



**Title VI Program Report**  
Sept 1, 2022, through Aug 31, 2025

2022 Report to the Federal Transit Administration  
in Accordance with FTA Circular 4702.1B, *Title VI Program Guidelines for Federal  
Transit Administration Recipients*

# Table of Contents

Introduction.....	2
Section I - General Reporting Requirements.....	3
Title VI Notice to the Public.....	3
Title VI Complaint Procedures and Form.....	4
Title VI Investigations, Complaints, and Lawsuits.....	8
Public Participation Plan.....	8
Public Meetings, Presentations, and Information Tables.....	9
Membership of Committees.....	14
Language Assistance Plan.....	14
Monitoring Subrecipient Compliance with Title VI.....	15
Review of Facilities Constructed.....	15
Documentation of Governing Body Review and Approval of Title VI Program.....	16
Section II - Requirements of Transit Providers.....	16
Service Standards and Service Policies.....	16
Vehicle Load.....	16
Vehicle Assignment.....	16
Demographics and Service Profile Maps and Charts.....	16
Demographic Ridership and Travel Patterns Collected by Surveys.....	16
Public Engagement Process for Setting the Major Service Change Policy.....	16
Service and Fare Equity Analysis.....	16
APPENDICES	
A. Title VI Public Notice	A-001
B. Title VI Instructions and Complaint Form	A-002
C. Amistad's Language Assistance Plan.....	A-003
D. Documentation of Board Action .....	A-004

## Introduction

Amistad offers a variety of social service programs whose funding comes from the City of El Paso, County of El Paso, State of Texas, and in past years from the federal government. Amistad operates a number of Transportation and Social Service Programs in El Paso and adjacent counties of Far West Texas. In order to receive services through these programs, certain eligibility requirements must be met by persons served by the agency. Amistad must also meet certain requirements in order to receive new and continuing funding. A major requirement is that the agency have in place a current Title VI Policy that addresses the requirements established by federal laws.

On the date this Title VI Policy was renewed, the agency employed 111 employees and operated a fleet of 39 vehicles (all equipped with wheelchair lifts or ramps and are ADA compliant).

Amistad prepared this Title VI Plan to comply with requirements of the Federal Transit Administration (FTA), Office of EEOC, and other government entities that also require such a plan. The FTA requires that transit agencies receiving federal funds submit a Title VI Plan every three years. This plan is for the period 9/1/22 through 8/31/25.

The FTA's authority to require this program stems from the Civil Rights Act of 1964 and subsequent regulations. As stated in circular FTA C 4702.1B, which provides guidance and instructions for complying with Title VI regulations, the purposes of the Title VI Plan are:

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

Circular FTA C 4702.1B includes a checklist of items that are to be included in the Title VI Plan. In general, this report is organized in the order of that checklist.

### **Equity and Social Justice in Foundational Programs and Policies**

Amistad has a deep and long-standing commitment to the principles embodied in Title VI of the Civil Rights Act of 1964. As affirmed in the foundational documents described below, Amistad is committed not only to nondiscrimination but also to actively promoting equity and social justice in all the services we provide.

### **Executive Order on Written Translation Process**

Noting that a substantial number of people in El Paso County have limited English proficiency, and that Amistad is dedicated to giving all its clients fair and equal access to services, opportunities and protection, Amistad has translated all public communication materials. This executive order requires Amistad to translate public communication materials and vital documents into Spanish, as soon as feasible within available resources and into other commonly spoken non-English languages according to guidelines provided. The order provides for the use of alternative forms of language assistance, such as interpretation services, when they are more effective or practical.

Policy Statement

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

## **SECTION I: General Reporting Requirements**

### **Title VI Notice to the Public**

Amistad uses a variety of means to notify the public that we comply with the requirements of Title VI and related statutes and regulations.

Placards displaying this notice, as well as information about how to file a complaint if a person believes Amistad has discriminated against them, are posted inside all buses, Amistad's website, [www.projectamistad.org](http://www.projectamistad.org), and in Amistad's offices to include the reception area and meeting rooms. The notice is translated into Spanish. A similar notice of Title VI obligations and remedies, also in Spanish, is provided to customers of Amistad's paratransit service. Amistad's language assistance plan, attached as Appendix B, includes images of these placards.

The wording of the notice follows:

#### **AMISTAD'S TITLE VI NOTICE TO PUBLIC**

Amistad hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, Executive Order (E.O.) 12898, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United State of America shall, on the ground of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Amistad receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Amistad. Any such complaint must be in writing and filed with the Amistad's Human Resources Department within 180 days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant by contacting the Chief People Officer at 915-225-1677. An individual may also submit a complaint to the transit or Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, Texas 76102 or Texas Department of Transportation, Attn: TxDOT-PTN, 125 East 11<sup>th</sup> Street, Austin, Texas 78701-2483.

In addition, the following notification is posted in English and Spanish on the Amistad website, [www.projectamistad.org](http://www.projectamistad.org):

#### **Title VI compliance**

##### **Title VI Notice to the Public**

Title VI of the Civil Rights of 1964 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 or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.

Any person who believes they have been harmed by an unlawful discriminatory practice regarding Amistad's programs has a right to file a formal complaint with Amistad. Any such complaint must be in writing and submitted to the Amistad Chief People Officer within one hundred eighty (180) days following the date of the alleged occurrence.

For more information regarding Amistad's Title VI Plans, the procedures to file a complaint, or to file a complaint, please contact:

Chief People Officer, Amistad  
3210 Dyer St., El Paso, TX 79930  
915-225-1677

A complaint may also be filed directly with the:

Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, Texas 76102, or  
Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483

If information is needed in another language, contact Chief People Officer at 915-225-1677.

### **Capítulo VI Aviso al Público**

Capítulo VI de los Derechos Civiles de 1964 y los estatutos que prohíben la discriminación en programas de asistencia federal establece que ninguna persona en los Estados Unidos, sea excluida de participar, negada de beneficios, o ser de alguna otra manera sujeta a discriminación por motivos de raza, color o origen nacional bajo cualquier programa o actividad que reciba asistencia federal.

Cualquier persona que cree haber sido sujeto de una práctica ilegal discriminatoria en cuanto a los programas de Amistad, tiene el derecho de presentar una queja formal a Amistad. Cualquier denuncia debe ser hecha por escrito y presentada a la Directora de Recursos Humanos, Amistad dentro de los ciento ochenta (180) días siguientes a la fecha del acontecimiento. Un individuo tambien puede someter una queja con el Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, Texas 76102 or Texas Department of Transportation, Attn: TxDOT-PTN, 125 East 11<sup>th</sup> Street, Austin, Texas 78701-2483.

Para más información sobre programas en Amistad de derechos civiles, el procedimiento de entregar quejas de los derechos civiles, de meter una queja, favor de contactar a:

Directora de Recursos Humanos, Amistad  
3210 Dyer St., El Paso, TX 79930  
915-225-1677

Una queja también se puede entrar directa mente con:

Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, Texas 76102, or  
Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483

Si información se necesita en otro idioma, favor o contactar a la Directora de Recursos Humanos a 915-225-1677.

Amistad's Notice to the Public is posted in the following locations:

Required:

- Agency website: [www.projectamistad.org](http://www.projectamistad.org)**
- Public areas of the agency's office**
- Reception desk**
- Meeting rooms**
- Notice at stations or stops and or inside transit vehicles**

A copy of our actual Title VI Notice is in Appendix A.

# **Title VI Complaint Procedures and Complaint Form**

## **AMISTAD'S TITLE VI COMPLAINT PROCEDURE**

### **Introduction**

As a sub-recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related Title VI statutes, Amistad ensures that no person shall, on the grounds of race, religion, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any agency programs or activities. All programs funded in whole or in part from federal financial assistance are subject to Title VI requirements. The Civil Rights Restoration Act of 1987 extended this to all programs within an agency that receives federal assistance regardless of the funding source for individual programs.

This policy is intended to establish a procedure under which complaints alleging discrimination in Amistad's provisions, services, or activities can be made by persons who are not employees of the agency. Any person who believes Amistad, or any entity that receives federal financial assistance from or through Amistad (i.e., sub-recipients, sub-contractors, or sub-grantees), has subjected them or any specific class of individuals to unlawful discrimination may file a complaint of discrimination.

### **When to File**

A complaint of discrimination must be filed within 180 calendar days of the alleged act of Discrimination, or discovery thereof; or where there has been a continuing course of conduct, the date on which that conduct was discontinued. Filing means a written complaint must be postmarked before the expiration of the 180-day period. The filing date is the day you complete, sign, and mail the complaint form. The complaint form and consent/release form must be dated and signed for acceptance. Complaints received more than 180 days after the alleged discrimination will not be processed and will be returned to the complainant with a letter explaining why the complaint could not be processed and alternative agencies to which a report may be made.

### **Where to File**

In order to be processed, signed original complaint forms must be mailed to:

Amistad  
Director of Human Resources  
3210 Dyer St.  
El Paso, TX 79930

Upon request, reasonable accommodations will be made for persons who are unable to complete the complaint form due to disability or limited-English proficiency. A complaint may also be filed by a representative on behalf of the complainant.

Persons who are not satisfied with the findings of Amistad may seek remedy from other applicable state or federal agencies such as:

- a. Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483
- b. Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102

## **Required Elements of a Complaint**

In order to be processed, a complaint must be in writing and contain the following information:

- Name, address, and phone number of the complainant.
- Name(s) and address(es) and business(es)/organization(s) of person(s) who allegedly discriminated.
- Date of alleged discriminatory act(s).
- Basis of complaint (i.e., race, color, national origin, sex, age, religion, or disability).
- A statement of complaint.
- A signed consent release form.

## **Complaint Process Overview**

The following is a description of how a discrimination complaint will be handled once received by Amistad.

### **1. A complaint is received by Amistad:**

Complaints must be in writing and signed by the complainant or their designated representative. If the complainant is unable to complete the form in writing due to disability or limited-English proficiency, upon request reasonable accommodations will be made to ensure the complaint is received and processed in a timely manner. Complainants wishing to file a complaint that do not have access to the Internet or the ability to pick up a form will be mailed a complaint form to complete. The complainant will be notified if the complaint form is incomplete and asked to furnish the missing information.

### **2. Complaint is logged into tracking database:**

Completed complaint forms will be logged into the complaint tracking database; basic data will be maintained on each complaint received.

### **3. Determine jurisdiction:**

Amistad's Title VI Review Team, which is comprised of the Chief People Officer and two other members of the Corporate Management Team (CMT) will complete an initial review of the complaint. The purpose of this review is to determine if the complaint meets basic criteria.

Criteria required for a complete complaint:

- Basis of alleged discrimination (i.e., race, religion, color, national origin, sex, age, or disability).
- Determination of timeliness will also be made to ensure that the complaint was filed within the 180- day period requirement.
- The program in which the alleged discrimination occurred will be examined to ensure that the complaint was filed with the appropriate agency. During this process, if a determination was made in which the program or activity that the alleged discrimination occurred is not related to the Amistad program or activity, every attempt will be made to establish the correct agency. Whenever possible and assuming consent was granted on the Consent/Release form, the complaint will be forwarded to the appropriate agency.

### **4. Initial written notice to complainant:**

Within 10 working days of the receipt of the complaint, Amistad will send notice to the complainant confirming receipt of the complaint; if needed, the notice will request additional information, notify complainant that the activity is not related to a Amistad program or activity, or does not meet deadline requirements. Conclusions made in step three will determine the appropriate response to the complaint.

If any additional information is needed from the complainant, it will be communicated at this point in the process. A copy of the written response, as well as the complaint form, will be forwarded to the Texas Department of Transportation PTC.

**5. Investigation of complaint:**

The Director of Human Resources will confer with the Chief Operating Officer Transportation Programs to determine the most appropriate fact-finding process to ensure that all available information is collected in an effort to reach the most informed conclusion and resolution of the complaint. The type of investigation techniques used may vary depending on the nature and circumstances of the alleged discrimination. An investigation may include but is not limited to:

- Internal meetings with Amistad staff and legal counsel.
- Consultation with state and federal agencies.
- Interviews of complainant(s).
- Review of documentation (i.e., planning, public involvement, and technical program activities).
- Interviews and review of documentation with other agencies involved.
- Review of technical analysis method (if applicable).
- Review of demographic data.

**6. Determination of investigation:**

An investigation must be completed within 60 days of receiving the complete complaint unless the facts and circumstances warrant otherwise. A determination will be made based on information obtained. The concern will be reviewed by the Title VI Review Team and follow up. The Title VI Review Team will render a recommendation for action, including formal and/or informal resolution strategies in a report of findings to the CEO.

In the event the finding is that the staff member violated any portion of Title VI, progressive discipline will follow as outlined in the Employee Handbook. Management staff will identify corrective action to prevent the reoccurrence of complaints and ensure that changes (if needed) are made accordingly.

The Director of Human Resources shall prepare a report and forward it to the appropriate supervisor regarding the outcome of the complaint highlighting issues that arose from the incident.

The following action shall be taken when appropriate:

If the root cause of the complaint was an isolated violation of Title VI policies and procedures the supervisor shall start appropriate disciplinary proceeding against the staff member who violated Title VI.

If the root cause of the complaint is systemic, appropriate changes shall be developed to eliminate the occurrence of similar complaints.

**7. Notification of determination:**

Within 10 days of completion of an investigation, the complainant must be notified by the Chief People Officer of the final decision.

A complaining party may Appeal the Title VI Review Team's Finding by informing the Chief People Officer of the desire to Appeal the Finding. The Appeal must be made within the next five days after the decision was made by the Title VI Review Team. The Chief People Officer shall notify the CEO within two business days and provide a copy of all relevant documents related to the complaint.

The CEO shall notify the party appealing the Title VI Review Team's finding as to the time and date to meet and hear the rationale for the appeal. Said meeting shall be held within five business days, unless the complaining party needs more time. However, if the complaining



party cannot meet within ten days from the Appeal date, the CEO shall render a decision without such meeting.

Once the CEO completes this process, he / she will make a decision that shall be final. The Chief People Officer will notify the complainant of the CEO’s final decision within five days of making that decision.

The notification will advise the complainant of his/her appeal rights with state and federal agencies if he/she is dissatisfied with the final decision. The following agencies are:

- a. Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483
- b. Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102
- c. U. S. Department of Transportation, 1200 New Jersey Avenue S. E., Washington, DC 20590

A copy of this letter, along with the report of findings, will be forwarded to the Texas Department of Transportation, Office of Civil Rights, and Contract Compliance Section for information purposes.

Details of these outcomes will be recorded and filed in the agency’s Title VI Complaint Log. The log documents the incident, tracks the date reported, time reported, parties involved, and all pertinent facts.

Instructions for filling out a Title VI complaint can be obtained from Amistad’s Office or by contacting the Chief People Officer at 915-225-1677 or on our website: [www.projectamistad.org](http://www.projectamistad.org)

A copy of the instructions and complaint form are in Appendix B.

## Title VI Investigations, Complaints, and Lawsuits

Amistad implemented the Title VI Plan in May 2014 and has not had any Title VI or civil rights complaints filed. Below is how Amistad will record complaints and actions taken listed in Table 1.

**Table 1**  
**Amistad’s - Complaints and Actions Taken**

Civil Rights Complaints					
		Date filed	Summary/Allegations (includes basis of complaint: race, color, or national origin)	Status	Action(s) Taken
1.	N/A				
Accommodation Complaints					
		Date filed	Summary/Allegations (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
2.	N/A				

## Public Participation Plan

Amistad has several policies and plans that establish expectations for how Amistad engages minority and

limited-English-proficient populations in our public engagement and outreach processes. These policies and plans reflect the fundamental principle that all those affected by a decision should be involved in shaping it.

1. The **Amistad Strategic Plan** establishes the following goal for public engagement: Promote robust public engagement that informs, involves, and empowers people and communities. The plan defines three public engagement objectives:
  - Expand opportunities to seek input, listen, and respond to residents.
  - Empower people to play an active role in shaping their future.
  - Improve public awareness of what Amistad does.
2. **Amistad's Executive Order on Translation** ensures that communications are culturally and linguistically appropriate to the target audiences and provides guidance for translating public communication materials.

In the context of these policies, Amistad's ongoing and project-based public engagement methods proactively seek to engage minority and limited-English-proficient populations in conversations that shape decision making.

### **Project-specific Engagement**

Amistad develops public engagement processes to invite the general riding and non-riding public to help shape decisions regarding new transit service, changes to existing service, and reinvestments of existing service resources in accordance with Amistad's strategic plan and service guidelines.

When developing major service changes, we design an engagement process that seeks to involve people affected by the change, including:

- Riders of affected routes
- Residents of areas around affected routes
- Community clubs and neighborhood councils
- Organizations that serve underrepresented and transit-dependent populations
- Staff and elected officials from local jurisdictions
- Major institutions
- Employers
- Partner transit agencies (e.g., Sun Metro).

We use information and input from the public to develop service proposals that respond to the public's expressed needs. Service proposals often include alternatives for coverage, frequency and span of service. Alternatives may also present variations for peak and all-day service, local and express service, and other aspects of service.

We inform and solicit input from the public through methods such as public meetings, questionnaires, conversations with community groups, social media, news releases, and advertisements. We involve people early in the planning process, presenting preliminary concepts and gathering input that is then used to develop proposals that are presented in a second round of outreach.

In every community engagement project, we research the demographics of those who may be affected by the change being considered. U.S. Census data, school district data, and targeted research with organizations serving transit-dependent populations is used to determine the best way to reach minority and limited-English-proficient people in the community affected by the change.

We design outreach strategies to reach these populations, creatively seeking to engage those who would not otherwise learn about our process via mainstream communication channels.

A primary approach Amistad takes is to partner with organizations serving minority populations to find out the most appropriate ways to engage those they serve. Other outreach efforts include:

- Distributing translated and large-print materials through community organizations, open houses and information tables.

- Hosting information tables at locations that serve minority and underrepresented populations, such as food banks, human service organizations, low-income housing, and cultural organizations.
- Working with community partners to host meetings designed in formats, locations and at times that are appropriate for limited-English-proficient populations.
- Boarding buses to reach people directly, using interpreters or translated materials as necessary.
- Providing information and purchasing advertising from ethnic media and community publications.
- Posting information at key community locations serving minority and underrepresented populations.
- Arranging for interpreters (including deaf and deaf/blind) upon request or working with community-based organizations to facilitate conversation when appropriate.
- Having Amistad’s staff members available at open houses to answer questions and provide support for people with special needs.

### Community Events, Presentations, and Outreach Events

Table 2 lists the WTEP meetings that were held during 9/2022 – 8/2023. Table 3 shows a general overview of the amount of outreach events, public meetings, media releases, social media postings and their impact on the audience reached (impressions) and presentations for the year.

**Table 2  
WTEP Meetings**

Date	Area	Participant s
<b>2022-2023</b>		
<b>WTEP Meetings</b>		
11/17/2022	Amistad Board Room / WTEP Stakeholders	6
1/19/2023	Amistad Board Room / WTEP Stakeholders	13
5/4/2023	Amistad Board Room / WTEP Steering	8
5/25/2023	Amistad Board Room / WTEP - Stakeholders	8
8/24/2023	Amistad Board Room / WTEP - Stakeholders	7

**Table 3  
Community Events, Presentations, Media Releases and Outreach Events**

Marketing events/Community events (fundraisers & networking)	19
Media releases (non-social media)	21
Presentations promoting agency	236
Outreach events	679
Social media postings	859
Number of audience reached/Impressions	87,612,598

### Membership of Committees

The table below shows the racial/ethnic breakdown of Amistad’s Board of Directors and the Advisory Committee, as well as members who have disabilities.

Members are recruited from community agencies that network with Amistad and from the general public. Every effort is made to have a cross section of the community.

**Table 4  
Advisory Committee Membership**

	<b>Board Of Directors</b>	<b>Advisory Committee</b>
African American	1	0
Asian-Pacific Islander	0	0
Caucasian	0	3
Hispanic	10	19
Person with disabilities	0	1

## **Language Assistance Plan**

Amistad has a program in place to ensure that people with limited English proficiency have access to our services and to public participation opportunities. The following is a synopsis of the program; the full implementation plan is attached as Appendix C.

Our practice is to translate public communication materials and vital documents into Spanish—by far the most commonly spoken non-English language in El Paso County—when translation is feasible within available resources. We will translate materials into the other commonly spoken non-English languages when those are the primary language spoken by 5 percent or more of the target audience. We may use alternative forms of language assistance, such as offering interpretation service upon request, when the alternative is more effective or practical.

Amistad has identified the non-English languages most commonly spoken in the county. We rely on these findings, which are based on one data source, in our language assistance program. In addition, Amistad staff members become familiar with limited-English populations and their translation needs by working with community organizations that serve these populations.

Available data and Amistad’s experience affirm that many refugees and immigrants who may have limited English proficiency rely on transit, and we offer a number of language resources to assist these customers. These include translated communication materials about services, interpretation offered through Amistad, signage that uses widely recognized symbols and notices of Title VI obligations on Amistad buses.

When Amistad conducts public outreach concerning proposed service changes, we provide or offer translated descriptions of the proposals and questionnaires, offer interpretation at public meetings, work with community organizations that can assist us in communicating with people who have limited English proficiency, and provide telephone comment lines for non-English-speakers.

## **Monitoring Subrecipient Compliance with Title VI**

To ensure that all subrecipients comply with Title VI regulations, grants staff and program managers monitor the performance of subrecipients monthly. The subrecipient monitoring process is summarized below. Note: If a subrecipient is already a direct recipient of FTA funds, Amistad is not responsible for monitoring the subrecipient’s Title VI compliance.

Monthly Subcontractor Visits - Travel is required to monitor on-time performance, driver files, Title VI plans, drug and alcohol programs, complaint procedure, proper notification to the Public and perform vehicle inspections. The Subcontractor Driver Monitoring forms are used to track driver training, background checks, licenses, etc. The Subcontractor Vehicle Monitoring forms are used to track vehicle mechanical components, insurance, registration, and other contract agreement requirements. The Subcontractor Demand Response Quality Check form is used to monitor quality of work performance, on-time performance, and vehicle compliance.

Grants staff:

- Ensure that project agreements with subrecipients contain all required federal documents and

clauses, including sample notices to the public informing them of their rights under Title VI, sample procedures on how to file a Title VI complaint, sample procedures for tracking and investigating Title VI complaints and information regarding expectations for notification from the subrecipient to Amistad when a Title VI complaint is received.

- Request subrecipients to provide us with Federal Funding Accountability and Transparency Act (FFATA) information and requests subrecipients to provide us with a copy of a Title VI plan.
- Review Title VI plan, if required.
- File copy of agreement/contract, FFATA form and Title VI plan, if available, in Grants Official Subrecipient File.
- Submit FFATA information in the [www.FSRS.gov](http://www.FSRS.gov) website.
- On an annual basis, send a letter to subrecipient requesting a copy of A-133 audit report or other financial documentation if the subrecipient received less than \$500,000 in federal funding from all sources.
- Review financial paperwork and communicate information to project managers. If necessary, request that project managers closely monitor the subrecipient.

Project managers:

- Maintain ongoing communication with subrecipient and manage subrecipient agreements/contracts and approve invoices.
- Report subrecipient progress on FTA quarterly milestone progress reports, if applicable.
- Gather documents from subrecipients to ensure they are complying with Title VI, if applicable.

## Review of Facilities Constructed

Amistad did not build any storage facilities, maintenance facilities or operation centers that require a Title VI analysis.

## Documentation of Governing Body Review and Approval of Title VI Plan

On November 18, 2020, Amistad’s Board of Directors reviewed the proposed Title VI Plan and recommended “that the Title VI Plan be approved”. Documentation of the board actions is found in Appendix D. There have been no material changes to the plan since that date.

## Section II: Requirements for Transit Providers

As mentioned in the introduction, Amistad offers a variety of demand response and express route transportation services to members living in El Paso County. In order to receive transportation services, certain eligibility requirements must be met. The agency operates a fleet of 39 vehicles equipped with wheelchair lifts.

### Service Standards

#### Vehicle Load Standards

The average of all loads during the peak operating period should not exceed vehicles’ achievable capacities, which are 14 passengers in an E-450 bus.

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Wheelchair	Total	
E-450 Bus	12	2	14	1.25

### Service Policies

#### Vehicle Assignment Policy

Vehicles will be assigned to the different depots such that the average age of fleet serving each depot does not exceed 5 years. Currently all vehicles used for serving all depots are 2012 E-450 and have the same floor plan, features and loading capacities.

### **Demographics and Service Profile Maps and Charts**

Amistad does not operate 50 or more fixed route vehicles in peak service and are not located in a UZA of 200,000 or more in population therefore this requirement does not apply to the agency.

### **Demographic Ridership and Travel Patterns Collected by Surveys**

Amistad does not operate 50 or more fixed route vehicles in peak service and are not located in a UZA of 200,000 or more in population therefore this requirement does not apply to the agency.

### **Public Engagement Process for Setting the Major Service Change Policy**

Amistad does not operate 50 or more fixed route vehicles in peak service and are not located in a UZA of 200,000 or more in population therefore this requirement does not apply to the agency.

### **Service and Fare Equity Analysis**

Amistad does not operate 50 or more fixed route vehicles in peak service and are not located in a UZA of 200,000 or more in population therefore this requirement does not apply to the agency.

**Appendix A**  
**Title VI Notice – English/Spanish**



**TITLE VI COMPLIANCE**  
**Title VI Notice to the Public**

**Title VI of the Civil Rights of 1964 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 or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance.**

**Any person who believes they have been harmed by an unlawful discriminatory practice regarding Amistad's programs has a right to file a formal complaint with Amistad. Any such complaint must be in writing and submitted to the Amistad Chief People Officer within one hundred eighty (180) days following the date of the alleged occurrence.**

**For more information regarding Amistad's civil rights programs, the procedures to file a complaint, or to file a complaint please contact:**

**Chief People Officer, Amistad  
3210 Dyer St., El Paso, TX 79930  
Tel. 915-225-1677**

**A complaint may also be filed directly with the:**

**Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36,  
Fort Worth, Texas 76102, or**

**Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street,  
Austin, TX 78701-2483.**

**If information is needed in another language, contact the Director of Human Resources at 915-225-1677.**





## Capítulo VI Aviso al Público

Capítulo VI de los Derechos Civiles de 1964 y los estatutos que prohíben la discriminación en programas de asistencia federal establece que ninguna persona en los Estados Unidos, sea excluida de participar, negada de beneficios, o ser de alguna otra manera sujeta a discriminación por motivos de raza, color o origen nacional bajo cualquier programa o actividad que reciba asistencia federal.

Cualquier persona que cree haber sido sujeto de una práctica ilegal discriminatoria en cuanto a los programas de Amistad, tiene el derecho de presentar una queja formal a Amistad. Cualquier denuncia debe ser hecha por escrito y presentada a la Directora de Recursos Humanos, Amistad dentro de los ciento ochenta (180) días siguientes a la fecha del acontecimiento.

Programas de derechos civiles de Amistad, el procedimiento de entregar quejas de los derechos civiles, de entregar una queja, favor de contactar a:

Directora de Recursos Humanos, Amistad  
3210 Dyer St., El Paso, TX 79930  
Tel. 915-225-1677

Una queja también se puede entregar directamente con:

**Federal Transit Administration, Region VI, 819 Taylor Street, Room 8A36, Fort Worth, Texas 76102, o con**

**Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483.**

**Si información se necesita en otro idioma, favor de contactar a la Directora de Recursos Humanos a 915-225-1677.**



**Appendix B**  
**Title VI Instructions and Complaint Forms – English/Spanish**

## NOTICE TO THE PUBLIC

### COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AGAINST AMISTAD

#### **Who can file a Title VI complaint?**

- A person who believes he or she has experienced discrimination based on race, color, national origin, or sex as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987.
- Someone may file on behalf of classes of individuals.

#### **How do I file a complaint?**

Fill out this form completely to help us process your complaint. Submit the completed form to the Chief People Officer within 180 calendar days of the alleged discriminatory act.

#### **What happens when I file a complaint?**

The Chief People Officer will send you a written receipt of your complaint and will facilitate and coordinate responses to your Title VI complaint. Amistad will notify our Public Transportation Coordinator (PTC) by email or fax of any Title VI related complaints received within 10 working days of the receipt of the complaint form, including a paper or electronic copy of the complaint form.

The Chief People Officer can provide a variety of services such as:

- technical assistance to the department on requirements and regulations
- coordination of meetings between the parties, if needed
- monitoring completion of any future activities included in a complaint response
- other services as requested or deemed appropriate

#### **What if I don't agree with the department's letter of resolution?**

A complainant who does not agree with the letter of resolution may submit a written request for an appeal to the Director of Human Resources within 5 days of the date the complainant receives the department's response.

#### **Do I need an attorney to file or handle this complaint with Amistad?**

No. However, you may wish to seek legal advice regarding your rights under the law.

#### **Return this form to:**

Amistad  
Attn: Chief People Officer  
3210 Dyer St.  
El Paso, TX 79930

Phone 915-225-1677

Fax 915-298-1103

**This form is available in alternate formats upon request. Contact the Director of Human Resources for help completing this form or with questions about the grievance procedure.**

## NOTICIA AL PUBLICO

**FORMULARIO DE DENUNCIA DE DISCRIMINACIÓN CONTRA AMISTAD LA  
LEY DEL TÍTULO VI****¿Quién puede interponer una queja del Título VI?**

- Una persona protegida por el Título VI que cree que ha sido discriminado por motivos de raza, color, origen nacional o sexo.
- Una persona puede presentar una queja en nombre de las clases de individuos protegidos por el Título VI.

**¿Cómo presento una queja?**

Por favor complete este formulario en su totalidad, con tinta negra. Firme y regrese el formulario a la Directora de Recursos Humanos dentro de los 180 días de la fecha cuando la discriminación alegada ocurrió.

**¿Qué sucederá después de presentar una queja?**

La Directora de Recursos Humanos le enviará un recibo por escrito confirmando la llegada de su queja y facilitará y coordinará las respuestas a su queja del Título VI. Amistad le notificara a su Coordinador de Transporte Publico por correo electrónico, o fax de cualquier queja relacionada con Título VI en los siguientes 10 días hábiles de haber recibido su queja incluyendo la forma o la copia electrónica de la queja.

El especialista puede ofrecer una variedad de servicios tales como:

- asistencia técnica para el departamento sobre los requisitos y regulaciones de la ley
- coordinación de las reuniones entre los partidos, si es necesario
- asegurar el cumplimiento del departamento con un acuerdo resolviendo la queja
- otros servicios según se solicite o se considere oportuno.

**¿Qué pasa si no estoy de acuerdo con la carta de resolución por el departamento?**

Un demandante que no está de acuerdo con la carta de resolución podrá presentar una solicitud proponiendo una resolución diferente a la Directora de Recursos Humanos dentro de los 30 días de recibir la resolución propuesta por el departamento.

**¿Necesito un abogado para presentar o manejar esta queja ante Amistad?**

No. Sin embargo, tiene el derecho de obtener consejo legal sobre sus derechos legales.

**Devuelva este formulario a:**

Amistad  
Attn: Directora de Recursos Humanos  
3210 Dyer St.  
El Paso, TX 79930

Phone 915-225-1677

Fax 915-298-1103

**Este formulario está disponible en formatos alternativos a pedido del interesado. Póngase en contacto con la Directora de Recursos Humanos para ayudar a completar este formulario o si tiene preguntas sobre el procedimiento de la queja.**




**A-002**

**Section IV:**

13. Date of Incident:	14. If applicable, name of person(s) who allegedly discriminated against you:
-----------------------	---

15. Discrimination based on (please check all that apply):    Race    Color    National Origin

16. Please provide a brief explanation of the incident and how you feel you were discriminated against, including how you feel others may have been treated differently than you. If you require additional space or have additional written material pertaining to your complaint, please attach to this form.

17. Why do you believe this event occurred?





18. In the complainant's view, what would be the best way to resolve the issue?

19. Please list any person(s) we may contact for additional information to support or clarify your complaint:  
Name:                                      Address:                                      Phone Number:

**Section V:**

Signature:	Date of filing:
------------	-----------------

**Please note: Amistad cannot accept your complaint without signature.**

Please mail your completed form to: Amistad  
Attention: Chief People Officer  
3210 Dyer St.  
El Paso, TX 79930

# Amistad

## Formulario de denuncia de los derechos civiles de Título VI

Instrucciones: Para presentar un reclamo de Título VI a Amistad, por favor imprimir y completar el siguiente formulario, firme y devuelva a: Amistad, atención: Directora de Recursos Humanos, 3210 Dyer St., El PASO, TX 79930. Para preguntas o para una copia completa de Título VI póliza de Amistad y los procedimientos de queja, por favor enviar una solicitud por escrito a la dirección anterior, o llame al (915) 532-3790, o correo electrónico: [ddelossantos@projectasmistad.org](mailto:ddelossantos@projectasmistad.org).

<b>Sección I:</b>	
1. Nombre (Denunciante):	
2. Dirección (calle N°, ciudad, estado, código postal)	
3. Teléfono:	4. Dirección de correo electrónico:
5. Requisitos de formato accesible? (por favor, compruebe preferencia)	
<input type="checkbox"/> Letra Grande <input type="checkbox"/> Audio Cinta <input type="checkbox"/> TDD	
<input type="checkbox"/> Otros (por favor indica) _____	
<b>Sección II:</b>	
6. Está presentando esta denuncia en su propio nombre? <input type="checkbox"/> Si <input type="checkbox"/> No	
(Si contesto "Si" a esta pregunta, por favor vaya a Sección III.)	
7. ¿Si contesto "no" a la pregunta 6, por favor describa su relación con la persona (denunciante) para quienes son presentados y porque está presentando para un tercer partido?	
8. Obtuvo permiso de la persona discriminada para presentar esta queja en su nombre?	
<input type="checkbox"/> Si <input type="checkbox"/> No	
<b>Sección III:</b>	
9. Usted a previamente presentado un Título VI denuncia con Amistad? <input type="checkbox"/> Si <input type="checkbox"/> No	
10. Presento esta queja con cualquier otra agencia de derechos civiles o tribunal local, estatal o federal? <input type="checkbox"/> Si <input type="checkbox"/> No	
11. Si contesto "si", por favor cheque todos que aplican:	
<input type="checkbox"/> Agencia Federal <input type="checkbox"/> Corte Federal <input type="checkbox"/> Agencia Estatal <input type="checkbox"/> Corte Estatal <input type="checkbox"/> Agencia Local	

12. Si presento en una agencia o tribunal, por favor proporcione información para su punto de contacto en la agencia/corte donde la queja fue presentada:

Agencia/Corte:

Nombre del Contacto:

Dirección:

Número de Teléfono:


**Sección IV:**

13. Fecha del incidente:

14. Si aplicable, nombre de la persona o personas que presuntamente discrimino contra usted:

15. Discriminación basado en (Marque todos que aplican): Raza Color País de Origen/Ascendencia

16. Por favor proporcionar una breve explicación del incidente y como siente que fue discriminada, incluyendo como se sienten que otros fueron tratados diferentemente que usted. Si usted requiere espacio adicional o tener adicional escrito material perteneciente a su queja, por favor adjuntar a este formulario.

17. Porque piensa que este evento ocurrió?

18. En la opinión del denunciante, ¿que será el mejor modo resolver la denuncia?

19. Por favor liste cualquier persona o personas que podemos contactar para más información para apoyar o aclarar su queja:

Nombre:

Dirección:

Número de Teléfono:

**Sección V:**

Firma:

Fecha de archivo:

**Por favor note: Amistad no puede aceptar su queja sin firma.**

Por favor envíe por correo el formulario completado a:

Amistad  
Atención: Directora de Recursos Humanos  
3210 Dyer St.  
El Paso, TX 79930

**Appendix C**  
**Amistad 's Language Assistance Plan**





# Limited English Proficiency Plan (LEP)

3210 Dyer St.  
El Paso, TX  
915-532-3790

## **Introduction**

Limited English Proficient (LEP) individuals are those who do not speak English as his or her primary language and have a limited ability to read, write, speak, or understand English, as a result of national origin. LEP individuals are entitled to language assistance with respect to a particular type of service, benefit, or encounter.

The Limited English Proficiency Plan (LEP) has been prepared to address Amistad's responsibilities as a recipient of federal funding. The plan will address the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

## **Plan Summary**

Amistad has developed the Limited English Proficiency (LEP) Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access the agency's services. 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, Amistad used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Amistad.
2. The frequency with which LEP persons come in contact with Amistad services.
3. The nature and importance of services provided by Amistad to LEP population.
4. The interpretation services available to Amistad and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## **MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS**

### **1. The number or proportion of LEP persons in the service area who may be served or are likely to require Amistad services.**

Amistad reviewed the July 1, 2018, U.S. Census Report and determined that out of 840,410 persons, 603,246 (71.78% of the population) speak a language other than English. In Amistad's service area, the breakdown of those individuals with limited English proficiency is as follows:

- 586,018 speak Spanish (69.73%)
- 17,228 speak a language other Spanish or English
- 237,164 speak only English

### **2. The frequency with which LEP persons come in contact with Amistad services.**

Amistad staff reviewed the frequency with which the board, office staff, case workers, and bus drivers have contact with LEP persons. The review includes documentation of phone inquiries, surveys, and office visits. The majority of the documents that provide agency information, eligibility of services, program descriptions, the agency website, have been translated to Spanish language. Amistad has had maximum contact and requests for Spanish language interpretation and few to no contact or requests for translated program documents into languages other than Spanish.

### **3. The nature and importance of services provided by Amistad to LEP population.**

Amistad is the primary source of transportation for many LEP individuals, low-income persons, persons with disabilities, and older adults. PA is also appointed guardian of over 350 individuals after they are found to be incapacitated and in need of a guardian. The Aging and Disability Transportation Resource Center is designed to effectively integrate the full range of long-term support and services into a single coordinated system by simplifying access to long-term care services. Many of the individuals served by the agency are limited English speakers. Out of the overwhelming majority of the population, 28.2%, speaks only English. For many, the agency is the only place where individuals can seek services from, whether it is to go to an appointment, or to provide him or her with social service resources.

### **4. The resources available to Amistad and overall cost to provide LEP assistance.**

Amistad reviewed its available resources that could be used for providing LEP assistance. The majority of Amistad brochures, which provide agency information, have been translated into Spanish language. To further assist LEP individuals, the agency proactively employs bilingual persons. Currently, the majority of the employees are bilingual (Spanish and English) speaking. Amistad also has an account with Language Line® Personal Interpreter Services in which they offer highly skilled and certified interpreters.

## LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has limited ability to read, write, speak, or understand English may be a Limited English Proficient person. He or she may be entitled to language assistance in regard to Amistad services. Language assistance can include interpretation, which means the written transfer of a message from one language into another.

How Amistad staff can identify a LEP person who needs language assistance.

- Post notice of LEP and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Amistad staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- Amistad staff will be informally surveyed periodically on their experience regarding any LEP participants.
- When Amistad sponsors an informational meeting or event, an advanced public notice of the event will be published. Amistad will inquire if any type of special needs is desired, such as a translator (LEP) or interpreter (sign language for hearing impaired individuals). Amistad will make every effort to provide translation methods to assist LEP individuals.

### Interpretation

Interpretation is the action of explaining the meaning of something from one language into another one. One way to determine the native language of LEP individuals is to use the “I Speak” identification cards. The cards invite LEP persons to identify his or her language needs to Amistad staff. A sample of Amistad’s “I Speak” Language Identification Card is as follows:

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöøic Vieät Ngöð.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi

## “I Speak” Language Identification Card

**Note:** For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

### **How LEP persons interact with Amistad**

Amistad staff will follow the steps below when the employee encounters communication with LEP individuals.

#### **Walk-in LEP Persons:**

1. PA receptionist will attempt to communicate with the walk-in visitor in English language. PA receptionist will determine if the client can understand the language satisfactorily.
2. If the client cannot understand or effectively communicate in English, the receptionist is encouraged to the best of his or her ability, to determine the language the client is speaking.
3. If Amistad receptionist cannot recognize the client’s language, the employee will provide an “I speak” card to the client. The client will document his or her language on the card.
4. The receptionist will quickly determine if any of the other employees working in the office, speak the necessary language to assist the client.
5. If so, the office staff interpreter will provide the same level of service as any other client requesting information from Amistad.
6. If there is no employee who speaks the necessary language, the receptionist must obtain approval from his or her supervisor to contact the Language Line® Personal Interpreter Service.
7. The client will receive the same level of service as any other client requesting information from Amistad.

#### **Phone-in LEP Persons:**

1. PA receptionist/call taker will attempt to communicate with the caller in English language. PA receptionist/call taker will determine if the client can understand the language satisfactorily.
2. If the client cannot understand or effectively communicate in English, the receptionist/call taker is encouraged to the best of his or her ability, to determine the language the client is speaking.
3. The receptionist/call taker will quickly determine if any of the other employees working in the office speak the necessary language to assist the client.
4. If so, the office staff interpreter will determine the need and relay the information to the appropriate person. The office staff interpreter will provide the same level of service as any other client requesting information from Amistad.
5. If there is no employee who speaks the necessary language, the receptionist/call taker must obtain approval from his or her supervisor to contact the Language Line® Personal Interpreter Service.
6. The caller will receive the same level of service as any other client requesting information from Amistad

#### **Drivers who have contact with LEP Persons:**

1. PA driver will attempt to communicate with the client in English language. PA driver will determine if the client can understand the language satisfactorily.

2. If the client cannot understand or effectively communicate in English, the driver is encouraged to the best of his or her ability, to determine the language the client is speaking.
3. If Amistad driver cannot recognize the client's language, he or she will provide an "I speak" card to the client. The client will document his or her language on the card.
4. The driver will quickly determine if there is any other person who speaks the necessary language to assist the client.
5. If so, PA driver will ask the interpreter to provide assistance to the client.
6. If there is no one who can provide assistance, the driver must contact his or her immediate supervisor for further instructions.

**Caseworkers who have contact with LEP Persons:**

1. PA caseworker will attempt to communicate with the client in English language. PA caseworker will determine if the client can understand the language satisfactorily.
2. If the client cannot understand or effectively communicate in English, the caseworker is encouraged to the best of his or her ability, determine the language the client is speaking.
3. If Amistad caseworker cannot recognize the client's language, he or she will provide an "I speak" card to the client. The client will document his or her language on the card.
4. The caseworker will quickly determine if there is any other person who speaks the necessary language to assist the client.
5. If so, PA caseworker will ask the interpreter to provide assistance to the client.
6. If there is no one who can provide assistance, the caseworker must contact his or her immediate supervisor for further instructions.

**Translation**

Translation is the interpretation of written text from one language to another language. Ideally, the translated version of a document should be released when the English language version is released. However, at times this is not possible. If it is not possible or would significantly delay the release of the English version, the translated version will be distributed as soon as possible.

**Oral**

Amistad will provide LEP persons with oral language assistance at reception desks, during telephone contact, or in person as needed. Such assistance may take the form of qualified bilingual staff, use of voluntary community interpreters who are skilled in interpreting, or other interpreter service.

Employment of bilingual staff is recommended, when feasible, where the percentage of LEP customers or potential customers is statistically significant. Additionally, employment of bilingual staff is also recommended where the frequency of contact with LEP persons will provide for efficient and effective communication. A decision to employ bilingual staff should be based on a needs assessment with due consideration given to budget constraints and agency policies.

Oral translation ability should be considered when using a translator. In some cases, a family member, neighbor, close friend, relative, employees, or other volunteers without formal certification might be a good choice. In circumstances that can possibly affect a person's rights, a certified interpreter is necessary.

## **Written**

Written materials that are routinely provided in English to customers and the general public will be translated into languages that are regularly encountered. The extent of the obligation to provide written translations of documents should be determined on a case-by-case basis.

## **Vital documents**

Vital documents are those that convey information critically affecting the service Amistad provides. These documents provide an opportunity for customers to make decisions. Whether or not a document (or the information it solicits) is “vital” depends upon the importance of the project, information, or service involved and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Examples of vital documents that require consideration for translation include, but are not limited to:

- Applications
- Public notices
- Flyers
- Agendas
- Consent forms
- Letters containing important information regarding Amistad services
- Eligibility rules
- Notices pertaining to service delivery and/or reduction in service
- Right to appeal
- Notices advising of the availability of language assistance
- Complaint forms
- Outreach and community education materials.

Amistad has developed criteria for determining which documents are vital and subject to translation.

Vital documents will be translated if:

1. Amistad undergoes new changes or reductions in service
2. If it is required to translate by law or through contract regulations
3. If Amistad has critical information that needs to be shared with clients

Examples of vital forms that have been translated are included at the end of this LEP plan.

## **Alternative communication methods**

To reduce costs and difficulty, Amistad encourages staff to explore the use of alternative methods of communication and devices that do not use language. For example, use of pictograms, symbol signs, diagrams, color-coded warnings, illustrations, graphics, and pictures can be considered as an alternative method of communication. Schematic maps can similarly quickly communicate large amounts of information without having to translate too many words.

## **Monitoring**

Monitoring and evaluating the accessibility and quality of language assistance needs of LEP persons ensures that LEP persons can meaningfully access services provided by Amistad. At a minimum, Amistad staff should conduct an annual assessment to determine:

- The number of documented LEP persons the agency came across annually
- Current communication needs of LEP persons
- Determine 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 Amistad's financial resources are sufficient to fund language assistance resources needed in the community
- Determine whether Amistad fully complies with the goals of this LEP Plan
- Determine whether sources of and arrangements for assistance are still current and viable
- Determine whether complaints have been received concerning agency failure to meet the needs of LEP individuals
- Maintain a Title VI complaint log, including LEP to determine issue and basis of complaints

### **Staff Training**

PA will train employees and volunteers on the policies and procedures of the Limited English Proficiency Plan. He or she will be trained in how to determine whether a customer needs assistance in obtaining information about Amistad and the services it provides. Training will include how to obtain language assistance services, use of the "I Speak" cards, and communication with interpreters and translators.

Specialized training may be required of certain front-line staff, supervisors, or caseworkers who are likely to have considerable interaction with LEP individuals. Staff should be trained on how to recognize potential Title VI issues and to properly respond to Title VI complaints, including those from LEP people on the basis of national origin.

### **Distribution of Amistad LEP Plan**

- Posting signs at frequent and accessible locations to notify LEP individuals of the services available and how to obtain these services.
- Indicate via agendas and public notices, in the language that LEP persons would understand, that documents are available upon request at 915-532-3790.
- Stating in outreach documents (brochures, pamphlets, flyers) that language services are available.
- Inform dialysis centers, cancer treatment centers, employment centers, social service centers, and other facilities of Amistad's LEP Plan.

Amistad will make the plan available to all employees, contractors, subcontractors, clients, and the community upon request. **All contractors and subcontractors performing work for Amistad will be required to follow the Title VI/LEP guidelines.**



**Appendix D**  
**Documentation of Board Action**