prepares a document, or schedules a meeting for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers and agendas will be printed in alternate language based on the known LEP population.
- Bus maps will be made available in an alternate language when and if a specific and concentrated LEP population is identified and requests are made.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Currently, BTD has no transit committees, but is considering building a transit ridership committee and are soliciting various types of riders (fixed route, demand response, etc.). BTD will actively encourage committee membership by all interested parties regardless of race, color or national origin.

MONITORING SUBRECIPIENTS

BTD does not distribute FTA funds to subrecipients.

DETERMINATION OF SITE OR LOCATION OF FACILITIES

Any construction of transit facilities with federal financial assistance will include a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color or national origin.

In the event BTD shall construct a transit facility, BTD will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

When evaluating locations of facilities, BTD will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. The analysis will be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

If BTD determines that the location of the project will result in a disparate impact based on race, color or national origin, BTD will only locate the project in that location if there is a substantial legitimate justification for locating the project there and where there are no alternative locations that would have a less disparate impact based on race, color, or national origin.

BTD will show how both tests are met; by showing how we considered and analyzed the alternatives to determine whether those alternatives would have less of a disparate impact based on race, color or national origin, and then implement the least discriminatory alternative.

No facilities have been sited.

SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Vehicle Load Standards

		Average Passenger Capacities			pacities
Vehicle Type	Service Area	Seated	Standing	Total	Maximum Load Factor
25' Cutaway	Lufkin, Nacogdoches and Cleveland	16	6	22	1.375
29' Trolley	Woodlands Waterway	22	8	30	1.36
30' Navistar	Bryan/College Station	24	6	30	1.25
30' Nova (2001)	Bryan/College Station	32	38	70	2.19
30' Nova (2002)	Bryan/College Station	35	30	65	1.86
35' New Flyer	Bryan/College Station	32	35	67	2.09

Vehicle Headway Standards

Fixed-route trolley service operates with four trolleys operating along a 4.1-mile route, the average frequency is about 10 minutes between vehicles during peak operations. Monday through Thursday 11:00 am to 9:00 pm, Friday and Saturday from 10:00 am to 10:00 pm and on Sunday from 11:00 am to 6:00 pm. Fixed-route trolley service has no set schedule; headways depend upon pedestrian and auto traffic in the area.

BTD operates fixed routes in Bryan/College Station, Lufkin and Nacogdoches. The fixed routes operate 60-minute headway, Monday through Friday, 5:00 a.m. to 7:00 p.m.

BTD operates a fixed route in Cleveland. The fixed route operates 60-minute headways, Monday through Friday, 9:00 a.m. to 4:00 p.m.

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. BTD's on-time performance objective is 90% or greater.

Service Availability Standards

Fixed routes operate multiple transit routes across Bryan/College Station, Lufkin and Nacogdoches, Cleveland and The Woodlands trolley services operate primarily centered around The Woodlands Town Center. BTD provides demand and response to all of the 16 counties in the service area.

SERVICE POLICIES

Vehicle Assignment Policy

The Waterway Trolley service operates a 29-foot Cable Car Concepts vintage-style trolley equipped with wheelchair lifts or ramps to make them ADA accessible. All vehicles are equipped with air conditioning and heating. The trolleys are the same age for this single route service. The average age of the fleet is six years.

Bryan/College Station fixed route bus service operates 14 30-foot buses and seven 35-foot buses which are all 100% ADA accessible with lifts or ramps. The average age of the fleet is 8.69 years.

Thirteen buses are used for fixed route services in Nacogdoches, Lufkin and Cleveland and operate 25-foot buses which are 100% ADA accessible with lifts. The average age of the fleet is three years.

Transit Amenities Policy

BTD is a flag stop system and does not have fixed stops. Every effort is made to pick up clients anywhere along the route as long as the location is in a safe area. Within the next year, BTD will be transitioning to a fixed stop system and will be identifying where our high service areas are. Installation of transit amenities along fixed routes will be based on the number of passengers boarding along those routes.

APPENDIX A - TITLE VI COMPLAINT FORM

BTD is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI Coordinator for BTD by calling 979-778-0607 ext. 4552. The completed form must be returned to:

Brazos Transit District Attn: Title VI Coordinator Email: titlevi@btd.org 1759 N. Earl Rudder Fwy. Bryan, Texas 77803

Please see following page for the Title VI complaint form.



Title VI Complaint Form

	Title of Complaint					
Section I:						
Name:						
Address:	Address:					
City:	State:		Zip:			
Electronic Mail Address:						
Home Phone Number with Area Code:						
Work Phone Number with Area Code:						
Accessible Format Requirements?	Large Print		Audio Tape			
	TDD		Other			
Section II:						
Are you filing this complaint on your own behalf?			Yes* □	No 🗆		
*If you answered "yes" to this question, go to Sec	tion III	•	-			
If not, please supply the name and relationship of						
you are complaining:	•					
Please Explain why you have filed for a third party	r:	-				
Please confirm that you have obtained the permis	sion of the aggrieved p	arty if you	Yes 🗆	No 🗆		
are filing on behalf of a third party.		· '				
Section III:						
Were you discriminated against because of:						
☐ Race ☐ National Origin ☐ C	Color 🗆 Other	Explain)				
Date of alleged incident: Date		,=-,,				
Explain as clearly as possible what happened and	how you ware discrimi	nated against Tr	ndicate who was in	volved Be sure to		
include the names and contact information of any						
I morade the names and contact information of any	minesses, il more sp	ice is necaca pr	Lase ase the back t	31 (1113 1 (1111)		
Section IV:						
Have you previously filed a Title VI complaint with this agency? Yes ☐ No ☐						
Section V:						
	ural State or Local Age	ocy or with	Yes 🗆	No 🗆		
Have you filed this complaint with any other Federal, State, or Local Agency; or with Yes No No any Federal or State court?						
If Yes, check all that apply:						
☐ Federal agency ☐ Federal Court ☐ Stat	a agancy	ourt 🗆 Local	agency			
Please provide information about a contact perso						
Name:	mac the agenoy court	mere and compi	anne was mear			
Address:						
City:	State:		Zip:			
Phone Number with Area Code:	otate		2.15.			
Section VI: Name of agency complaint is against:						
Contact Person: Title: Phone Number with Area Code:						
Phone Number with Area Code:						
Bus Number: Route Number: Route Number: You may attach any written materials or other information that you think is relevant to your complaint.						
·	rmation that you think	is relevant to yo	ur compiaint.			
Sign and Date Required Below. I understand that checking this box constitutes a leg-	al cianatura confirmica H	at the informatio	n I bana neonidad a b	vano ie truo and accurate		
in a ranger scand that the county this box constitutes a leg	ar agnarure communing tr	at the miornalo	u i nave hrovineg an	ove is a de aila accurace.		
Signature:			ate:			

Please mail this form to: Brazos Transit District - 1759 N Earl Rudder Frwy - Bryan, Texas 77803

FORMULARIO DE QUEJAS DEL TÍTULO VI

Brazos Transit District (BTD) está comprometida a garantizar que ninguna persona sea excluida de participar o se le sean negados los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el Título VI del Acta de Derechos Civiles de 1964. Las quejas conforme al Título VI deben ser presentadas dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor póngase en contacto con el coordinate de BTD del Título VI llamando al 979-778-0607 ext. 4552. El formulario completo deberá ser devuelto a la siguiente dirección:

Brazos Transit District
Attn: Coordinate del Título VI
Email: titlevi@btd.org
1759 N. Earl Rudder Fwy.
Bryan, Texas 77803

Por favor vea la siguiente página para el formulario de quejas del Título VI.

www.btd.org



Titulo VI Queia Forma

	Titulo vi Queja re	,,,,,,,		
Sección I:				
Nombre:				
Dirección:				
Ciudad:	Estado);	Código p	ostal:
Dirección de correo electrónico:				
Numero do teléfono con código de área:				
Teléfono trabajo con LADA:				
¿Requisitos do formato accesible?	Letra de gran tamaño		Cinta de audio	
	TDD		Otros	
Sección II:	<u>'</u>		<u> </u>	
¿Está presentando esta denuncia en su nombr	re?		Si* □	No 🗆
*Si contestaste "si" a esta pregunta, ir a la sec				
Si no, por favor suministrar el nombre y la rela	ación de la persona para qu	ien se		
quejan:				
Porfavor explique por qué han presentado po	or un tercero:			
Por favor confirme que ha obtenido el permisi	o de la parte agraviada și es	ta	Si □	No 🗆
presentando en nombre de un tercero.				
Sección III:				
Fueron discriminados por:				
	☐ Color la raza ☐	Otros (explic	ar)	
Fecha del incidente:			,	
Explicar lo más claramente posible lo que suce	edió v como se discrimino c	ontra. Indica	r que estaba involucrad	lo. Asegúrese de
incluir los nombres e información de testigos.			'	•
ű	'			
Sección IV:				
¿Usted ha presentado anteriormente una que	ja del titulo VI con esta age	ncia?	Si □	No 🗆
Sección V:	<u>, </u>			
Has presentado esta denuncia ante cualquier	otro Federal, estado o Δσει	ncia Local: Zo	Si 🗆	No 🗆
de la Corte Federal o estatal?	on or eachan, estado or agen	1014 20041, 00	3, 4	"""
En caso afirmativo, marque todas las que aplic	can:		-	
☐ Agencia Federal ☐ Tribunal Federal [orte 🗆 Lo	cal agencia estatal	
Sírvanse facilitar información sobre una perso	_			ia.
Nombre:	The de contracto en la ligerio	ia, cribariai ac	oriae se presento la que	j wi
Dirección:				
Ciudad:	Estado	n:	Código p	nostal:
Numero do teléfono con código de área:			1	
Sección VI:				
Nombre de denuncia de la agencia está en cor	ntra do:			
Persona de contacto:	Titulo:			
Numero do teléfono con código de área:	Titalo.			
Numero de bus:	Nume	ro de ruta:		
Isted puede conectar cualquier material escriti			levante a su queia	
osteu puede correctar cuarquier materiar escrit □ Entiendo que marcar esta casilla es una firma les				ente es verdadera v
omacta.	yar que commina que la milom	words dare tie	proportionado anticido (11)	ciae co rei dadeia y
· · · · · · · · · · · · · · · · · · ·			F	
Firma:			Fecha:	

Envié este formulario a: Brazos Transit District - 1759 N Earl Rudder Fwy - Bryan, Texas 77803

APPENDIX B- NOTICE TO LEP PERSONS ABOUT LANGUAGE ASSISTANCE

Brazos Transit District



A Political Subdivision of the Great State of Texas

Providing Rural & Urban Public Transportation in Central & East Texas Since 1974

EQUAL ACCESS FOR PERSONS WHO ARE LIMITED ENGLISH PROFICIENCY

What is Limited English Proficiency (LEP)?

An LEP individual is a person who is unable to speak, read, write or understand the English language at a level that allows him or her to obtain the services offered by Brazos Transit District (BTD) to the public.

BTD provides translation and interpretation services, free of charge:

- ▶ At events sponsored by BTD for its projects and services
- ► Maps and Rider's Guides

For more information contact:

Brazos Transit District Attn: Title VI Coordinator 1759 N Earl Rudder Fwy. Bryan, TX 77803 (979) 778-0607 ext. 4552

IGUALDAD DE ACCESO PARA PERSONAS CON COMPETENCIA LIMITADA EN INGLÉS

¿Qué es el dominio limitado del Inglés?

Un individuo, inglés limitado, es una persona que no puede hablar, leer escribir o entender el idioma inglés a un nivel que le permite obtener los servicios ofrecidos por el Brazos Transit District (BTD) al público.

BTD ofrece servicios, gratis, de traducción e interpretación:

- ► En eventos patrocinados por BTD para sus proyectos y servicios
- ► Guía de Mapas y Jinetes

Para más información, el contacto es:

Brazos Transit District Attn: Title VI Coordinator 1759 N Earl Rudder Fwy Bryan, TX 77803 (979) 778-0607 ext. 4552

1759 N Earl Rudder Freeway Bryan, Texas 77803

www.btd.org

Office: 979-778-0607 Fax: 979-778-3606

APPENDIX C-I SPEAK LANGUAGE IDENTIFICATION CARD

2004 Census Test Consus Language Identification Flashcard	
ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
Խողըում ենւջ նչում կատարեջ այս ջառակուսում, եթե խոսում կամ կարդում եջ Հայերեն:	2. Armenian
যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাবেন দাগ দিন।	3. Bengali
ឈូមបញ្ជាក់ក្នុងប្រអច់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodiar
Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
如果你能读中文或讲中文,请选择此框。	6. Simplified Chinese
如果你能讀中文或講中文,請選擇此框。	7. Traditional Chinese
Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
Mark this box if you read or speak English.	11. English
اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi

Cocher ici si vous lisez ou parlez le français.	13. French
Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाई	Ťι 17. Hindi
Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungariar
Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
Marchi questa casella se legge o parla italiano.	21. Italian
□ 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
ใช้ขมายใส่ยุ่อๆนี้ ก้าท่างอ่างตูปากผาสาลาว.	24. Laotian
Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

Assinale este quadrado se você lê ou fala português.	26. Portuguese
Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
Marque esta casilla si lee o habla español.	31. Spanish
Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูคภาษาไทย.	33. Thai
Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
اگرآپ اردوپڑھتے یابولتے ہیں تواس خانے میں نشان لگائیں۔	36. Urdu
Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

APPENDIX D – EMPLOYEE EDUCATION FORM



Title VI Employee Annual Education Form 2018

Brazos Transit Employees:

The Federal Transit Authority (FTA) requires transit agencies to design and implement a Title VI program. A copy of the Title VI Program is available in the break room (bright pink). Within this program, Brazos Transit is required to include an "Employee Annual Education Form" every year to all employees with their pay check/stub. This form includes the Title VI Policy and the designated Title VI Coordinator.

Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from, participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of Brazos Transit District are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint regarding Title VI protections, direct him or her to contact:

Sarah Santoy Title VI Coordinator 979-778-0607 ext. 4552 Email: titlevi@btd.org

Thank you,

Sarah Santoy Title VI Coordinator Brazos Transit District



1759 N Earl Rudder Freeway Bryan, Texas 77803

www.btd.org

Office: 979-778-0607 Fax: 979-778-3606

APPENDIX E - ACKNOWLEDGEMENT OF RECEIPT OF TITLE VI PLAN



Acknowledgement of Receipt of Title VI Plan

I have been informed of Brazos Transit District's Title VI Plan and of its location on site. As an employee of Brazos Transit District, I am committed to ensuring that no person is excluded from, participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI regulations (49 CFR part 21) in Federal Transit Administration (FTA) Circular 4702.1B issued October 1, 2012.

Employee signature	
Print your name	
Date	



1759 N Earl Rudder Freeway Bryan, Texas 77803

www.btd.org

Office: 979-778-0607 Fax: 979-778-3606

APPENDIX F – RECORD OF LANGUAGE ASSISTANCE FORM

RECORD OF LANGUAGE ASSISTANCE								
Date	Language Provided	Person Providing Assistance	County	Reason				

Brazos Transit District

Major Route and Fare Changes

July 2017-December 2019

341) 2017 Becelliser 2013								
DATE OF CHANGE	CITY	ROUTE	DESCRIPTION					
			Added Gaslight street (medical district) at the					
Monday, March 19, 2018	Lufkin	Blue	request of City Officials					
			Added HEB parking lot at the request of City					
Monday, March 19, 2018	Lufkin	Purple	Officials					
			The Yellow (Texas Express) and Pink route were					
			added to the BCS area as new routes to service					
			Texas Ave (yellow) and South College Station					
			(pink). This was the first change after the AECOM					
Monday, December 3, 2018	BCS	Yellow/Pink	transit study.					
			Due to declining ridership and route changes, the					
			TAMU Express route was discontinued from					
			service. The new route changes still covered the					
			TAMU campus. A public hearing was held for this					
Monday, February 18, 2019	BCS	TAMU Exp	change due to the comments received.					
			This was the second stage of changes to come					
			after the AECOM transit study. The Yellow and					
Monday, June 3, 2019	BCS	All Routes	Pink routes were not changed.					
		Red, Blue,	These four routes were slightly altered to					
		Green and	accommodate rider feedback after the June Route					
Monday, August 12, 2019	BCS	Maroon	changes.					
7, 13, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5,			Fare Decrease and started new passes (Day Pass,					
Monday, December 2, 2019	ALL	All Routes	Weekly Pass and Monthly Pass)					
· · · · · · · · · · · · · · · · · · ·			Discontinuation of Free Transfers					
Thursday, January 2, 2020	ALL	All Routes	Discontinuation of Free Transfers					

All major route and fare changes are published in the newspaper and posted at the terminals and on all buses in that service area. Comments were received for the February 2019 changes to keep the route but the route was discontinued due to lack of ridership and one of our other routes still services TAMU's campus. The comments received for the June 2019 changes were to not change the routes and they were not okay with the changes; all comments were taken into consideration and changes were made again in August from the rider feedback.



RESOLUTION

Adoption of The Brazos Transit District Title VI Program Plan Civil Rights Act of 1964

WHEREAS, Brazos Transit District is a Political Subdivision providing small urban and rural transportation and is a recipient of Federal Transit Administration (FTA) and Texas Department of Transportation (TxDOT) funding; and,

WHEREAS, Brazos Transit District desires to comply with Title VI of the Civil Rights Act of 1964, as delineated in the U.S. Department of Transportation's FTA Circular 4702.1B; and,

WHEREAS, the Board of Directors of Brazos Transit District wishes to authorize approval of the plan developed to comply with necessary provisions of the Civil Rights Act.

NOW THEREFORE BE IT HEREBY RESOLVED by the Board of Directors for Brazos Transit District as follows:

- The President/CEO is authorized to implement components of the plan in order to meet federal requirements.
- 2. The President/CEO is authorized to implement policies that may be necessary to comply with the subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Brazos Transit District on this 17th day of June, 2020.

It was duly moved by _	, that this Resolution be adopted.	and seconded by
Mr. Bud Haynie, Chair	June 1 Date	7, 2020