

**Community Services, Inc. dba Community Transit Service**

## **Title VI Policy**

Effective February 2014

Revised:

May 2017

June 2020

## **Community Transit Rural Public Transportation**

### **Title VI Policy**

#### **Community Transit Service (CTS)**

#### **Commitment to Civil Rights**

CTS operates as a component of Community Services, Inc. (CSI). CTS is a rural public transportation program that provides demand response in the Ellis and Navarro County area. CTS currently has 15 transit related employees and 12 revenue vehicles. Hours of operation is Monday thru Saturday 5:00 a.m. to 5:30 p.m. excluding holidays.

CTS is hereby given public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age or disability be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding CTS programs has a right to file a formal complaint. Any such complaint must be in writing and submitted to Title VI Complaint Coordinator within 180 days following the date of the alleged occurrence. Complaint procedures and forms are available on the transit website: [www.csicorsicana.org](http://www.csicorsicana.org). For more information regarding civil rights complaints, please contact:

Community Transit Service  
Physical address: 302 Hospital Drive  
Mailing address: P.O. Box 612  
Corsicana, Texas 75151-0612  
Tele: (903)872-2405 or 1(800)834-1924  
Email: [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org)

**A Complainant should file a complaint in the order listed below:**

1. Community Transit Service- P.O. Box 612 (Corsicana, Texas 75151-0612)
2. TXDOT- Public Transportation Division- 125 E. 11<sup>th</sup> (Austin, Texas 78701)
3. FTA-Office of Civil Right-Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE, (Washington, DC 20590)

If information is needed in another language, call (903)872-2405 or 1(800)834-1924

SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 or 1(800)834-1924

Title VI of the Civil Rights Act of 1964 requires that no person in the United States, on the grounds of race, color or national origin be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance.

Any person who believes that they have been subjected to discrimination may file a written complaint with CTS office. Federal and state law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident. The agency will notify their PTC (Public Transportation Coordinator) by email or fax of any Title VI-related complaints received within 10 working days of the receipt of the complaint, including a paper or electronic copy of the complaint form.

### **Complaint Form**

A complaint may be submitted in writing that contains the following information:

- a. The complaint form may be obtained from our local office, website, or from the transit drivers. If information is needed in another language, call (903)872-2405 or 1(800)834-1924. SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 o 1(800)834-1924.  
Office: Community Transit Services  
302 Hospital Drive  
Corsicana, Texas 75110  
Website: [www.csicorsicana.org](http://www.csicorsicana.org)
- b. Name, address, and telephone number of the complainant.
- c. Names of person(s) who allegedly discriminated against you, if known.
- d. Date(s) of alleged discrimination.
- e. Location of alleged incident.
- f. Type of alleged discrimination.
- g. Explain what happened and how you believe you were discriminated against.
- h. Name, addresses and telephone numbers of person who may have knowledge of the event.
- i. What other information do you have that you believe is relevant to this investigation?
- j. Have you filed a complaint with CTS before? If so, include: when, where and how.
- k. Complainant's signature and date.
- l. The complaint may be emailed to [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org) or mail to CTS at P.O. Box 612, Corsicana, Tx.75151-0612, or faxed to 1(903)875-3779.

**Se puede obtener un formulario de queja o se puede presentar un reclamante en una declaración escrita que contenga la siguiente información:**

a. El formulario de queja se puede recoger de nuestra oficina local, sitio web, o de los conductores de tránsito. SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 o 1(800)834-1924. If information is needed in another language, call (903)872-2405 o 1(800)834-1924.

Oficina: Community Transit Service  
302 Hospital Drive  
Corsicana, Texas 75110

Sitio web: [www.csicorsicana.org](http://www.csicorsicana.org)

- b. Nombre, dirección y número de teléfono del reclamante.
- c. Nombres de la (s) persona (s) que supuestamente discriminaron en su contra, si se conocen.
- d. Fecha (s) de presunta discriminación.
- e. Ubicación del presunto incidente.
- f. Tipo de supuesta discriminación.
- g. Explique qué sucedió y cómo cree que fue discriminado.
- h. Nombre, direcciones y números de teléfono de la persona que puede tener conocimiento del evento.
- i. ¿Qué otra información usted tiene que usted cree es relevante a esta investigación?
- j. ¿Ha presentado una queja ante CTS antes? Si es así, incluya: cuándo, dónde y cómo.
- k. Firma y fecha del reclamante.
- l. La queja puede ser enviada por correo electrónico a [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org) o por correo a CTS en P.O. Box 612, Corsicana, Tx. 75151-0612, o por fax al 1 (903) 875-3779.

## **What Happens To My Complaint?**

The agency will notify their PTC (Public Transportation Coordinator) by email or fax of any Title VI-related complaints received within 10 working days of the receipt of the complaint, including a paper or electronic copy of the complaint form.

The Title VI Complaint Coordinator will contact the complainant in writing no later than fifteen (15) working days after receipt of complaint for additional information, if needed to investigate the complaint. If the complainant fails to provide the requested information in a timely basis, the Title VI Complaint Coordinator may administratively close the complaint.

The Executive Director and the Title VI Complaint Coordinator will complete the investigation within thirty calendar (30) days of receipt of the complaint. A written investigation report will be prepared by the investigator and will be kept confidential. The report shall include a summary description of the incident, findings and recommendations. A written report will be provided to the complainant on the incident and findings.

If the matter cannot be resolved, then the complainant can make an appeal request within sixty (60) days of the incident. The written appeal must include the complainant's name, address, and telephone contact number. A statement of reason(s) why the complainant believes the denial of accommodation request or access to public transportation was inappropriate is recommended. If the matter cannot be resolved, it may be taken to the CTS Board for an appeal and if the matter cannot be resolved the complainant will be informed of his/her right to appeal to:

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

## Exhibit B

### Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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."

The following information is necessary to assist in processing your complaint. Should you require any assistance in completing this form, please contact the Title VI Complaint Coordinator. If information is needed in another language, call (903)872-2405 or 1(800)834-1924. **SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 o 1(800)834-1924.** Complete and return this form to: Community Transit Service, Title VI Complaint Coordinator, P.O. Box 612, Corsicana, Texas 75151-0612. You may also fax a complaint form to 1(903)875-3779 or scan and e-mail to [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org).

1. Complainant's Name: \_\_\_\_\_

2. Address: \_\_\_\_\_

3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

4. Telephone Number (Home): \_\_\_\_\_

(Alt): \_\_\_\_\_

5. Person discriminated against (if someone other than the complainant):

Name: \_\_\_\_\_ Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place:

Were you discriminated against because of: (check one)

a. Race/Color: Yes \_\_\_\_ No \_\_\_\_

b. National Origin: Yes \_\_\_\_ No \_\_\_\_

7. What date and time did the alleged discrimination take place? \_\_\_\_\_

8. Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. Please use the back of this form if additional space is required:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If so, list agency/ agencies and contact information below

10. Please provide information about a contact person at the agency/court where the complaint was filed.

a. Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

b. Agency: \_\_\_\_\_ Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

11. I affirm that I have read the above charge and it is true to the best of my knowledge.

Complainants Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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**Print or Type Name of Complainant**

**Date Received:** \_\_\_\_\_

**Received By:** \_\_\_\_\_

## Exposición B

### Formulario De Quejas Title VI

Community Transit Service centra sus esfuerzos en garantizar que nadie sea excluido de la participación en sus servicios ni que se nieguen los beneficios de estos, con base en raza, color u origen nacional, en conformidad con las disposiciones del Title VI de la Ley de Derechos Civiles de 1964 y enmiendas. Las quejas bajo el Title VI deben presentarse en el transcurso de 180 días a partir de qué ocurre la discriminación supuesta.

La información siguiente es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, le agradeceremos que se dirija al Title VI Coordinator, al teléfono (903) 872-0561. SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 o 1(800)834-1924. **If information is needed in another language, call (903)872-2405 or 1(800)834-1924.**

El formulario completo debe devolverse al Title VI Coordinator, Community Transit Service P.O. Box 612, Corsicana, Texas 75151-0612. También puede enviar por fax un formulario de queja a (903) 872-0561 o exploración y correo electrónico a [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org).

1. Su nombre: \_\_\_\_\_

2. Dirección: \_\_\_\_\_

3. Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

4. Teléfono (Casa): \_\_\_\_\_ (Segundo): \_\_\_\_\_

5. Persona discriminada (si alguien que no sea el demandante):

El Nombre: \_\_\_\_\_ Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

6. ¿Cuál de los siguientes mejor describe la razón por la supuesta discriminación

Marque Uno:

a. Raza/Color: Sí \_\_\_ No \_\_\_

Fecha del incidente: \_\_\_\_\_

b. Nacionalidad: Sí \_\_\_ No \_\_\_

Hora del incidente: \_\_\_\_\_

7. ¿En qué fecha se hizo la supuesta discriminación ocurren? \_\_\_\_\_

8. Por favor, describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados de Community Transit Service involucrados, si cuenta con la información. Explique lo sucedido; quien considera que fue responsable; y otra información específica pertinente.

(Por favor, use el reverso de este formulario si requiere espacio adicional.)

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9. Ha presentado alguna queja ante otra agencia federal, estatal o local con respecto a este incidente?  
(Marque Uno) SI \_\_\_ No \_\_\_

10. Si la respuesta es afirmativa, por favor, a continuación enumere la agencia o agencias y la información de contacto:

Agencia: \_\_\_\_\_ Número de contacto: \_\_\_\_\_

Dirección: \_\_\_\_\_ Ciudad: \_\_\_\_\_ Estado: \_\_\_ Código Postal: \_\_\_\_\_

11. Confirmando que he leído el cargo que se indica arriba y que es verdadero hasta donde tengo conocimiento.

Firma del declarante: \_\_\_\_\_ Fecha: \_\_\_\_\_

\_\_\_\_\_  
o escriba en letra de imprenta el nombre del declarante

**Fecha de Recepcion:** \_\_\_\_\_

**Recibido por:** \_\_\_\_\_

## **Community Transit Service**

### **Policy on Public Participation and Comment**

#### **Public Participation Plan**

#### **Date Approved by Transit Board**

June 30, 2020

#### **A. Introduction and Policy Statement**

Community Transit Service is committed to providing an open and visible decision-making process to which Ellis/Navarro County residents has equal access. It is the policy of the Community Transit Service to actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, neighborhood meeting, and public hearings.

Further, it is the policy of the Community Transit Service to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, and limited English proficiency (LEP) populations (as well as older adults and people with limited mobility) in the course of conducting public outreach activities, consistent with Federal Transit Administration (FTA) Circular 4702.1B ("Title VI Requirements and Guidelines for Federal Transit Administration Recipients").

#### **B. Public Participation/Engagement Plan**

##### **Goal**

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

##### **Objectives – Applicable to FTA C 4702.1B**

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.

- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

### **Identification of Stakeholders**

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public engagement process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

### **Elements of the Public Participation/Engagement Plan**

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice
  - a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.
2. Public Engagement Process/Outreach Efforts:
  - a. Public meetings
  - b. Open houses
  - c. Rider forums

- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

### 3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
  - i. Dedicated email address.
  - ii. Website.
  - iii. Regular mail.
  - iv. Forms using survey tool for compilation.
  - v. Videotaping.
  - vi. Phone calls to Customer Service Center [phone]

### 4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

## C. Public Involvement Principles

The following principles will be used to develop the Public Involvement Plan for Community Transit Service projects and programs. At this time CTS is participating in the Regional Planning / Needs Assessment for Ellis and Navarro County with NCTCOG:

- \* When a project may affect a neighborhood, special neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to organized neighborhood groups and any individual who has requested notification.
- \* All public hearing notices shall be written in clear, concise and understandable language and will incorporate graphics when it aids the message. The notices will clearly be identified as a Community Transit Service notice.

- \* The Public Involvement Plan will reflect the Community Transit Service's policy to provide early and continuous opportunities for the public to be involved in the identification of the impacts of proposed decisions. It will also reflect the Community Transit Service's policy to seek out the viewpoints of minority, low-income, and Limited English Proficiency (LEP) populations, as well as older adults and people with limited mobility, in the course of conducting public outreach and involvement activities, consistent with the Community Transit Service's Title VI Program, on access for individuals with Limited English Proficiency and U.S. Department of Transportation (DOT) LEP Guidance.
- \* The Public Involvement Plan will be tailored to the populations affected and the type of plan, program, or service under consideration.
- \* Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.
- \* Public meetings and hearings will be broadly advertised in the community in both English and Spanish (e.g., through posters onboard buses and at major transit stops and facilities, and local print media) and notification will be provided regarding the availability of language assistance.

#### **D. Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations**

During development of the Public Involvement Plan and/or planning for public engagement in general, the Community Transit Service will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with Federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, staff will implement the strategies identified in Section D, including holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearing in English and Spanish, and providing notice of the availability of language assistance.

In addition, Community Transit Service staff should consider implementing the following public engagement strategies to complement the minimum requirements, as appropriate to the plan, project, or service:

- \* Using supplemental outreach strategies such as surveys regarding Community Transit Service projects or proposed service changes.

\* Partnering with community organizations to engage members of the public who are less likely to attend traditional public meetings (including LEP populations) through means such as surveys and focus groups. The Community Transit Service maintains a list of current and potential future community partners.

\* Attending community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from diverse members of the public.

Community Transit Service staff may consult FTA Circular 4703.1 ("Environmental Justice Policy Guidelines for Federal Transit Administration Recipients") for additional strategies that may be incorporated into the Public Involvement Plan.

#### **E. Title VI Outreach Best Practices**

CTS ensures all outreach strategies, communications and public involvement efforts comply with Title VI. CTS's Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, CTS provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

#### **2020 – 2024 Title VI Program Public Engagement Process**

CTS [will conduct] [conducted] a Public Engagement Process for the 2020-2024 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

CTS [will provide] [provided] briefings to the Board of Directors and Advisory Bodies.

CTS [will conduct] [conducted] a 30 day public comment period to provide opportunities for feedback on the 2020-2024 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (agency option)

#### Summary of 2020-2024 Public Outreach Efforts

- A. Bus Schedule is in the Daily Sun weekly paper. Special outings are published in the on agency website. Assistant Director of Transportation is in contact with the social workers at the nursing home and senior apartments. Local churches continue to inform members of the transportation service when needed. Local community will contact Assistant Director of Transportation if they know someone that could use the service. Posters are up in local Food Pantry and City Council Office.
- B. Outreach to minority, LEP, and other underserved populations:  
The Public Participation Plan include information about outreach methods to engage minority and limited English proficiency (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Program submission.
  - i. Poster magnets for the transportation department are posted at the Food Pantry and the City Council Office.
  - ii. Council and Board meetings are held in the City of Corsicana which is handicap accessible.
  - iii. The Assistant Director of Transportation works with the 5 churches in town to make the congregation aware of the Bus services. The social workers at the Nursing home and Senior apartments help residence make necessary arrangements in using the bus.

Efforts to involve minority and LEP populations include both comprehensive measures as well as targeted measures to address linguistic, institutional, religious, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a sub-recipient's decision-making process.

#### **F. Public Comment for Fare increases and Major Service Changes**

It is the policy of the Community Transit Service to solicit public opinion and consider public comment before raising fare or implementing a major service change.

A public hearing is required prior to implementation of a fare increase or a major service change. A "major" service change is defined as a modification that affects 25% or more of a single route or 25% or more of all routes. Additional public involvement strategies, such as public meetings, neighborhood meetings, or other outreach to affected individuals will be

implemented as appropriate to solicit public comment for consideration in advance of the public hearing. Public comments received will be compiled and considered prior to finalizing the Community Transit Service's recommendation to the transit board regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to the transit board for the fare increase or major service reduction in question.

The public hearing will be scheduled as part of a regular transit board meeting, the Community Transit Service's citywide outreach mailing list, posters and flyers on buses. The hearing will also be advertised through targeted outreach to neighborhood groups or other organizations and individuals, as appropriate to the proposed change. Notices regarding the public hearing will be provided in both English and Spanish. The Community Transit Service will additionally post notice of the public hearing in the local newspapers. The public hearing will consist of a staff report before the transit board, followed by public testimony.

#### **G. Equity Analysis for Facilities**

The agency has not constructed any facilities.

**Attachment 1 provides additional information on practices related to public comment.**

#### **Attachment 1**

##### **Additional information on process for soliciting public comment on service changes**

Proposed service changes are developed by Community Transit Service staff. Once proposals are finalized, printed information is created that explains the proposed changes. These informational materials (available in English and Spanish) are placed on the buses and used as handouts at public informational meetings and hearings. Flyers and posters that direct interested individuals to these materials are also posted on the buses, at Community Transit Service offices, and are provided to facilities (libraries, senior communities, human service organizations, schools, etc.) which are likely to be impacted by the service changes.

Any interested individual is invited to make comments. Comments may be submitted in person at the public informational meetings and public hearings. They may also be submitted in person at the public informational meetings and public hearings. They may also be submitted by mail and by Comment Card. In addition, comments may be submitted over the phone to Community Transit Service's representatives and via email.

Information about scheduled public meetings is available via:

1. On the agency website: [www.csicorsicana.org](http://www.csicorsicana.org)
2. Posters in Community Transit Service offices

3. At the Community Transit Service reception desk
4. Bus posters
5. Transit board meeting agenda
6. In public meeting rooms
7. Appropriate venues, such as senior communities, human service organizations, and schools.

All comments received are reviewed by Community Transit Service Management and considered in the final decisions. The goal of the Community Transit Service is to always provide the best possible service to the most current riders or potential riders.

## Notifying the Public of Rights under Title VI

### Community Transit Service

\*Community Transit Service operates its 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Community Transit Service.

\*For more information on Community Transit Service's civil rights program, and the procedures to file a complaint, call (903)872-2405 or 1(800)834-1924; email [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org); visit our website: [www.csicorsicana.org](http://www.csicorsicana.org) or administrative office at 302 Hospital Drive, Corsicana, Texas 75110.

\*A complainant may first file a complaint directly with TXDOT Public Transportation Division 125 E.11<sup>TH</sup> Austin, Texas 75801

\*Then a complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

**\*If information is needed in another language, call (903)872-2405 or 1(800)834-1924. SI NECESITA INFORMACION EN OTRO IDIOMA LLAME (903)872-2405 o 1(800)834-1924**

Notice to the public is posted:

1. On the agency's website: [www.csicorsicana.org](http://www.csicorsicana.org)
2. In the office of Community Services, Inc.
3. At the reception desk
4. Bus posters
5. Transit board meeting agenda
6. In public meeting rooms
7. Appropriate venues, such as senior communities, human service organizations, and schools.

## **Notificación al público de los derechos del Título VI**

### **Servicio de Tránsito Comunitario**

\* El Servicio de Tránsito Comunitario opera sus programas y servicios sin tener en cuenta raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el Servicio de Tránsito Comunitario.

\* Para obtener más información sobre el programa de derechos civiles del Servicio de Tránsito Comunitario y los procedimientos para presentar una queja, comuníquese con (903) 872-2405 o 1 (800) 834-1924; Correo electrónico [kragan@csicorsicana.org](mailto:kragan@csicorsicana.org); Visite nuestro sitio web: [www.csicorsicana.org](http://www.csicorsicana.org) o la oficina administrativa en 302 Hospital Drive, Corsicana, Texas 75110.

\* Un denunciante puede primero presentar una queja directamente con la División de Transporte Público de TXDOT 125 E.11TH Austin, Texas 75801

\* Luego, un denunciante puede presentar una queja directamente con la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Título VI Coordinador del Programa, Edificio Este, 5to piso-TCR, 1200 New Jersey Ave., SE, Washington DC 20590

**\* Si necesita información en otro idioma, llame al (903) 872-2405 o 1 (800) 834-1924.  
If information is needed in another language, call (903) 872-2405 or 1(800)834-1924.**

### **Se publica un aviso al público:**

1. En el sitio web de la agencia: [www.csicorsicana.org](http://www.csicorsicana.org)
2. Carteles en las oficinas del Servicio de Tránsito Comunitario
3. En la recepción
4. Carteles de autobuses
5. Agenda de la reunión del consejo de tránsito
6. En las salas de reuniones públicas
7. Lugares apropiados, tales como comunidades mayores, organizaciones de servicios humanos y escuelas.

## RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS AND/OR LAWSUITS, AND CONSTRUCTION PROJECTS

There are no active lawsuits or complaints alleging discrimination on the basis of race, color, or national origin with respect to transit service provided by Community Transit Service in the past.

Community Transit Service has not received any requests for a civil rights compliance review from any local, state, or federal agency in the past.

Community Transit Service has not participated in any federally funded construction projects in the past.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

## **Table Depicting Minority Representation on Committees and Councils selected by the Recipient**

### **Advisory Bodies**

CTS will not 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 on the grounds of race, color, or national origin. The agency is currently wrapping up the selection process for additional board members and the potential results of those under consideration will change the board makeup accordingly (i.e., race, age, class, etc.) and updates will be reported accordingly.

CTS does not have transit-related non-elected planning boards, advisory councils or committees, or similar committees that are selected by the agency. If CTS establishes such boards or committees, a table will be used to depict the racial breakdown of the membership of those committees and will be included in future Title VI programs in lieu of the agency's board demographics. In addition, a description of efforts made to encourage the participation of minorities on such committees will also be included.

### **Table Depicting Membership of Committees, Councils, Broken Down by Race**

<b><u>Body</u></b>	<b><u>Caucasian</u></b>	<b><u>African American</u></b>	<b><u>Other</u></b>
<b>Public Rep.</b>	<b>0 %</b>	<b>67 %</b>	<b>0 %</b>
<b>Private Rep.</b>	<b>11 %</b>	<b>11 %</b>	<b>0 %</b>
<b>Client Rep.</b>	<b>0 %</b>	<b>0 %</b>	<b>11 %</b>

## **Limited English Proficiency Plan Community Services, Inc. /Community Transit Service**

### **Introduction**

This Limited English Proficiency Plan has been prepared to address the Community Service Inc. /Community Transit Service responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all Community Services, Inc. / Community Transit Service departments receiving federal grant funds.

Plan Summary The Community Services, Inc. / Community Transit Service has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the Community Services, Inc. / Community Transit used the four-factor LEP analysis which considers the following factors:

1. The number of proportion of LEP persons in the service area who may be served by the Community Services Inc. / Community Transit Service.
2. The frequency with which LEP persons come in contact with Community Services Inc. / Community Transit Service.
3. The nature and importance of services provided by the community Services Inc. / Community Transit Service to the LEP population.
4. The interpretation services available to the Community Services, Inc. / Community Transit

Service and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion LEP persons in the service area who may be served or are likely to require Community Services, Inc. / Community Transit Service.

The Community Services Inc. / Community Transit Service staff reviewed the 2010 U.S. Census Report and determined that 197,345 persons in Community Services, Inc. / Community Transit Service 39.5% of the population speak a language other than English. Of those 77,951 persons 56.5% have limited English proficiency; that is, they speak English “not well” or “not at all”, this is only a 22.5% of the overall population in the service area. In Community Services, Inc. / Community Transit Service, service area, of those persons with limited English proficiency, 42,359 speak Spanish and 980 speak Puerto Rican, and 703 speak Cuban language.

2. The frequency with which LEP persons come in contact with Community Service Inc. / Community Transit Service services.

The Community Services, Inc. / Community Transit Service staff reviewed the frequency with which the office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date the Community Services, Inc. / Community Transit Service has had no requests for interpreters and no requests for translated program documents. The Office staff and bus/van drivers have had very little contact with LEP persons.

3. The nature and importance of services provided by the Community Services, Inc. / Community Transit Service to the LEP population. There is no large geographic concentration of any type of LEP individuals in the service area for the Community Services, Inc. / Community Transit Service. The overwhelming majority of the population 60.5%, speak only English. As a result, there are a few social, services, professional and leadership organizations within the Community Services, Inc. / Community Transit Service’s service area that focus on outreach to LEP individuals. The Community Services, Inc. / Community Transit Service office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, and phone conversations.

4. The resources available to the Community Services, Inc. / Community Transit Service and overall cost to provide LEP assistance. The Community Services, Inc. / Community Transit Service reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and use Spanish speaking staff.

### **Safe Harbor Provision**

In accordance with the Safe Harbor Provision, it has been determined that vital documents should be translated into Spanish. DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

## **LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Community Services, Inc. / Community Transit Service services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. The agency will provide a list of all vital written documents which includes, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notice of denials, losses, or decreases in benefits or services; and notice advising LEP individuals of free language assistance services.

How the Community Services, Inc. / Community Transit Service staff may identify an LEP person who needs language assistance:

1. Post notice of LEP Plan and the availability of interpretation or translation services, for the Public Transportation program, free of charge in languages LEP persons would understand.
2. All Community Services, Inc. / Community Transit Service staff have been provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
3. All Community Services, Inc. / Community Transit Service staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
4. When the Community Services Inc. /Community Transit Service sponsors an informational meeting or event, an advanced public notice or the event should be published including special needs related to offering a translator (LEP). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

### **Language Assistance Measures**

Although there is a very low percentage in the Community Services, Inc. / Community Transit Service of LEP individuals, that is, persons who speak English "not well" or "not at all", we will offer the following measures:

1. The Community Services, Inc. / Community Transit Service staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Staff

## **STAFF TRAINING**

The following training is provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

## **TRANSLATION OF DOCUMENTS**

The Community Services, Inc. / Community Transit Service are translating documents for these LEP groups. The following resources will be available to accommodate LEP persons. All vital written documents which includes, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notice of denials, losses, or decreases in benefits or services; and notice advising LEP individuals of free language assistance services. All staff is trained on Title VI and LEP responsibilities.

## **MONITORING**

Monitoring and Updating the LEP Plan The Community Services, Inc. / Community Transit Service will update the LEP Plan as required. At a minimum, the plan was reviewed and updated when data from the 2010 U.S. Census was available, or when it was clear that higher concentrations of LEP individuals are present in the Community Services, Inc. / Community Transit Service’s service area. Updates include the following:

- The agency does not have any subrecipients.
- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether the Community Services, Inc. / Community Transit fully comply with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

**Official Approval of Title VI Nondiscrimination Program**

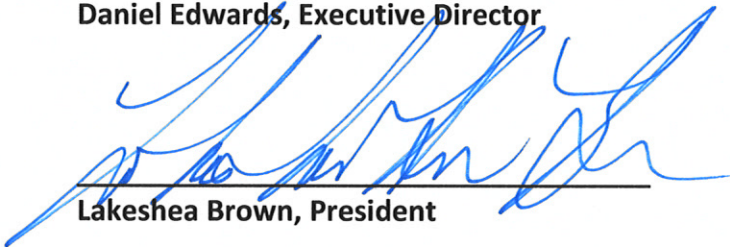
**As Executive Director of Community Services, Inc. dba Community Transit Service and on behalf of the Board of Directors, I hereby ascertain that the Board of Directors approved the above revised Title VI Nondiscrimination Program on 6/30/2020. An earlier version was approved by the Board of Directors and adopted effective February 2014.**



**Daniel Edwards, Executive Director**



**Date**



**Lakeshea Brown, President**



**Date**