

Title VI and LEP Plan Agency

Name: Heart of Texas Council of Governments RTD

Date Adopted: June 22, 2017

Description of service

HOTCOG/RTD utilizes two employees, two subcontractors and twenty seven ADA accessible vehicles in a purchase of service program to provide curb to curb demand response service in Bosque, Falls, Freestone, Hill and Limestone Counties 6 am to 6 pm Monday through Friday. HOTCOG/RTD administers a 5311 non-urbanized general public transportation and 5310 Enhanced Mobility for Seniors and Individuals with disabilities programs as a sub recipient of Texas Department of Transportation Public Transportation Division through the two employees and two subcontractors.

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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 a n y program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Heart of Texas Council of Governments RTD (HOTRTD) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This plan was developed to guide HOTRTD in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Rep Pledger
Transportation Manager
Heart of Texas Council of Governments / Rural
Transit District 1514 S. New Road
Waco, Texas 76711

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in the HOTRTD facilities and on their revenue vehicles. Additional information relating to nondiscrimination obligation can be obtained from the HOTRTD Transportation Manager.

Title VI information shall be disseminated to HOTRTD employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the

HOTRTD policy statement, and of their Title VI responsibilities in their daily work and duties. During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and HOTRTD's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgment of Receipt (see Appendix B).

III. Record Keeping

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

IV. Title VI Complaint Procedures How to file a complaint

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

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with HOTRTD at the following address:

HOTCOGRTD
Attention: Transportation
Manager 1514 S New Road
Waco, TX 76711

NOTE: HOTRTD encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

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 HOTRTD will be directly addressed by HOTRTD. HOTRTD shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. HOTRTD shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Appendix D). Additionally, HOTRTD will notify its Public Transportation Coordinator (PTC) by email or fax of any Title VI-related complaints within 10 working days of the receipt of the complaint. 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.

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

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

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Texas Department of Transportation
TXDOT-PTN
125 E. 11th Street
Austin, TX 78701-2483

Federal Transit Administration Office of Civil Rights Attention:
Title VI Program Coordinator
East Building 5th Floor -TCR 1200
New Jersey Ave., SE Washington,
DC 20590

Transit-related TVI investigations, Complaints and Lawsuits

Please see example table in Appendix H

V. Public Participation

HOTRTD will work with HOTCOG staff to identify targeted minorities and LEP populations within the service area. HOTCOG staff will supply demographic information to the lowest census level possible within the region to identify specifically what minority populations exist within the HOTRTD service area. HOTRTD will identify the appropriate locations to disseminate information to the identified populations (e.g., church, neighborhood gathering space) to seek comment, interest in new service or service revisions and/or extensions. HOTRTD will document and maintain on file all activities related to Title VI outreach. This plan and documentation will be made available at TXDOT’s and or the FTA’s request.

HOTRTD will coordinate with the other 18 stakeholders in the Regional Transportation Coordination Council to ensure that HOTRTD is included in regional planning efforts and that regional planning efforts include outreach to targeted populations within the HOTRTD service area.

HOTRTD will provide a summary to TXDOT of all outreach efforts upon request or prior to future plan submittals and review upon request.

HOTRTD recognizes that future funding for new or revised service requires documentation of the above efforts.

Regional Transportation Coordination

HOTRTD is the lead agency for Regional Transportation Coordination in the HOTCOG Region. Coordination meetings are held quarterly with multiple stakeholders and other interested parties, with representatives of the following agencies/groups regularly attending: Heart of Texas Council of Governments, Waco Metropolitan Planning Organization, Rural Planning Organization, Heart of Texas Workforce Board, Texas Department of Aging and Disability Services, Heart of Texas Region Mental Health & Mental Retardation Center, Heart of Texas Independent Living Center, Area Agency on Aging of the Heart of Texas, Veterans Administration, Representative for colleges and/or universities, Representative for emergency management coordinators, Representative for urban transportation systems, Representative for rural transportation systems, Bosque County representative, Falls County representative, Freestone County representative, Hill County representative, Limestone County representative and McLennan County representative.

Board Meetings

The HOTCOG Board of Directors holds meetings every month and the public is invited to attend and given the opportunity to make comment.

Public Meetings

When a new service is proposed information will be disseminated to the neighborhoods affected and public meetings will be scheduled.

HOTRTD will make presentations to community groups and organizations, as invited in its five-county region.

Customer Complaint Process

Citizens may call our Designated Complaint Line at 254-292-1837 to lodge a complaint or comment. All complaints/comments are input into a database and then distributed to the relevant manager who researches the complaint and responds back to the citizen. HOTRTD complaint process was updated in 2017.

HOTRTD submits to the Texas Department of Transportation annually an application for funding. The application covers funding for planning, capital, and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period

VI. 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." Per the 2010 U.S. Census, LEP individuals accounted for 25.2 million, or 9 percent, of the US population over age 5. The number of LEP individuals in the United States grew 80 percent between 1990 and 2010. The highest concentrations of LEP individuals were found in the six-traditional immigrant-destination states – California, Texas, New York, Florida, Illinois, and New Jersey. These states each had 1 million or more LEP residents and together represented 68 percent of the total LEP population.

Spanish-speaking LEP individuals accounted for 66 percent of the total US LEP population in 2010. The next two languages most commonly spoken were Chinese and Vietnamese, which accounted for 6 percent and 3 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 2010, five languages – Spanish, Chinese, Vietnamese, Korean, and Tagalog -were spoken by 79 percent of all LEP individuals. The sixth through tenth most common languages spoken by LEP individuals -Russian, French Creole, Arabic, Portuguese, and African languages -were distributed roughly equally.

Public transit is a key means of achieving mobility for many LEP persons. Per the 2010 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.

Plan Summary

The HOTCOG/RTD has developed this Limited English Proficiency Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to HOTCOG/RTD services as required by Executive Order 13166. This plan details procedures on how to identify a person who may need language assistance, ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future updates.

Evaluation

Four Factor Analyses

The U.S. Department of Transportation (DOT) issued its Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons: 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; 2) The frequency with which LEP persons 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. A brief description of the self-assessment undertaken in each of these areas follows.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.

Spanish speakers are the primary LEP persons likely to be encountered by HOTCOG/RTD District staff and subcontractors. The HOTCOG/RTD examined the US Census 2010 Demographic Profile Highlights and was able to determine that approximately 16%, or 18,236 persons within HOTCOG/RTD's five county service area age 5 and older spoke a language other than English. HOTCOG/RTD was unable to determine what

percentage of these persons were elderly. The Hispanic population for the HOTCOG/RTD service area is 17%. There are no other major ethnic groups identified in our five-county region that may not speak the English language.

2. The frequency with which LEP persons encounter the program.

The HOTCOG/RTD will assess the frequency at which staff or our subcontractors' staff has or could possibly have contact with LEP persons. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. As a public transportation provider, it is necessary to recognize this segment of the general population.

3. The nature and importance of the program, activity or service provided by the recipient to people's lives.

Public transportation is vital to many people's lives. Per the Department of Transportation's Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons, "Providing public transportation access to LEP persons is crucial. An LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."

The Hispanic/Latino population is 17% of the overall population of our service area. Any lack of social, service, professional or leadership organization within the HOTCOG/RTD service area which would focus on outreach of the LEP persons could be detrimental to their quality of life.

4. The resources available to the recipient and costs.

The HOTCOG/RTD has no available resources budgeted now that can be used for providing LEP assistance. LEP assistance will be explored to determine the availability of professional interpreter and translation services. We will determine which documents would be the most valuable to be translated and take an inventory of available organizations that the HOTCOG/RTD could partner with for outreach and translation efforts, and what level of staff training is needed.

After analyzing the four factors outlined in the U.S. DOT policy guidance, the Heart of Texas Council of Governments/Rural Transit District developed the following plan for providing language assistance to LEP persons.

LIMITED ENGLISH PROFICIENCY PLAN

Components of the Plan

There are five areas that comprise the HOTCOG/RTD'S LEP plan:

1. Identifying LEP persons who need language assistance
2. Language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the LEP plan

Identifying LEP persons who need language assistance

The Census 2010 data show that Spanish-speaking LEP persons are the primary group requiring language assistance. This information can also be used to identify concentrations of LEP persons within our five-county service area.

Higher percentages of LEP persons can also be identified more accurately by census tracts. Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures.

There are also several measures that can be taken to identify persons who may need language assistance:

- When open houses or public meetings are held, set up a sign-in table, and have a staff member greet and briefly speak to each attendee, to informally gauge his/her ability to speak and understand English.
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings.
- Survey bus or transit drivers and other front line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP persons.

Language assistance measures

Documents that are determined to be vital will be translated into Spanish. Vital documents are defined as those documents without which a person would be unable to access services.

HOTCOG/RTD will implement the following LEP procedures. The creation of these steps is based on the relatively low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the HOTCOG/RTD service area:

- When an interpreter is needed, in person or on the telephone, and the HOTCOG/RTD staff has exhausted the above options, staff will first attempt to determine what language is required. Staff will use the telephone interpreter service – Language Line Services at <http://www.language.com>, on the Language Line home page. The staff will select the "Need an Interpreter Now" link and follow the directions to receive and access a code.

Training staff

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and understand the LEP plan. Properly training staff is a key element in the effective implementation of the LEP plan.

There are three primary groups of staff members who are critical to the LEP plan; transit drivers, dispatchers, department directors. Bus or transit drivers have the most frequent contact with LEP persons through daily interaction with passengers. Dispatchers also have frequent contact with LEP persons, either in-person or by telephone. These two groups are most likely to encounter LEP persons and thus to provide language assistance. LEP training for both groups occurs during their initial departmental training. Additionally, this training is included in an annual safety meeting held for all bus or transit drivers. Training topics for these two groups include:

- Understanding the Title VI LEP responsibilities
- What language assistance services HOTCOG/RTD offers
- Specific procedures to be followed when encountering an LEP person

Department directors, including the Transportation Directors, are also crucial in implementing LEP policy. Copies of the LEP plan are distributed to all transportation directors and transportation managers, and it is their responsibility to disseminate LEP plan information to appropriate administrative staff.

Transportation managers and directors should ensure that staff understands Title VI responsibilities. A summary of the LEP plan is included in the employee handbook, and is addressed during new employee orientation.

All HOTCOG/RTD staff will be provided the LEP Plan and will be educated on procedures to follow. This information will also be part of the HOTCOG/RTD staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities.
- What language assistance services the HOTCOG/RTD offers.
- Use of LEP “I Speak Cards”.
- How to use the Language Line interpretation and translation services.
- Documentation of language assistance requests.
- How to handle a Title VI and/or LEP complaint.

Providing notice to LEP persons - Outreach Techniques

However, the following are a few options that HOTCOG/RTD will incorporate for LEP outreach:

- If a staff member knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements and agenda will be printed in an alternative language, based on known LEP populations in our five-county service area.
- When running a general public meeting notice, staff will insert a clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available.” for example: “Un traductor del idioma espanol estará disponible,” this means “A Spanish translator will be available.”
- Key print materials, including but not limited to schedules, maps and brochures will be translated and made available at the HOTCOG/RTD office located at 1514 S. New Road, Waco, TX 76711 or by calling (254) 292-1800 to request a copy, on board all HOTCOG/RTD vehicles, and the community when a specific and concentrated LEP populations is identified.

Monitoring and updating the LEP plan

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and to monitor changes in demographics and types of services, and to update the LEP plan when appropriate. At a minimum, HOTCOG/RTD will follow the Title VI Program update schedule for the LEP plan. Each update should examine the following:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of the LEP persons?
- What is the current LEP population in the HOTCOG/RTD Region?
- Has there been a change in the types of languages where services are needed?
- Have available resources, such as technology, staff and finances change?
- Were any complaints received?
- Do staff members understand the LEP plan policies and procedures?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to Spanish speakers. Feedback from the LEP community will be sought through community outreach events and presentations to determine the effectiveness of the plan in reaching LEP persons. Special consideration will be given to the LEP plan when

service enhancements funded through the HOTCOG/RTD are implemented, to ensure that LEP persons are aware of these services. Census data will also be reviewed as it becomes available to determine changes in the LEP population.

Future considerations for the LEP plan include:

- Providing all or part of the website in Spanish
- Translating other brochures into Spanish
- Provide group travel training to LEP persons by working with bilingual staff

This plan outlines five key areas of an effective LEP strategy:

- Identifying LEP persons who need language assistance, primarily through Census data;
- Language assistance measures, including written and oral language services, and responding to LEP persons on the telephone, in writing and in person;
- Training staff, including transit drivers, dispatchers and management employees;
- Providing notice to LEP persons through both oral and written communications; and
- Monitoring and updating the LEP plan through a variety of means.

Dissemination of the Limited English Proficiency Plan

HOTCOG/RTD's Notice of Rights under Title VI to the public will be posted at the Heart of Texas Council of Governments, on all HOTCOG/RTD vehicles and in selected printed materials. Any person, including social service, non-profit and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the LEP Plan will be provided, on request to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the HOTCOG/RTD Transportation Manager.

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 HOTRTD 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 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 HOTRTD 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.

Your signature _____

Print your name _____

Date _____

Appendix C
Heart of Texas Council of Governments / Rural Transit District
Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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." If you feel you have been discriminated against in transportation services, please provide the following information in order to assist us in processing your complaint and send it to:

Gary Luft
Director of Health and Human Services
Heart of Texas Council of Governments/Rural Transit District 1514 S.
New Road
Waco, Texas 76711 Please

print clearly:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: Home: _____ Cell: _____

Message: _____

E-Mail: _____

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

Race or Color

National Origin

Income

Other Please identify: _____

What was the date of the alleged discrimination? _____

What type of corrective action would you like to see taken?

Have you filed this complaint with any other federal, state or local agency; or with any federal or state court?

Yes No

If yes, please check all that apply:

Federal Agency State Agency Local Agency

Federal Court State Court

Please provide information about a contact person at the agency and/or court where the complaint was filed. If the complaint has been filed with multiple agencies / courts, please identify contact on additional sheets.

Name:

Agency or Court:

Address:

City, State, Zip Code:

Phone:

E-mail:

Please attach any documents you have which support the allegation. Then date and sign the form and mail it to:

Rep Pledger
Transportation Manager
Heart of Texas Council of Governments / Rural Transit District 1514 S.
New Road
Waco, Texas 76711

Within 7 days of receipt of the complaint the Heart of Texas Council of Governments / Rural Transit District will notify you acknowledging receipt and that we have initiated an investigation. Every effort will be made to complete our investigation and to notify you of the results within 60 days of receipt, if not sooner. Should additional time or information be required to complete the investigation, the staff will contact you within 60 days upon receipt of the complaint

Your Signature

Print Your Name

Date

APPENDIX D

Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jane Doe
1234 Main St.
Waco, TX 76711

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against HOTRTD alleging Title VI violation.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 254-292-1873, or write to me at 1514 S New Road, Waco, TX 76711.

Sincerely,

Name
Title VI Coordinator

APPENDIX E

Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jane Doe
1234 Main St.
Waco, TX 76711

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the HOTRTD alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name
Title VI Coordinator

APPENDIX F

Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jane Doe
1234 Main St.
Waco, TX 76711

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against HOTRTD alleging Title VI violations has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

HOTRTD has analyzed the materials and fact pertaining to your case for evidence of the agency's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from HOTRTD, and/or 2) file a complaint externally with the Texas Department of Transportation and/or the Federal Transit Administration at

Texas Department of Transportation
TXDOT-PTN
125 E. 11th Street
Austin, TX 78701-2483

Federal Transit Administration Office of Civil Rights Attention:
Title VI Program Coordinator
East Building, 5th Floor - TCR 1200 New
Jersey Ave., SE Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Name
Title VI Coordinator

APPENDIX G

Public of Rights Under Title VI

Heart of Texas Council of Governments

- Heart of Texas Council of Governments (HOTCOG) and its subcontractors operates its transportation programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the HOTCOG.
- For more information on the HOTCOG's civil rights program, and the procedures to file a complaint, contact 254-292-1800; email transportation@hot.cog.org; or visit our administrative office at 1514 South New, Waco, TX 76711.
For public notices, please visit www.HOTCOG.org/administration/public-notices/
- A complainant may file a complaint directly with the Texas Department of Transportation, Attn: TXDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483 or Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact (254)292-1800.

APPENDIX H

Please note this a blank example of the table that HOTRTD will use to document any Transit-related TVI investigations, Complaints and Lawsuits

HOTRTD													
Transit-related TVI Investigation, Complaints and Lawsuits													
	Required	Date	Letter of	Client				Notify	Additional	Written			
Number	information	Received	Acknowledgement	Name	Investigation	Complaint	Lawsuite	PTC	Information Requested	Response	Appeal	Complete	
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													

APPENDIX I

Governing Board

The HOTRTD governing board consist of Elected officials from our five-county region.

APPENDIX J

Subcontractor Monitoring

HOTRTD staff will review all subcontractors Title VI programs relating to HOTRTD's five county region that is being served by a subcontractor during annual compliance audit unless or otherwise deemed necessary. Excessive Title VI complaints will require HOTRTD staff to conduct more frequent audits.