

2023

Waco Transit System, Inc. Title VI Program



Waco Transit System

Serena M. Stevenson, General Manager

City of Waco – Waco Transit System

2023 – 2025

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I. Title VI Notice of Rights

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

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

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

II. Title VI Coordinator

Susan Sturgeon
Human Resource Coordinator
301 S. 8th St., Suite 100
Waco, Texas 76701
(254) 750 – 1915
WTSTitleVIcomplaints@wacotx.gov

III. Title VI Objectives

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with Limited English Proficiency (LEP).

IV. Title VI Notice to the Public and Information Dissemination

Waco Transit System is hereby notifying the public of rights under Title VI. • Waco Transit System 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 she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Waco Transit System. • For more information on Waco Transit Systems civil rights program, and the procedures to file a complaint, contact 254-750-1900 email WTSTitleVIcomplaints@wacotx.gov; or visit our administrative office at 301 S. 8th Street, Suite 100, Waco, Texas 76701. The Title VI Coordinator may also be contacted to request additional information regarding Title VI program responsibilities. For more information, visit www.wacotransit.com • 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, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 • If information is needed in another language, contact 800-555-1212. • Si necesita información en otro idioma, llame al 800-555-1212

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding Waco Transit System program has a right to file a formal complaint. **Any such complaint must be in writing and submitted to Waco Transit's Title VI Coordinator within 180 days following the date of the discriminatory act.** For more information regarding civil rights complaints or if information is needed in another language other than English or Spanish, or if assistance is needed with completing a form please contact:

**Waco Transit System
Title VI Coordinator
301 S 8th Street
Suite 100
Waco, Texas 76701
Phone# (254) 750-1900
WTSTitleVIcomplaints@wacotx.gov**

Title VI information posters shall be prominently and publicly displayed in Waco Transit System facility and on their revenue vehicles. The name of the Title VI coordinator is available on Waco Transit System's website, at <https://www.waco-texas.com/Departments/Transit-System>. Additional information relating to nondiscrimination obligation can be obtained from Waco Transit System Title VI Coordinator.

Title VI information shall be disseminated to Waco Transit System employees annually via the Employee Annual Education Form (see Appendix A) in payroll envelopes. This form reminds employees of Waco Transit System policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions

of Title VI, and Waco Transit System’s expectations to perform their duties accordingly.

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

V. Subcontracts and Vendors

Title VI procedures relating to contractors are enforced by the City of Waco, primarily through direct supervision of operations and the exercise of contract provisions.

The Waco Transit System Operations Department supervises the design of routes and schedules and also oversees the operation of the system. This program ensures compliance with non-discriminatory provisions pursuant to Title VI of the Civil Rights Act of 1964, as amended.

All subcontractors and vendors who receive payments from Waco Transit System where funding originates from any federal assistance, are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

VI. Record Keeping

Title 49 CFR Section 21.9(b) requires recipients to “keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with [49 CFR part 21].

Waco Transit System will maintain permanent records, which include, but are not limited to signed acknowledgements of receipt from the employees indicating the receipt of Waco Transit System’s Title VI Plan. This also includes copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

VII. Title VI Complaint Procedure

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 or be denied benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. If an individual needs assistance filing or completing a Title VI complaint form, they can call 254-750-1900 and request assistance from the Title IV Coordinator. You may also file a complaint by email at WTSTitleVIcomplaints@wacotx.gov.

How to file a Title VI Complaint?

Any person who believes that they have been subjected to discrimination may file a written complaint with Waco Transit System, Inc. Federal and state law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.

The complainant may submit a written statement that contains the following information:

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

- a. Name, address, and telephone number of the complainant.
- b. Names of person(s) who allegedly discriminated against you, if known.
- c. Date(s) of alleged incident.
- d. Location of alleged incident.
- e. Type of alleged discrimination.
- f. Explain what happened and how you believe you were discriminated against.
- g. Name, addresses, and telephone numbers of person who may have knowledge of the event.
- h. What other information do you have that you believe is relevant to this investigation?
- i. Have you filed a complaint with Waco Transit System before? If so, include: when, where, and how.
- j. Complainant's signature and date.
- k. The complaint may be sent or faxed to the following mailing address:

Waco Transit System
Attn: Title VI Coordinator
301 S 8th Street
Suite 100, Waco, Texas 76701
Fax Number: (254) 750-1901
Email- WTSTitleVIcomplaints@wacotx.gov

What happens to the complaint once is it submitted?

The Title VI Coordinator will begin an investigation within fifteen (15) working days of receipt of a complaint.

The Title VI Coordinator will contact the complainant in writing no later than thirty (30) 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 General Manager may administratively close the complaint.

The Title VI Coordinator will complete the investigation within ninety (90) days of receipt of the complaint and prepare a written investigation report. The report shall include a summary description of the incident, findings, and recommendations. The General Manager will review the report and a closing letter will be provided to the complainant.

If the matter cannot be resolved, the complainant will be informed of his/her rights to file a complaint with the Federal Transit Administration (FTA)-Office of Civil Rights, Attention: Title

VI Program Coordinator, Federal Transit Administration Office of Civil Rights 1200 New Jersey Avenue SE Washington, DC 20590.

VIII. Title VI Transit-Related Investigations, Complaints or Lawsuits

Waco Transit System will prepare and maintain a list of the following alleged discrimination on the basis of race, color, or national origin: Active investigations conducted by FTA and entities other than FTA; Lawsuits; and Complaints naming Waco Transit System.

This information shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

List of Investigations, Lawsuits, and Complaints

	Date	Summary (race, color, or national origin)	Status	Action(s) Taken
Investigations				
1				
2				
Lawsuits				
1				
2				
Complaints				
1				
2				

IX. Public Participation Plan

Waco Transit System is the transit system providing public transportation for the Waco Metropolitan Service Area. Waco Transit System uses the Public Participation Plan (PPP) developed and utilized by the Waco Metropolitan Planning Organization (MPO) and works with the MPO to meet the standards and regulation within. The Public Participation Plan for Waco Transit emphasizes the importance of early, on-going public involvement in the transit planning process with respect to 5307 Federal funding and all other funding received. Early public involvement enables Waco Transit System to make more informed decisions, improve quality through collaborative efforts, as well as build mutual understanding and trust between Waco Transit System and the public.

It is the intent of Waco Transit System that the PPP provide the greatest possible involvement in the transit planning process. As part of the Title VI Program, Waco Transit System, is bolstering its public participation processes and enhancing its strategies for engaging under-served groups, including those with limited English. This plan outlines the importance of and provides guidelines for involving the public in efforts to ensure that all groups are represented, and their needs considered. Moreover, Waco Transit System intends that the PPP be implemented in a continuous, proactive manner.

Public Participation Goals and Objectives

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

The following objectives will enable Waco Transit System to meet its overall goal for public participation:

- 1) Identify target audiences/stakeholders and encourage their involvement in the planning process. These include but are not limited to:
 - a. General Public/Citizens
 - b. Minorities (with consideration of Limited English Proficiency persons)
 - c. Low income communities
 - d. Private Businesses/Organizations
 - e. State and Local Governmental entities
 - f. Publicly funded organizations and agencies
- 2) Provide notification of meetings and forums in languages understood by targeted audiences and at locations in which they frequent. This will include visual techniques such as charts, pictures, and maps when necessary.
- 3) Follow the procedures and standards established in the Waco Transit System LEP Program in an effort to reach and communicate with persons speaking a language other than English.

- 4) Establish meeting opportunities at times and locations that maximize public engagement and participation. Phone calls and emails are also encouraged for persons who are unable to attend a forum.
- 5) Continuously evaluate public involvement strategies and make changes as needed to improve the effectiveness of public participation.
- 6) At the beginning of all projects staff will determine which strategies might have the highest potential to encourage public participation and best serve all those affected or possibly affected by the project, including those in the under-served communities. At any time during the project, it may be reevaluated and if appropriate, additional public participation activities will be explored.
- 7) Community involvement and contribution will be included in the development of the plans, passenger amenities, service additions and/or reductions, and fare changes including increases and decreases and improvements at Waco Transit.

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

Public Participation Plan Elements

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

- Provide timely information about transit issues, process, and plans to stakeholders, interested parties, and the general public.
- Give adequate public notice of participation activities and allow time for public review and comment at key decision points. If the final draft of any plan differs significantly from the one available for public comment and raises new material issues an additional opportunity for public comment on the revisions will be made available.
- Report (when significant written or oral comments are received ‘during the planning process as a result of public outreach and participation process) on the disposition of comments in the final plan.
- Solicit the needs and input of historically under-served individuals and agencies that provide services to the same.
- Provide a public comment period of 45 calendar days prior to the adoption of The Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP); and a public comment period of at least 10 calendar days prior to the adoption of any formal amendments or updates.

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

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

Waco Transit System
301 S 8th Street Suite 100
Waco Texas 76701
www.wacotransitsystem.com

Waco MPO
401 Franklin Avenue
Waco, Texas 76701
<http://www.waco-texas.com/cms-mpo/>

X. Public Participation Outreach

Public participation is an ongoing and integral part of the Waco Transit System planning process. This section contains a list and brief description of public participation tools that will be used by Waco Transit System:

- Website – Waco Transit System will use its own site and the Waco Metropolitan Planning Organization website to announce public participation opportunities. These websites will also contain additional information about projects and plans about the Waco Transit System. They are www.wacotransitsystem.com and <http://www.waco-texas.com/cms-mpo/>.
- Database – Waco Transit System maintains a database of media contacts and local agencies that inform and serve our community of passengers. These entities are informed and communicate upcoming plans, service changes or additions, and involvement opportunities.
- Legal Advertisements – The *Waco Tribune-Herald* is the major local newspaper. In addition, *El Tiempo* is the major Hispanic newspaper. Waco Transit System uses both mediums to communicate with the general public.
- Press Releases – Waco Transit System utilizes local channels and news broadcasts to inform the general public.
- Public Meetings – Used to solicit public comments and opinions about transit projects and plans. Advanced notices are given and accessible times and locations are provided.
- Surveys – Surveys may be utilized when a very specific input is desired.
- Posters and Flyers – Can be used to announce meetings and events. These are distributed in public places including those frequented by low-income, minority, and disabled persons.

Waco Transit System also participates in other techniques initiated by the MPO to meet public involvement requirements.

Public Engagement Activities 2019-2022

- ▶ LaSalle Shuttle Public Participation Plan
 - ▶ Council IR – July 19, 2022
 - ▶ Legal Notice / Press Release- July 20, 2022
 - ▶ 1st Public Meeting -August 3, 2022
 - ▶ Legal Notice/Press Release- August 29, 2022
 - ▶ 2nd Public Meeting- September 7, 2022
 - ▶ 55th Day – September 21, 2022
 - ▶ Effective- October 1, 2022
- ▶ Reimagine Waco Plan Public Engagement Phase 1
 - ▶ Find Your Waco Life Festival- October 22, 2021
 - ▶ CROctober Fest -October 22, 2021
 - ▶ Waco Transit System- October 22, 2021
 - ▶ **Project related marketing materials provided to the following:**
 - ▶ Art Locally Waco
 - ▶ Downtown Waco
 - ▶ Prosper Waco
 - ▶ Waco Bicycle Club
 - ▶ Waco Walks
- ▶ Reimagine Waco Public Engagement Phase 2
 - ▶ Kick Off- April 7, 2022
 - ▶ Waco MPO Policy Board Meeting – April 21, 2022
 - ▶ Business Community Outreach meeting (virtual)- April 21, 2022 @ 10am
 - ▶ Open House At Waco Transit System -April 28, 2022
 - ▶ Neighborhood Leaders' Network Meeting-April 28, 2022
 - ▶ **Project related marketing materials provided to the following:**
 - ▶ Union Food Hall
 - ▶ Running Home
 - ▶ Letterpress
 - ▶ Coming Home to Waco
 - ▶ EOAC Community Services
 - ▶ City of Waco Development Center
 - ▶ Spice Village
 - ▶ Bitt & Beau's Coffee
 - ▶ Fabled Bookshop and Café
 - ▶ Provident Heights Elementary School
 - ▶ Poco Loco Supermercado
 - ▶ Waco car audio
 - ▶ Waco Charter School
 - ▶ South Waco Recreation Center
 - ▶ Waco Ale Company
 - ▶ Downtown Barbershop
 - ▶ New Day Bar
 - ▶ Waco Work
 - ▶ Lighthouse Coffee & wine

XI. Waco Transit System Title VI Limited English Proficiency Program and Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the Waco Transit System (WTS) 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 USC 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 programs administered by the Waco Transit system.

Plan Summary

The Waco Transit System 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 participate within the transportation planning process. As defined within Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the WTS used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons who may reside in within the WTS jurisdiction.
2. The frequency with which LEP persons come in contact with WTS administrative staff, office staff, dispatchers, bus/van operators and Policy Board members.
3. The nature and importance of services provided by the WTS to the LEP population.
4. The interpretation services available to the WTS 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

Factor 1: Population Served

The jurisdiction of WTS is coextensive with McLennan County, Texas. According to the 2020 American Community Survey (US Census), 35.1% of persons within the WTS jurisdiction age 5 or older speak a language other than English. Of those persons, 13.3% have limited English proficiency; that is, they speak English less than ‘very well’. In the WTS jurisdiction, of those persons with limited English proficiency, 28.8% speak Spanish, 2.3% speak other Indo-European languages and 3.0% speak Asian or other Pacific Island languages.

Language	Percent LEP
Spanish	28.8
Indo European	2.3
Asian and Pacific Islander	3.0
Other	1.0

While performing the four-factor analysis Waco Transit identified Spanish as the predominant language that met the Safe Harbor LEP Threshold of 5% or 1,000 individuals, whichever is less, will be followed.

GOAL #1: Waco Transit System will monitor local, state, and federal reports for population trends in the Waco Metropolitan area. Moreover, we will communicate with organizations that also monitor population trends and demographics.

Factor 2: Frequency of Contact

The WTS staff reviewed the frequency with which the WTS staff or Policy Board members have, or could have, contact with LEP persons. This includes documenting phone inquiries, public hearings / meetings or office visits. To date, the WTS office staff has had 2 to 4 clients per week via the telephone that request interpretation of information in regard to transportation. There have been no requests for translated program documents. The members of the WTS Policy Board have had no contact with LEP persons at Board meetings regarding the transportation process.

GOAL #1: Waco Transit System will work closely with the Waco Metropolitan Planning Organization (MPO) to continue monitoring residential trends, population densities, and local growth patterns.

GOAL #2: Waco Transit System will continue reviewing transit routes and trip scheduling to ensure services are being made available and being communicated adequately to persons who primarily speak a language other than English.

GOAL #3: Waco Transit System will administer surveys and monitor customer comments and complaints to stay abreast of LEP passenger riding patterns. Leadership staff will also regularly communicate with system drivers and supervisors to identify LEP customer service needs and how best to communicate with that population.

Factor 3: The Nature and Importance of Program

The critical services provided by WTS are paratransit, fixed route services, non-emergency medical transportation, and college transportation needs of the community. Waco Transit's fixed route services provide critical transportation for all rider types including LEP persons, who need medical services, employment opportunities, and education programs.

The span of service at Waco Transit System is as follows: Fixed Route Service is 5:15am – 7:15pm Monday thru Friday and 6:15am – 8:15pm on Saturday. No Sunday service is provided. The Waco Transit System's Paratransit service mirrors the Fixed Route Service in hours of operation and span of service. Waco Transit System uses Spanish route maps to communicate with non-English speaking persons. Bilingual employees at Waco Transit System assist Spanish speaking customers with service questions or inquiries for information. Most of our questions or inquiries are in regard to passengers riding to work, places available for entertainment, shopping, doctor appointments, and other areas of interest.

Paratransit Service at Waco Transit System is also utilized by LEP persons and takes passengers to all the, same types of locations as the Fixed Route Service.

GOAL #1: Waco Transit System will become more involved with the local Hispanic Chamber of Commerce. This will also enable Waco Transit staff to identify services most important to LEP passengers.

GOAL #2: Waco Transit System will ensure route schedules are printed and distributed in English and Spanish and other languages spoken by more than 1,000 people in the Cities.

GOAL #3: Waco Transit System will ensure schedule changes, delays, detours, safety/security data and emergency management information is translated, posted, and distributed in areas frequented by LEP persons.

GOAL #4: Waco Transit System will attempt to maintain qualified individuals who speak Spanish and other languages as an effort to help make overall communication with LEP persons more effective.

Factor 4: Resources and Costs

The WTS reviewed its available resources that could be used for providing LEP assistance and which of its documents that would be most valuable to be translated if the need should arise. Currently, WTS has translated its transportation maps and vital documents to the Spanish language. WTS has bilingual staff members that are available to translate through telephone interpretation, Monday through Friday 8 a.m. to 5 p.m. Other language translation if needed would be provided through a telephone interpreter line for which there is a cost. Costs for these services include a charge of \$.74 per minute for a language other than Spanish.

While performing the four-factor analysis, the Waco Transit and Waco MPO identified Spanish as the predominant language that met the Safe Harbor LEP Threshold of 5% or 1,000 individuals, whichever is less, will be followed. The Waco MPO and other local organizations will continue to monitor (if any) additional groups are identified that may meet the Safe Harbor LEP Threshold. As a result of this analysis, Waco Transit had our system wide transit map translated into Spanish. The cost to print Spanish maps each time a new transit map is updated is approximately \$1,000.00.

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 person and may be entitled to language assistance with respect to WTS 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 following steps will be used by the WTS staff to identify an LEP person who needs language assistance:

- Post notice of the LEP plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- WTS staff will be provided with 'I Speak' cards to assist in identifying the language interpretation needed if the occasion arises.
- WTS staff will record any contacts with LEP persons and WTS staff will review these contacts annually.
- When the WTS sponsors or conducts an informational meeting, hearing or event, an advanced public notice of the event will 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 able to be provided at each and every event, it will help identify the need for future events.

Language Assistance Measures

Although the overall percentage of LEP individuals within the WTS area is small, as determined in factor three of the four-factor analysis, certain neighborhoods have much higher percentages than the regional average. As a result, especially in those neighborhoods within high LEP percentages, the WTS will strive to offer the following measures:

1. The WTS will take reasonable steps to provide the opportunity for meaningful access to LEP residents who have difficulty communicating in English.
2. Language interpretation will be accessed for all other languages through a telephone interpretation service.

3. Establish relations with more agencies and organizations serving LEP persons.
4. Get feedback from agencies regarding key languages being used and resources from those agencies that may assist WTS with LEP persons as it relates to transportation needs of the LEP individuals.
5. Identify other key documents that will require translation.
6. Place a link on the WTS website, <https://www.waco-texas.com/Departments/Transit-System> with access to documentation that is pertinent to the transportation needs of the LEP individuals.
7. Develop training to administrative staff, office staff, dispatchers, and bus/van operators on how to respond to LEP individuals and basic education on the services that should be available to all LEP individuals.

The following resources will be available to accommodate LEP persons:

- Interpreters for the Spanish language are currently available to all callers in regard to transportation needs. Any client who has transportation needs and arrives on the WTS site will be provided translation services by one of our bilingual staff members.
- Language interpretation will be accessed for all other languages first through either Baylor University or McLennan Community College or if not available through Baylor or MCC, then through a telephone interpretation service.

GOAL #1: Include LEP program efforts in system planning, budgeting, and deliverables when relative.

GOAL #2: Make Waco Transit System LEP Program and concept part of regular service operations. The actual plan and goals will be reviewed biannually to monitor progress and achievement.

Plan Implementation

Waco Transit's current LEP Program efforts include:

- Bilingual Staff
- Notice to the public
- ISPEAK Language Identification Card

Waco Transit's LEP goals include those listed in the Four Factor Analysis section, continuation of current efforts, and the following:

- Advertising in ethnic media
- Vital documents will be printed in languages other than English

Monitoring and Updating the LEP Plan

The WTS will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when new data from the US Census is publicly available. 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 within the Waco Metropolitan 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 the WTS financial resources are sufficient to fund language assistance resources when needed.
- Determine whether the WTS fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning WTS's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

As demographics and communication measures change for persons in the LEP threshold, Waco Transit will adjust policies and procedures accordingly. Changes will be reported through the establishment of new goals, objectives, and training measures for staff. Additionally, Waco Transit will continue to report to the LEP population any adjustments in service or new ways in which they can find information regarding the service. Record of the changes (if any) will be recorded and reported with Title VI documentation annually. The LEP Program document will be treated as a living document and thereby adjusted as often as necessary

Conclusion

This document serves as Waco Transit's analysis, goals, and implementation plan for passengers who primarily speak a language other than English. Current goals and efforts should not pose a financial burden on the agency; however, as more LEP persons move to the city of Waco, costs are certain to increase as our contact efforts will have to increase. The agency will update this document in TEAM triennially to include new goals, technology, efforts, and means to further communicate with non-English speaking persons within the community in which we provide transportation services. However, as goals and communication measures change, Waco Transit will revise the LEP program document at the time of the revision.

XII. Membership of Non-Elected Committees and Councils

Minority representation on planning and advisory bodies is covered by Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program. The City of Waco follows the CFR guidance when selecting Transit Advisory Board members. Minority members are encourage to apply on the City of Waco Boards and Commissions webpage as are all members of the general public.

Waco Transit System has a transit-related, non-elected transportation advisory board (TAB) of which the membership is appointed by the governing bodies of the city of Waco.

Description of efforts made to encourage the participation of minorities on such committees.

The governing body of the city of Waco select representation on several community boards and committees that guide the decision-making process. Applications for such membership and the qualifications and eligibility are determined by a combination of the following: ordinance, statute, experience, background, and interest. The value of this body directly reflects the interest and dedication of our citizens in making the city of Waco a better place to live and are encouraged to apply for appointment to any Board/Commission in which one may be interested.

Table Depicting Membership of the Transit Advisory Board Non-Elected Members

Body	Caucasian	Latino	African American	Native American
Waco Population				
Transit Advisory Board				

Note: Waco Transit System does not have authority in selecting TAB members and the City of Waco does not collect the above data on committee, board participants.

Waco Transit Advisory Board

Board Roster

**Jon Mark Buckner****1st Term** Oct 01, 2021 – Sept 30, 2023

Email hwwii2@me.com

Home Phone Mobile: (615) 693-4717

Address

4907 Lake Hurst Dr.

Waco, TX 76710

Appointing Authority City Council

Position 5

Appointment Date Nov 02, 2021

**Wilson Boggess****1st Term** Oct 01, 2021 – Sept 30, 2023

Email rocky@prosperitytax.com

Home Phone Mobile: 254-315-6233

Address

5404 Copper Mountain Drive

Waco, TX 76708

Appointing Authority City Council

Position 1

Appointment Date Sep 06, 2022

**Isabel Lozano****2nd Term** Oct 01, 2021 – Sept 30, 2023

Email isabel.lozano@wacoisd.org

Home Phone Mobile: (254) 744-0616

Alternate Phone Business: (254) 752-3316

Address

2201 Baylor Avenue

Waco, TX 76706

Appointing Authority City Council

Position 2

Appointment Date Sept 21, 2021

**Jon Passavant****1st Term** Apr 05, 2022 – Sept 30, 2023

Email jon@startupwaco.com

Home Phone Mobile: (254) 304-9179

Address

XXXXX

Waco, TX 76710

Appointing Authority City Council

Mayor, At-Large

Appointment Date Apr 05, 2022



John Lowe

2nd Term Oct 01, 2021 – Sept 30, 2023

Email john_lowe@baylor.edu

Home Phone Mobile: (254) 230-2766

Alternate Phone Home: (254) 399-8239

Address

7021 Canterbury Dr.

Waco, TX 76712

Appointing Authority City Council

Position 3

Appointment Date Sept 07, 2021



Austin Meek

2nd Term Oct 02, 2022 – Sept 30, 2024

Email austin.a.meek@gmail.com

Home Phone Home: (214) 458-8575

Address

XXXXX

Waco, TX 76701

Appointing Authority City Council

Position 4

Appointment Date Nov 01, 2022



Daysi Barrera

1st Term Oct 01, 2021 – Sept 30, 2023

Email daysiamadordiaz@gmail.com

Home Phone Mobile: (254) 498-4498

Address

1024 N 60th St.

Waco, TX 76710

Appointing Authority City Council

Position 4

Appointment Date Sept 07, 2021



Suzi Elnaggar

1st Term Oct 01, 2022 – Sept 30, 2024

Email suzi.elnaggar@gmail.com

Home Phone Mobile: (219) 292-1525

Address

3303 Castle Ave

Waco, TX 76710

Appointing Authority City Council

Position 3

Appointment Date Sept 06, 2022



Roy Walthall

1st Term Oct 02, 2022 – Sept 30, 2024

Email lavegavet@yahoo.com

Home Phone: (254) 723-8796

Alternate Phone: (254) 799-0808

Address

1936 Post Oak Drive

Waco, TX 76705

Appointing Authority City Council

Position 1

Appointment Date Sept 06, 2022



Mason Dunnam

2nd Term Oct 01, 2022 – Sept 30, 2024

Email

masondunnam@dunnamlaw.com

Business Phone: (254) 753-6437

Alternate Phone: (254) 744-2911

Address

4012 Parrott Avenue

Waco, TX 76707

Appointing Authority City Council

Position 5

Appointment Date Sept 06, 2022

XIII. Monitoring Sub-recipients

In accordance with 49 CFR 21.9(b), and to ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must monitor their sub-recipients for compliance with the regulations. Importantly, if a sub-recipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

XIV. Title VI Equity Analysis

Waco Transit has not constructed or determined sites of new facilities since the last Title VI Program submission; therefore, has not undergone a Title VI Equity Analysis. Should Waco Transit System embark on such a project in the future, it will conduct an equity analysis to maintain full compliance with FTA's Title VI regulations.

Appendix A



Title VI Employee Annual Education Form Year

Waco Transit Employees:

The Federal Transit Authority requires transit agencies to design and implement a Title VI program. A copy of the Title VI Program is available in the break room (bright pink). Within this program, Waco Transit is required to include an “Employee Annual Education Form” every year to all employees with their pay check/stub. This form includes the Title VI Policy and the designated Title VI Coordinator.

Title VI Policy

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of Waco Transit System, Inc. are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint regarding Title VI protections, direct him or her to contact:

Susan Sturgeon
Title VI Coordinator
254.750. 1915
susans@wacotx.gov

Thank you,

Susan Sturgeon

Appendix B

Acknowledgement of Receipt of Title VI Plan

I have been informed of the Waco Transit System's Title VI Plan and of its location on site. As an employee of Waco Transit System, I am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI regulations (49 CFR part 21) in Federal Transit Administration (FTA) Circular 4702.1B issued October 1, 2012.

Employee signature

Print your name

Date

Appendix C

Waco Transit System Title VI Complaint Form

This form is used to file a complaint with Waco Transit System, Inc. based on purported violations of Title VI of the Civil Rights Act of 1964. You are not required to use the attached form. A letter that provides the same information is sufficient to file a complaint.

If you need assistance completing this form due to physical impairment, please contact our office by phone at (254) 750-1900.

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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
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:

Waco Transit
 Title VI Coordinator
 301 S 8th Street Suite 100, Waco, Texas 76701

Waco Transit System
Forma de Queja para Titulo VI

Esta forma es para presentar un queja de violacion a Titulo VI of the Civil Rights Act of 1964. No es requerido llenar esta forma. Una carta con esta misma informacion es suficiente.

Si usted necesita ayuda llenar esta forma por una discapacidad, llame al numero (254) 750-1900.

Seccion I:				
Nombre:				
Direccion:				
Telefono (Casa)			Telefono (Movil)	
Correo Electronico:				
Formas Accesibles:	Large Print		Audio Tape	
	TDD		Other	
Seccion II:				
Usted tiene la queja?			Si*	No
*Si tu respuesta es, "SI" sigue a la seccion III.				
Si tu respuesta es, "No" en el espacio escribe el nombre de la persona y la relacion:				
Porque estas llenando esta forma de tercera persona: _____				
Porfavor confirme que usted tiene derecho de llenar esta forma por la persona:			Si	No
Section III:				
Yo siento que la discriminacion es basada en:				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origin Nacional				
Fecha cuando ocurrio la discriminacion: _____				
Porfavor escribe lo que sucedio en esta fecha y por que sientes que fuistes discriminado. Porfavor incluye los nombres de las personas involucradas.				

Seccion IV				
Usted a llenado esta forma anterior?			Si	No

Seccion V	
Usted a entregado esta queja a la agencia federal, estatal, local o otra agencia federal o estatal de corte	
<input type="checkbox"/> Si	<input type="checkbox"/> No
Si conteso si, escoge la agencia:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Porfavor incluya el nombre de la person quien contacto para la discriminacion.	
Nombre:	
Titulo:	
Agencia:	
Dirreccion:	
Numero de telefono:	
Seccion VI	
Nombre de la agencia contra la discriminacion:	
El nombre de persona de contacto:	
Titutlo:	
Numero de telefono:	

Puedes incluir otra informacion or documentos involucrados:

Firma

Fecha

Entraga esta informacion a el Coordinador de Titulo VI:

Waco Transit
Title VI Coordinator
301 S 8th Street Suite 100, Waco, Texas 76701

XVII. Service Standards and Policies

Waco Transit System has developed a set of quantifiable service standards and policies. These service standards are documented below.

Vehicle Load Standards

Maximum seating capacity is outline below for fixed route transit vehicles.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity
Opus LFB-34	31	25	56
Opus LFB-29	23	26	49
New Flyer Xcelsior-35	32	26	58
El Dorado Passports	22	8	30
Chance Trolley	24	6	30

Headways (Frequencies)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. Currently, all fixed routes for Waco Transit System are scheduled at one hour frequencies. The one commuter route offered by Waco Transit is one hour and fifteen minutes in duration.

On-Time Performance (Schedule Adherence)

Among the most important service standard for riders is On-Time Performance or adherence to published schedules.

- A vehicle is considered on-time if it departs a scheduled time point no more than (3) minutes early and no more than (3) minutes late.
- Waco Transit's on-time performance objective is 97%

Service Availability

Waco Transit System currently provides service so that 55.0% of all residence of the greater Waco urbanized area is within 1,300 feet (1/4 mile) walk of bus service. Consideration is given to new markets as demand warrants and as resources are available.

Vehicle Assignment Policy

The fleet operated by Waco Transit System has an average age of approximately 9.89 years. Waco Transit has two different size buses that are utilized for the (9) fixed routes, (6) university shuttle routes and (1) commuter route. When possible, Waco Transit assigns the most practical sized vehicle to meet the demand of each type of service offered.

Transit Amenity Policy

Waco Transit System is a flag stop system and does not have fixed stops. Every effort is made to pick up clients anywhere along the route as long as the location is a safe area. Waco Transit places benches and shelters along our routes according to industry and safety standards (TCRP Report 19) with consideration of permitting and for local and special needs.

Waco Transit System places shelters and benches throughout the service areas based on where the service generators are located (i.e. Wal-Mart, HEB, Caritas, Malls, etc.). In addition, benches are placed along the routes in safe and accessible areas to assist passengers.

If a passenger amenity is damaged beyond repair, Waco Transit reserves the right to permanently remove the amenity.

LANGUAGE IDENTIFICATION FLASHCARD

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

- | | |
|---|--------------------|
| <input type="checkbox"/> Cocher ici si vous lisez ou parlez le français. | 13. French |
| <input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | 14. German |
| <input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | 15. Greek |
| <input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | 17. Hindi |
| <input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | 18. Hmong |
| <input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | 20. Ilocano |
| <input type="checkbox"/> Marchi questa casella se legge o parla italiano. | 21. Italian |
| <input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。 | 22. Japanese |
| <input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | 23. Korean |
| <input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ. | 24. Laotian |
| <input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish |

- | | | |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această căsuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратик уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้กาเครื่องหมายลงในช่องนี้ท่านอ่านหรือพูดภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> | Xin ñaunh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø nouì ñöôïc Vieät Ngöô. | 37. Vietnamese |
| <input type="checkbox"/> | באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |