



**McLennan County Rural Transit
District (MCRTD)**

Title VI, Civil Rights Plan

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Transit Manager
(Originally adopted in July 2015)

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(Originally adopted in July 2015)

Approved by:

McLennan County Rural Transit District

Board of Directors

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I. Title VI Plan Statement

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). Notice to the Public should be posted at the following locations: McLennan County Rural Transit District's Website (<http://www.co.mclennan.tx.us/595/McLennan-County-Rural-Transit-District>), Receptionist desk @ WTS, and Fixed Route Terminal Dispatch.

McLennan County Rural Transit District ("MCRTD") 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 McLennan County Rural Transit District in its administration and management of Title VI-related activities.

McLennan County Rural Transit District has an inter-local agreement with Waco Transit System for contracted transportation services to be able to provide throughout the MCRTD service area. MCRTD provides paratransit service and commuter bus route service.

McLennan County Rural Transit District has contracted Waco Transit System to provide the best service capabilities to McLennan County and adjacent counties that include Hill County, Limestone County, Falls County, Bell County, Coryell County, and Bosque County. Destinations include anywhere in McLennan or adjacent counties, as long as one of the stops originates from or travels to a rural address. For a detailed map of our rural coverage area visit: www.WacoTransitSystem.com. Through the inter-local agreement MCRTD utilizes Waco Transit System's employees to provide service to McLennan County. On a day to day basis WTS provides MCRTD with enough transit-related employees to ensure that all trips will be completed. The following information is a detailed description of MCRTD and WTS' relationship.

Increased mobility

Mobility is the ability to move or be moved freely and easily. Between Waco Transit System and McLennan County Rural Transit District's partnership, improved transportation in the McLennan county rural area by utilizing twenty-four vehicles available to the rural communities. This partnership provides a coordinated service which provides the ability to book trips one day in advance, same day trips and Saturday service. Stand-by drivers are also available to ensure all trips are fulfilled in the event of a driver's absence, wreck, traffic delays etc. These designated drivers provide the community with insurance that all trips will be completed in the event of a difficulty may occur for MCRTD.

Improved access

Public transportation within the rural McLennan County area has drastically improved since the establishment of MCRTD and with the assistance of Waco Transit System's services provided.

Expected savings or financial efficiencies

Waco Transit System will be able to achieve external economies of scale through acquiring the McLennan County Rural Transit District transportation service by providing a more efficient service on a larger scale with minimal additional costs. The reduction of indirect system costs, and better utilization of resources will also achieve internal economies of scale to minimize cost. The amount being spent on the McLennan County Rural Transit District transportation service can be absorbed by the Waco Transit System and can be used in a more financial efficient manner by providing a share ride service. By coinciding services, the Waco Transit System can maximize the use of funds by acquiring McLennan

County Rural Transit District's transportation service with the additional services already being provided. In addition to the service becoming more efficient, Waco Transit System will also become more economical by providing jobs such as drivers, mechanics, and administrative personnel to maximize the efficiency of the financial funds received for the McLennan County Rural Transit District transportation services.

Project promotion of the development of shared transit information

Waco Transit System already provides information through the use of its website, social media accounts, printed materials, and client handouts. To promote new shared transit information, Waco Transit System will incorporate McLennan County Rural District transportation services into all shared transit information created by combining resources McLennan County Rural Transit District information becomes intergraded with the services Waco Transit System provides.

Supporting local economic development and expansion of economic opportunities

Waco Transit System provides service within the urbanized areas created by the 2010 Census. This will provide residents with the opportunity to access jobs, education, medical treatments, and will also give employers a greater pool of employees. With McLennan County Rural Transit District and Waco Transit System coinciding, trips to and from adjacent counties will provide trips for riders to travel from the rural service area to the urban service area within a wider range of locations.

Efficiency and effectiveness of the transit operations

Consolidating the McLennan County Rural Transit District transportation with the services already being provided by Waco Transit System is beneficial in improving the efficiency and effectiveness to both transit operations. All services are being coordinated by Waco Transit System, ensuring maximum use of all resources in the most economical manner. The ability to schedule and coordinate MCRTD and other services together, enables Waco Transit System to provide the most efficient transportation service for all clients. This allows scheduling and coordinating trips to be more flexible to accommodate all client trips. In turn, each trip is then being completed in the most efficient and effective manner.

II. Title VI Coordinator Contact Information

Title VI coordinator can be contacted at:

**McLennan County Rural Transit District
Title VI Coordinator: Allen Hunter
301 S 8th Street Suite 100
Waco, Texas 76701
Phone: (254) 750-1900**

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.

IV. Title VI Notice to the Public and Information Dissemination

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

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding McLennan County Rural Transit District program has a right to file a formal complaint. Any such complaint must be in writing and submitted to the MCRTD's Title VI Coordinator within 180 days following the date of the alleged occurrence. For more information regarding civil rights complaints or if information is needed in another language, please contact:

**McLennan County Rural Transit District
Title VI Coordinator: Allen Hunter
301 S 8th Street Suite 100
Waco, Texas 76701
Phone: (254) 750-1900**

Or

**Federal Transit Administration- Office of Civil Rights
Attention: Title VI Program Coordinator
1200 New Jersey Avenue SE
Washington, DC 20590**

Or

**Texas Department of Transportation
Attention: TxDOT-PTN
125 E. 11th Street
Austin, Texas 78701-2483**

Title VI information posters shall be prominently and publicly displayed in McLennan County Rural Transit District facility and on their revenue vehicles. The contact information of the Title VI coordinator will be available on the McLennan County Rural Transit District's website. Additional information relating to nondiscrimination obligation will be obtained from McLennan County Rural Transit District Title VI Coordinator.

Title VI information shall be disseminated to McLennan County Rural Transit District employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form will remind employees of the McLennan County Rural Transit District 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 McLennan County Rural Transit District'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 Form (see Appendix B).

Si necesita ayuda, póngase en contacto con: (254) 750-1620

IV. Título VI Notificación al Público y Difusión de Información

McLennan County Rural Transit District (MCRTD) por la presente de aviso public de su política de mantener y asegurar el cumplimiento total del Título VI de la Ley de Derechos Civiles de 1964 y todos los estatutos relacionados. El Título VI y los estatutos relacionados que prohíben la discriminación en programas asistidos por el gobierno federal requieren que ninguna persona en los Estados Unidos de America, por motivos de raza, color, origen nacional, sexo, edad o discapacidad sea excluida de la participación en o ser objeto de discriminación en cualquier programa o actividad que reciba asistencia financiera federal.

Cualquier persona que crea que ha sido agraviada por una practica discriminatoria ilicita con respect al programa del McLennan County Rural Transit District (MCRTD) tiene el derecho de presenta una queja formal. Cualquier queja debe ser por escrito y presentada al Coordinador Título VI del MCRTD dentro de los 180 dia siguientes a la fecha de la presunta ocurrencia. Para obtener mas informacion sobre las quejas de derechos civiles o si se necesita informacion en otro idioma, comuniquese con:

**McLennan County Rural Transit District
Coordinador del Título VI: Allen Hunter
301 S 8th Street Suite 100
Waco, Texas 76701
Phone: (254) 750-1900**

Or

**Administracion Federal de Transito- Oficina de Derechos Civiles
Atencion: Coordinador del Programa Título VI
1200 New Jersey Avenue SE
Washington, DC 20590**

Or

**Texas Department of Transportation
Attention: TxDOT-PTN
125 E. 11th Street
Austin, Texas 78701-2483**

Los carteles de información del Título VI serán prominentes y públicamente exhibidos en las instalaciones del Distrito de Tránsito Rural del Condado de McLennan y en sus vehículos de ingresos. El nombre del coordinador del Título VI estará disponible en el sitio web del Distrito de Tránsito Rural del Condado de McLennan. Información adicional relacionada con la obligación de no discriminación se obtendrá del Coordinador del Título VI del Distrito de Tránsito Rural del Condado de McLennan.

La información del Título VI será difundida anualmente a los empleados del Distrito de Tránsito Rural del Condado de McLennan a través del formulario de Educación del Empleado (ver Apéndice A) en sobres de nómina. Este formulario recordará a los empleados de la declaración de política del Distrito de Tránsito Rural del Condado de McLennan, y de sus responsabilidades de Título VI en su trabajo diario y deberes.

Durante la Orientación para Nuevos Empleados, los nuevos empleados serán informados de las provisiones del Título VI, y las expectativas del Distrito de Tránsito Rural del Condado de McLennan de cumplir sus deberes en consecuencia.

Todos los empleados recibirán una copia del Plan Título VI y deberán firmar el Formulario de Acuse de Recibo (ver Apéndice B).

Si necesita ayuda, póngase en contacto con: (254) 750-1620

V. Subcontracts and Vendors

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

McLennan County Rural Transit District's Planning Department will supervise the design of routes and schedules and also oversees the operation of the system to assure compliances with non-discriminatory provisions pursuant to Title VI of the Civil Rights Act of 1964, as amended.

All subcontractors and vendors who will receive payment from McLennan County Rural Transit District 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].

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of McLennan County Rural Transit District's Title VI Plan, copies of Title VI complaints or lawsuits that include related documentation, 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.

How to file a Title VI Complaint?

Any person who believes that they have been subjected to discrimination may file a written complaint with McLennan County Rural Transit District Coordinator. Federal and State laws require complaints to 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:

- 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 McLennan County Rural Transit District 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:

**McLennan County Rural Transit District
Attention: Title VI Coordinator: Allen Hunter
301 S 8th Street, Suite 100
Waco, Texas 76701
Fax: (254) 750-1901**

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with McLennan County Rural Transit District at the address shown above.

Title IV Complaint procedures and forms can also be found on the McLennan County Rural Transit District's website listed below:

<http://www.co.mclennan.tx.us/595/McLennan-County-Rural-Transit-District>

What happens to the complaint once is it submitted?

The Title VI Coordinator will begin an investigation within ten (10) working days of receipt of a complaint. An electronic or paper copy of the complaint form will be submitted to the Texas Department of Transportation Public Transportation Coordinator by email or fax within (10) working days of the receipt of the 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 Transit 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 Transit 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 appeal to:

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

Si necesita ayuda, póngase en contacto con: (254) 750-1620

VII. Procedimiento de Queja del Título VI

El Título VI de la Ley de Derechos Civiles de 1964 exige que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de los beneficios o sea objeto de discriminación en virtud de cualquier programa o actividad que reciba ayuda federal. asistencia financiera.

¿Cómo presentar una queja de Título VI?

Cualquier persona que crea que ha sido objeto de discriminación puede presentar una queja por escrito ante el Coordinador del Distrito de Tránsito Rural del Condado de McLennan. Las leyes federales y estatales requieren que las quejas se presenten dentro de los ciento ochenta (180) días calendario posteriores al último suceso alegado.

El reclamante puede presentar una declaración por escrito que contenga la siguiente información:

- a. Nombre, dirección y número de teléfono del reclamante.
- b. Nombres de la (s) persona (s) que supuestamente discriminaron en su contra, si se conocen.
- c. Fecha (s) del presunto incidentes.
- d. Ubicación del presunto incidente.
- e. Tipo de supuesta discriminación.
- f. Explique qué sucedió y cómo cree que fue discriminado.
- g. Nombre, direcciones y números de teléfono de la persona que puede tener conocimiento del evento.
- h. ¿Qué otra información usted tiene que usted cree es relevante a esta investigación?
- i. ¿Ha presentado una queja con el Distrito de Tránsito Rural del Condado de McLennan antes?
Si es así, incluya: cuándo, dónde y cómo.
- j. Firma y fecha del reclamante.
- k. La queja puede ser enviada o enviada por fax a la siguiente dirección:

**McLennan County Rural Transit District
Atención: Coordinador Título VI: Allen Hunter**

**301 8th Street, Suite 100
Waco, Texas 76701
Fax: (254) 750-1901**

Se puede usar el Formulario de Queja del Título VI (ver Apéndice C) para presentar la información de la queja. La queja puede ser presentada por escrito al Distrito de Tránsito Rural del Condado de McLennan en la siguiente dirección arriba.

¿Qué sucede con la queja una vez que se presenta?

El Coordinador del Título VI iniciará una investigación dentro de los quince (10) días hábiles siguientes a la recepción de una queja.

El coordinador del Título VI se pondrá en contacto con el reclamante por escrito a más tardar treinta (30) días hábiles después del recibo de la queja para obtener información adicional, si es necesario para investigar la queja. Si el reclamante no proporciona la información solicitada oportunamente, el Gerente de Tránsito puede cerrar administrativamente la queja.

El Coordinador del Título VI completará la investigación dentro de los noventa (90) días posteriores a la recepción de la queja y preparará un informe escrito de la investigación. El informe incluirá una descripción resumida del incidente, conclusiones y recomendaciones. El Gerente de Tránsito revisará el reporte y una carta de cierre será entregada al demandante.

Si el asunto no puede ser resuelto, el demandante será informado de su derecho a apelar a:

**Administración Federal de Tránsito - Oficina de Derechos Civiles
Atención: Coordinador del Programa Título VI
1200 New Jersey Avenue SE
Washington, DC 20590.**

Si necesita ayuda, póngase en contacto con: (254) 750-1620

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

McLennan County Rural Transit District 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 McLennan County Rural Transit District.

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

*Do not include any **active** investigations, complaints, or lawsuits that are Title IV transit-related.*

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

IX. Public Participation Plan

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

It is the intent of McLennan County Rural Transit District that the PPP provide the greatest possible involvement in the transit planning process. Moreover, McLennan County Rural Transit District intends that the PPP be implemented in a continuous, proactive manner.

Public Participation Goals and Objectives

McLennan County Rural Transit District Goal:

To develop and provide public transit services in the McLennan County Service Area by engaging in comprehensive planning activities to include public involvement and consultation with public officials.

The following objectives will enable McLennan County Rural Transit District 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 LEP persons)
 - c. People who classify as lower-income
 - 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 frequently visit. This will include visual techniques such as charts, pictures, and maps when necessary.
- 3) Follow the procedures and standards established in the McLennan County Rural Transit District 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.

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 McLennan County Rural Transit District and contains the goals, objectives, and techniques used by McLennan County Rural Transit District for public engagement. In its public participation process, McLennan County Rural Transit District 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 MTP and the 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 McLennan County Rural Transit District 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:

McLennan County Rural Transit District (MCRTD)
301 S 8th Street Suite 100
Waco Texas 76701

<http://www.co.mclennan.tx.us/595/McLennan-County-Rural-Transit-District>

Waco Metropolitan Planning Organization (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 McLennan County Rural Transit District planning process. This section contains a list and brief description of public participation tools that will be used by McLennan County Rural Transit District.

Website – McLennan County Rural Transit District will use its own and the Waco Metropolitan Service Area website to announce public participation opportunities. They are <http://www.co.mclennan.tx.us/595/McLennan-County-Rural-Transit-District> and <http://www.waco-texas.com/cms-mpo/>.

These websites will also contain additional information about projects and plans about McLennan County Rural Transit District.

Database – McLennan County Rural Transit District 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. McLennan County Rural Transit District uses both mediums to communicate with the general public.

Press Releases – McLennan County Rural Transit District utilizes local news stations 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 – 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.

McLennan County Rural Transit District also participates in other techniques initiated by the MPO to meet public involvement requirements. MCRTD's Public outreach/participation meetings can be held at:

**Waco Transit System (WTS)
301 S 8th Street, Suite 100
Waco, Texas 76701
Phone: (254) 750-1900
Fax: (254) 750-1901**

XI. McLennan County Rural Transit District Title VI LEP Program and Plan

Introduction-

This Limited English Proficiency Plan has been prepared to address the McLennan County Rural Transit District (MCRTD) 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 understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive Federal funds, including all programs administered by the McLennan County Rural Transit District.

Plan Summary-

The McLennan County Rural Transit District 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 MCRTD 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 MCRTD jurisdiction.
2. The frequency with which LEP persons come in contact with MCRTD administrative staff, office staff, dispatchers, bus/van operators and Policy Board members.
3. The nature and importance of services provided by the MCRTD to the LEP population.
4. The interpretation services available to the MCRTD 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 the McLennan County Rural Transit District is coextensive with McLennan County, Texas. According to the American Community Survey in 2010 (US Census), 19.8% of persons within the MCRTD jurisdiction age 5 or older speak a language other than English. Of those persons, 38.5% have limited English proficiency; that is, they speak English less than 'very well'. This represents 7.6% of the total population 5 years of age or older. In the MCRTD jurisdiction, of those persons with limited English proficiency, 92.7% speak Spanish, 2.5% speak other Indo-European languages and 4.5% speak Asian or other Pacific Island languages.

GOAL #1: McLennan County Rural Transit District will monitor local, State, and Federal reports for population trends in the McLennan County rural area. Moreover, MCRTD will communicate with organizations that also monitor population trends and demographics.

Factor 2: Frequency of Contact

The MCRTD staff reviewed the frequency with which the MCRTD 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 MCRTD office staff has had 3 to 5 clients per day via the telephone that request interpretation of information in regards to transportation. There have been no requests for translated program documents. The members of the MCRTD Policy Board have had no contact with LEP persons regarding the transportation process.

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

GOAL #2: McLennan County Rural Transit District 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: McLennan County Rural Transit District 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 the LEP Program

The critical services provided by MCRTD are paratransit, commuter route, and non-emergency medical transportation. McLennan County Rural Transit District's services provide critical transportation for all rider types including LEP persons, who need medical services, employment opportunities, and education programs.

The hours of operation for McLennan County Rural Transit District are as follows: 5:15am-7:15pm Monday thru Friday and 6:15am-8:15pm on Saturday only. These services hours mirror Waco Transit System's Fixed Route System. McLennan County Rural Transit District's service area covers the McLennan County Rural area. McLennan County Rural Transit District uses service area 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 for McLennan County Rural Transit District. MCRTD passengers ride to places of employment, entertainment, health services, and various other places throughout the McLennan County rural area.

Paratransit and non-emergency medical transportation services at McLennan County Rural Transit District is utilized by LEP persons which takes passengers to all types of locations throughout the McLennan County area and adjoining counties.

GOAL #1: McLennan County Rural Transit District will become more involved with the local Hispanic Chamber of Commerce. This will also enable the McLennan County Rural Transit District's staff to identify services most important to LEP passengers.

GOAL #2: McLennan County Rural Transit District will ensure service schedules are printed and distributed in English, Spanish and other languages spoken by more than 1,000 persons in the cities within the McLennan County Rural Transit District service area.

GOAL #3: McLennan County Rural Transit District 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: McLennan County Rural Transit District will attempt to maintain qualified individuals who speak Spanish and other languages as an effort to help make the overall communication with LEP persons more effective.

Factor 4: Resources and Costs

The MCRTD 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, MCRTD has translated its transportation maps and vital documents to the Spanish language. MCRTD 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 the city would pay a fee. Costs for these services include a charge of \$.61 per minute for a language other than Spanish. The contact for these services is:

Contact Language Line Services, Inc.
Coordinator: Thomas Costello
Phone: (877) 735-9770
Fax: (831) 648-7595

While performing the four factor analysis, the McLennan County Rural Transit District 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, McLennan County Rural Transit District 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 has a limited ability to read, write, speak or understand English may be a Limited English Proficient person. These persons that qualify may be entitled to language assistance with respect to MCRTD 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 MCRTD 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.
- MCRTD staff will be provided with 'I Speak' cards to assist in identifying the language interpretation needed if the occasion arises.
- MCRTD staff will record any contacts with LEP persons and then they will review these recorded contacts annually.
- When the MCRTD sponsors conduct 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 MCRTD area is small, as determined in factor 3 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 MCRTD will strive to offer the following measures:

1. The MCRTD takes reasonable steps to provide the opportunity for meaningful access to LEP residents who have difficulty communicating in English.
2. Language interpretation is accessible for all other languages through a telephone interpretation service.
3. Establish relations with more agencies and organizations serving LEP persons.
4. Receive feedback from agencies regarding key languages being used and resources from those agencies that may assist MCRTD with LEP persons as it relates to transportation needs of the LEP individuals.
5. Identify other key documents that require translation.
6. A link has been placed below for the MCRTD website, that gains access to documentation that is pertinent to the transportation needs of the LEP individuals:
<http://www.co.mclennan.tx.us/595/McLennan-County-Rural-Transit-District>
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. Training is provided that includes a B.U.S talk program that implements weekly information about buses and passengers. There is also passenger assistance training that iterates the ability to properly handle passengers with different disabilities including a language barrier.
8. The following resources is available to accommodate LEP persons:
 - Interpreters for the Spanish language are currently available to all callers in regards to transportation needs. Any client who has transportation needs and arrives on the MCRTD site will be provided with 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 (MCC). 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 McLennan County Rural Transit District 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

McLennan County Rural Transit District's current LEP Program efforts include:

- Bilingual staff
- Notice to the public

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

- Language identification cards using "I Speak" cards
- Advertising in ethnic media
- Vital documents will be printed in languages other than English

Monitoring and Updating the LEP Plan

MCRTD 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 McLennan County, Texas
- 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 MCRTD financial resources are sufficient to fund language assistance resources when needed.
- Determine whether the MCRTD fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the MCRTD'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, MCRTD will adjust policies and procedures accordingly. Changes will be reported through the establishment of new goals, objectives, and training measures for staff. Additionally, McLennan County Rural Transit District 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

LEP Program Conclusion

This document will serve as the MCRTD'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 McLennan County, costs are certain to increase as our contact efforts will have to increase. The agency will update this document in TrAMS 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, MCRTD 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) which 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.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

McLennan County Rural Transit District has a board of officials that are elected from the surrounding municipalities within McLennan County. MCRTD elected officials do not have a schedule and a meeting time, but meets when it is only necessary for the purpose of McLennan County Rural Transit District’s business.

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

The governing body of the City of Waco select representatives on several community boards and committees that guide the decision making process. Applications for such membership, 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 Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
McLennan County Population					
Transportation Advisory Committee					

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.

Increased mobility

Mobility is the ability to move or be moved freely and easily. Waco Transit System partnering with the McLennan County Rural Transit District improves mobility for the clients on the McLennan county rural area by offering twenty-four vans to be utilized to move clients easily. MCRTD partnering with the Waco Transit System provides a coordinated service which provides the ability to book trips one day in advance, same day trips and Saturday service. Stand by drivers will also be available to ensure all trips are fulfilled in the event of a driver's absence, wreck, traffic delays etc. The stand-by drivers provide insurance that all trips will be completed in the event of a difficulty that may occur for the MCRTD.

Improved access

McLennan County Rural Transit District is drastically improved with the help of Waco Transit System by improving the access to the rural transportation service area. MCRTD has adopted The Waco Transit System projected hours of service which allows the hours of operation to be available Monday through Saturday. This is estimated to provide 34,000 trips annually as we build confidence in the service.

Expected savings or financial efficiencies

Waco Transit System will be able to achieve external economies of scale through acquiring the McLennan County Rural Transit District transportation service by providing a more efficient service on a larger scale with minimal additional costs. The reduction of indirect system costs and better utilization of resources will also achieve internal economies of scale to minimize cost. The amount being spent on the McLennan County Rural Transit District transportation service can be absorbed by the Waco Transit System and can be used in a more financial efficient manner by providing a share ride service. By coinciding services, the Waco Transit System can maximize the use of funds by acquiring the McLennan County Rural Transit District transportation service with the additional services already being provided. In addition to the service becoming more efficient, the Waco Transit System will also become more economical by providing jobs such as drivers, mechanics, and administrative personnel to maximize the efficiency of the financial funds to provide the McLennan County Rural Transit District transportation service.

Project promotion of the development of shared transit information

Waco Transit System already provides information through the use of its website, social media accounts, printed material, and client handouts. To promote new shared transit information the Waco Transit System will incorporate the McLennan County Rural District transportation service into all shared transit information. By combining resources the McLennan County Rural Transit District information becomes intergraded with all the services the Waco Transit System provides.

Supporting local economic development and expansion of economic opportunities

Waco Transit System provides service to the urbanized areas created by the 2010 census. This will provide residents with the opportunity to access jobs, education, medical treatments, and will also give employers a greater pool of employees. With McLennan County Rural Transit District and WTS coinciding, trips to and from adjacent counties will provide trips for riders to get from the rural service area to the urban service area with the ability to travel to a wider range of locations.

Efficiency and effectiveness of the transit operations

Consolidating the McLennan County Rural District transportation with the services already being provided by WTS is beneficial in improving the efficiency and effectiveness to both transit operations. All services are being coordinated by Waco Transit System ensures maximum use of all resources in the most economical manner. The ability to schedule and coordinate MCRTD and all other services together enables the Waco Transit System to provide the most efficient transportation service for all clients. This allows scheduling and coordinating trips to be more flexible to accommodate all client trips. In turn, each trip is then being completed in the most efficient and effective manner.

XIV. Service Standards and Policies

McLennan County Rural Transit District has adopted a set of quantifiable service standards and policies through the inter-local agreement with their service provider, Waco Transit System. These service standards are documented below.

Vehicle Load

Vehicle Load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred
Chevrolet 4500	10	0	13	1
Ford E450	9	0	10	1
Chevrolet Impala	5	0	5	1
Chevrolet HHR	4	0	4	1

Headways (Frequencies)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. Currently, McLennan County Rural Transit District offers two commuter routes that do not exceed more than one hour and fifteen minutes in duration. MCRTD also provides a door to door service that riders have to call to book their trip with a twenty-four hour notice. All trips are booked based upon availability.

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 on the commuter routes if it departs a scheduled time point no more than (3) minutes early and no more than (3) minutes late.
- A vehicle is considered on-time for the paratransit and non-medical transportation service if it arrives no later than one hour after the scheduled time of arrival.
- McLennan County Rural Transit District's on-time performance objective is 97%.

Service Availability

McLennan County Rural Transit District currently provides service so that people of the McLennan county area and adjoining counties can have access to job opportunities, healthcare, and other services the public needs. Consideration is given to new markets as demand warrants and as resources are available.

Vehicle Assignment Policy

The fleet operated by McLennan County Rural Transit District has an average age of approximately 6 years. MCRTD has three different size vehicles that are utilized on the door to door service and the amount of vehicles that operates daily varies upon demand. MCRTD offers two of the three types of vehicles to operate on the two commuter routes to meet the demands of the public. When possible, MCRTD assigns the most efficient yet practical sized vehicle to meet the demand of each type of service offered.

Transit Amenity Policy

McLennan County Rural Transit District's commuter routes are a flag stop system and do 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. MCRTD places benches and shelters along our routes according to industry and safety standards (TCRP Report 19) with consideration of permitting for local and special needs. MCRTD's door to door service is based upon demand response service and only goes to the directed stops that each passenger has to be picked up and dropped off at.

McLennan County Rural Transit District places shelters and benches throughout the service areas based on where the service generators are located. In addition, benches are placed along the commuter routes in safe and accessible areas to assist passengers.

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

Appendix A

Employee Annual Education Form

Title VI Policy

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

All employees of McLennan County Rural Transit District public transportation 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:

**McLennan County Rural Transit District
Attention: Title IV Coordinator: Allen Hunter
301 S. 8th Street, Suite # 100
Waco, Texas 76701
Phone: (254) 750-1900
Fax: (254) 750-1901**

When presented with dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to respectfully address them without regard to race, color or national origin.

Appendix B**Employee Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge the receipt of the Title VI plan, I have read the plan, and I am committed to ensuring that no person is excluded from participation in, or denied the benefits of 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 4702.1.B issued October 1, 2012.

Employee Signature

Employee Name Printed

Date

Appendix C

McLennan County Rural Transit District Title VI Complaint Form

This form is used to file a complaint with McLennan County Rural Transit District based on reported violations of Title VI of the Civil Rights Act of 1964. **You are not required to use the attached form; however a letter that provides all of the following 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):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
<i>*If you answered "yes" to this question, go to Section III.</i>				
If not, please supply the name and relationship of the person that you are filing on the behalf of:				
Please explain why you have filed on behalf of the person noted above: _____				
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 (xx/xx/xxxx): _____				
Explain below 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?	<input type="checkbox"/> Yes	<input type="checkbox"/> 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 the contact information of the 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:		

Please include any additional written documentation, evidence, or other information that may be relevant to the complaint filed. Please ensure to sign/print on the signature form that follows to complete the complaint form.

Si necesita ayuda, póngase en contacto con: (254) 750-1620

Complaint Form Signatures

Complainant Signature

(If unable to sign please print their name)

Date

Third Party Signature

Date

Please submit the completed complaint form by mail or in person at the address below:

**McLennan County Rural Transit District
ATTN: Title VI Coordinator: Allen Hunter
301 S 8th Street Suite 100
Waco, Texas 76701**

Version Espanola de Apendice C

McLennan County Rural Transit District Forma de queja para Titulo VI

Esta forma es para presentar un queja de violacion a Title VI of the Civil Rights Act of 1964. **No es requerido llenar esta form. 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:	Letra Grande		Cinta de Audio	
	TDD		Otro	
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
Seccion III:				
Yo sentio que la discriminacion es basada en:				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen 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"/> Agencia Federal: _____ <input type="checkbox"/> Corte Federal: _____ <input type="checkbox"/> Agencia del Estado: _____ <input type="checkbox"/> Tribunal Estatal: _____ <input type="checkbox"/> Agencia Local: _____		
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:		

Por favor incluya cualquier documentacion adicional por escrito, pruebas u otra informacion que puede ser relevante a la queja presentada. Por favor asegurese de senal e impression en el formulario de frima que sigue para completar el formulario de reclamacion.

Si necesita ayuda, póngase en contacto con: (254) 750-1620

Firma del Formulario de Queja

Firma del Denunciante

(Si no muestra, por favor escribe su nombre)

Fecha

Firma de Terceros

Fecha

Por favor, envíe el formulario de reclamación completado por correo o en persona en la siguiente dirección:

**McLennan County Rural Transit District
ATTN: Title VI Coordinator: Allen Hunter
301 S 8th Street Suite 100
Waco, Texas 76701**

Si necesita ayuda, póngase en contacto con: (254) 750-1620