

Title VI Plan

El Paso County Transit



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Plan Approval and Revision Log

Title VI Plan 07/01/2014

Adopted on: _____

Adopted by: El Paso County Commissioners' Court

Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
07/01/2014	Original document adopted by the El Paso County Transit	N/A
05/01/2017	Revised Complete Title VI	Updated existing Title VI document
10/30/2020	Revised Complete Title VI	Updated existing Title VI document
09/12/2023	Revised Complete Title VI	Updated existing Title VI document

Description of Services

El Paso County operates and provides transit services and programs to the public via several bus routes. The routes and services operate in several locations throughout the county, and current routes are listed below:

- Route 10 Anthony/Canutillo; fixed route
- Route 20 Montana Vista; fixed route
- Route 30 Horizon; fixed route
- Route 31 Eastlake; fixed route
- Route 40 Fabens/Tornillo; fixed route
- Route 50 Mission Trail; fixed route
- Route 84 EPCC Mission del Paso; fixed route
- Gold Route; fixed route
 - Routes 10-40, passengers can board the bus at locations listed on the public timetable or by flagging the bus at other locations along the route, with adequate shoulder space for buses to safely pull off the road and re-enter traffic. Routes 50, 84, and the Gold Route, passengers can board the bus at the specified locations listed on the route's public timetable.

Number of Transit Related Employees

Total number of Transit Related Employees: 37

Number of Revenue Service Vehicles

Total number of Revenue Service Vehicles: 31

Policy Statement

El Paso County Transit, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Texas Department of Transportation (TxDOT), will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and TxDOT-PTN requirements as specified in the Master Grant Agreement and State Management Plan.

Title VI Notice to the Public

El Paso County Transit's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI of the Civil Rights Act

El Paso County Transit

- El Paso County operates its transit 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 El Paso County.
- For more information on El Paso County Transit's civil rights program, the procedures to file a complaint, or to file a complaint contact (915) 208-9120, (915) 273-3330; or visit our administrative office at 800 E. Overland Ave., Rm. 200, El Paso, Texas 79901. For more information, visit <https://www.epcounty.com/transit.htm> .
- A complaint may also be filed directly with the:
 - Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, Tx. 78701-2483, or
 - Federal Transit Administration, Office of Civil Rights, Attn: Title VI Program Coordinator, 1200 New Jersey Ave. SE, East Building 5th Floor-TCR, Washington, D.C. 20590.
- If information is needed in another language, contact (915) 273-3330.
- This item will be placed in public meeting spaces, county reception areas and is listed on the County website.

El Paso County Transit's Notice to the Public is posted in the following locations:

- <https://www.epcounty.com/transit.htm>
- Planning & Development Department
- Rider Guides/Schedules

Si necesita información en otro idioma, comuníquese con el Departamento de Transporte Público del Condado de El Paso al (915) 273-3330.

Title VI Complaint Procedure

El Paso County Transit's Title VI Complaint Procedure is made available in the following locations:

- <https://www.epcounty.com/transit.htm>
- Planning & Development Department
- If information is needed in another language, contact El Paso County Transit at (915) 273-3330

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the El Paso County Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at:

<https://www.epcounty.com/transit.htm>, or requested at: 800 E. Overland Ave., Rm. 200, El Paso, Tx. 79901.

El Paso County Transit investigates complaints received no more than 180 days after the alleged incident. El Paso County Transit will process complaints that are complete.

Once the complaint is received, El Paso County Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by El Paso County Transit. A copy of each Title VI complaint received will be forwarded to the TxDOT Public Transportation Coordinator (PTC) within ten (10) calendar days of receipt by email or fax.

El Paso County Transit has 90 days to investigate the complaint. If more information is needed to resolve the case, El Paso County Transit may contact the complainant.

The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, El Paso County Transit can administratively close the case. A case can also be administratively closed if the complainant no longer wished to pursue their case.

After the investigator reviews the complaint, he/she will issue one of two (2) letters to the complainant: a closure letter or a Letter Of Finding (LOF).

- A closure letter summarizes the allegations and states there was not a Title VI violation, and the case will be closed.
- A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member(s), or other action will occur.

If the complainant wishes to appeal the decision, he/she has 30 days after the date of the closure letter or the LOF to do so.

A person may also 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
Office of Civil Rights, Attn: Title VI Program Coordinator
1200 New Jersey Ave. SE, East Building 5th Floor-TCR
Washington, D.C. 20590

If information is needed in another language, then contact El Paso County Transit at (915) 273-3330.

Si necesita información en otro idioma, comuníquese con el Departamento de Transporte Público del Condado de El Paso al (915) 273-3330.

Title VI Complaint Form

El Paso County Transit's Title VI Complaint Procedure is made available in the following locations:

- <https://www.epcounty.com/transit.htm>
- Planning & Development Department
- If information is needed in another language, contact El Paso County Transit at (915) 273-3330

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply): [] Race [] Color [] National Origin Date of Alleged Discrimination (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____				

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ☐ Yes ☐ No If yes, check all that apply: ☐ Federal Agency: _____ ☐ Federal Court _____ ☐ State Agency _____ ☐ State Court _____ ☐ Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		

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

Signature and date required below

Signature	Date
Please submit this form in person at the address below, or mail this form to:	

Transportation Engineer
El Paso County Planning & Development Department
800 E. Overland Ave., Rm. 200
El Paso, Texas 79901

If information is needed in another language, contact El Paso County Transit at (915) 273-3330.

Si necesita información en otro idioma, comuníquese con el Departamento de Transporte Público del Condado de El Paso al (915) 273-3330.

List of Transit Related Title VI Investigations, Complaints and Lawsuits

El Paso County Transit maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no processed investigations, complaints and/or lawsuits filed against El Paso County Transit since the last plan submission.

 There have been processed investigations, complaints and/or lawsuits filed against El Paso County Transit. *See list below.*

	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.				

Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, El Paso County Transit will employ the following strategies, as appropriate:

- Provide for frequent and continuous engagement by the public
- Select varied meeting locations and times that are convenient and accessible for minority and Limited English Proficient (LEP) communities
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP populations
- Use media in addition to other resources as a way to gain public involvement to include publications, notifications, and invitations that serve LEP populations

El Paso County Transit is committed to informing and involving the public in the planning and delivery of public transportation services in its service area and will comply with state and federal laws and regulations including Title VI of the Civil Rights Act of 1964 which states 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.” Pursuant to the Federal Transportation Administration Title VI Circular FTA C 4702.1B, “Every Title VI program shall include an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI submission.”

El Paso County Commissioners Court allows for public participation for all transit items that require the Court’s approval which include: applications for funding, funding agreements, procurement of subcontractors, and purchase of service agreements. El Paso County Commissioners Court allows public comment on all agenda items it considers. In addition, any member of the public may address the Commissioners Court on any non-agenda item, including transit, at any of its regular meetings. Meeting agendas are posted at least 72 hrs. in advance of the meeting and are available on the County’s website at <http://www.epcounty.com/government.asp>.

El Paso County Transit does not have non-elected transit-related committees or councils.

El Paso County actively participates in the Far West Texas/El Paso Regional Transportation Coordination Committee (WTEP) and has served as its Lead Agency since 2006; however, as of April 1st, 2017, El Paso County Transit is no longer the lead for WTEP. WTEP facilitates human services – public transportation coordination and requires that all transportation providers submitting funding proposals to the state transportation agency, TxDOT, or El Paso Metropolitan Planning Organization (MPO) present proposed projects in order to obtain the WTEP endorsement. All WTEP meetings are open to the public and announced 72 hrs. in advance with agendas posted at <https://projectamistad.org/wtep/>. Included under the MPO is the Transportation Project Advisory Committee (TPAC), which is comprised of 16 voting members. TPAC reviews and makes recommendations to the Transportation Policy Board (TPB) on Metropolitan Transportation Plan(s) (MTP), Transportation Improvement Program(s) (TIP), Unified Planning Work Program(s) (UPWP), Congestion Management Process (CMP), project selection criteria,

and special Transportation Planning Studies (TPB). TPB ensures all regional transportation studies are performed in accordance with local governments' desires and pursuant to federal and state laws, rules and regulations. TPB is comprised of 30 elected and/or appointed public officials from the local governments that have authority for project implementation; membership also includes local and county elected officials, State Senators, and State Representatives.

El Paso County actively participates in the development of the Transportation Improvement Program (TIPs) administered by El Paso MPO. TIP must include all major capital projects in order to receive federal funding. TIP meetings are open to the public with agendas posted 72 hrs. in advance and available on the MPO website at http://www.elpasompo.org/scroll_bar_area/tip/default.htm. El Paso County Transit continues to participate in regional WTEP and MPO meetings and follows the appropriate posting requirements for meeting times.

El Paso County Transit conducts regular surveys of its ridership and maintains a record of all complaints. This information is reviewed and considered when relevant projects, service changes, or other operational issues are being planned or considered. El Paso County Transit has conducted transportation studies, led by the Texas A&M Transportation Institute (TTI), for rural commuter bus service needs. All studies and any possible proposed service changes were discussed/presented in several stakeholder and public meetings (for each study) to adequately obtain the public's input. Other methods of public outreach were done by press release and the use of social media outlets.

El Paso County Transit may also conduct public informational meetings to obtain public comment when it is considering fare changes, significant route alterations, major capital improvements, or other service or system changes for which the County believes public input is warranted. El Paso County Transit may also proactively schedule presentations before faith-based organizations, community organizations or at community gatherings where members of the public are likely to be in attendance and use County transit services that may be affected by proposed changes.

In such cases, the following process will be utilized:

El Paso County Transit Public Participation Process

- Outline project for which public participation process is sought
- Prepare/update mailing and email lists of key stakeholders and community interests
- Prepare/post/publish, as appropriate, notice of public participation opportunity which may take the form of surveys, public meetings, invitation for comment or other in-put mechanisms
- Develop and make available project outline and information materials along with relevant El Paso County Transit standards/policies, project goals and objectives and how to provide in-put comment
- Maintain a record of public input process, activities and input received.

Since the previous Title VI submittal, El Paso County Transit has conducted regular community engagement and outreach via traditional media, social media, and through on-board customer service.

Public Participation for El Paso County Transit

June 7, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a public meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
June 7, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a stakeholder engagement meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
June 8, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a public meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
June 10, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold two public meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
October 19, 2017	El Paso County Commissioners Court received the First Update for the “El Paso County Regional Transit Institutional Options Feasibility Study”
October 19, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a stakeholder engagement meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
December 7, 2017	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a stakeholder engagement meeting for the “El Paso County Regional Transit Institutional Options Feasibility Study”
August, 23, 2018	El Paso County Commissioners Court received the Final Presentation on the “El Paso County Regional Transit Institutional Options Feasibility Study”
May 16, 2019	El Paso County Commissioners Court received a presentation related to establishing a regional transit entity for El Paso County and local municipal partners
October 1, 2019	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a public meeting for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”
October 2, 2019	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a public meeting for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”

October 3, 2019	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a public meeting for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”
February 25, 2020	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a pop-up event at Sun Metro Transfer Centers for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”
February 26, 2020	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a pop-up event at Sun Metro Transfer Centers for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”
February 27, 2020	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold a pop-up event at Sun Metro Transfer Centers for Task Order 9 “Best Practices for Bus Shelter Locations Along El Paso County Rural Transit Routes”
May 11, 2020	El Paso County Commissioners Court received a presentation on the creation of the El Paso Area Transportation Services, Local Government Corporation (EPATS, LGC)
May 14, 2020	El Paso County partnered with the Texas A&M Transportation Institute (TTI) to hold an online project stakeholder meeting for Task Order 10 “Best Practices and Guidelines for El Paso County Rural Public Transportation to Identify Potential Stop Locations and Route Configurations”
December 7, 2020	El Paso County Commissioners Court discussed and took appropriate action regarding the adoption of the proposed articles of incorporation and bylaws for the El Paso Area Transportation Services, Local Government Corporation (EPATS, LGC)
February 16, 2022	The El Paso Area Transportation Services, Local Government Corporation (EPATS, LGC) held it’s first regular meeting
March 30, 2022	EPATS, LGC Special Meeting
April 20, 2022	EPATS, LGC Regular Meeting
July 20, 2022	EPATS, LGC Regular Meeting
October 19, 2022	The first EPATS, LGC Start of FY Annual Regular Meeting
January 18, 2023	EPATS, LGC Regular Meeting
April 19, 2023	EPATS, LGC Regular Meeting
June 14, 2023	EPATS, LGC Special Meeting
July 19, 2023	EPATS, LGC Regular Meeting
October 4, 2023	EPATS, LGC Special Meeting

October 18, 2023	EPATS, LGC Start of FY Annual Regular Meeting
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It should be noted that meetings for both El Paso County Commissioners Court and the El Paso Area Transportation Services, Local Government Corporation (EPATS, LGC) are publicly broadcast and allows for Public Comment on Consent and Regular Session Agenda Items.

All meetings for public involvement listed above can be accommodated for minority and/or LEP populations upon request to El Paso County Transit at (915) 273-3330.

If information is needed in another language, then contact El Paso County Transit at (915) 273-3330.

Language Assistance Plan

Limited English Proficiency Plan Conducted June 2014, and Amended April 2017

Plan Components

As a recipient of federal US DOT funding, El Paso County Transit is required to take reasonable steps to ensure meaningful access to our programs and activities by Limited English Proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

This LEP Plan has been prepared to address El Paso County Transit's responsibilities as a recipient of federal financial assistance as these 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. 2000d, 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 understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all El Paso County departments receiving federal grant funds.

Plan Summary

El Paso County Transit has developed this LEP 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.

El Paso County Transit's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s) served
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, El Paso County Transit has conducted a *Four Factor Analysis* of the following areas:

1. The number or proportion of LEP persons in the service area who may be served by El Paso County Transit.

2. The frequency with which LEP persons come in contact with El Paso County Transit services.
3. The nature and importance of services provided by El Paso County Transit to the LEP population.
4. The resources/interpretation services available to El Paso County Transit and overall cost to provide LEP assistance.

A summary of the four-factor analysis is in the following section.

Meaningful Access: Four-Factor Analysis

1. Factor 1 – The number or proportion of LEP persons in the service area who may be served by El Paso County Transit.

El Paso County Transit Staff reviewed the latest 2020 U.S. Census data and found that out of the population in rural El Paso County over the age of 5 (129,584 individuals), 74.8% (or 96,742 persons) speak a language other than English at home. Among these individuals, 40.3% (or 52,843 persons) have limited English proficiency, indicating that they speak English 'less than very well.' Within this group, the majority (83.2%) speak Spanish or Spanish Creole, amounting to 49,142 individuals with limited English proficiency. Additionally, there are 720 individuals who speak Indo-European languages (such as European languages), with only 0.1% of them reporting limited English proficiency. Among those who speak Asian or other Pacific Islander languages, 0.2% (284 persons) have limited English proficiency. These findings emphasize the significant presence of limited English proficient individuals in rural El Paso County, particularly among those who speak Spanish, underlining the need for language assistance and outreach programs to ensure effective communication and accessibility for all residents.

2. Factor 2 – The frequency with which LEP persons come into contact with El Paso County Transit services.

El Paso County Transit staff reviewed the frequency with which the Commissioners Court, office staff and bus drivers have or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, El Paso County Transit has had no requests for interpreters and no requests for translated program documents. Nevertheless, the Commissioners Court, office staff and bus drivers have significant contact with LEP persons.

3. Factor 3 – The nature and importance of services provided by El Paso County Transit to the LEP population.

There is a substantial concentration of limited English proficient (LEP) individuals who primarily speak Spanish throughout the entire service area of rural El Paso County, with no significant geographic concentrations of other LEP populations in the service area. In fact, 83.2% of the population in this area, which accounts for more than four out of every five individuals, speak Spanish. Among them, 37.9% speak Spanish exclusively. This demographic landscape is indicative of the prevalence of Spanish speakers in rural El Paso County, with a high proportion of residents being bilingual in English and Spanish. Consequently, many social, service, professional, and leadership organizations within rural El Paso County naturally employ Spanish speakers on their staff and routinely serve the LEP population without necessitating specialized outreach. Given these demographics, El Paso County Commissioners, office staff, and bus drivers are most likely to interact with LEP individuals during bus rides, office visits, phone conversations, and attendance at Commissioners Court meetings, where numerous other bilingual individuals are also present.

4. Factor 4 – The resources/interpretation services available to El Paso County Transit, and overall costs to provide LEP assistance.

El Paso County Transit staff reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if need should arise.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient (LEP) person and may be entitled to language assistance with respect to El Paso County Transit 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.

How El Paso County Transit staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Selected El Paso County Transit staff and contractors will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When El Paso County Transit sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). 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 provided at the event it will help identify the need for future events.

Language Assistance Measures

There is a significant percentage of LEP individuals in rural El Paso County, that is, persons who speak English “not well” or “not at all” and El Paso County Transit will implement the following measures:

- El Paso County Transit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- The following resources will be available to accommodate LEP persons:
 - Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.

Staff Training

The following training will be provided to all El Paso County Transit Staff:

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

All contractors or subcontractors performing work for El Paso County Transit will be required to follow the Title VI LEP guidelines.

Translation Documents

El Paso County Transit weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time documents will only be translated into Spanish. Due to the large Spanish speaking population alongside the significant LEP Spanish speaking population, El Paso County does not have a formal outreach procedure in place.

However, when and if the need arises for LEP outreach, El Paso County Transit will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

El Paso County Transit staff has yet to outsource translation services for any public notices, meetings, or outreach, as in-house staff has been able to accommodate these services. However, El Paso County, averages, about \$40,000/year in costs associated with translation services.

Monitoring and Updating the LEP Plan

El Paso County Transit will update the LEP Plan as required. At a minimum, the LEP Plan will be reviewed and updated when the data from the most recent U.S. Census data is available, or when it is clear that higher concentrations of LEP individuals are present in El Paso County service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether El Paso County Transit financial resources are sufficient to fund language assistance resources needed.
- Determine whether El Paso County Transit fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the El Paso County Transit's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

Dissemination of El Paso County Transit LEP Plan

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request at (915) 546-2143

Special Note

More than two-thirds of the population of El Paso County (69.8%) speaks a language other than English, with the majority of these individuals (74.8%) being bilingual. Specifically, 72.8% of the population speaks Spanish or Spanish Creole, with 59.5% of them reporting that they speak English 'very well.' Among these Spanish speakers, 40.5% report speaking English 'less than very well.' In addition to Spanish, there are smaller populations speaking other Indo-European languages (1.0%), of which 76.1% report speaking English 'very well' and 23.9% 'less than very well.' Furthermore, 0.8% of the population speaks Asian and Pacific Island languages, with 51.2% indicating proficiency in English and 48.8% reporting limited English proficiency. The remaining 0.3% speak other languages, with 71.8% indicating proficiency in English and 28.2% reporting limited English proficiency. Given the substantial bilingual and Spanish-speaking population, service providers are likely to have a significant number of Spanish-speaking staff members who can effectively communicate with Spanish-only speakers utilizing their services.

	El Paso County, Texas		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
Label	Estimate	Estimate	Estimate
Population 5 years and over	706,977	69.8%	30.2%
Speak only English	25.2%	(X)	(X)
Speak a language other than English	74.8%	59.7%	40.3%
Spanish or Spanish Creole	72.8%	59.5%	40.5%
Other Indo-European languages	1.0%	76.1%	23.9%
Asian and Pacific Island languages	0.8%	51.2%	48.8%
Other languages	0.3%	71.8%	28.2%
SPEAK A LANGUAGE OTHER THAN ENGLISH			
Spanish or Spanish Creole	515,008	59.5%	40.5%
Other Indo-European languages	6,718	76.1%	23.9%
Asian and Pacific Island languages	5,404	51.2%	48.8%
Other languages	1,973	71.8%	28.2%

U.S. Census Bureau. "LANGUAGE SPOKEN AT HOME." *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601*, 2021, <https://data.census.gov/table/ACSST5Y2021.S1601?q=el+passo+texas>. Accessed on October 27, 2023.

Vital Documents

Vital Documents which this plan pertains will include the following:

- El Paso County Transit Policy Service Policies

- Notice to the Public
- Title VI Complaint Procedure
- Title VI Complaint Form
- El Paso County Transit Public Participation Plan
- Limited English Proficiency Plan
- El Paso County Transit Service Standards

If information is needed in another language, then contact El Paso County Transit at (915) 273-3330.

Membership and Demographics of Non-Elected Committees and Councils

The El Paso Area Transportation Service, LGC is organized for the purpose of encouraging and assisting local units of government to join and cooperate with one another to provide and deliver regional multimodal transportation solutions for the residents of the Greater El Paso community. The LGC is a partnership between the County, Horizon City, the City of San Elizario and the Village of Vinton. The organization was recognized by the Texas Secretary of State on November 29th, 2021. The LGC looks forward to continuing the process to begin to implement a seamless regional transit system that will benefit the entire El Paso Region as a whole with public transportation.

Body	Hispanic or Latino	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other Race alone	Population of two or more races
Service Area Population	82.64%	11.35%	2.82%	0.27%	1.24%	0.18%	0.28%	1.23%
EPATS, LGC Board	100%	0%	0%	0%	0%	0%	0%	0%

Schedule of Subrecipient Compliance

The Texas Department of Transportation (TxDOT) audits El Paso County Transit annually to verify compliance with Title VI. As a result of this annual audit, El Paso County Transit submits its current Title VI Plan to TxDOT, including any necessary updates and/or revisions, to remain in full compliance. For any third party contractors, included in bid specifications and the contract for all proposed projects, contractors will be required to follow Title VI compliance, on behalf of El Paso County Transit, via this document. El Paso County Transit will conduct quarterly audits of its contractors for compliance with Title VI.

If information is needed in another language, then contact El Paso County Transit at (915) 273-3330.

Equity Analysis

El Paso County Transit has not constructed any facility, such as a vehicle storage facility, maintenance facility, operation center, etc., therefore, there is no equity analysis.

Service Standards

Vehicle Load

The average of all loads during the peak operating period should not exceed the vehicles' achievable capacity which is 16 passengers for a 15' mini-bus.

Vehicle Type	Average Passenger Capacity		<u>Total</u>	<u>Maximum Load Factor</u>
	<u>Seated</u>	<u>Standing</u>		
Type 3b (176" wheelbase cutaway w/lift)	16	2	18	1.125

Vehicle Headways

El Paso County Transit operates eight (8) commuter routes for a total of 99 trips each service day. Service operates during commute and other heavy load hours on regional arterials, Monday through Sunday for Routes 20,30,31, and 50, Monday through Saturday for Routes 10 and 40, and Monday through Friday for the Gold Route, except on New Year's Day, Easter Sunday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas holidays for a total of 307 service days each year.

Scheduling involves the consideration of a number of factors including: available funds, cost of service, ridership, street capacity and condition, density of transit-dependent populations, relationship to regional transportation plan and priorities, relationship to other transportation services and developments, land use, transportation demand management and availability of vehicles.

Route #	Period of Operation	Headways
10	Monday – Saturday	
	AM 05:42 – 12:16	48 – 91 min.
	AT 07:00 – 09:57	48 – 91 min. <i>(Where AT is the second morning run)</i>
	PM 12:21 – 06:57	48 – 91 min.
20	PT 16:00 – 19:21	48 – 91 min <i>(Where PT is the second afternoon run)</i>
	Monday – Friday	
	AM 05:30 – 12:25	48 min.
	AT 08:00 – 13:05	48 min. <i>(Where AT is the second morning run)</i>
	PM 12:30 – 08:06	48 min
	PT 13:10 – 20:20	48 min. <i>(Where PT is the second afternoon run)</i>
	Saturday & Sunday	
30	AM 07:00 – 11:25	95 min.
	PM 11:30 – 16:10	95 min.
	Monday – Friday	
	AM 05:30 – 12:25	50 min.
	AT 06:20 – 11:30	50 min. <i>(Where AT is the second morning run)</i>
	PM 12:30 – 19:25	50 min.

	PT 11:35 – 18:30 Saturday & Sunday AM 08:00 – 16:40 PM 08:00 – 16:40	50 min. (<i>Where PT is the second afternoon run</i>)
31	AM 05:00 – 11:35 AT 05:55 – 13:30 PM 12:40 – 20:15 PT 13:35 – 19:15	60 min. 60 min (<i>Where AT is the second morning run</i>) 60 min 60 min (<i>Where PT is the second afternoon run</i>)
40	AM 06:43 – 12:27 PM 12:32 – 18:16	100 min. 100 min.
50	AM 08:00 – 13:55 AT 09:00 – 12:55 PM 13:00 – 18:00 PT 14:00 – 17:55	100 min. 100 min. (<i>Where AT is the second morning run</i>) 100 min. 100 min. (<i>Where PT is the second afternoon run</i>)
84	AM 50:48 – 11:48 PM 12:10 – 19:17	90 min. 90 min.
Gold Route	AM 04:32 – 09:49 PM 14:56 – 20:39	56 min. 62 min.

On-Time Performance

El Paso County Transit's goal is that ninety-five percent (95%) of vehicles will complete their established routes no more than zero (0) minutes early and no more than five (5) minutes late in comparison to the currently established timetables for each route.

Service Availability

El Paso County Transit's goal is to configure transit services such that seventy-five percent (75%) of all residents in the service area are within a half-mile of commuter bus service. El Paso County Transit's Commuter Bus Service will only stop at time points which are on the public timetables and only at other requested locations limited to safe areas for passenger boarding and debarking, and which provide adequate space for the buses to pull off the road to prevent accidents with another vehicle.

If information is needed in another language, then contact the El Paso County Transit at (915) 273-3330.

Service Policies

Vehicle Assignment

El Paso County Transit vehicles are interchangeable among four out of the seven commuter routes and are assigned by the contracted operator's General Manager based on system needs. Routes 10-40 are interchangeable, while routes 50, 84 and the Gold Route are stand-alone.

The interchangeable buses shall be clearly marked "El Paso County Transit" and contain no exterior advertising or signage and no interior advertising or signage not approved by the County.

All vehicles will be equipped with operable heating and air conditioning systems and shall maintain temperatures $> 65^{\circ}$ F between October 15th and April 1st and $< 75^{\circ}$ or 20° below the ambient outdoor temperature whichever is higher between April 2nd and October 14th.

All vehicles will include working lifts and restraints to accommodate wheelchairs.

Debris will be removed from vehicles after each run. Vehicle interiors will be spot cleaned each day and thoroughly cleaned each week. Vehicle exteriors will be washed each week or more frequently as needed. Graffiti will be removed as soon as possible after it is discovered and vehicles with offensive graffiti that cannot be removed will be taken out of service.

Transit Amenities

Installation of transit amenities along County commuter routes will be determined by the availability of funds and will be based on safety considerations, availability of land, commitment of partners to maintain facilities, applicable laws and estimated passenger boardings.

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