



Title VI Plan



REAL, Inc.

Rural Economic Assistance League, Inc.
301 Lucero Street
Alice, TX 78332
361-668-3158

Gloria Ramos
Executive Director
Title VI Coordinator

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Section 1: Title VI Plan Approval

Title VI Plan

Adopted on: January 3, 2017

Adopted by: REAL, Inc. Board of Directors

As Chariman of the Board for the Rural Economic Assistance League, Inc., I hereby approve the above revised Title VI Nondiscrimination Program. An earlier version was approved in August, 2014.

Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
1/3/17	Revisions were in the following sections: Notice to the Public; Complaint Procedures; Language Assistance Plan; Membership of Non-elected	Title VI Update is required every three years. These general revisions are updating the 2014 version of REAL's Title VI Plan.

Section 2: Description of Organization and Service Provided

Mission & Vision

The Rural Economic Assistance League, Inc. (REAL) and Board of Directors desire to be “The Provider of Choice” to the constituents that reside within our service area. We assure these communities quality care, prompt response, and cost efficiency in our delivery of services.

We do not commit fraud, abuse, neglect, or waste. Furthermore, we will not tolerate anyone who does.

We believe in honesty, due diligence in provision of services, avoidance of waste and the necessity of listening to our patients/clients and staff regarding any concerns that they may have.

Background

The Rural Economic Assistance League, Inc. (REAL) is a non-profit organization established in 1972 with the mission to provide safe, caring and quality community centered services for the elderly, persons with disabilities and the general public by assisting them and their families in maintaining an independent and fulfilling life.

Transportation: We provide public transportation in our clean, comfortable and wheelchair accessible fleet of buses. Our drivers are friendly, helpful and treat you like a part of our family. Travel assistant rides FREE.

Adult Day Care Centers: We provide recreation, transportation, well balanced meals by a dietician and an LVN on sites: Alice, Benavides, Premont, San Diego, Texas.

Home Health Care: Whether it’s extra assistance after a hospital stay, helping you maintain an independent lifestyle, or providing occasional respites for a family caregiver, we can help.

Housing: We operate a variety of housing facilities for the elderly and disabled throughout South Texas that provide excellent amenities and care option subsidized by federal programs.

TRIP for Salud Y Vida: (**TRIP**) Transportation for **Rural Integrated health Partnership** for Salud Y Vida is a project of Sí Texas, a Methodist Healthcare Ministries of South Texas, Inc. project and Social Innovation Fund program.

Through the Sí Texas Project, R.E.A.L. Inc. is implementing an integrated behavioral health (IBH) **TRIP** for Salud y Vida to expand the reach of its current IBH services within the rural community – specifically, to address the 22 percent (more than 1 in 5) consumer no-show rate for follow-up care. A key element of the model is the systematic and seamless offering of transportation services and programs to self-empower patients.

Section 3: Title VI Policy Statement

Policy Statement

The REAL, Inc., 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 4: Notice to the Public

The **REAL Inc.**'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The REAL, Inc.

- ✓ The **REAL, Inc.** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **REAL, Inc.**
- ✓ For more information on the **REAL, Inc.**'s civil rights program, the procedures to file a complaint, or to file a complaint contact 361-668-3158; email Gloria.ramos@realinc.org; or visit our administrative office at 301 Lucero Street, Alice, TX 78332. For more information, visit www.realinc.org
- ✓ A complaint may also be filed directly with the:

Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, or

Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 361-668-3158. Si necesita informacion en otro idioma llame al 361-668-3158.

The REAL, Inc's Notice to the Public is posted in the following locations: (*check all that apply*)

- ✓ Agency website: www.realinc.org
- ✓ Public office
- ✓ Reception areas
- Meeting rooms
- ✓ Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- Other, _____

Section 5: Title VI Complaint Procedure

The REAL, Inc.'s Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ✓ Agency website: www.realinc.org
 - ✓ Hard copy in the central office
 - ✓ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
 - ✓ Other, _____
-

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **REAL, Inc.** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: www.realinc.org, or requested at: 301 Lucero Street, Alice, TX 78332.

The REAL, Inc. investigates complaints received no more than 180 days after the alleged incident. The **REAL, Inc.** will process complaints that are complete.

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

The **REAL, Inc.** has 15 days to investigate the complaint. If more information is needed to resolve the case, **REAL, Inc.** may contact the complainant.

The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, REAL, Inc. can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

If the complainant wishes to appeal the decision, she/he has 5 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the: Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, or Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 361-668-3158. Si necesita informacion en otro idioma llame al 361-668-3158.

Section 6: Title VI Complaint Form

The **REAL, Inc.**'s Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- ✓ Agency website
- ✓ Hard copy in the central office
- ✓ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- ✓ Other, _____

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
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

Signature Date

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

REAL, Inc.
Gloria Ramos
Title VI Coordinator
301 Lucero Street
Alice, TX 78332



Formulario de Quejas Titulo VI

Section I:

Nombre:				
Direccion:				
Telefono (Casa):		Telefono (Trabajo):		
Correo electronico:				
Requisito de Formato Accesible:	Letra Grande		Cinta de Audio	
	TDD		Otro	

Section II:

Esta llenando esta forma para usted mismo(a)?	Si*	No
*Si contesto "Si" en esta pregunta, por favor de seguir a la Section III.		

Que relacion tiene con la persona que esta haciendo la queja?	
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Porfavor de explicar porque tiene que hacer la queja departe de otra persona.

Por favor de confirmar que usted tiene permiso de llenar esta forma de la persona(s) agredida, si esta llenandola por la persona(s).	Si	No
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Section III:

Yo creo que la discriminacion por la cual yo pase fue basado por (marque todo lo que coresponda):

Raza Color Origen Nacional

Fecha de la presunta discriminacion: (Dia, Mes, Año): _____

Por favor describa lo mas claro posible, que paso y porque usted piensa que fue discriminado(a). Describe todas las personas que estuvieron involucrados. Incluya el nombre y la informacion de la persona(s) que lo discriminaron (si lo sabe) y el nombre y la informacion de algun testigo. Si acaso necesita mas espacio, por favor de usar la parte de atras de esta forma.

Section IV

¿Ha presentado previamente una queja Title VI con esta agencia?	Si	No
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Section V

¿Ha presentado previamente una queja con una agencia Federal, Estado, agencia local o cualquier Corte Federal o Corte Estatal?

Si No

En caso afirmativo, marque todas las que corespondan:

Agencia Federal: _____

Corte Federal: _____ Agencia Estatal: _____

Corte Estatal: _____ Agencia Local: _____



Formulario de Quejas Titulo VI

Por favor de proveir informacion de la persona(s), de la agencia/corte donde la queja fue archivado

Nombre:				
Titulo:				
Agencia:				
Direccion:				
Telefono:				

Section VI

Nombre de la agencia le la cual tuvo la queja?				
Persona para contactar:				
Titulo:				
Numero de Telefono:				

Puede agregar cualquier material o otra informacion que usted piense que sea relevante a su queja.

Firma y Fecha requerida.				
Firma			Fecha	

For favor de entregar esta forma en persona a la direccion que esta abajo, o mandela por coreo:

REAL Transit				
Gloria Ramos, Title VI Coordinator				
301 Lucero Street				
Alice, TX 78332				

If information is needed in another language, then contact Gloria Ramos, Title VI Coordinator, at 361-668-3158

Si necesita information en otro idioma, comuniquese con Gloria Ramos, Cordinadora de Titulo VI, al 361-668-3158

				March-2014
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Section 7: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **REAL, Inc.** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

Section 8: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **REAL, Inc.** will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Distribute service brochures
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The promote public outreach and involvement activities by the **REAL, Inc. , REAL Inc.** will employ the following strategies and activities, as appropriate and identified within this section:

- Distribution of REAL transit brochures, flyers and posters distributed to the public through health fairs, congregate senior centers, DAHS facilities in the entire REAL service area. In the past year, this distribution was in 41 different locations in the counties served by REAL, Inc.
- Brochures and flyers were given out to existing riders on board of the vehicles.
- On-going public service announcements on KOPY radio reaching Spanish language riders.
- A brief story about REAL's services in Live Oak county was broadcast in the last year ½ on the noon and evening news program by KRIS TV. This story was also included on their website.

Section 9: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **REAL, Inc.** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

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

The **REAL, Inc.** Language Assistance Plan includes the following elements:

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

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **REAL, Inc.** has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the **REAL, Inc.** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program. Identifies and assesses the frequency **REAL, Inc.**'s staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

This section discusses how the **REAL, Inc.'s** program and services impact the lives of person's within the community. The **REAL, Inc.** will specify the community organizations that serve LEP persons, if available.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low cost methods the **REAL, Inc.** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

REAL, Inc., employees speak Spanish and English and are available interpreters as needed. REAL, Inc. will continue to provide a diverse workforce to provide LEP person with interpreter services. Language Assistance will continue through the I Speak cards that are located within each vehicle being operated.

Language Assistance Plan

Plan Background

This *Limited English Proficiency Plan* has been prepared to address R.E.A.L., Inc.'s 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 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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

Plan Summary

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

In order to prepare this plan, REAL, Inc. 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 REAL, Inc.
2. The frequency with which LEP persons come in contact with REAL, Inc. services.
3. The nature and importance of services provided by REAL, Inc. to the LEP population.
4. The interpretation services available to REAL, Inc. 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 REAL, Inc. services. The REAL, Inc. staff reviewed the 2010 U.S. Census Report and determined that out of the entire population of 191,500 persons, only 19,534 persons in Aransas, Bee, Brooks, Duval, Jim Hogg, Jim Wells, Live Oak, Refugio and San Patricio Counties have limited English proficiency; that is, they speak English less than "Very Well," this is only a 10.20% of the overall population in the service area.
2. The frequency with which LEP persons come in contact with R.E.A.L., Inc. services. The staff reviewed the frequency with which the board, office staff and drivers have contact with LEP persons. This includes documenting phone inquiries or office visits. To date, REAL, Inc. has had no requests for interpreters and no requests for translated program documents. The board, office staff and drivers have infrequent contact with LEP persons. Most LEP persons speak Spanish as their primary language and REAL, Inc.'s board, office staff and drivers all speak Spanish.
3. The nature and importance of services provided by REAL, Inc. to the LEP population. There is no large geographic concentration of any type of LEP individuals in the service area for REAL, Inc. The overwhelming majority of the population speaks only English. As a result, there are few social service, professional and leadership organizations within the REAL, Inc. service area that focus on outreach to LEP individuals. The REAL, Inc. board, office staff and drivers are most likely to encounter LEP individuals through rides, office visits and phone conversations.
4. The resources available to REAL, Inc., and overall costs to provide LEP assistance. REAL, Inc. reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and staff is available that would be willing if needed, to provide voluntary Spanish translation. Other language translation would be provided through a telephone interpreter line for which REAL, Inc. would pay a fee.

REAL, Inc. will review the LEP Plan periodically and update it as needed. Otherwise, it will be reviewed every three years.

“I Speak” Language Identification Card

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 vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를 표시	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
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

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

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 10: Minority Representation Information

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.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	%	%	%	%	%	%
Board of Directors	%	% 100	%	%	%	%

B. Efforts to Encourage Minority Participation

REAL, Inc. Board of Directors is a diverse body that is reflective of the population being served.

Section 11: Sub-recipients, Subcontractors and Vendors

All sub-recipients, subcontractors and vendors related to the implementation of the RELA, Inc. public transportation services are subject to the provisions of the Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain on-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

No Title VI equity analysis is included as REAL has not constructed a facility whereby a Title VI equity analysis would be required to be conducted during the planning stage with regard to the location of the facility.

Section 12: Official Approval of Title VI Nondiscrimination Program

As Executive Director of the Rural Economic Assistance League, Inc. (REAL, Inc.) and on behalf of the Board of Directors, I hereby ascertain that the Board of Directors approved the above revised Title VI Nondiscrimination Program on January 3, 2017. An earlier version was approved by the Board of Directors and adopted effective March 2014.



Gloria Ramos, Executive Director

January 13, 2017

Date