



Concho Valley Transit

Title VI Plan

Title VI of the Civil Rights Act of 1964

Effective 2023 - 2025

Adopted date

February 2020

Revised March 2024



CONCHO VALLEY
COUNCIL OF GOVERNMENTS

I. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

During the Obama Administration, the Federal Transit Administration (FTA) placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency (LEP).

Recipients of public transportation funding from FTA and the Concho Valley Council of Governments (CVCOG) are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Concho Valley Transit (CVT) incorporates nondiscrimination policies and practices in providing services to the public. Concho Valley Transit (CVT) is 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 in Federal Transit Administration (FTA) Circular 4702.1.B.

II. Overview of Services

Concho Valley Transit (CVT) is a political subdivision of Texas that Texas Transportation Code Chapter 458 authorizes, and therefore receives state funds for transit services. CVT serves as a rural transit district (RTD) for 12 counties in central and western Texas, including Coke, Concho, Crockett, Irion, Kimble, McCulloch, Menard, Reagan, Schleicher, Sterling, Sutton, and Tom Green. In 2006, CVT took over the responsibility from the City of San Angelo to provide public transportation for the San Angelo urbanized area (UZA), and CVT serves as an urban transit district (UTD) as well.

As a RTD, CVT operates demand-response service in rural areas of Tom Green County and all of the rest 11 counties. CVT develops a fixed schedule for each county to provide regular out-of-county bus service. As a UTD, CVT operates fixed-route service and ADA paratransit service within the city limit of San Angelo, and for the San Angelo UZA outside the city limit. In addition, CVT contracts with American Medical Response to provide non-emergency medical transportation for eligible residents in the entire Concho Valley Region. CVT also partners with several local agencies and organizations, such as Foster Grandparents, Senior Companion and Area Agency on Aging, to provide transit services to their clients.

III. Policy Statement and Authorities

Title VI Policy Statement

Concho Valley Transit is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Concho Valley Transit’s Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Signature of Authorizing Official

Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, 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 (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation— Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy

Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

IV. NONDISCRIMINATION ASSURANCES TO COG

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when CVCOG submits its annual certifications and assurances to FTA.

As part of the Certifications and Assurances submitted to at the time of grant application and award, Concho Valley Transit submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination because of a disability (ADA).

In signing and submitting the assurance, Concho Valley Transit confirms to CVCOG our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Concho Valley Transit’s Title VI Implementation Plan 2023-2025. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of CVT’s transportation services on the basis of race, color, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

Signature of Authorizing Official

DATE

Councilman Harry Thomas, CVT Board Chairman

Concho Valley Transit

NOTE: ****Provide here**** a copy of meeting minutes, resolution, or other appropriate documentation showing that the board of directors or appropriate governing entity of official(s) responsible for policy decisions has reviewed and approved the Title VI Program.

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Concho Valley Transit's Title VI Manager and be responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Title VI Manager Responsibilities

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI Responsibilities of the Agency

The Title VI Manager is responsible for ensuring the aforementioned elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, CVT will maintain:

- A database or log of Title VI complaints received that tracks the investigation of and response to each complaint.

- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

Concho Valley Transit does not have subrecipients.

3. Annual Review of Title VI Program

Each year the Title VI Manager will review the agency's Title VI program to ensure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of Information Related to the Title VI Program

Information on CVT's Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document and according to federal and state laws/regulations. The Title VI program will be available in other languages when needed according to the LEP plan.

Title VI information shall be disseminated to CVT employees annually via the Employee Education form (Appendix A). This form reminds employees of the CVT 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 (Appendix B).

Title VI information posters will be prominently and publicly displayed in the CVT Multi-Modal facility and on all revenue vehicles (Appendix C). The Title VI Plan will also be posted on CVT's website at www.cvtd.org.

5. Resolution of Complaints

Any individual may exercise his or her right to file a complaint if that person believes that he/she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. CVT will report the complaint to CVCOG within three (3) business days (per CVCOG requirements), and make a concerted effort to resolve complaints locally using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported to COG in the Quarterly Report (in addition to immediately).

6. Written Policies and Procedures

CVT's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal Education

CVT's employees will receive training on Title VI policies and procedures upon hiring and annually. This training will include requirements of Title VI, CVT's obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. In addition, training will be provided when any Title VI related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of CVT's Transit Manager.

8. Title VI Clauses in Contracts

In all federal procurements requiring a written contract or Purchase Order (PO), CVT's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Procurement Manager who is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, CVT shall disseminate this information to the public by: (the following is a sample of options for Title VI notice and should be updated to reflect your agency's practice)

- posting a Title VI notice on the agency's website
- posting a Title VI notice in public areas of the agency's office(s), including the reception desk meeting rooms
- posting a Title VI notice in federally-funded vehicles
- etc.

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Sample of Narrative

Any individual may exercise his or her right to file a complaint with CVT if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to CVCOG within three (3) business days (per CVCOG requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to CVCOG.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

CVT includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

CVT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected

by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on CVT's nondiscrimination policies and procedures, or to file a complaint, please visit the website at cvtd.org or contact Concho Valley Transit, 510 N. Chadbourne St., San Angelo, TX 76903, Phone: 325.947.8729.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within CVT's passenger policies/ride guide/Other brochure.

A copy of CVT's TITLE VI COMPLAINT FORM is attached as APPENDIX D.

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or COG, or if any Title VI lawsuits are filed against CVT, the agency will follow these:

Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
- b. The complainant shall be in writing and signed by the complainant(s).
- c. The complaint should include:
 - the complainant's name, address, and contact information (i.e., telephone number, email address, etc.);
 - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance);
 - a description of the alleged act of discrimination;
 - the location(s) of the alleged act of discrimination (include vehicle number if appropriate);
 - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin;
 - if known, the names and/or job titles of those individuals perceived as parties in the incident;
 - contact information for any witnesses; and
 - indication of any related complaint activity (i.e., was the complaint also submitted to COG or FTA?).
- d. The complaint shall be submitted to the Title VI Manager at 510 N. Chadbourne, San Angelo, TX 76903 and or cvtd.org.
- e. Complaints received by any other employee of CVT will be immediately forwarded to the Title VI Manager.
- f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Operations Manager will assist the complainant in converting the verbal allegations in writing.

2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify COG (no later than three (3) business days from receipt);
 - b. notify CVT Authorizing Official; and
 - c. ensure that the complaint is entered in the complaint database.
3. Within three (3) business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If COG has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures;
 - b. reviewing routes, schedules, and fare policies;
 - c. reviewing operating policies and procedures;
 - d. reviewing scheduling and dispatch records; and e. observing behavior of the individual whose actions were cited in the complaint.
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager shall prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, COG, and if appropriate our legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation within seven business days. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to COG in the event the complainant wishes to appeal the determination. This letter will be copied to COG.
13. A complaint may be dismissed for the following reasons:
 - a. the complainant requests the withdrawal of the complaint;
 - b. an interview cannot be scheduled with the complainant after reasonable attempts; and
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to CVCOG every three years (3) and new information regarding complaints, lawsuits, or investigations shall be provided to CVCOG with the Annual Report.

SEE APPENDIX E – Investigations, Lawsuits, and Complaints Document

PUBLIC OUTREACH AND INVOLVEMENT

Public Participation Plan

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Concho Valley Transit (CVT) utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

CVT established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

CVT will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

A SAMPLE OF EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:

- a. Determining and identifying what meetings and program activities lend themselves to client public participation.**
- b. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.**
- c. Employing different meeting sizes and formats.**
- d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.**

- e. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- f. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

SEE APPENDIX F – Summary of Outreach Efforts.

VIII. ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (“LEP”)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by CVT is based on FTA guidelines.

As required, CVT developed a written LEP Plan (below). Using 2022 and American Community Survey (ACS) Census data, CVT has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population (all subrecipients are required to do this)

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2018-2022)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov for CVT’s service area. The agency’s service area includes a total of 11,861 (12.28%) of persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2018-2022 ACS Census).

Information from the 2018-2022 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. This data indicates the extent to which translations into other language are needed to meet the needs of LEP persons.

Table 1 – LEP Persons by Language Spoken at Home

Concho Valley Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	11,132	7.64%	92.43%
Other Indo-European Languages	294	0.20%	2.44%
Other Pacific Island Languages	191	0.13%	1.59%
Chinese	93	0.06%	0.77%
Thai	57	0.04%	0.47%
Laotian	48	0.03%	0.40%
Korean	40	0.03%	0.33%
Vietnamese	33	0.02%	0.27%
Gujarati	24	0.02%	0.20%
German	20	0.01%	0.17%
French	20	0.01%	0.17%
Russian	17	0.01%	0.14%
French Creole	14	0.01%	0.12%
Other Slavic Languages	13	<0.01%	0.11%
Mon-Khmer (Cambodian)	13	<0.01%	0.11%
Hindu	12	<0.01%	0.10%
Italian	9	<0.01%	0.07%
Tagalog	5	<0.01%	0.04%
Urdu	5	<0.01%	0.04%
Other Indic Languages	4	<0.01%	0.03%
Total LEP Population	12,044	8.27%	
Total Service Area Population	145,672		

Spanish or Spanish Creole (11,132) is the most widely spoken language among LEP individuals in the Concho Valley Service Area. No other language group surpasses the Safe Harbor Provision.

Factor 2: Assessment of Frequency LEP Individuals Come into Contact with the Transit Services or System (applicable if Factor 1 identifies any languages that meet the threshold)

Concho Valley Transit reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have encountered these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to CVT's customer service telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at community meetings or public hearings hosted by Concho Valley Transit;
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers).

Concho Valley Transit (CVT) found that there were a significant number of Spanish speaking passengers. To accommodate the Spanish speaking customers, we have all postings in both English and Spanish as well as utilizing Google Translator in the office when needed.

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact.

To assist in language identification, we use a language identification flashcard based what was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)

Information from Community Organizations that Serve LEP Persons

To supplement the Census, education, and labor department data, CVT conducted community outreach to the following organizations that work with LEP populations.

- *State and local governments;*

Concho Valley Transit works with entities throughout the Concho Valley Service Area as requested to include public and transportation meetings that include various human service organizations.

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Concho Valley Transit (CVT) provides the following programs, activities and services:

CVT provides public transportation which focuses on the needs for people throughout Concho Valley who have no or few transportation options as well as those who choose to ride public transit. CVT works closely with the local governments to identify transportation needs such as senior living and the LEP populations to ensure rides are provided to improve their quality of life. Stops are added along the Fixed Routes when new senior living housing is established to aid in this process as well. Specific needs include work, school, medical appointments, and shopping.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that the following services/routes/programs are currently of particular importance to LEP persons in the community.

- CVT provides demand response service in each of the 12 counties listed: Coke, Concho, Crockett, Irion, Kimble, McCulloch, Menard, Reagan, Schleicher, Sterling, Sutton, & Tom Green.

The following are the most critical services provided by CVT for all customers, including LEP persons.

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services, including reduced fare application process
- ADA paratransit services, including eligibility certification process
- Other paratransit services
- Services targeted at low-income persons

Factor 4: Assessment of the Resources Available to the Agency and Costs

Costs

The following language assistance measures are currently being provided by Concho Valley Transit:

- 20% of CVT’s Administrative Staff speak fluent Spanish.
- Use of universal signage on vehicles
- Use of google translator

We anticipate that these activities and costs will increase over time and as new routes/stops are added.

Based on the analysis of demographic data and contact with community organizations and LEP persons, CVT has determined that no additional services are needed to provide meaningful access:

Resources

Concho Valley Transit has not requested additional grant funding for language assistance. As CVT staff is utilized for assistance.

In-kind, assistance may be available through community organizations, other city or county departments, other transit agencies who may be able to partner for language assistance services.

LEP Implementation Plan

Through the four-factor analysis, CVT has determined that the following types of language assistance are most needed and feasible:

- Translation of vital documents into Spanish. These documents include:
 - CVT Guidebook
 - All printed materials on ADA Paratransit
- Translation of vital documents into Braille. These documents include:
 - ADA Paratransit Guidebook
- Attempt to hire bilingual staff with competency in spoken and written (Spanish, as appropriate for your service area).
- In-person translation for ADA eligibility inquiries as needed.

Staff Access to Language Assistance Services:

Agency staff who come into contact with LEP persons can access language services by utilizing google translator, offering the individual a translated document on hand, or transferring a call to bilingual staff (if available). All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: Calls received from LEP persons are transferred to the appropriate language speaking person usually on staff or by utilizing google translator.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: Such communications are addressed and handled by an appropriate bi-lingual staff member for accuracy purposes.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: Communication via google translate to include a person from management as well as a bi-lingual staff member (if available) to meet the needs of the person.

The following procedures are followed by operators when an LEP person has a question on board a CVT vehicle: incidents regarding a driver are usually handled over a portable communication

device with an appropriate bi-lingual staff member or a physical appearance from our supervisory team along with a language speaking staff member.

Staff Training

As noted previously, all CVT staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely encounter customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Sensitivity training is covered for all employees annually which covers LEP persons.

Providing Notice to LEP Persons

LEP persons are notified of the availability of language assistance through the following approaches:

- following our Title VI policy statement included on our vital documents;
- on our website, with the ability to translate vital documents in other languages;
- through signs posted on our vehicles and in our customer service and administrative offices;
- through ongoing outreach efforts to community organizations, schools, and religious organizations;

LEP persons will also be included in all community outreach efforts related to service and fare changes.

Monitoring/Updating the plan

This plan will be updated on a periodic basis (at least every three (3) years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, CVT will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, focus groups, community meetings, internal meetings with staff who assist LEP

persons, review of updated Census data, formal studies of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

Based on the feedback received from community members and agency employees, CVT will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore CVT will attempt to identify the most cost-effective approaches. As the community grows and new LEP groups emerge, CVT will strive to address the needs for additional language assistance.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

(this section should be updated to reflect your agency’s preferred language and procedures) This section applies to agencies providing fixed route, public transit or other agencies that have Boards or Committees. It is an FTA requirement that such committees or boards should be representative of the population served. If this doesn’t apply to your agency, do not delete it but state the reason it is not applicable. Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Concho Valley Transit has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. 1. Please provide a description of your selection process, including recruitment efforts made to encourage the participation of minorities on such committee(s). 2. Please provide a table(s) depicting the racial breakdown of the membership of those committees.

Record Keeping

The Title VI Coordinator, or his/her designee, will maintain permanent records, which include, but are not limited to, signed Acknowledgements of Receipt from employees indicating the receipt of the CVT Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

Organization and Staffing – General

The Executive Director is responsible for ensuring the implementation of Concho Valley Transit’s Title VI program. The Title VI Coordinator or investigator is responsible for the overall management of the Title VI program. The day-to-day administration of the program lies with the Title VI Coordinator.

Title VI Coordinator Contact Information

Concho Valley Transit, Title VI Coordinator - (325) 947-8729

Program Administration and Title VI Coordinator's Responsibilities

As authorized by the Executive Director of the Concho Valley Transit (CVT), the Title VI Coordinator is responsible for initiating, monitoring, and ensuring CVT's compliance with Title VI requirements as follows:

1. Process, review and investigate Title VI complaints received by CVT in accordance with Complaint Procedures. If any individual believes that he or she or any other program beneficiaries have been subject to unequal treatment or discrimination as to the receipts of benefits and/or services, or on the grounds of race, color, national origin he or she may exercise their right to file a complaint with CVT. Every effort will be made to resolve complaints informally at the local and contractor level.
2. Review special emphasis program areas to determine the effectiveness of program area activities at all levels. In addition to the day-to-day monitoring, all special emphasis program areas will be reviewed annually to ensure effectiveness in their compliance of Title VI provisions. The Title VI Coordinator and program liaisons will coordinate efforts to ensure equal participation in their program areas and activities at all levels.
3. Conduct Title VI reviews, when necessary, of contractors and other recipients of federal aid funds.
4. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.
5. Develop Title VI information for Public Dissemination and Limited English Proficiency. Ensure dissemination to the general public and, where appropriate, in languages other than English. CVT will disseminate Title VI Program information to CVT employees, contractors, subcontractors, consultants, and sub-consultants as well as the general public. Public dissemination will include posting of public statements (Appendix D) and inclusion of Title VI language in contracts. The Title VI Policy Statement will be published in newspapers having a general circulation in the vicinity of proposed projects and announcements of hearings and meetings in minority publications.
6. Prepare an Annual Title VI Update Report. The update will report on any accomplishments and changes to the program occurring during the preceding year.
7. Schedule training for Title VI related statutes for appropriate CVT employees. The training will provide comprehensive information on Title VI provisions, its application to program operations, identification of Title VI issues and resolution of complaints.
8. Identify and eliminate discrimination when found to exist. Work with CVT offices and departments to establish procedures for promptly resolving deficiencies. Procedures will be

implemented to identify and eliminate discrimination when found to exist, including, but not limited to utilization of disadvantaged business enterprises, public involvement and property acquisition.

9. A list of all Title VI complaints, investigations and lawsuits received since the last Title VI Program submission will be provided to FTA in the triennial update (Appendix I).

10. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary within a period not to exceed 90 days. The CVT will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, procedures will be promptly implemented to resolve Title VI issues, and reducing to writing remedial action agreed necessary within a period not to exceed 90 days.

11. Maintain updated legislative and procedural information regarding CVT's Title VI Program. This will include federal laws, rules and regulations, local guidelines, CVT Plan and updates, and other resource information pertaining to Title VI issues.

Complaint Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 relating to any transportation or program or activity administered by CVT, as well as to sub-recipients, consultants, and contractors. These procedures apply to complaints filed against a program and/or activity funded by either the Federal Transit Administration (FTA), the Federal Highway Administration (FHWA), and other Federal offices.

The complainant may file a signed, written complaint up to one hundred eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

1. The complainant's name, mailing address, and contact information (i.e. telephone number, email address, etc.)
2. How, when, where, and why the complainant believes he/she was discriminated against. Include the location, names, and contact information of any witnesses.
3. Other information that deemed significant by the complainant.

The Title VI Complaint Form (Appendix E) may be used to submit the complaint information.

Title VI Complaints are to be filed in writing to:

Title VI Coordinator
Concho Valley Transit
510 N Chadbourne
San Angelo, TX 76903

Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by CVT will be directly addressed by CVT. CVT shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, CVT shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledgment of receipt of complaint (Appendix F) will be mailed within seven 7 business days. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

The 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.

These procedures are part of an administrative process, which do not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

How will the complainant be notified of the outcome of the complaint?

CVT will send a final written response letter (Appendix G or H) to the complainant. In the letter notifying the complainant that the complaint is not substantiated (Appendix G), the complainant is also advised of his or her right to 1) appeal within seven (7) calendar days of receipt of the final written decision from CVT, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Title VI Emphasis in Transportation Planning Process

Intent of the Public Involvement Policy

CVT's policy is to be proactive in reaching out to the community and encouraging input from the public. The public involvement process should be an integral part of an agency's activities and its adequacy should be explicitly considered each time an agency makes major program changes, initiates new studies to identify solutions to transportation problems, and updates its plans. The Public Involvement Policy (PIP) is the official procedure document for CVT, to ensure that the transportation planning process includes input from the citizens, advisory committee, private transportation providers, agencies, and other interested parties.

Recognizing the importance of public involvement, CVT's goal is an effort which provides for:

- The public being informed fully about transportation issues throughout the process;
- The public has adequate opportunity to express opinions and concerns about public transportation issues in an orderly manner and appropriate forum; and
- Public transportation plans, policies, and decisions have public support.

The procedures for public participation are intended to allow for orderly public interaction with the CVT Board and staff. The PIP will include public involvement procedures for the planning documents and any other public transportation planning initiatives and/or studies that have a significant scope or impact.

The CVT relies on the San Angelo Metropolitan Planning Organizations public participation process to satisfy the requirements for the Program of Projects. The CVT and the San Angelo MPO coordinates in ensuring that the public participates in the TIP development process. However, the CVT has developed this document to guide its public participation efforts regarding fare changes, reduction of services, and major modifications of the fixed route system.

San Angelo Metropolitan Planning Organization (SAMPO) annually updates and coordinates CVT's future plans for transportation improvement programs and projects. The update also informs other CVT jurisdictions of the current planning direction for transportation needs. Projects included in the update are the result of evaluation and prioritization of needs in various transportation areas. The evaluation process includes input from local jurisdictions and organizations, citizen groups, and private individuals.

In addition, SAMPO utilizes a comprehensive transportation planning process which incorporates input from the public. The process further entails the monitoring and collection of varied data pertaining to transportation issues. SAMPO also coordinates the establishment of new transportation corridors within the district.

SAMPO has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public has been invited to participate in these activities:

Transportation Improvement Plan (TIP). The TIP is a fiscally constrained four-year planning document that addresses transportation project and programs including: federal, state and local highways, transit, ridesharing, bike paths and pedestrian facilities. The TIP process includes public hearings and public comment periods.

Regional Transportation Coordination

CVT is the lead agency for Regional Transportation Coordination in the Concho Valley Region. Coordination meetings are held quarterly with multiple stakeholders and other interested parties, with representatives from the following agencies/groups regularly attending: San Angelo Metropolitan Planning Organization, Workforce Development Center, Area Agency on Aging, San Angelo Health Foundation, Concho Valley Council of Governments, and the United Way of the Concho Valley.

CVT Board Meetings

The CVT Board shall meet at least four (4) times a calendar year, at least once each quarter or as often as the CVT Board desires to conduct the business of the CVT. The Board shall determine the time and place of such meetings.

The meetings of the CVT shall be subject to the Open Meetings Act of 1967 as amended (Article 6252-17c of Texas Vernon's civil statutes). (**Chapter 551 of the Texas Government Code**) Additionally any ad hoc or advisory committee formed under the auspices of the Board shall be subject to the same provisions.

Records of meetings of CVT are subject to the provisions of the Open Records Act, Texas Vernon's Civil Statutes Article 6252-17a as amended. **Texas Government Code Chapter 552.** The Board shall keep written minutes of each meeting, which shall include a record of members present and the votes on all motions.

The public shall be given an opportunity to participate at every public meeting by public comment periods. CVT staff is responsible for preparing the meeting agenda. CVT staff shall provide any technical assistance necessary during the meeting or will arrange for others to provide the technical assistance.

Notification will be provided through the following methods:

- CVT staff will post meetings at the Tom Green County Courthouse or on the CVCOG outdoor bulletin board and on the CVT website (<http://www.cvt.org>) a minimum of seventy-two (72) hours in advance.
- CVT staff will send notifications of meetings via e-mail or mail to all persons in the notification database.
- Texas Secretary of State website <http://www.sos.state.tx.us/texreg/index.shtml>
- Meetings will be held at handicap accessible locations. CVT will make available meeting minutes, roster of attendees, and relevant documents at the CVT office and on CVT's website.

Public Meetings

CVT will hold public hearings prior to a decrease in service or an increase in fares. Major modifications to the fixed route system that constitute a greater than 25% change will also require a public hearing. Scheduling public hearings will be in a manner that makes them accessible to the community. The date, time, location, and subject matter of the hearing will be published in the

local newspaper and on the CVT website at least seventy-two (72) hours in advance. The meetings dates will be a minimum of ten calendar days prior to the adoption of the plan.

CVT staff shall notify local government and the public access channel of public hearings. CVT will be responsible for preparing an agenda, distributing announcements, providing technical assistance, making presentations or arranging for others to make a presentation. This includes the rural counties in the Concho Valley Region and the Regional Coordination Planning Area.

Public Appearances

CVT will make every effort to comply with requests from civic or professional groups, organizations, or committee to present or discuss information related to the work of CVT. Organizations should contact CVT and allow ample time for CVT staff to arrange to attend.

Advisory Committee

To assist in soliciting public opinion and comment, and other issues affecting CVT and the community, the CVT Board may designate an Advisory Committee. The Advisory Committee will be a combination of volunteers from the community who are key public representatives and concerned citizens, and the Committee will seek comments from community groups. CVT staff will provide assistance for the Committee or will arrange for other assistance. Committee will serve at the discretion of the CVT Board.

Title VI Responsibilities

1. Ensure that all aspects of the transportation planning process comply with Title VI.
2. Ensure participation of a cross section of various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic organizations and participating in roundtable meetings in minority communities when applicable.
3. Assist the Title VI Coordinator in gathering and organizing information for internal annual Title VI Update Reports.
4. Review the Program Development work program and other directives to ensure compliance with Title VI program requirements.
5. Gather statistical data on program participation regarding race, color, and national origin.

Limited English Proficiency (LEP) Analysis and Assistance Plan

Individuals with a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." According to the 2013 American Community Survey (ACS) and the 1990

and 2000 Decennial Census, LEP individuals accounted for 25.1 million, or 8.5 percent, of the US population over age 5. Between 1990 and 2013, the LEP population grew 80 percent from nearly 14 million to 25.1 million. The highest concentrations of LEP individuals were found in the six traditional-destination states – California, Texas, New York, Florida, Illinois, and New Jersey. These states each had 1 million or more LEP residents and together represented approximately two-thirds of the total LEP population.

Spanish-speaking LEP individuals accounted for 64 percent of the total US LEP population in 2013. The next two languages most commonly spoken were Chinese and Vietnamese, which accounted for 6 percent and three percent, respectively. While the predominance of Spanish eclipses other languages spoken by LEP individuals in terms of share and absolute number, the diversity of other LEP-spoken languages has important implications for government agencies, businesses, and communities in which LEP individuals reside, particularly when vital information must be communicated to all residents.

In 2013, five languages – Spanish, Chinese, Vietnamese, Korean, and Tagalog – were spoken by 80 percent of all LEP individuals. The six through tenth most common languages spoken by LEP individuals – Cambodian, Laotian, Russian, Armenian, and French Creole languages – were distributed roughly equally.

Public transit is a key means of achieving mobility for many LEP persons. According to the 2000 Census, more than 11 percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 4 percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transportation at higher rates than native-born adults. Agencies that provide language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers.

Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways: (1) agencies that reach out to recent immigrant populations in order to prepare a language implementation plan send a positive message to these persons that their business is valued; and (2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations.

Legal Basis for Language Assistance Requirements

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

The U.S. DOT requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). DOT recommends that recipients use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

Evaluation

The Four Factor Analysis

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

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

1. Language Fluency – All Counties

Source: 2018-2022 American Community Survey 5-Year Estimates

	Language Spoken At Home	Population 5 Years and Over	English Only	Language other than English	Speak English less than "very well"	Spanish	Speak English less than "very well"	Other Indo-European languages	Speak English less than "very well"	Asian and Pacific Islander languages	Speak English less than "very well"	Other language	Speak English less than "very well"
Coke Estimates	#	3,173	2,825	348	146	322	96	0	0	26	10	0	0
	%		89%	11%	4.63%	10.1%	27.6%	0%	0.0%	.08%	38.5%	0.00%	0.00%
Concho Estimates	#	3,106	1,999	1,107	622	568	622	36	0	16	0	2	0
	%		64.4%	35.6%	20.0%	54.5%	22.24%	100%	0.00%	59.3%	0.00%	100%	0.00%
Crockett Estimates	#	2,850	1,202	1,648	154	1,648	154	0	0	0	0	0	0
	%		42.2%	57.8%	5.4%	57.8%	5.4%	0%	0.00%	0.00%	0.00%	0%	0%
Irion Estimates	#	1,515	1,199	316	9	316	9	0	0	0	0	0	0
	%		79.1%	20.9%	0.6%	20.9%	0.6%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Kimble Estimates	#	4,078	3,372	706	200	687	195	0	0	0	0	5	0
	%		82.7%	17.3%	4.9%	16.8%	28.4%	0.00%	0.00%	0.00%	0.00%	26.3%	0.00%
Mason Estimates	#	3,619	2,976	643	283	522	283	117	24	4	0	0	0
	%		82.2%	17.8%	7.8%	14.4%	7.8%	3.2%	20.5%	0.1%	0.00%	0.00%	0.00%
McCulloch Estimates	#	7,225	5,377	1,848	435	1,788	432	52	0	8	0	0	0
	%		74.4%	25.6%	6%	24.7%	24.2%	0.7%	0.00%	0.1%	0.00%	0%	0.00%
Menard Estimates	#	1,888	1,428	460	131	460	131	0	0	0	0	0	0
	%		75.6%	24.4%	6.9%	24.4%	6.9%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Reagan Estimates	#	3,010	1,407	1,603	465	1,532	465	0	0	71	32	0	0
	%		46.77%	53.3%	15.4%	50.9%	15.4%	0%	0.00%	2.4%	45.1%	0.00%	0.00%
Schleicher Estimates	#	2,265	1,434	831	140	873	140	0	0	8	0	0	0
	%		63.3%	36.7%	6.2%	36.3%	6.2%	0.00%	0.00%	0.4%	0.00%	0.00%	0.00%
Sterling Estimates	#	1,266	992	274	50	274	50	0	0	0	0	0	0
	%		78.4%	21.6%	3.9%	21.6%	3.9%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Sutton Estimates	#	3,162	1,435	1,727	455	1,717	455	0	0	10	0	0	0
	%		45.4%	54.6%	14.4%	54.3%	14.4%	0.00%	0.00%	0.3%	0.00%	0.00%	0.00%
Tom Green Estimates	#	111,675	84,541	27,134	6,913	25,129	6,913	1,007	102	780	420	218	66
	%		75.7%	24.3%	6.2%	22.5%	6.2%	.9%	10.1%	0.7%	53.8%	.2%	30.3%
Total – All Counties	#	149,704	108,779	40,925	10177	38,669	9,727	291	68	297	77	1,593	305
	%		72.66%	27.34%	6.80%	25.83%	6.50%	0.19%	0.05%	0.20%	0.05%	1.06%	0.20%

2. Language Spoken at Home – All Counties

Source: 2018-2022 American Community Survey 5-Year Estimates

	Coke	Concho	Crockett	Irion	Kimble	Mason	McCulloch	Menard	Reagan	Schleicher	Sterling	Sutton	Tom Green	Total
English Only	2,801	2,506	1,697	1,257	3,436	3,036	6,149	1,586	1,375	1,654	737	1,851	80,694	108,779
Spanish	342	1,182	1,680	257	718	703	1,492	490	2,088	1,254	289	1,790	26,384	38,669
French					4		8					29	138	179
French Creole		3												3
German	4	2			19	47				6		12	204	294
Russian							13						79	92
Other Slavic Languages		7												7
Persian		11												11
Other Indic Languages													7	7
Other Indo-European Languages	2	18	53						21				197	291
Chinese	5												60	65
Korean						14							229	243
Vietnamese		38				61							70	169
Other Asian Languages						20							277	297
Tagalog						7							194	201
Other Pacific Island Languages		5	24			1						29	412	471
Arabic							2						53	55
Urdu							24							24

Factor 2: The Frequency with Which LEP Individuals Come into Contact with Your Programs, Activities, and Services

CVT has two primary types of transportation services that are provided to the general public, para-transit and fixed routes. All of these services are accessible by LEP persons and the areas we predict they originate. Although these services are accessible to LEP populations, we would like to grow the number of LEP riders by making available materials, training, and outreach services that would help serve this population better. CVT has completed Spanish language translations of all vital documents and signage at the Multi-Modal Terminal and on all revenue vehicles.

Several of CVT's drivers, both para-transit and fixed route, three customer service representatives, one supervisor, and the administrative office full-time receptionist speak Spanish with proficiency. Their ability to speak with our LEP population has allowed us to continue to serve the needs of the majority of the LEP public. Though this helps us significantly, there are many obvious barriers of having only a limited number of people who can assist most of our LEP population such as, but not limited to, being tied up with other tasks, unavailable during breaks, taking days off, and being busy communicating with other customers.

In order to better determine CVT's current interactions with LEP populations, CVT will administer an internal survey of its employees' experiences with LEP populations. The findings of the survey will hopefully provide us with areas of needed improvement.

Factor 3: Assessing the Nature and Importance of Program, Activity, or Service to LEP Individuals

Both types of transportation that CVT provides are equally important to LEP individuals. Paratransit services provide transportation for critical needs that transcend all rider types. These rides provide critical access to medical appointments, nutrition, health and human service organizations, employment, pharmacies, and education. Additionally, para-transit services provide transportation to places that improve the quality of life, including friends, relatives, entertainment, and the arts. The nine fixed routes in the City of San Angelo provide access to Angelo State University, Howard College, West Texas Training Center, Workforce Solution of the Concho Valley, and several branches of the Tom Green County Library system, all of which can assist in language and workforce education.

Factor 4: Resources Available to the Recipient and Costs

US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, 'reasonable steps' may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-

effective means of delivering competent and accurate language services before limiting services due to resource concerns.”

Based on this guidance, we have reviewed our resources and deemed that given the high concentration of LEP individuals in our service area, upon request we will translate our vital documents into the language requested to ensure accessibility.

With our limited funds chasing increasing demand, CVT is not able to allocate funds solely for the purpose of assisting LEP populations. At the current time, CVT does not have the technical assistance, experience, and funds to identify the total costs associated with fully implementing the necessary new or improved programs and services for LEP individuals.

Safe Harbor Stipulation

Federal law provides a “safe harbor” situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A “safe harbor” means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance that can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient’s written translation obligations under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% of 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

LEP Program Action Plan

Within the next three years, CVT will work at completing the following activities to further enhance its LEP Program as it relates to the provision of transportation services and transit-related benefits:

1. Identify language concentrations by census tract and fixed routes.

2. Establish relations with more agencies and organizations serving LEP persons.
3. Get feedback from agencies regarding key languages being used in the service area.
4. Get feedback from agencies regarding language services needed.
5. Identify the resources agencies may have to assist CVT with LEP persons as it relates to provision of transportation services or transit-related benefits.
6. Explore the possibility of developing contracts or service relationships for language services.
7. Develop materials in alternate languages, as applicable.
8. Continue to provide training for drivers including how to respond to LEP individuals and awareness of services available in dealing with LEP individuals.
9. Continue to provide training for administrative and customer service staff including awareness of services available, how to respond to LEP individuals in person, to LEP callers, and to LEP correspondence.

Public Participation Plan

Concho Valley Transit System is the transit system providing public transportation for the San Angelo Metropolitan Service Area. Concho Valley Transit System uses the Public Participation Plan (PPP) developed and utilized by the San Angelo Metropolitan Planning Organization and works with the MPO to meet the standards and regulation within. The Public Participation Plan for CVT emphasizes the importance of early, on-going public involvement in the transit planning process. Early public involvement enables Concho Valley Transit System to make more informed decisions, improve quality through collaborative efforts, as well as build mutual understanding and trust between Concho Valley Transit System and the public.

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

Public Participation Goals and Objectives

Concho Valley Transit System Goal: To develop and provide public transit services in the CVT Service Area by engaging in comprehensive planning activities to include public involvement and consultation with public officials.

The following objectives will enable Concho Valley Transit System 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 Businesses/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 CVT Transit System LEP Program in an effort to reach and communicate with persons speaking a language other than English.
 4. Establish meeting opportunities at times and locations that maximize public engagement and participation. Phone calls and emails are also encouraged for persons who are unable to attend a forum
 5. Continuously evaluate public involvement strategies and make changes as needed to improve the effectiveness of public participation.

All persons attending the public meetings will be asked to sign a roster that will be maintained by the MPO.

Public Participation Plan Elements

The Public Participation Plan is intended to provide direction for public involvement activities to be conducted by the Concho Valley Transit System and contains the goals, objectives, and techniques used by the Concho Valley Transit System for public engagement. In its public participation process, Concho Valley Transit System will:

- Provide timely information about transit issues, process, and plans to stakeholders, interested parties, and the general public.
- 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.
- Report (when significant written or oral comments are received ‘during the planning process as a result of public outreach and participation process) on the disposition of comments in the final plan.
- Solicit the needs and input of historically under-served individuals and agencies that provide services to the same.
- Provide a public comment period of 45 calendar days prior to the adoption of the MTP and the TIP; and a public comment period of at least 10 calendar days prior to the adoption of any formal amendments or updates.

Minutes of public meetings shall be maintained by the MPO (with whom Concho Valley Transit System works in conjunction) for a period of five (5) years. Current minutes of the public meetings will be maintained on the MPO website as shown below. The public will be given an opportunity to comment on or at every public meeting or forum.

This Public Participation Plan will be made available during regular business hours at:

Concho Valley Transit
510 N. Chadbourne Street
San Angelo, Texas 76903
www.cvtd.org

San Angelo MPO
510 N. Chadbourne Street
San Angelo, Texas 76903
www.sanangelompo.org

2023-2024 Regional Coordination Planning Committee Stakeholders

Disability Connections
MHMR
Tx Hunger Initiative
Workforce Solutions
CV Workforce
CV Community Action
United Way
Area Agency on Aging
Children's Advocacy Center
Sterling County Judge
Eldorado City Manager
San Angelo MPO
TxDOT
ASU
Adult Literacy Council
Menard Senior Center
City of Big Lake
Sutton County Senior Center
Crockett County Senior Center
Junction Senior Center

Minority Participation within the Planning and Advisory Bodies

Concho Valley Transit understands the importance of diverse representation on committees, councils and boards. The inclusion of minority participants on the Planning and Advisory Board results in adequate policies and procedures reflective of its entire population. As such, CVT encourages participation of all its citizens.

As vacancies on the Stakeholder's Committee become available, CVT will make efforts to encourage and promote diversity.

To encourage participation on this board, CVT will continue to reach out to communities and organizations to connect with all populations within the Concho Valley. In addition, CVT will

make participating realistic and reasonable. Accommodations will be made when available, such as: scheduling times so that all members can be present, transportation to and from the meeting site or providing meeting information via email or in person.

Construction Program Requirement

If CVT begins any construction projects, a Categorical Exclusion (CE) will be prepared for the NEPA requirement and the community disruption and environmental justice sections of FTA standard CE Checklist will be completed. CVT will also complete a Title VI Equity Analysis on the chosen location of the proposed property during the planning stages of construction. The analysis will ensure that the selection of the location does not result in adverse or disparate impact.

System-Wide Service Standards and Policies

1. Vehicle loads for the fixed route system set up by Concho Valley Transit has been studied and set up to efficiently and effectively serve the community of the City of San Angelo with peak time vehicle loads being 1.1 and off-peak time loads being 0.7. If vehicle peak time loads exceeds 1.25 the driver will notify Dispatch and a supervisor will be consulted to relieve the pressure on that route until the demand diminishes.
2. Headway for fixed route system is 50 minutes at this time. If traffic, construction or passenger load creates a delay in Headway the driver will contact Dispatch and a supervisor will be consulted to determine if relief is needed to correct the headway issue.
3. On-time performance will be measured in early or delayed arrival at locations spelled out in the route schedule or arrival back at the main terminal. These performance standards will be maintained in order to efficiently and reliably serve the public citizenry of San Angelo. Early arrival at any destination or designated location is not permissible. Late arrival at any destination or designated location is allowable up to 5 minutes after the designated time. If Construction, traffic or other factors cause a route to run in excess of 5 minutes late the driver will notify Dispatch and a supervisor will be consulted to determine if relief is needed to correct the delays.
4. The Service availability of our fixed routes will be determined based on Census information and likely need to the areas of the community based on demographics of the city, needs of the portion of the community intended to be served in those areas and population increase or decrease as well. All fixed routes have designated pick up areas.
5. Distribution of transit amenities for our fixed route system includes but is not limited to bus stop benches at some designated bus stops depending on ridership and needs of the community. Printed signs are available in the Multi-Modal Terminal lobby as well as outside the lobby in public display cases. Also, ample numbers of individual Route schedules with maps included are available at the Multi-Modal facility, in several locations around the city, and on CVT's website at www.cvtd.org.
6. Vehicle assignments are assigned each day a vehicle determination is made depending on vehicle availability and ridership on each route. Generally speaking, each fixed route will be assigned a bus capable of carrying 23 passengers and a total of two-wheel chairs at a minimum. However, in the case where a bus of this size may not be available a smaller bus may be assigned to the Route with the lowest ridership and/or shortest route.

7. CVT fixed route will abide by the 49 CFR for the following ADA Fixed Route service requirements:
 - a. When wheelchair lifts are inoperable, the CVT driver can deploy the ramp manually, or call a supervisor for assistance in an alternative transportation.
 - b. Drivers will allow adequate time for persons with disabilities to board and deboard the vehicle.
 - c. Drivers will make stop announcements at major intersections and landmarks, or as requested by a passenger.
 - d. Route numbers will be visible and will be announced upon request.

Appendix A
Employee Annual Education Form
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 Concho Valley Transit 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, direct him or her to the Title VI Coordinator.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them, without regard to race, color or national origin.

Appendix B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Concho Valley Transit Title VI Plan. I have read the plan and 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 in Federal Transit Administration (FTA) Circular 4702.1.B.

Employee Signature

Print Name

Date

Appendix C

Concho Valley Transit Title VI Notice to Public

Concho Valley Transit (CVT) hereby gives public notice that it is CVT's policy to assure full compliance with Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

CVT is 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 in Federal Transit Administration (FTA) Circular 4702.1.B. If you feel you are being denied participation in or being denied benefits of the transit services provided by CVT, or otherwise being discriminated against because of your race, color, or national origin, you may contact our Title VI Coordinator at (325) 947-8729. Any such complaint must be in writing and filed with the Concho Valley Transit Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant by calling (325)947-8729 or on our website www.cvtd.org.

For additional information on CVT's nondiscrimination policies and procedures, or to file a complaint, please visit the website at cvtd.org or contact Concho Valley Transit, 510 N. Chadbourne St., San Angelo, TX 76903, Phone: 325.947.8729.

This notice is to be posted in the office of CVT, in the CVT Multi-Modal Terminal, on the CVT website, and on all revenue vehicles.



Concho Valley Transit Título VI Aviso Público

Concho Valley Transit (CVT) se da aviso público que es política de CVT para asegurar la completa conformidad con el título VI de la ley de derechos civiles de 1964. Título VI de la ley de derechos civiles de 1964 prohíbe la discriminación por raza, color u origen nacional en programas y actividades que reciben asistencia financiera Federal. En concreto, título VI establece que "ninguna persona en los Estados Unidos, por razón de raza, color u origen nacional, se excluirá de la participación en, ser negada los beneficios de o ser sujeta a discriminación bajo cualquier programa o actividad recibir Asistencia financiera federal"(42 U.S.C. sección 2000 d).

CVT se compromete a garantizar que ninguna persona es excluida de la participación en, o negada los beneficios de sus servicios de transporte sobre la base de raza, color u origen nacional, como protegido por el título VI en tránsito Federal administración (FTA) 4702.1.B Circular. Si usted siente que se les niega participación en o se les niega los beneficios de los servicios de transporte prestados por CVT o de lo contrario ser discriminadas debido a su raza, color, origen nacional, puede comunicarse con nuestro título VI Coordinador en (325) 947-8729. Cualquier denuncia debe ser por escrito y ante el Coordinador del Concho Valley Transit título VI dentro de ciento ochenta 180 días siguientes a la fecha de la supuesta ocurrencia discriminatoria. Título VI formularios de queja de discriminación puede obtenerse de esta oficina sin costo alguno al demandante, llamando al (325)947-8729 o en nuestro sitio web www.cvtd.org.

Este aviso debe ser publicada en la oficina de CVT en la Terminal multimodal de CVT, en el sitio web de la CVT y en todos los vehículos de ingresos.



Concho Valley Transit
 510 N. Chadbourne
 San Angelo, TX 76903
 Phone: 325.947.8729 Fax: 325.227.6852
 Email : cvtinfo@cvcog.org
 Web site: www.cvtld.org

Appendix D

Title VI Complaint Form

Complaint Form Instructions: If you would like to submit a Title VI complaint to Concho Valley Transit (CVT), please fill out the form below and send it to: Concho Valley Transit, Attn: Title VI Coordinator, 510 N Chadbourne, San Angelo, Texas 76903. For questions or a full copy of CVT’s Title VI policy and complaint procedures call 325-947-8729

1. Name (Complainant):	
2. Phone:	3. Home address (street no., city, state, zip):
4. If applicable, name of person(s) who allegedly discriminated against you:	
5. Location and position of person (s) if known:	6. Date of incident:
7. Discrimination because of: <input type="checkbox"/> Race <input type="checkbox"/> Other <input type="checkbox"/> Color <input type="checkbox"/> National Origin	
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.	

9. Why do you believe these events occurred?			
10. What other information do you think is relevant to the investigation?			
11. How can this/these issue(s) be resolved to your satisfaction?			
12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):			
Name:	Address:	Phone Number:	
13. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, check all that apply:			
<input type="checkbox"/> Federal agency		<input type="checkbox"/> Federal Court	<input type="checkbox"/> State court
<input type="checkbox"/> Local agency		<input type="checkbox"/> State agency	
If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.			
Agency/Court:	Contact's Name:	Address:	Phone number:
Signature (Complainant)		Date of filing:	



Concho Valley Transit

510 N. Chadbourne

San Angelo, TX 76903

Phone : 325.947.8729 Fax : 325.227.6852

Email : cvtinfo@cvcog.org

Web site: www.cvtd.org

Forma de Queja de Discriminación de Título VI

Enviar forma firmada: Concho Valley Transit, Attn: Title VI Coordinator, 510 N Chadbourne, San Angelo, Texas 76904 o por fax al 325-944-9925

Apellido:		Nombre:	
Teléfono:		Dirección:	
Ciudad:	Estado:	Código Postal:	
Correo Electrónico:		Teléfono Alternativo:	
<p>Indica por favor la(s) base(s) de su queja:</p> <p><input type="checkbox"/> Raza <input type="checkbox"/> Otra</p> <p><input type="checkbox"/> Color</p> <p><input type="checkbox"/> Origen Nacional</p>			
<p>Fecha y lugar de la(s) presunta(s) acción(es) discriminatoria(s). Favor de incluir la primera fecha de la presunta discriminación y la fecha más reciente de la presunta discriminación.</p>			
<p>Como se discrimino contra usted relacionado a transportación pública? Describa la naturaleza de la acción decisión a las circunstancias de la presunta discriminación. Explique, de la manera más clara posible, que sucedió y porque cree usted que su status protegido fue un factor en la discriminación. Incluya como otras personas fueron tratadas de distinta manera que usted. (Adjunte hojas adicionales de ser necesario).</p>			
<p>La ley prohíbe intimidación o represalias contra cualquier persona ya sea por tomar acción o por participar en la toma de acción para asegurar los derechos protegidos por estas leyes. Si usted siente que se han tornado represalias en su contra, aparte dela presunta discriminación mencionada anteriormente, favor de explicar las circunstancias a continuación. Explique la acción que usted tomo que cree sea la causa de la presunta represalia.</p>			

Nombre de los individuos responsables de la(s) acción(es) discriminatoria(s):		
Nombre de personas (testigos, compañeros de trabajo, supervisores u otros) a quienes podamos contactar para obtener información adicional para respaldar o aclarar su queja: (adjunte hojas adicionales de ser necesario).		
Nombre:	Dirección:	Teléfono:
<p>Alguna vez ha presentado, o tiene la intención de presentar, una queja con respecto a esta situación con cualquiera de las organizaciones que se mencionan a continuación? De ser así, favor de proporcionar las fechas en que se presentaron. Marque todas las que apliquen.</p> <p><input type="checkbox"/> Departamento de Transporte de los EE.UU. _____</p> <p><input type="checkbox"/> Administración Federal de Carreteras de los EE.UU. _____</p> <p><input type="checkbox"/> Administración de Transporte Federal de los EE.UU. _____</p> <p><input type="checkbox"/> Oficina de Programas de Cumplimiento de Contratos, Federales de los EE.UU. _____</p> <p><input type="checkbox"/> Comisión para la Igualdad de Oportunidades en el Empleo de los EE.UU. _____</p> <p><input type="checkbox"/> Tribunal Federal O Estatal de los EE.UU. _____</p> <p><input type="checkbox"/> Otros _____</p>		
Ha hablado sobre la queja con algún representante de CVT ? De ser así, favor de proporcionar el nombre y puesto de la persona y la fecha en la que tuvo la conversación.		
Explique brevemente que remedio, o acción está usted buscando por la presunta discriminación.		
Favor de proporcionar cualquier información adicional y/o fotografías, si son pertinentes, que usted crea ayudaran el la investigación.		
No podemos aceptar una queja sin firma. Favor de incluir su firma y la fecha a continuación:		
Firma del Demandante: _____		
Fecha: _____		

Appendix E

Investigations, Lawsuits, and Complaints Document

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) taken
Investigations				
1	None			
Lawsuits				
1	None			
Complaints				
1	None			

Appendix F

Summary of Outreach Efforts

CVT's Public Outreach Efforts

- IX. Determine and identify what meetings and program activities lend themselves to client public participation.
- Foster Grandparents
 - Senior Companion
 - Area Agency on Aging
 - Angelo State University
 - Howard College
 - Goodfellow Air Force Base
 - Shannon Medical Center
 - Concho Valley Workforce Solutions
 - HEB Feast of Sharing
 - Disability Connections
 - West Texas Lighthouse for the Blind
- X. Schedule meetings and times that are convenient and accessible for minority and LEP communities. Offer transportation when having meetings at the CVT Depot Annex building.
- XI. Employing different meeting sizes and formats.
- XII. Coordinate with community organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- XIII. Consider social media, television, or radio ads and publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- XIV. Provide opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.