



BRAZOS TRANSIT DISTRICT
TITLE VI PROGRAM

MAY 2024



TITLE VI POLICY STATEMENT

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
2117 Nuches Lane
Bryan, Texas 77803
Phone: 979.778.0607
Email: titlevi@btd.org
Website: www.btd.org

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

John McBeth
President & CEO
Brazos Transit District

5/13/2024

Date

TITLE VI PUBLIC NOTICE ON RIGHTS AND PROTECTIONS TO BENEFICIARIES

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

<u>Location Name</u>	<u>Address</u>	<u>City</u>
BTD Main Office	2117 Nuches Lane	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



Brazos Transit District
2117 Nuches Lane
Bryan, Texas 77803

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
2117 Nuches Lane
Bryan, Texas 77803
979-778-0607
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 Título 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 Civiles 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
2117 Nuches Lane
Bryan, Texas 77803
979-778-0607
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 2117 Nuches Lane., 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 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 Deputy CEO/General Manager 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 Deputy CEO/General Manager, 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

BTB will maintain a complaint log on all Title VI complaints filed and investigated by BTB. 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 BTB 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 <i>(Month, Day, Year)</i>	Summary <i>(include basis of complaint: race, color, or national origin)</i>	Status	Action(s) Taken
Investigations				
1	None			
2				
3				
Lawsuits				
1	None			

2				
3				
Complaints				
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 20 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:

BTD website – BTD will announce public participation opportunities via our website at www.btd.org. 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.

Public media – 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.

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

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

Public meetings – 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) - BTDD will coordinate public meetings for transit operational and demographic studies with the MPO. On behalf of BTDD, 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.

Surveys – 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 BTDD transit services. This LAP is prepared to address the BTDD 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 BTDD.

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 20 Texas counties. BTD staff reviewed the 2022 ACS 5-Year Estimates via U.S. Census Bureau databases at <https://data.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 2022 American Community Survey 5-Year Estimates data for Table S1601: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over for each of the 20 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:

Source: 2022 ACS 5 Year Estimates					
County	County Population	% Speaks Spanish and English less than "Very Well"	% Speak Chinese and English less than "very well"	% Speaks Asian and Pacific Island and English less than "Very Well"	% Speaks other Indo-European and English less than "Very Well"
Angelina County	80,974	5.79%	0.01%	0.03%	0.03%
Brazos County	221,415	5.82%	0.65%	0.31%	0.41%
Burleson County	16,961	7.54%	0.00%	0.00%	0.00%
Grimes County	27,851	6.81%	0.00%	0.05%	0.00%
Houston County	21,034	2.56%	0.00%	0.09%	0.00%
Leon County	15,095	3.68%	0.01%	0.00%	0.00%
Liberty County	86,674	10.83%	0.02%	0.09%	0.00%
Madison County	15,750	7.21%	0.00%	0.00%	0.00%
Montgomery County	589,724	6.58%	0.16%	0.15%	0.26%
Nacogdoches County	60,831	6.39%	0.01%	0.00%	0.11%
Polk County	47,988	3.36%	0.00%	0.08%	0.00%
Robertson County	15,850	2.27%	0.00%	0.00%	0.00%
Sabine County	9,251	0.05%	0.00%	0.08%	0.08%
San Augustine County	7,633	3.12%	0.00%	0.00%	0.00%
San Jacinto County	26,322	5.41%	0.00%	0.00%	0.02%
Shelby County	22,496	6.41%	0.00%	0.08%	0.00%
Trinity County	13,077	4.10%	0.00%	0.00%	0.00%
Tyler County	19,188	2.30%	0.00%	0.00%	0.17%
Walker County	74,180	4.47%	0.13%	0.08%	0.00%
Washington County	33,920	3.66%	0.00%	0.00%	0.02%

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.

BTB 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. BTB has adequate Spanish speaking employees that can offer Spanish interpretation assistance.

BTB 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 BTB to the LEP population.

The transit system and transportation planning are very important services that BTB provides to the public. BTB provides transit services in 20 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. BTB will provide this community with language assistance through oral interpretation and translation of the identified vital documents. If you need assistance or information in another language, please contact 979-778-0607 or visit our website.

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

BTB has assessed the resources that could be used to provide LEP assistance. BTB 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. BTB will translate vital documents such as complaint forms, maps, schedules and rider guides into the identified LEP language(s). BTB 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. BTB 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.

BTB 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 in-person 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
 2117 Nuches Lane
 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 a Safety Committee as part of the Public Transportation Safety Action Plan (PTASP). As required by the Bipartisan Infrastructure Law, this committee was convened by a joint labor-management process and consists of an equal number of frontline employee representatives and management representatives. 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

Vehicle Type	Service Area	Maximum Passenger Capacities			
		Seated	Standing	Total	Maximum Load Factor
25' Cutaway	Lufkin, Nacogdoches and Cleveland	16	6	22	1.375
30' Arboc	Lufkin and Nacogdoches	19	10	29	1.53
35' New Flyer	Bryan/College Station	32	35	67	2.09

Vehicle Headway Standards

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. Nacogdoches Fixed Routes operate 60-minute and 30-minute headways, 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, Nacogdoches Liberty, Dayton, Ames, and Cleveland. BTD provides demand and response to all of the 20 counties in the service area.

SERVICE POLICIES

Vehicle Assignment Policy

Bryan/College Station fixed route bus service operates 16 35-foot buses which are all 100% ADA accessible with lifts or ramps. The average age of the fleet is five years.

Thirteen buses are used for fixed route services in Nacogdoches, Lufkin, Cleveland, Liberty, and operate 25-foot buses and 30-foot buses which are 100% ADA accessible with lifts. The average age of the fleet is seven years. The Arboc fleet in Lufkin and Nacogdoches have an average age of two 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. The completed form must be returned to:

Brazos Transit District
Attn: Title VI Coordinator
Email: titlevi@btd.org
2117 Nuches Lane
Bryan, Texas 77803

Please see following page for the Title VI complaint form.



Brazos Transit District
 2117 Nuches Lane
 Bryan, Texas 77803

www.btd.org

Title VI Complaint Form

Section I:				
Name:				
Address:				
City:		State:		Zip:
Electronic Mail Address:				
Home Phone Number with Area Code:				
Work Phone Number with Area Code:				
Accessible Format Requirements?	Large Print	<input type="checkbox"/>	Audio Tape	<input type="checkbox"/>
	TDD	<input type="checkbox"/>	Other	<input type="checkbox"/>
Section II:				
Are you filing this complaint on your own behalf?			Yes* <input type="checkbox"/>	No <input type="checkbox"/>
*If you answered "yes" to this question, go to Section III				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please Explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes <input type="checkbox"/>	No <input type="checkbox"/>
Section III:				
Were you discriminated against because of:				
<input type="checkbox"/> Race	<input type="checkbox"/> National Origin	<input type="checkbox"/> Color	<input type="checkbox"/> Other (Explain)	
Date of alleged incident: Date				
Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed please use the back of this form.				
Section IV:				
Have you previously filed a Title VI complaint with this agency?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
Section V:				
Have you filed this complaint with any other Federal, State, or Local Agency; or with any Federal or State court?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
If Yes, check all that apply:				
<input type="checkbox"/> Federal agency	<input type="checkbox"/> Federal Court	<input type="checkbox"/> State agency	<input type="checkbox"/> State court	<input type="checkbox"/> Local agency
Please provide information about a contact person at the agency/court where the complaint was filed.				
Name:				
Address:				
City:		State:		Zip:
Phone Number with Area Code:				
Section VI:				
Name of agency complaint is against:				
Contact Person:			Title:	
Phone Number with Area Code:				
Bus Number:			Route Number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Sign and Date Required Below.

I understand that checking this box constitutes a legal signature confirming that the information I have provided above is true and accurate.

Signature: _____

Date: _____

Please mail this form to: Brazos Transit District – 2117 Nuches Lane - 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 coordinador de BTD del Título VI llamando al 979-778-0607. El formulario completo deberá ser devuelto a la siguiente dirección:

Brazos Transit District
Attn: Coordinador del Título VI
Email: titlevi@btd.org
2117 Nuches Lane
Bryan, Texas 77803

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



Brazos Transit District
 2117 Nuches Lane
 Bryan, Texas 77803

www.btd.org

Título VI Queja Forma

Sección I:				
Nombre:				
Dirección:				
Ciudad:		Estado:		Código postal:
Dirección de correo electrónico:				
Numero do teléfono con código de área:				
Teléfono trabajo con LADA:				
¿Requisitos do formato accesible?	Letra de gran tamaño	<input type="checkbox"/>	Cinta de audio	<input type="checkbox"/>
	TDD	<input type="checkbox"/>	Otros	<input type="checkbox"/>
Sección II:				
¿Está presentando esta denuncia en su nombre?			Si* <input type="checkbox"/>	No <input type="checkbox"/>
*Si contestaste "si" a esta pregunta, ir a la sección III				
Si no, por favor suministrar el nombre y la relación de la persona para quien se quejan:				
Por favor explique por qué han presentado por un tercero:				
Por favor confirme que ha obtenido el permiso de la parte agraviada si esta presentando en nombre de un tercero.			Si <input type="checkbox"/>	No <input type="checkbox"/>
Sección III:				
Fueron discriminados por:				
<input type="checkbox"/>	Raza	<input type="checkbox"/>	Origen nacional	<input type="checkbox"/>
<input type="checkbox"/>	Color la raza	<input type="checkbox"/>	Otros (explicar)	
Fecha del incidente:				
Explicar lo más claramente posible lo que sucedió y como se discrimino contra. Indicar que estaba involucrado. Asegúrese de incluir los nombres e información de testigos. Si se necesita mas espacio utilice el reverso de este formulario.				
Sección IV:				
¿Usted ha presentado anteriormente una queja del titulo VI con esta agencia?			Si <input type="checkbox"/>	No <input type="checkbox"/>
Sección V:				
Has presentado esta denuncia ante cualquier otro Federal, estado o Agencia Local; ¿o de la Corte Federal o estatal?			Si <input type="checkbox"/>	No <input type="checkbox"/>
En caso afirmativo, marque todas las que aplican:				
<input type="checkbox"/>	Agencia Federal	<input type="checkbox"/>	Tribunal Federal	<input type="checkbox"/>
<input type="checkbox"/>	Agencia	<input type="checkbox"/>	estado corte	<input type="checkbox"/>
<input type="checkbox"/>	Local agencia estatal			
Sírvanse facilitar información sobre una persona de contacto en la Agencia/tribunal donde se presento la queja.				
Nombre:				
Dirección:				
Ciudad:		Estado:		Código postal:
Numero do teléfono con código de área:				
Sección VI:				
Nombre de denuncia de la agencia está en contra de:				
Persona de contacto:			Titulo:	
Numero do teléfono con código de área:				
Numero de bus:			Numero de ruta:	

Usted puede conectar cualquier material escrito u otra información que crees que es relevante a su queja.
 Entiendo que marcar esta casilla es una firma legal que confirma que la información que he proporcionado anteriormente es verdadera y exacta.

Firma: _____ Fecha: _____

Envíe este formulario a: Brazos Transit District – 2117 Nuches Lane- 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
2117 Nuches Lane
Bryan, TX 77803
(979) 778-0607

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
2117 Nuches Lane
Bryan, TX 77803
(979) 778-0607



2117 Nuches Ln.
Bryan, Texas 77803

www.btd.org

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

APPENDIX C– I SPEAK LANGUAGE IDENTIFICATION CARD

2004 Census Test	United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD	

- | | | |
|--------------------------|---|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Մարդու՞մ եւք նշում՞ կատարեք այս քառակուսում,
եթե խոսում՞ կամ՞ կարդում՞ եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | ឈ្មួញបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنزید. | 12. Farsi |

- | | | |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français. | 13. French |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | 14. German |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | 15. Greek |
| <input type="checkbox"/> | Make kazye sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | 17. Hindi |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | 18. Hmong |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | 20. Ilocano |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano. | 21. Italian |
| <input type="checkbox"/> | 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 |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | 23. Korean |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ. | 24. Laotian |
| <input type="checkbox"/> | 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 квадратик 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
- ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย. 33. Thai
- Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. 34. Tongan
- Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. 35. Ukrainian
- اگر آپ اردو پڑھتے یا بولتے ہیں تو اس 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 2024

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:

Title VI Coordinator
979-778-0607
Email: titlevi@btd.org

Thank you,

Title VI Coordinator
Brazos Transit District



2117 Nuches Ln.
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



2117 Nuches Ln.
Bryan, Texas 77803

www.btd.org

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

APPENDIX G – ROUTE AND FARE CHANGES- PUBLIC PARTICIPATION

Brazos Transit District			
Public Participation			
<i>2020-2024</i>			
DATE OF EVENT	CITY	TYPE	DESCRIPTION
June 2020	BCS	Public Notice	BTD released a public notice in english and spanish regarding grey route change.
August 2021	ALL	Public Notice	BTD released a public notice in english and spanish regarding fares for fixed route and ADA Paratransit will be reinstated.
February 2022	Huntsville	Transit Study	BTD contines to work towards completing a Transit and Mobility study for the city of Huntsville in Walker County. Working with advisory committee.
April 2022	Lufkin	Bus Shelters	BTD works with the City of Lufkin to determine the locations for bus shelters.
2020-Current	ALL	Presentations	All presentations, health fairs, and other events open to public that BTD participated expand on the communtiy outreach and partnership addressed in BTD's Title VI plan.
Saturday, February 24, 2024	Nacogdoches	Public Notice	BTD released a public notice in english and spanish regarding grey route change.



APPENDIX H – RESOLUTION OF TITLE VI PROGRAM APPROVAL



RESOLUTION

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

WHEREAS, Brazos Transit District is a Political Subdivision providing large 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:

1. 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 13th day of May, 2024.

It was duly moved by Robert Shankle and seconded by

Roy Bolden, that this Resolution be adopted.


Honorable Duane Peters, Chair

May 13, 2024
Date