



Title VI Plan

Approved by the
Transportation Planning Policy Board
on March 14, 2018

Prepared By:
Killeen-Temple Metropolitan Planning Organization
2180 N. Main Street
Belton, TX 76513

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Section 1: Title VI Plan Approval



KILLEEN TEMPLE METROPOLITAN PLANNING ORGANIZATION (KTMP) TRANSPORTATION PLANNING POLICY BOARD MEETING (TPPB)

Wednesday March 14, 2018
9:30 AM

Central Texas Council of Governments (CTCOG)
2180 North Main Street
Belton, TX 76513

Policy Board Voting Members Present

Chair Mayor Marion Grayson—City of Belton	Councilmember Tim Davis—City of Temple
Judge John Firth—Coryell County	Mayor Tammy Cockrum—Bell County
Commissioner Tim Brown—Bell County	Carole Warlick—Hill Country Transit District (HCTD)
Brynn Myers for Mayor Danny Dunn—City of Temple	Stan Swiatek—Texas Dept. of Transportation (TxDOT) Waco District
Amy Burlarley-Hyland for Councilmember Juan Rivera—City of Killeen	

Policy Board Non-Voting Members Present

Kristina Manning for Keith Gogas—Fort Hood

Others Present

Liz Bullock—TxDOT Waco District	Sam Listi—City of Belton
Victor Goebel—TxDOT Waco District	Jim Reed—KTMP
Darrell-Burtner—HCTD	John Weber—KTMP
	Kendra Coufal—KTMP

Meeting Minutes

- 1. Call to Order:** Chair Mayor Marion Grayson called the meeting to order at 9:35 a.m.
- 2. Opportunity for Public Comment:** No comments were made from the public.
- 3. Staff Update:** KTMP staff provided the following updates.

--John Weber stated that a Transportation Improvement Program (TIP) administrative amendment is needed for Belton project B40-05. The administrative amendment includes funding category was clarified from Category 9 to Category 9 TAP, project date was revised from FY2020 to FY2021 and the

local In-Kind Participation in the amount of \$194,325 was added to the Preliminary Engineering section of the project cost.

--The next Bicycle/Pedestrian Advisory Committee meeting will be held on May 15, 2018 at 9:00 a.m. The next Freight Advisory Committee meeting will be held on May 22, 2018 at 11:30 a.m.

--Ozone readings for the month of February were 46 parts per billion (ppb) at the Killeen station and 43 ppb at the Temple station.

--Jim Reed explained that KTMPO is planning to allocate Category 2 funds for projects in the upcoming months.

4. Action Item: Approve minutes from February 21, 2018 meeting.

Sam Listi made a motion to approve February 21, 2018 meeting minutes, seconded by Councilmember Tim Davis; the motion passed unanimously.

5. Action Item: Regarding approval of amendments to the 2040 Metropolitan Transportation Plan (MTP) and FY17-20 Transportation Improvement Program (TIP) regarding Belton project, B40-04, Chisholm Trail Corridor Hike and Bike Facility Phase II.

Jim Reed stated that a 15 day public comment period and one public hearing was held for amendments to the 2040 MTP and FY17-20 TIP. An amendment was needed to revise the project limits and project description for this project. The revised project limits are University Blvd 0.25 miles south of Crusader Way to Tiger Dr 0.10 mi north of Sparta Road and the revised description is construct sidewalks and shared use path—widths vary from 8 ft. to 10ft; includes landscaping and lighting. KTMPO did not receive comments during this time.

Sam Listi made a motion to approve proposed amendments to the 2040 MTP and FY17-20 TIP regarding Belton project, B40-04, Chisholm Trail Corridor Hike and Bike Facility Phase II, seconded by Carole Warlick; the motion passed unanimously.

6. Action Item: Regarding approval of amendments to the FY17-20 Transportation Improvement Program (TIP) regarding the following projects:

- a) Transit's Fleet Replacement Project, A40-15 (CSJ 0909-36-062)
- b) Killeen's SH 195, K40-27 (CSJ 0836-02-073)
- c) US 190, W40-06 (CSJ 0231-03-145 and CSJ 0231-04-061)
- d) Harker Heights' US 190 at FM 2410, H35-01 (CSJ 0231-03-147)

Kendra Coufal provided explanations on the following amendments. Project A40-15 was selected by the Policy Board to receive 10% of Category 7 funds (\$1,615,000) on May 17, 2017. The project was included in the public involvement process for an amendment that occurred May 20-June 3, 2017 for the FY17-20 TIP. On June 21, 2017, the Policy Board approved the amendment for adding the Transit Project to the TIP, however, the TIP sheet for the project was mistakenly omitted from the Policy Board meeting packet. Since the June 2017 meeting, the Transit Project was administratively amended on August 28, 2017 to remove the word "Transit" from the cell labeled "City." The original TIP sheet made available during the public involvement process and the administratively amended TIP sheet from August 2017 were presented to the TPPB.

Project K40-27 was selected for TxDOT Project Development funding on May 18, 2016 and was placed in Appendix D of the TIP. This project was selected by the Policy Board to receive Category 7 funds (\$800,000) on May 17, 2017. The project was included in the public involvement process for an amendment that occurred May 20-June 3, 2017 for the FY17-20 TIP. On June 21, 2017, the Policy Board approved the amendment for adding the project to the TIP. Since the June 2017 meeting, the project was administratively amended on March 7, 2018 to update the total project cost from \$1,581,000 to \$902,000. The original TIP sheet approved by the Policy Board in June 2017 and the administratively amended TIP sheet from March 2018 were presented to TPPB.

Project W40-06 was selected by the Policy Board to receive Category 2 funds (\$39,000,000) on May 17, 2017. The project was assigned two Control Section Job (CSJ) numbers by TxDOT (CSJ 0231-03-145 and CSJ 0231-04-061) and presented on two separate TIP sheets during the public involvement process for an amendment that occurred May 20-June 3, 2017 for the FY17-20 TIP. On June 21, 2017, the Policy Board approved the amendment for adding the project to the TIP, however, one of the two TIP sheets for the project was mistakenly omitted from the Policy Board meeting packet. The two TIP sheets made available during the public involvement process were presented to TPPB.

Project H35-01 was selected by the Policy Board to receive Category 7 funds (\$5,000,000) on May 17, 2017. The project was included in the public involvement process for an amendment that occurred May 20-June 3, 2017 for the FY17-20 TIP. On June 21, 2017, the Policy Board approved the amendment for adding the project to the TIP. Since the June 2017 meeting, the project was administratively amended on November 16, 2017, to update the description of the project to accurately describe the location "at FM 2410." The original TIP sheet approved by the Policy Board in June 2017 and the administratively amended TIP sheet from November 2017 were presented to TPPB.

Carole Warlick made a motion to approve proposed amendments to the FY17-20 TIP for KTMPO projects A40-15, K40-27, W40-06 and H35-01, seconded by Sam Listi; the motion passed unanimously.

7. Discussion and Action Item: Regarding approval of updated plans to include:

- a) Public Participation Plan;
- b) Title VI Plan; and
- c) Limited English Proficiency Plan.

Jim Reed stated that a 45 day public comment period and two public hearings were held for the updated Public Participation Plan. KTMPO did not receive any comments during this time. The Title VI Plan is to be updated every year with the last update occurring in September 2014. The Title VI Plan Addendum includes the Limited English Proficiency Plan (LEP). Mr. Reed explained that KTMPO has adopted HCTD's LEP Plan in the past and propose to do the same. Their current plan was updated in July 2017.

Councilmember Tim Davis made a motion to approve the Public Participation Plan and to adopt the Title VI Plan and Limited English Proficiency Plan, seconded by Brynn Myers; the motion passed unanimously.

8. Action Item: Regarding approval of draft FY19-22 Transportation Improvement Program (TIP) and initiation of the public involvement process.

Jim Reed explained that the TIP is to be updated every two years with the last update occurring in 2018. The approved FY19-22 TIP will need to be submitted to TxDOT on June 1, 2018. A 30 day public comment period will be from March 17, 2018 to April 15, 2018. Two public forums will be held on April 10, 2018 at noon and 5 p.m. at the Copperas Cove Police Station and at the CTCOG offices in Belton respectively.

Commissioner Tim Brown made a motion to approve draft FY19-22 TIP and to initiate the public involvement process, seconded by Amy Burlarley-Hyland; the motion passed unanimously.

9. Discussion Item: 2045 Metropolitan Transportation Plan (MTP) project selection and scoring process.

Jim Reed explained that the MTP is required to be updated every 5 years with the next update to occur in May 2019. In order to adhere to the 2045 MTP update schedule, staff would like to finalize the scoring criteria, project submission and project scoring process in April. For scoring criteria, project submission and project scoring process, staff recommended using the same scoring criteria form the 2016 MTP Reprioritization, keep legacy projects and submit new projects only, and use subjective scores from 2016 Reprioritization and score new projects only. Entities may revise past projects if desired. Any entity that wishes to withdraw a legacy project may do so in writing.

The consensus on March 7, 2018 was that TAC supported the above staff recommendations regarding legacy projects and scoring criteria with minor revisions to the weighting of objectives that would not require resubmission of legacy projects. Subjective scoring process will be further discussed at the April meeting.

TPPB consensus was to support TAC's recommendations.

10. Discussion Item: 2045 Metropolitan Transportation Plan (MTP) project selection and scoring process.

Jim Reed explained that KTMPO staff has prepared two options to calculate estimated transportation funds. Option #1 uses the same inputs as decided for the 2040 MTP update and option #2 uses the same inputs as decided for the 2040 MTP update in addition to new inputs developed by TTI since the previous MTP update. At the March 7, 2018 TAC meeting, TAC supported staff recommendations of utilizing Option #1 with baseline and medium scenarios for Short and Long Range Plans, respectively. Staff plans to present fiscal constraint options again in April for final discussion and approval.

TPPB consensus was to support Staff's recommendations.

11. Discussion Item: 2045 Metropolitan Transportation Plan (MTP) public workshops.

Jim Reed explained that KTMPO will host a series of public workshops to inform the public of the Plan update and to obtain the public's perspective on regional priorities. Staff have scheduled workshops in 5 different locations across the MPO region in the month of April. TPPB was presented with a list of public workshop dates and times.

No discussion was taken on this item.

12. Public Comments: Public input received through February 28, 2018.

Public input received through February 28, 2018 was presented.

13. Member Comments: No comments were made from the public.

14. Adjourn: The meeting adjourned at 10:04 a.m.

These meeting minutes were approved by the TPPB members at their meeting on _____.

Mayor Marion Grayson, Chair

Jim Reed, Interim KTMPO Director

Section 2: Description of Organization and Service Provided

The Killeen-Temple Metropolitan Planning Organization (KTMPO) is responsible for establishing a comprehensive transportation planning process for the greater area around Killeen and Temple. The MPO is comprised of a Transportation Planning Policy Board and a Technical Advisory Committee whose members are community and county elected officials and/or are appointed by those officials.

The KTMPO boundary covers all of Bell County, parts of Coryell and Lampasas counties, portions of Fort Hood and encompasses the following cities: Bartlett, Belton, Copperas Cove, Harker Heights, Holland, Kempner, Killeen, Little River-Academy, Morgan's Point Resort, Nolanville, Rogers, Salado, Temple, and Troy.

The Central Texas Council of Governments (CTCOG) is the fiscal agent for KTMPO. CTCOG covers a seven-county region which includes the MPO planning area.

Hill Country Transit District (HCTD) operates the only regional public transportation system for this area. HCTD provides rural service to the seven CTCOG counties and also to Llano and Mason counties. In addition to the rural service, HCTD operates two urban divisions—the Temple Urban Division which includes the cities of Temple and Belton, and the Killeen Division which includes the cities of Killeen, Copperas Cove and Harker Heights. Service in the urban divisions includes fixed route and complementary para-transit service.

Section 3: Policy Statement

The Central Texas Council of Governments (CTCOG), as a recipient of Federal Financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, assures that no person shall, on the grounds of race, color, sex, religion, disability, age, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. CTCOG further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether or not those programs and activities are federally funded.

In the event CTCOG distributes federal aid funds to another entity or contractor, CTCOG will include Title VI language in all written agreements and will monitor for compliance.

CTCOG's Executive Director is responsible for initiating and monitoring Title VI activities, preparing required reports, and other CTCOG responsibilities as required by 23 CFR 200 (Title VI Program and Related Statutes) and 49 CFR 21 (Nondiscrimination in Federally-Assisted Programs of the Department of Transportation).



Jim Reed
CTCOG Executive Director

11/28/2017
Date

Section 4: Authorities

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the term "programs or activities" to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether or not such programs and activities are federally assisted (Public Law 100-259 [S. 557] March 22, 1988).

KTMO's Title VI practices and reviews are governed by a wide range of requirements, including federal laws, regulations, and executive orders which include, but are not limited to the following:

Title VI of the Civil Rights Act of 1964 is a federal law that protects individuals, groups and organizations from discrimination on the basis of race, color or national origin in federally assisted programs and activities. Since other nondiscrimination authorities have expanded the scope and range of Title VI application and reach, reference to Title VI includes other provisions of federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving federal financial assistance.

42 USC Section 2000d, Prohibits discrimination in federally assisted programs on the basis of race, color, or national origin.

The 1970 Uniform Act (42 USC 4601) prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federally assisted programs or activities.

The Age Discrimination Act of 1975 (42 USC, Section 6101-6107) prohibits discrimination based on age.

Americans with Disabilities Act of 1990, as amended, (42USC 12101 et seq.), prohibits discrimination on the basis of disability.

23 USC 109(h), National Environmental Policy Act of 1969, Implementation.

Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC, Section 324) prohibits discrimination based on sex (gender).

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on a disability.

The Civil Rights Restoration Act of 1987, P.L. 100-209 further clarified the intent of Title VI to include all programs and activities of entities whether those programs and activities are federally funded or not.

23 CFR Part 200, the Federal Highway Administration's Title VI Program Implementation and Review Procedures.

23 CFR Part 450, Metropolitan Planning Organization (MPO) Regulations.

28 CFR Part 50.3, US Dept. of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964.

49 CFR Part 21, the U.S. Department of Transportation's Implementing Regulations of Title VI of the Civil Rights Act of 1964.

USDOT Order 1050.2, Standard DOT Title VI Assurances.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, addresses disproportionate adverse environmental, social and economic impacts that may exist in communities, specifically minority and low-income populations.

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, addresses access to services for persons whose primary language is not English and who have limited ability to read, write, speak or understand English.

Executive Order 12250, *Leadership and coordination of Nondiscrimination Laws*, addresses consistent and effective implementation of various laws prohibiting discriminatory practices in Federal programs and programs receiving Federal financial assistance.

Central Texas Council of Governments (CTCOG) Procurement Policy, addresses rules and regulations for acquiring goods and services.

Section 5: Organization and Staffing - General

The Director of KTMPO is responsible for ensuring the implementation of KTMPO Title VI program. The Title VI Coordinator (hereafter referred to as Coordinator), on behalf of the KTMPO Director, is responsible for oversight of the Title VI program. The day-to-day administration of the program lies with the Title VI Coordinator under the direct supervision of the KTMPO Director.

Section 6: Title VI Coordinator Responsibilities

The Title VI Coordinator with assistance from program liaisons is assigned the responsibility for implementing, monitoring, and ensuring KTMPO's compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received by KTMPO.
2. Collect statistical data (race, color, sex, and national origin) of participants in, and beneficiaries of KTMPO programs, i.e. citizens and affected communities.
3. Review Environmental Impact Statements prepared by KTMPO for Title VI and Environmental Justice compliance.
4. Conduct Title VI review of program areas (planning, education and training, environmental affairs and contracting).
5. Conduct Title VI review of consultant contractors and recipients of federal funds directly distributed by KTMPO.
6. Review internal policies and, where applicable, include Title VI and related requirements.
7. Make available training for KTMPO employees on Title VI and related statutes for KTMPO programs.
8. Prepare a yearly report of Title VI accomplishments for the past year.
9. Prepare Title VI information for dissemination to the general public and, where necessary and appropriate, in languages other than English.
10. Conduct approval reviews of KTMPO programs and applicants for compliance with Title VI requirements, i.e. persons seeking contracts with KTMPO.
11. Identify, investigate, and eliminate discrimination when found to exist in connection with KTMPO programs.
12. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

Section 7: Program Administration - General

The KTMPO Director will be responsible for ensuring the implementation of the KTMPO Title VI program. The Coordinator will assist in the overall administration of the Title VI program, plan and assurances. KTMPO Program Liaisons will assist the Coordinator in the day-to-day administration of the program.

A. Complaints

If any individual believes they or any other program beneficiaries have been the object of an unequal treatment or discrimination as to the receipts of benefits and/or services, or on the grounds of age, race, color, national origin, sex, disability, or religion they may exercise their right to file a complaint with KTMPO. Every effort will be made to resolve complaints informally at the agency, subrecipient, and contractor's level. A record of Title VI investigations, complaints, and lawsuits is provided in Addendum 2.

B. Training Program

KTMPO will assist the Texas Department of Transportation (TxDOT) in the distribution of information on available training programs regarding Title VI and related statutes to KTMPO employees. Training is available to all KTMPO employees as related to their job descriptions.

C. Public Dissemination

KTMPO will disseminate Title VI Program information to KTMPO employees, subrecipients, and contractors, as well as the general public as necessary for KTMPO programs. Public Dissemination will include posting of public statements in public areas of the agency's office, the electronic posting of public statements on the agency's web site, inclusion of Title VI language in contracts, and distribution of Title VI information sheets/brochures as appropriate.

D. Remedial Action

KTMPO will actively pursue the prevention of any Title VI deficiencies or violations and will take the necessary steps to ensure compliance with program administrative requirements. If irregularities occur in the administration of the federal and/or state funds, corrective action will be taken to resolve Title VI issues. When conducting Title VI reviews on subrecipients, KTMPO will reduce to writing remedial action agreed to be necessary, all within a period not to exceed 90 days.

KTMPO will seek the cooperation of the subrecipient in correcting any deficiencies found during the review. KTMPO will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily. Subrecipients placed in a deficiency status

will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies.

If a subrecipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the Coordinator will submit to the KTMPO Director two copies of the case file and a recommendation that the subrecipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the subrecipient refuses to comply, KTMPO may, with TxDOT and FHWA's concurrence, initiate sanctions per 49 CFR 21.

TxDOT will be notified of any complaint filed involving Title VI issues, as well as its resolution.

E. Limited English Proficiency (LEP)

KTMPO will make every effort to provide services to individuals with Limited English Proficiency (LEP), either through translation or interpreter, available prior to scheduled meetings, such as public hearings or project meetings.

When a need has been identified by KTMPO or KTMPO receives a request, KTMPO shall make every effort to provide services requested in a timely manner. KTMPO will pay for the translation of vital documents and interpreter services.

Hill Country Transit District's (HCTD) 2017 LEP Plan using the Four Factor Analysis process was adopted by KTMPO in conjunction with this Title VI Plan. The HCTD service area includes the KTMPO Planning Area. KTMPO will coordinate with HCTD for periodic updates as needed to determine which languages need assistance and what activities can be done to provide reasonable access. See Addendum 5 for the HCTD LEP Plan and the KTMPO LEP Certification.

F. Public Participation Plan (PPP)

The KTMPO PPP details how the MPO notifies the public regarding the development of transportation plans and improvement programs, solicits their comments, and addresses their comments in the final documents. Additionally, the PPP details how KTMPO notifies the public regarding public hearings and public meetings, collects comments at these meetings, and addresses these comments. The KTMPO PPP is provided as Addendum 6.

G. Environmental Justice (EJ)

KTMPO's Public Participation Plan includes an Environmental Justice component that incorporates basic EJ principles, demographic analysis, and methodology discussion to

identify EJ areas within the KTMPO boundary. The PPP also includes outreach methods to individuals in the identified EJ areas.

H. Outreach Summary

From 2014 – 2016, Hill Country Transit District (HCTD) staff performed outreach by participating, coordinating presentations, and networking at a number of local area events. During that time, HCTD consciously increased its outreach efforts. As a result, individuals and agencies provided information about transportation service needs for the area. HCTD continues its strong efforts for outreach, networking, and community involvement.

HCTD also ensures that information about its service is actively distributed throughout the community. This distribution is achieved by HCTD staff attendance at community events, through HCTD Travel Training program, via a website that details The HOP's services, through fare media and route maps that are provided to locations throughout the area.

Special Event Highlights

Food for Families food drive, City of Temple Christmas Parade, City of Copperas Cove Christmas Parade, City of Killeen Christmas Parade, Killeen Independent School District Career Day, City of Belton Independence Day Parade, City of Killeen Planning Meetings, CTCOG Planners' Round Table, KTMPO Bus Tour, Developmental District of Central Texas Meetings, Copperas Cove Rotary Club, Copperas Cove Fire Department, National Night Out, Come Walk in My Shoes, Earth Day, Student Success Fair, Welcome to the Real World, Temple College Open House, Just Do It for the Health of It, Senior Market Day, Senior Expo Fair, Job Fairs, Sunglasses for School Children, Community in Unity, NAACP, KISD Transition Meeting, New Bus Unveiling, Charles Borromeo Church, Temple Medical Education District Planning, Cedar Crest Hospital, Children's Day Event, Belton Goodwill Learning Center, VFW Ladies Auxiliary Luncheon, Hiring Our Heroes, Killeen Daily Herald, Wounded Warrior Resource Fair, Rusty Awards, Horseshoe Bay Business Alliance, Central Texas 4C, Gatesville Senior Expo, Killeen Lions Club, Senior Market Day, BPAC, West MLK Jr. Avenue Extension Project. HCTD Quarterly Drivers Meeting.

Fare Media Distribution Highlights

City of Harker Heights, Killeen United Way, City of Temple, Temple Visitors Center, City of Belton Utility Billing Department.

Route Map Distribution Highlights

Aegis Communications Group, Adult Services, Amtrak Visitors Center, Attorney General's Office, Bell County Chamber of Commerce, Bell County Juvenile Services, Central Texas College, Central County Services (Killeen), Central Texas Workforce (Belton), Central TX Council of Government, Central TX Workforce Downtown Temple, City of Temple, Copper Mountain Library, Copperas Cove Chamber of Commerce, Copperas Cove City Hall, Copperas Cove Library, Harker Heights City Hall, Harker Heights Goodwill, Killeen Help

Center, Killeen Airport, Killeen Chamber of Commerce, Killeen City Hall, Killeen Convention Center, Killeen Downtown Library, Metroplex Hospital Information Desk, Baylor Scott and White Social Work, Santa Fe Depot, Temple Chamber of Commerce, Temple College, Temple High School, Temple Public Library, Temple VA Central Texas Veterans Health Care, Texas A&M Central Campus, Texas Work Force Commission (Killeen), United Way (Killeen), University of Mary Hardin Baylor, U.S. Department of Veterans Affairs HUD-VASH, Belton Utility Administration Building.

Section 8: Education and Training

A. Staff Development

TxDOT will provide information on training opportunities as they become available for KTMPO staff and subrecipients, including training provided by the National Highway Institute (NHI). KTMPO staff may also explore external training opportunities as they become available.

B. Operational Guidelines

Training is available to all KTMPO employees.

C. Title VI Responsibilities

Assist TxDOT in the distribution of information on training programs regarding Title VI and related statutes.

Ensure equal access to, and participation in, applicable NHI courses for qualified KTMPO employees.

Section 9: Consultant Contracts Coordination

A. Consultant Contracts

The KTMPO Director is responsible for leading the process for consultant selection, negotiation, and the administration of consultant contracts.

B. Consultant Selection Process

The KTMPO operates under its internal contract procedures and follows all relevant federal and state laws.

C. Title VI Responsibilities

- Ensure opportunities exist for Disadvantaged Business Enterprises (DBE).
- Ensure that all federally funded consultant contracts administered by the KTMPO have the appropriate Title VI provisions included.
- Review directives and procedures to ensure Title VI compliance.
- Maintain necessary data and documentation required for completion of the KTMPO's Title VI Update Annual Report.
- Ensure that all solicitations for bid/Request for Proposals include the required U.S. DOT paragraph for non-discrimination.

Section 10: Minority Representation

To encourage participation on its boards, committees and councils, KTMPO will seek to identify community leaders and organizations associated with minority or traditionally underserved populations inviting them into the process, encouraging their participation, and placing them on email notification contact lists.

Section 11: Providing Assistance to and Monitoring Subrecipients

KTMPO does not provide funding to subrecipients.

ADDENDUM 1: Nondiscrimination Complaint Procedures and Form

Nondiscrimination Complaint Procedures and Form for Federally Assisted Programs or Activities

Si necesita información en otro idioma, comuníquese con el Coordinador del título VI en.

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by KTMPO as to subrecipients, consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

NOTE: If information is needed in another language, contact the Title VI Coordinator at 254-770-2200.

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with KTMPO's Title VI Coordinator at the following address. The complaint must be filed within 180 calendar days of the complainant learning of the incident.

Killeen-Temple Metropolitan Planning Organization
Attn: Title VI Coordinator
2180 N. Main Street
Belton, TX 76513
Fax: (254) 770-2360
Email: KTMPO@ctcog.org

2. Once the complaint is received, KTMPO will review it to determine if our office has jurisdiction. In cases where the complaint is against one of KTMPO's subrecipients of federal funds, KTMPO will assume jurisdiction and will investigate and adjudicate the case. (A copy of each Title VI complaint received will be forwarded to TxDOT Title VI Coordinator within ten (10) calendar days of receipt.) The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.
3. The complaint will receive a case number and will then be logged in the KTMPO's records identifying its basis and the race, color, national origin, and gender of the complainant.
4. In cases where KTMPO assumes the investigation of the complaint, KTMPO will provide the respondent with the opportunity to respond to the allegations in writing. The

respondent will have 15 calendar days to furnish KTMPO his/her response to the allegations.

5. Within 60 calendar days of receipt of the complaint, KTMPO's Investigator* will prepare an investigative report for the KTMPO Director's review. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

* This may be one of KTMPO's Title VI Liaisons, KTMPO's Title VI Coordinator, the Title VI Specialist for a subrecipient of federal funds, the TxDOT Title VI Coordinator or the TxDOT Title VI Liaison in the Waco or Brownwood Districts.

6. The investigative report and its findings will be sent to KTMPO's Legal Counsel for review.
7. Any comment(s) or recommendation(s) from KTMPO's Legal Counsel will be reviewed by KTMPO's Investigator. The Investigator will discuss the report and recommendations with the KTMPO Director. The report will be modified as needed and made final for its release.
8. Once KTMPO's investigative report becomes final, the parties will be properly notified of the outcome and appeal rights.
9. KTMPO's investigative report and a copy of the complaint will be forwarded to TxDOT's Office of Civil Rights within 60 calendar days of the receipt of the complaint. The Office of Civil Rights will share the report with FHWA Texas Division Office as part of its Annual Title VI Update and Accomplishment Report. External discrimination complaints filed under Title VI with the subrecipient in which the subrecipient or its lower tier subrecipient is named as the respondent must be forwarded to TxDOT for investigation within 10 calendar days.
10. If the complainant is not satisfied with the results of the investigation, s/he shall be advised of their rights to appeal KTMPO's determination to the TxDOT Office of Civil Rights. If a complainant is still not satisfied, the next right of appeal is to FHWA Texas Division Office; FTA Region 6, Fort Worth; United States Department of Transportation (USDOT); or the United States Department of Justice (USDOJ). Appeals must be filed within 180 days after KTMPO's final resolution. Unless new facts not previously considered come to light, reconsideration of KTMPO's determination will not be available.
11. KTMPO will serve as an appeal forum to a complainant that is not satisfied with the outcome of an investigation conducted by one of its subrecipients. KTMPO will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.
12. To receive additional information on general KTMPO discrimination obligations and the KTMPO complaint procedures, contact the Title VI Coordinator at 254-770-2200.

OFFICE USE ONLY

Date received: ____/____/20____

Logged by: _____

TITLE VI DISCRIMINATION COMPLAINT FORM

Person (s) alleging discrimination:		
NAME		
STREET ADDRESS		
CITY	STATE	ZIP CODE
DAYTIME TELEPHONE	E-MAIL ADDRESS	
Person alleging discrimination, if different from above:		
NAME		
STREET ADDRESS		
CITY	STATE	ZIP CODE
DAYTIME TELEPHONE	E-MAIL ADDRESS	
RELATIONSHIP TO THE PERSON(S) ALLEGING DISCRIMINATION		
KTMP staff member(s), board member(s), consultant(s) or program(s) that allegedly discriminated:		
NAME	PROGRAM	
NAME	PROGRAM	
NAME	PROGRAM	
DATE ALLEGED DISCRIMINATION BEGAN	DATE OF LAST INCIDENT	

Basis of Alleged Discrimination

A complaint must be filed within 180 calendar days of the date the complainant learned of the alleged discrimination. If your complaint is in regard to either alleged discrimination in the delivery of services or in the treatment of you (or the person(s) alleging discrimination) by associates or programs of the Killeen-Temple Metropolitan Planning Organization, please indicate below what you believe to be the basis of the alleged discrimination.

Example: If you believe that you were discriminated against because you are Native American, circle the word "Race" and write "Native American" in the space provided.

Race: _____

Color: _____

Sex: _____

Religion: _____

Disability: _____

Age: _____

National Origin: _____

Explanation

In the space below please explain as clearly and in as much detail as possible the nature of the discrimination you are alleging (attach additional sheets if necessary). Provide the names of all witnesses, if any, to the alleged discrimination. Attach copies of all written materials pertaining to your complaint.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

By signing below, I certify that the statements contained on this form are true to the best of my knowledge.

Signature

Date

Send this form and all attachments to:

Attn: Title VI Coordinator
Killeen-Temple Metropolitan Planning Organization
2180 N. Main Street
Belton, TX 76513

Documents may be sent via the U.S. Postal Service, faxed to (254) 770-2360, or scanned and e-mailed to KTMPO@ctcog.org.

NOTE: If information is needed in another language, contact the Title VI Coordinator at 254-770-2200.

Si necesita información en otro idioma, comuníquese con el Coordinador del título VI en.

Procedimientos para quejas por discriminación y formulario para programas y actividades asistidos por el gobierno federal

Estos procedimientos cubren todas las quejas presentadas bajo el Título VI de la Ley de Derechos Civiles de 1964, la Sección 504 de la Ley de Rehabilitación de 1973, la Ley de Restauración de Derechos Civiles de 1987 y la Ley de estadounidenses con discapacidades de 1990, relacionadas con cualquier programa o actividad administrada por KTMPO en cuanto a subbeneficiarios, consultores y contratistas. La ley prohíbe la intimidación o represalia de cualquier tipo. Los procedimientos no niegan el derecho del demandante a presentar quejas formales con otras agencias estatales o federales, ni a buscar un abogado privado para reclamos que aleguen discriminación. Se hará todo lo posible para obtener una resolución temprana de las quejas al nivel más bajo posible. La opción de reunión (es) de mediación informal entre las partes afectadas y el Coordinador del Título VI puede utilizarse para la resolución.

NOTA: Si necesita información en otro idioma, comuníquese con el Coordinador del Título VI al 254-770-2200.

Procedimiento

1. Cualquier persona, grupo de personas o entidad que crea que ha sido objeto de discriminación prohibida por las disposiciones de no discriminación del Título VI puede presentar una queja por escrito al Coordinador del Título VI del KTMPO a la siguiente dirección. La queja debe presentarse dentro de los 180 días calendario a partir de la fecha en que el demandante se entera del incidente.

Organización de planificación metropolitana de Killeen-Temple
A la atención de: Coordinador del Título VI
2180 N. Main Street
Belton, TX 76513
Fax: (254) 770-2360
Correo electrónico: KTMPO@KTMPO.org

2. Una vez que se reciba la queja, el KTMPO la revisará para determinar si nuestra oficina tiene jurisdicción. En los casos en que la queja es contra uno de los subreceptores de fondos federales del KTMPO, el KTMPO asumirá la jurisdicción e investigará y adjudicará el caso. (Se enviará una copia de cada reclamo del Título VI al Coordinador de Transporte Público de TxDOT dentro de los diez (10) días calendario posteriores a la recepción). El demandante recibirá una carta de acuse de recibo informándole si nuestra oficina investigará la queja.
3. La queja recibirá un número de caso y luego se registrará en los registros del KTMPO identificando su base y la raza, el color, el origen nacional y el género del denunciante.

4. En los casos en que el KTMPO asuma la investigación de la queja, el KTMPO brindará al demandado la oportunidad de responder a los alegatos por escrito. El demandado tendrá 15 días calendario para proporcionar al KTMPO su respuesta a las alegaciones.
5. Dentro de los 60 días calendario posteriores a la recepción de la queja, el Investigador * del KTMPO preparará un informe de investigación para la revisión del Director Ejecutivo del KTMPO. El informe incluirá una descripción narrativa del incidente, identificación de las personas entrevistadas, hallazgos y recomendaciones para la disposición.

* Esta puede ser una de las coordinadoras del Título VI de KTMPO, Coordinador del Título VI del KTMPO, el Especialista del Título VI para un subbeneficiarios de fondos federales, el Coordinador del Título VI de la División de Transporte Público de TxDOT o el Enlace del Título VI de TxDOT en los Distritos de Waco o Brownwood.
6. El informe de investigación y sus conclusiones se enviarán al Asesor Jurídico del KTMPO para su revisión.
7. Cualquier comentario (s) o recomendación (es) del Asesor Legal del KTMPO será revisado por el Investigador del KTMPO. El Investigador discutirá el informe y las recomendaciones con el Director Ejecutivo del KTMPO. El informe se modificará según sea necesario y se hará definitivo para su lanzamiento.
8. Una vez que el informe de investigación del KTMPO sea definitivo, las partes serán debidamente notificadas del resultado y los derechos de apelación.
9. El informe de investigación del KTMPO y una copia de la queja se enviarán a la Oficina de Derechos Civiles de TxDOT dentro de los 60 días calendario posteriores a la recepción de la queja. La Oficina de Derechos Civiles compartirá el informe con la Oficina de la División FHWA de Texas como parte de su Actualización anual del Título VI y el Informe de logros. Las quejas de discriminación externa presentadas en virtud del Título VI con el receptor intermedio en el que el subreceptor o su receptor intermedio de nivel inferior se nombra como el demandado se deben remitir a TxDOT para su investigación dentro de los 10 días calendario.
10. Si el demandante no está satisfecho con los resultados de la investigación, se le informará de sus derechos para apelar la determinación del KTMPO a la Oficina de Derechos Civiles de TxDOT. Si el demandante aún no está satisfecho, el próximo derecho de apelación es para la Oficina de la División de Texas de FHWA; TLC Región 6, Fort Worth; Departamento de Transporte de los Estados Unidos (USDOT); o el Departamento de Justicia de los Estados Unidos (USDOJ). Las apelaciones se deben presentar dentro de los 180 días posteriores a la resolución final del KTMPO. A menos que surjan nuevos hechos que no se hayan considerado previamente, la reconsideración de la determinación del KTMPO no estará disponible.

11. KTMPO servirá como un foro de apelación para un demandante que no está satisfecho con el resultado de una investigación realizada por uno de sus subbeneficiarios. KTMPO analizará los hechos del caso y emitirá su conclusión al apelante dentro de los 60 días posteriores a la recepción de la apelación.
12. Para recibir información adicional sobre las obligaciones generales de discriminación del KTMPO y los procedimientos de quejas del KTMPO, comuníquese con el Coordinador del Título VI al 254-770-2200.

Título VI Formulario de Queja de Discriminación

Persona (s) que alega discriminación:		
NOMBRE		
DIRECCIÓN		
CIUDAD	ESTADO	CÓDIGO POSTAL
TELÉFONICO DIURNO	DIRECCIÓN DE CORREO ELECTRÓNICO	
Persona (s) que alega discriminación, si es diferente de arriba:		
NOMBRE		
DIRECCIÓN		
CIUDAD	ESTADO	CÓDIGO POSTAL
TELÉFONICO DIURNO	DIRECCIÓN DE CORREO ELECTRÓNICO	
RELATIONSHIP TO THE PERSON(S) ALLEGING DISCRIMINATION		
Miembros del personal del CTCOG, miembros de la junta, asesores o programa (s) que presuntamente discriminaron:		
NOMBRE	PROGRAMA	
NOMBRE	PROGRAMA	
NOMBRE	PROGRAMA	
FECHA EN QUE EMPIEZÓ LA ALEGADA DISCRIMINACIÓN	FECHA DEL ÚLTIMO INCIDENTE	

Base de presunta discriminación

Una queja debe presentarse dentro de los 180 días calendario a partir de la fecha en que el demandante se enteró de la supuesta discriminación. Si su queja es con respecto a una presunta discriminación en la prestación de servicios o en el tratamiento de usted (o la persona (s) que alega discriminación) por asociados o programas del Organización de planificación metropolitana de Killeen-Temple, indique a continuación lo que usted cree ser la base de la supuesta discriminación.

Ejemplo: Si crees que fuiste discriminado porque eres nativo americano, encierra en un círculo la palabra "Raza" y escribe "Nativo americano" en el espacio provisto.

Raza: _____

Color: _____

Sexo: _____

Religión: _____

Discapacidad: _____

Edad: _____

Origen nacional: _____

Explicación

En el espacio a continuación, explique con la mayor claridad y en detalle posible la naturaleza de la discriminación que alega (adjunte hojas adicionales si es necesario). Proporcione los nombres de todos los testigos, si los hubiera, a la supuesta discriminación. Adjunte copias de todos los materiales escritos relacionados con su queja.

[illegible]

Al firmar abajo, certifico que las declaraciones contenidas en este formulario son verdaderas según mi leal saber y entender.

Firma

Fecha

Envíe este formulario y todos los archivos adjuntos a:

A la atención de: Coordinador del Título VI
Organización de planificación metropolitana de Killeen-Temple
2180 N. Main Street
Belton, TX 76513

Los documentos pueden enviarse a través del Servicio Postal de EE. UU., Enviarse por fax al (254) 770-2360, o escanearse y enviarse por correo electrónico a KTMPO@ctcog.org.

NOTA: Si se necesita información en otro idioma, comuníquese con el Coordinador del Título VI al 254-770-2200.

ADDENDUM 2: KTMPO Record of Title VI Investigations, Complaints, and Lawsuits

Killeen-Temple Metropolitan Planning Organization Record of Title VI Investigations, Complaints, and Lawsuits

Killeen-Temple Metropolitan Planning Organization (KTMPPO) has not had any allegations of discrimination on the basis of race, color, sex, religion, disability, age, or national origin, and is not involved in any active investigations, complaints, or lawsuits naming KTMPO.

	Date	Summary	Status	Action Taken
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				

NOTE: There have been no complaints filed within the last three years.

ADDENDUM 3: KTMPO Title VI Notice to Public

KTMPO Title VI Notice to Public

Notifying the Public of Rights Under Title VI

Killeen-Temple Metropolitan Planning Organization (KTMPO)

- ✓ KTMPO 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 KTMPO.
- ✓ For more information on KTMPO's civil rights program, the procedures to file a complaint, or to file a complaint contact 254-770-2200; email hotline@ctcog.org or KTMPO@CTCOG.org; or visit our administrative office at 2180 N. Main Street, Belton, TX 76513. For more information, visit www.KTMPO.org.
- ✓ 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, 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 the Title VI Coordinator at 254-770-2200.

KTMPO's Notice to the Public is posted in the following locations: *(check all boxes for Required)*

Required:

- ☒ Agency website: www.KTMPO.org
- ☒ Public areas of the agency's office
- ☒ Reception desk
- ☐ Meeting rooms
- ☐ Notice at stations or stops and or inside transit vehicles

Notificar al público de los derechos bajo título VI

Organización de planificación metropolitana de Killeen-Temple (KTMPPO)

- ✓ KTMPPO opera sus programas y servicios sin importar raza, color y origen nacional según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con KTMPPO.
- ✓ Para más información sobre el programa los derechos civiles de KTMPPO, los procedimientos para presentar una queja, o al archivo de una queja 254-770-2200 contacto; Hotline@ctcog.org o KTMPPO@CTCOG.org; o visite nuestra oficina administrativa en 2180 N. Main Street, Belton, TX 76513. Para obtener más información, visite www.KTMPPO.org.
- ✓ También puede presentar una queja directamente con la:

Departamento de Transportación de Texas, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, o

Administración Federal de Transito, oficina de derechos civiles, atención: título de Coordinador del programa VI, edificio este, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ Si necesita información en otro idioma, comuníquese con el Coordinador del título VI en el 254-770-2200.

Aviso de KTMPPO a la opinión pública es colocado en los siguientes lugares: (*Marque todas las casillas para*)

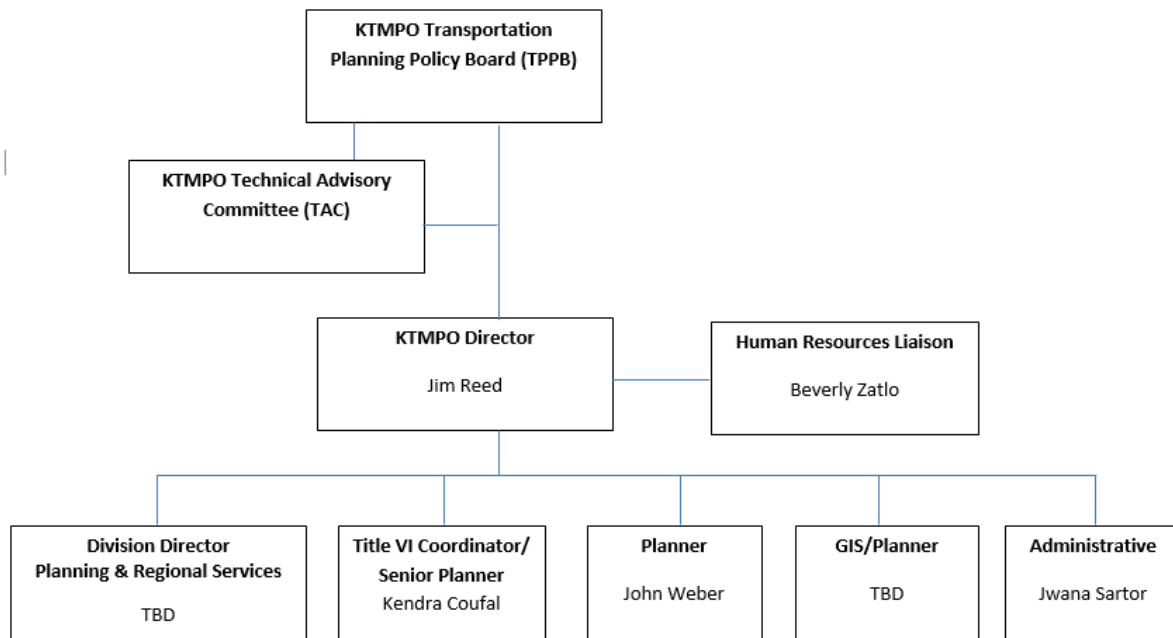
Obligatorio:

- ☒ Página Web: www.KTMPPO.org
- ☒ Zonas comunes de la oficina de la Agencia
- ☒ Escritorio de recepción
- ☐ Salas de reuniones
- ☐ Aviso en las estaciones o paradas y o dentro de vehículos de transporte

ADDENDUM 4: KTMPO Organization Chart

Killeen-Temple Metropolitan Planning Organization

*Organization Chart



*Includes staffing utilized on both a full and part-time basis.

ADDENDUM 5: Limited English Proficiency Plan

Limited English Proficiency Plan and System-Wide Service Standards/Policies Excerpt from HCTD 2017 Title VI Plan

Limited English Proficiency (LEP) Certification

Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency”, indicates that differing treatment based upon a person’s inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal 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 transit providers and Lead Agencies which receive federal assistance through the Texas Department of Transportation (TxDOT).

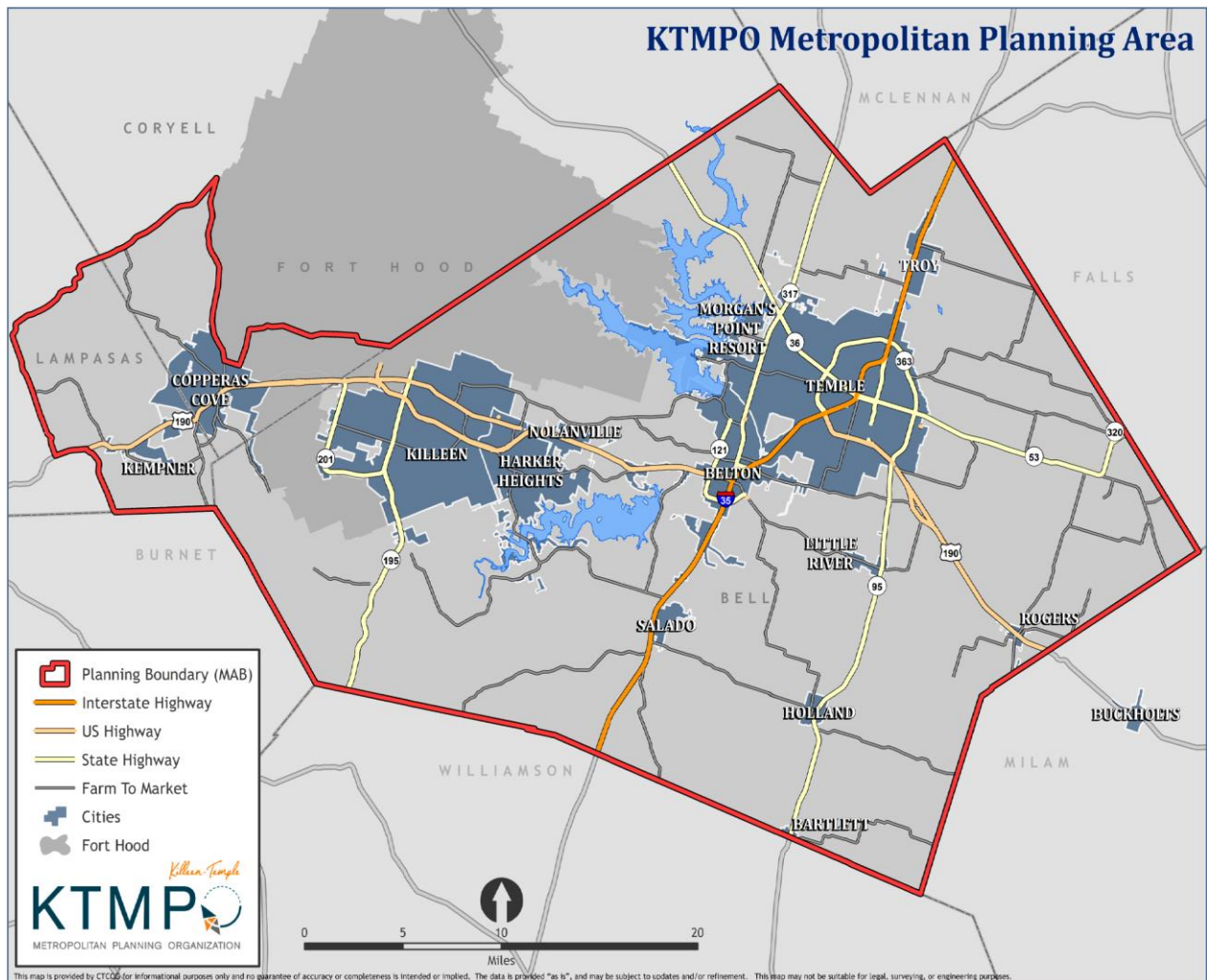
The Limited English Proficiency Plan prepared by Hill Country Transit District (HCTD) addresses responsibilities as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et se, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

The undersigned, known as Killeen-Temple Metropolitan Planning Organization (KTMPO) hereby certifies that it has adopted the HCTD LEP Plan and will take responsible steps to carry out said Plan to all areas served by KTMPO*, ensure meaningful access to the benefits, services, information and activities for individuals who are Limited English Proficient (LEP). The undersigned has agreed to work together formally with HCTD to coordinate activities and prevent violations of the law, including regulations applicable to this entity or its officers or employees and that the LEP program satisfies the requirements of Executive Order 13166.

Mayor Marion Grayson
KTMPO Chair

Date

*Areas Served: Bell County and the urbanized portions of Lampasas and Coryell Counties. See attached map of KTMPO planning area.



Title VI Program Policy

Includes Limited English Proficiency (LEP) Plan

HILL COUNTRY TRANSIT DISTRICT

July 2017

Hill Country Transit District

Limited English Proficiency (LEP) Plan

Hill Country Transit District (HCTD) has developed its Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined in 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, HCTD used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD.
2. The frequency with which LEP persons come into contact with HCTD programs, activities or services.
3. The nature and importance of the program, activity, or service provided by HCTD to the LEP population.
4. The resources available to HCTD for LEP outreach, as well as the costs associated with that outreach.

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD.

HCTD provides services in nine Texas counties (covering approximately 9,000 square miles). HCTD staff reviewed the 2010 U.S. Census Report and compiled the following statistics to identify the number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD:

It was determined that 59,731 persons in the combined service areas (16.4%) speak a language other than English. Of those persons, 18,567 (5.1%) speak English less than “very well”. Of those persons with limited English proficiency, 13,698 (3.77%) Spanish speaking persons speak English less than “very well”. There were 1,926 (0.53%) persons of other Indo-European languages who spoke English less than “very well”, and 2,773 (0.76%) of Asian and Pacific Islanders who spoke English less than “very well”.

2. **The frequency with which LEP persons come into contact with HCTD programs, activities or services.**

HCTD reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries, surveying vehicle operators, and office visits. To date, the most frequent contact between LEP persons is with bus drivers, dispatchers, schedulers, and front office staff. HCTD is staffed with Spanish, German and Italian translators to assist LEP persons with translation in these languages.

3. **The nature and importance of the program, activity, or service provided by HCTD to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the HCTD service areas. Over 83% of the population in the service areas speaks English only. Although there is 17% of the population in the service areas that speak a language other than English, only 5.1% of this population speaks English less than “very well”. Because HCTD provides services to persons over nine counties, it is most likely that the fixed route system and the paratransit system will both encounter LEP individuals.

4. **The resources available to HCTD for LEP outreach, as well as the costs associated with that outreach.**

HCTD has assessed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that could be partnered with for outreach and translation efforts. HCTD maintains access to a language line to facilitate communication with LEP persons. There is a fee to use this service, but the use of it has been very rare so the cost has been minimal. HCTD will also provide an interpreter to LEP persons if a request for language assistance is made, or it is evident that such assistance is needed.

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 HCTD programs and activities. 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. HCTD will determine when interpretation and/or translation are needed and are reasonable.

How HCTD staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed in the future.
- Have Language Identification ("I Speak") Flashcards available at the customer service desk and easily accessible to drivers, supervisors, dispatchers, and schedulers as needed.
- Periodically interview bus drivers, dispatchers, schedulers and other front-line staff on their experience concerning any contacts with LEP persons during the previous year.

Language Assistance Measures

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which HCTD staff may respond to LEP persons, whether in person, by telephone, or in writing.

- HCTD will provide an interpreter to an LEP person if they request language assistance or it is evident that such assistance is needed.
- If an LEP person asks for language assistance and HCTD determines that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then make available interpretation services for the LEP person.
- Bilingual HCTD staff will provide language services to LEP persons upon request and if available. HCTD will take reasonable steps to ensure that staff provides interpretative services at a level of fluency, comprehension and confidentiality appropriate to the specific nature, type, and purpose of information at issue.
- An LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by HCTD. Informal interpreters may include family members, friends, legal guardians, service representatives, or advocates of the LEP person.
- HCTD will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

Staff Training

The following training will be provided to HCTD staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification ("I Speak") Flashcards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

Any and all contractors or subcontractors performing work for HCTD will be required to follow the Title VI/LEP guidelines.

Translation of Documents

HCTD 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 it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, HCTD does not have a formal outreach procedure in place, as of 2016. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, HCTD 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 alternative language based on the known LEP population.
- Bus schedules, maps and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP population is identified and requests are made.

Monitoring

Monitoring and Updating the LEP Plan. HCTD will update the LEP as required. At a minimum, the plan will be reviewed and updated when data from the upcoming U.S. Census is made available, or when it is clear that higher concentrations of LEP individuals are present in the HCTD 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.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether HCTD's financial resources are sufficient to fund language assistance resources needed.
- Determine whether HCTD fully complies with the goals of this LEP plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

Dissemination of the HCTD LEP Plan

HCTD's Title VI Policy and LEP Plan are made available on the company's website at www.takethehop.com. Any person or agency may request a copy of the LEP plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request a copy of the plan in alternative languages which will be provided, if feasible.

Questions concerning the LEP Plan may be submitted to Hill Country Transit District at:

Hill Country Transit District
4515 W. U.S. Hwy. 190
Belton, TX 76513
Phone: (254) 933-3700
Fax: (254) 933-3724
www.takethehop.com

Hill Country Transit District

System-Wide Service Standards

Chapter IV of FTA Circular 4702.1B provides that all transit providers who operate fixed route service, as shown in the Table in Section 1, must "Set system-wide standards and policies" that "only apply to fixed route services". Because The HOP, operated by Hill Country Transit District (HCTD), does not "operate 50 or more fixed route vehicles in peak service", HCTD is not required to "Collect and report data", to "Evaluate service and fare equity changes", or to "Monitor transit service".

Vehicle Load Standards

Hill Country Transit District utilizes four different vehicles for our fixed-route operations. In tracking the number of passengers that are carried, it has been found that our average passengers per hour is 14.4 while our peak is 35. This results in all of our passengers being able to be seated except during our peak times.

Average Load:

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Load Factor
30' Transmark	14.4	0	14.4	0.4
32' EZ-Rider	14.4	0	14.4	0.4
34' NABI	14.4	0	14.4	0.4
32' Trolley	14.4	0	14.4	0.4
35' EZ-Rider	14.4	0	14.4	0.3

Peak Load:

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Factor
30' Transmark	26	9	35	1.3
32' EZ-Rider	26	9	35	1.3
34' NABI	26	9	35	1.3
32' Trolley	26	9	35	1.3
35' EZ-Rider	35	0	35	1.0

HCTD considers a vehicle overloaded if the load factor exceeds 1.5 where one third of our passengers are standing.

Vehicle Headway Standards

Vehicle Headway Standards:

During the week, Hill Country Transit District fixed-route vehicles run every hour for most stops. The only exception to this is the Temple-Killeen Connector route which makes a full cycle every two hours. On Saturdays, two of our weekday routes combine to become the Route 2/5 and runs once every two hours while the other six routes run once every hour.

WEEKDAY ROUTES	Periods of Operation
Urban Routes	60
Temple-Killeen Connector	120

SATURDAY ROUTES	Periods of Operation
Urban Routes	60
Route 2/5	120

**Periods of Operation are expressed in terms of minutes.*

On-Time Performance Standards

On-time performance for fixed route service is considered as not leaving a time point ahead of schedule and not arriving at a time point more than five minutes late. HCTD's on-time performance objective is 95% or greater, whereby at least 95% of trips on any given run during any given calendar month are on-time, and whereby at least 95% of all runs system-wide within any given calendar month are on-time.

Service Availability Standards

HCTD complies with the following standards regarding distance between bus stops:

- In high population density areas (such as neighborhoods and apartment complexes) and small business areas (such as strip malls and small business centers), the walking distance between bus stops is 750 to 900 feet, which places stops 1,500 to 1,800 feet apart.
- In medium population density areas (such as thoroughfares with limited side street residential areas) the walking distance between bus stops is 900 to 1,300 feet, which places stops 1,800 to 2,600 feet apart.

- In low population areas (such as thoroughfares with no side street access, great distances between side streets, etc.) the walking distance between bus stops is 1,500 to 2,500 feet, with approximately 3,000 feet between stops.

Vehicle Assignment Policy

Hill Country Transit District ensures that vehicles are assigned to drivers and routes the evening before service. HCTD's vehicle assignment is based on a couple of different factors. The first and most major factor in assigning a vehicle to a route is how narrow the streets are on a particular route. For these routes, a bus must be assigned that doesn't have too wide of a turning radius. The next factor considered is the mileage of a vehicle. The newer vehicles are assigned to higher-mileage routes whenever possible. Finally, vehicle assignments are rotated out based on maintenance needs.

Transit Amenities Policy

Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes. System maps are provided at the Belton Operations Facility and at various organizations located throughout the service area (i.e., workforce centers, free clinics, city halls, service organizations, etc...). Trash cans are installed by HCTD according to perceived need.

New benches and shelters paid for by HCTD are located according to a number of factors including, but not limited to:

- Average daily boardings at the stop
- Prevalence of disabled passengers
- Presence or absence of amenities in the nearby area (i.e., shelter, trash cans, lighting, seating, etc.)
- Cost for additional curb, gutter, street, or sidewalk improvements
- Financial assistance from local jurisdictions, business improvement districts, etc.
- Minimum ridership of daily boardings for shelters
- Title VI compliance goals

ADDENDUM 6: Public Participation Plan

Public Participation Plan (With Environmental Justice Component)