

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

April 2020



Section 1: Title VI Plan Approval

Title VI Plan adopted on March 2014
REAL Board of Directors

Title VI Plan updated on January 2017
REAL Board of Directors

Title VI Plan updated on April 2020
Gloria Ramos, RN, Executive Director

Gloria Ramos RN

Public Notice - Title VI Policy

The Law

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

Filing a Complaint

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding REAL Inc.'s Title VI Program has a right to file a formal complaint. Any such complaint must be in writing and submitted to REAL Inc.'s Title VI Coordinator within 180 days following the date of the alleged occurrence. A person may also file a complaint directly with the Office of Civil Rights for the Federal Transit Administration. For more information regarding civil rights complaints or if information is needed in another language, please contact:

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

Federal Transit Administration
Office of Civil Rights
Att: Title VI Program Coordinator, E. Bldg 5th Floor, TCR
1200 New Jersey Ave, SE
Washington, DC 20590

La Ley

REAL, Inc. da aviso al publico que es la norma de esta agencia asegurar cumplimiento total con el Título VI de la Ley de los Derechos Civiles de 1964 y articulos relacionados y regulaciones en todos los programas y actividades. El Título VI require que ninguna persona en los Estados Unidos sera discriminada por razon de raza, color, pais de origen, sexo, edad, o discapcidad; sera excluida de participar en, denegar servicios de programas, ayudas o beneficios por ningún programa o actividad financiados por el gobierno federal.

Presentar una queja

Cualquier persona que crea que se ha violado su protección bajo el Título VI, puede presentar una queja. Esta queja debe ser por escrito con la Coordinadora de Titulo VI de REAL, Inc. dentro de los ciento ochenta dias de la fecha en que se alega que la discriminación ocurrió. La person tambien puede presentar una queja con la Oficina de Derechos Civiles de Federal Transit Administration Para recibir formularios de reclamo or mas informacion por favor póngase en contacto con:

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

Federal Transit Administration
Office of Civil Rights
Att: Title VI Program Coordinator, E. Bldg 5th Floor, TCR
1200 New Jersey Ave, SE
Washington, DC 20590

Notice to the public is posted in REAL's web site: www.realinc.org; reception area; and public meeting rooms, rider guides/schedules.

The REAL, Inc. Notice to the public is posted in the following locations:

- Agency Web Site: www.realinc.org
- Reception Area
- Public Meeting Rooms
- Rider Guides/Schedules

"PUBLIC PARTICIPATION PLAN" POLICY STATEMENT

REAL, Inc. supports and encourages early and continuous public participation and input into the planning process and to adhere to the principles of Title VI of the Civil Rights Act. REAL, Inc.'s public participation plan is designed to ensure early and continuous opportunities for the public to express its views on transportation program issues and to become active participants in the decision-making process.

A 1994 Presidential Executive Order directed every Federal agency to make Environmental Justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations." REAL, Inc.'s initiatives will strive to accomplish this by involving the potentially affected public through a Citizens Outreach Program. This program consists of REAL, Inc. staff activities designed to develop partnerships with, and enhance the participation in the transportation planning process, by groups and individuals of "traditionally underserved" communities.

These communities include minorities, transit dependent citizens, low income, the elderly, and persons with disabilities. Staff activities may include nontraditional outreach and involvement strategies such as: web-based sessions, attendance and participation in existing group meetings and coalitions serving these communities. REAL, Inc. targets communications with local media outlets, conducts meetings in a manner most suitable for the audience being addressed, hosts meetings at times and locations that are accessible to transit dependent or non-driving individuals when possible, and we publish documents in non-technical, or other easily accessible formats as necessary and appropriate for purposes of obtaining input and comment. In carrying out the public participation plan, REAL, Inc.'s practice shall be to cultivate a culture of early and responsive outreach by welcoming the public's involvement and input through the use of such methods as: (i) holding public meetings at convenient and accessible locations and times; (ii) being sensitive in the use of industry terms and language so as to be understood by the lay stakeholders; (iii) employing stronger visualization techniques through the use of visuals and other tools as reasonably possible to describe transportation plans and programs; (iv) providing a brief written summary of the meeting's highlights and information offered at the meeting and (v) offering an electronically accessible response mechanism for two-way communication with the public when submitting a comment and receiving an acknowledgement of the receipt of information. The goal of REAL, Inc.'s outreach program is to ensure that all citizens regardless of race, color, religion, income status, national origin, age, gender, disability, marital status, or political affiliation, have an equal opportunity to participate in REAL, Inc.'s decision-making process.

I. BACKGROUND

REAL, Inc. provides demand response services to the general public in Aransas, Bee, Brooks, Duval, Jim Hogg, Jim Wells, Live Oak, Refugio, and San Patricio Counties. Transportation services are offered Monday through Friday, 8:00 am to 5:00 pm. The demand response service provided picks up the client from their specific location and delivered to their desired destination. REAL, Inc. utilizes a minimum of 24-hour call system which allows for Scheduling trips. There is a fee for service. REAL, Inc. provides high quality, efficient, and effective services to the general public, including individuals to employment related destinations, educational settings, medical appointments and other quality of life destinations. REAL

employs anywhere from 35 - 41 part time and full time transit related employees. REAL's vehicle fleet inventory is currently at 81 revenue service vehicle fleet and 4 support vehicles.

II. MAP-21 MOVING AHEAD FOR PROGRESS IN THE 21ST CENTURY ACT REQUIREMENTS

The Map-21 Moving Ahead for Progress in the 21 Century (Map-21) was enacted July 6, 2012, as Public Law 112-141 and creates a streamlined and performance-based surface transportation program and builds on many of the highway, transit, bike, and pedestrian programs and policies established in 1991. The MAP-21 Act requires REAL, Inc. to advance regional coordination of service planning to fill service gaps and eliminate overlaps in public transportation services.

REAL, Inc. shall provide citizens, affected public agencies, private providers of transportation, users of public transportation, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on transportation plans, programs and revisions. REAL, Inc.'s Public Participation Plan (REAL, Inc.-PPP) shall be developed in consultation with all interested parties; and shall provide that all interested parties have reasonable opportunities to comment on the contents. The REAL, Inc.-PPP is a living document and will be continually reviewed for possible revisions.

III. PUBLIC PARTICIPATION PROCESS

A. General Guidelines

REAL, Inc.-PPP is intended to cultivate a culture of early and responsive outreach by welcoming the public's involvement and input. Involvement activities are conducted in a manner that offers equal opportunity in the decision-making process to residents of the 9-county region. The policies, goals, objectives and techniques used for public involvement are:

1. Provide timely information about transportation issues and processes to citizens, affected public agencies, representatives of transportation agencies, private providers of transportation, other interested parties and segments of the community affected by transportation plans, programs and projects.
2. Provide reasonable public access to policy information used in the development of transportation plans and projects, and conduct open public meetings where matters related to transportation programs are being considered.
3. Give adequate public notice of public participation activities and allow time for public review and comment at key decision points, including, but not limited to, approval of appropriate transportation plans and projects.
4. Respond in writing, when applicable, to public input and prepare a brief assessment of meetings hosted and attended. A summary of highlights and major accomplishments is made available for citizens unable to attend meetings to access for informational purposes.
5. Solicit the needs of those under-served by existing transportation systems, including but not limited to the transportation disadvantaged, minorities, elderly, persons with disabilities, and low-income households. MAP-21 requires that REAL, Inc. shall provide reasonable opportunities for affected public agencies, private providers of transportation, users of public transportation, representatives of the disabled, and

other interested parties with a reasonable opportunity to comment on the transportation planning process.

6. Provide a public comment period of not less than 30 calendar days prior to the adoption of the REAL, Inc.-PPP and/or any amendments. Notice of the comment period will be advertised in a newspaper of general circulation and various other publications prior to the commencement of the comment period. Notice will also be posted on REAL, Inc. vehicles for existing riders to view prior to the start of the comment period.
7. Provide a public comment period of not less than 30 calendar days prior to adoption of plans, any updates, and other appropriate transportation plans and projects, except under circumstances of an unusual nature.

B. Public Participation Goals, Objectives, and Policies

Goal: To provide the public with thorough information on transportation planning services and project development in a convenient and timely manner.

OBJECTIVE 1

REAL, Inc. shall actively engage the public in the transportation planning process according to State and Federal law and the policies outlined in this plan.

Policy 1.1: REAL, Inc. shall make a good faith effort to maintain an up-to-date mailing and electronic database of contacts that provide individuals and entities interested in the process a reasonable opportunity to comment on the planning process and products:

- a) Citizens expressing an interest in transportation planning activities
- b) Elected officials
- c) Local government staff
- d) Transportation agencies
- e) Local media (TV, radio, print, etc.)
- f) Civic groups
- g) Libraries (for public display)
- h) Faith-based organizations
- i) Private providers of transportation
- j) Users of public transportation
- k) Individuals with disabilities

Policy 1.2: REAL, Inc. shall employ visualization and communication techniques that depict transportation plans. Examples may include charts, graphs, photo interpretation, maps, use of GIS systems, artist renderings, etc.

OBJECTIVE 2

REAL, Inc. shall keep the public informed of on-going transportation related activities.

Policy 2.1: REAL, Inc. shall provide publications electronically and in hardcopy at the REAL, Inc. offices.

Policy 2.2: REAL, Inc. shall maintain an internet web site that will be compliant with Section 508 of the Americans with Disabilities Act for individuals with disabilities.

Policy 2.3: The web site shall be updated and maintained to provide the following current and accurate information:

- a) Contact information (mailing address, phone, fax, and e-mail)
- b) REAL, Inc. reservations/dispatch number
- c) Meeting calendars and agendas for the current year
- d) Work products and publications
- e) Comment/Question Form
- f) REAL, Inc.-PPP and updates

OBJECTIVE 3

REAL, Inc. shall encourage the involvement of stakeholders in the planning process.

Policy 3.1: Target audiences shall be identified i.e. residents, traditionally underserved or underrepresented populations, but not limited to low income, individuals with disabilities, minority households and business/property owners.

Policy 3.2: REAL, Inc. shall make a good faith effort to hold public meetings at a site convenient to potentially affected citizens.

Policy 3.3: REAL, Inc. shall make a good faith effort to attend and participate in existing group meetings and coalitions serving these communities.

OBJECTIVE 4

REAL, Inc. shall strive to continuously improve public participation.

Policy 4.1: REAL, Inc. shall continuously evaluate public involvement strategies and techniques to better engage the public.

Policy 4.2: REAL, Inc.-PPP shall be reviewed and adopted at least every four (4) years to improve the effectiveness of public involvement.

C. Public Participation Outreach Summary

REAL, Inc.-PPP is an integral part of one-time activities and regularly repeated activities. This section contains descriptions of public participation tools used by REAL, Inc. on an on-going basis since the last Title VI program submission and include the following:

- REAL, INC. Web Site: www.realinc.org
- Internal and External Newsletter with the public
- Community presentations
- Coalition participation
- Direct mailing to riding public including surveys, request for feedback
- Posting of flyers and posters on REAL revenue service vehicles to announce services, activities.

- County level Commissioner’s courts presentations providing information and soliciting feedback.



- REAL, Inc. Logo as an identifiable transit service REAL, Inc. provides:
- On-board passenger surveys to solicit public comment
- Rider information posters throughout service area in city halls, libraries, restaurants and other community centers.
- Outreach activities promoting services and soliciting feedback from the existing and potential riding public

D. Summary REAL, INC.-PPP Table*

Program Adoption	Comment Opportunity or Public Meetings	Comment Period	Remarks
Title VI Plan	One meeting prior to REAL, Inc. Board Meeting	30 Days	A summary of comments will be provided to the Board and made available for public review at the REAL, Inc. offices and on the REAL, Inc. web site.
REAL, Inc. Public Participation Plan (REAL, Inc.-PPP)	N/A	30 Days	Recommended: Four year updates of the REAL, Inc.-PPP
Other service changes, plans, or studies as appropriate	Optional: 1 meeting prior to REAL, Inc. Board approval	30 Days	
Open Meetings			
REAL, Inc. Board	Regular meetings every month at REAL, Inc. Offices		Notices will be posted in REAL, Inc. offices REAL, Inc.
Other Committees as assigned	Determined individually		

** Subject to exception due to public emergencies, action requests from other public agencies, and circumstances beyond REAL, Inc.’s control*

IV. LIMITED ENGLISH PROFICIENCY PLAN

INTRODUCTION

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 based on 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 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 encounter 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 71,748 persons over the age 5 in Aransas, Bee, Brooks, Duval, Jim Hogg, Jim Wells, Live Oak, Refugio and San Patricio Counties speak a language other than English. Of those, 7,586 persons have limited English proficiency; that is, they speak English less than "Very Well," this is only a 4% of the overall population in the service area. No one county in the region has more than 2.4% of the population speaking a language other than English or Spanish and all other language groups combine to represent less than 1.25 percent of the entire population.
2. The frequency with which LEP persons encounter 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, 62% 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 contacted local citizens that would be willing if needed, to provide voluntary Spanish translation within a reasonable time period. Other language translation would be provided through a telephone interpreter line for which REAL, Inc. would pay a fee.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to REAL, Inc. services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How REAL, Inc. staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All REAL, Inc. staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All REAL, Inc. staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When REAL, Inc. sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage in REAL, Inc.'s service area of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. REAL, Inc. staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.

2. The following resources will be available to accommodate LEP persons:

- The majority of REAL, Inc. staff members speak both Spanish and English fluently, however, volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period when needed.
- Language interpretation will be accessed for all other languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:

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

All contractors or subcontractors performing work for REAL, Inc. will be required to follow the Title VI LEP guidelines.

TRANSLATION OF DOCUMENTS

REAL, Inc. weighed the cost and benefits of translating documents for potential LEP groups, however, there is no other language spoken in significant percentages other than Spanish. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated. Key brochures and informational flyers have already been translated into Spanish.

Due to the very small local LEP population, REAL, Inc. does not have a formal outreach procedure in place, as of 2010. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, REAL, Inc. will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan - REAL, Inc. The Title VI Coordinator will update the LEP Plan as required. At a minimum, the plan will be reviewed and/or updated when the next U.S. Census is available or when it is clear those higher concentrations of LEP individuals are present in REAL, Inc.'s service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether REAL, Inc.'s financial resources are sufficient to fund language assistance resources needed.
- Determine whether REAL, Inc. fully complies with the goals of this LEP Plan.

- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF REAL, INC.'s LEP PLAN

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request.

V. COMPLAINT PROCEDURES

INTRODUCTION

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by REAL, Inc. (hereinafter referred to as "REAL") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. REAL investigates all complaints received and will track all of them in the REAL Title VI Complaint Log. All filled complaints will be investigated in no more than 180 days after the alleged incident. REAL will process complaints that are complete.

Once the complaint is received, REAL will review it to determine if REAL has jurisdiction on the matter. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by REAL. If REAL conducts any complaint investigation, REAL will notify its PTC by email or fax any title VI related complaints being investigated within 10 working days of receipt of the complaint, including a paper or electronic copy of the complaint form completed.

REAL has 30 days to investigate the complaint. If more information is needed to resolve the case, REAL may contact the complainant. The complainant has 5 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 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 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 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.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

REAL, Inc.'s Title VI Complaint Procedure are available on REAL's web page at www.realinc.org. On REAL's web site you can also find REAL's Title VI Complaint form in both English and in Spanish.

COMPLAINT TRACKING LOG

COMPLAINT FORM

TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

There are no public transportation-related Title VI investigations, complaints or lawsuits filed with REAL, Inc. since the last submission.

MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

REAL, Inc. does not have a non-elected transit-related committee or council

ASSISTANCE TO AND MONITORING SUB-RECIPIENTS

REAL, Inc. does not have any transit-related sub-recipients.

TITLE VI EQUITY ANALYSIS FOR FACILITIES