

**Span, Inc.**

**Title VI Plan**

**Adopted by the Board of Directors  
June 28<sup>th</sup>, 2017**

(TVI plan expires 3 years from date listed above)

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## **Section 2: Title VI Policy Statement**

### **Policy Statement**

Span, Inc. as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Texas Department of Transportation (TxDOT) or the North Central Texas Council of Governments (NCTCOG), 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 3: TITLE VI Notice to the Public

## Span, Inc. Title VI Notice to the Public

- ✓ Span operates its programs and services without regard to race, color, or 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 Span.
- ✓ For more information on Span's Title VI program, the procedures to file a complaint, or to file a complaint contact the Executive Director at 940-382-2224; email [span@span-transit.org](mailto:span@span-transit.org); or visit our administrative office at 1800 Malone Street, Denton TX 76201. For more information, visit [www.span-transit.org](http://www.span-transit.org).
- ✓ *Span opera sus programas y servicios, sin distinción de raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja con Span.*
- ✓ *Para obtener más información sobre Span 's Título VI programa, los procedimientos para presentar una queja, o para presentar una queja contacto el Director Ejecutivo al 940-382-2224; lapso de correo electrónico @ [ñol transit.org](mailto:span@span-transit.org). . o visite nuestra oficina administrativa en 1800 Malone Street, Denton TX 76201. Para obtener más información, visite [www.span-transit.org](http://www.span-transit.org).*
- ✓ A complaint may also be filed directly with the:  
  
Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11<sup>th</sup> Street, Austin, TX 78701-2483, or  
  
Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact 940-382-2224. Para más información llame a este número 940-382-2224.

The Span's Nondiscrimination Statement is posted in the following locations:

On Span's website at [www.span-transit.org](http://www.span-transit.org)

At Span's reception desk and public meeting rooms at its administrative office at 1800 Malone Street, Denton TX

On all Span vehicles

In Span's Policies and Procedures for riders.

#### Section 4: Title VI Complaint Procedure

Span's Title VI Complaint Procedure and Complaint Form are made available in the following locations:

- ✓ Span's website at [www.span-transit.org](http://www.span-transit.org)
- ✓ Span's administrative office at 1800 Malone Street, Denton TX 76201.
- ✓ By mail by contacting Span at 940-382-2224.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Span may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Span investigates complaints received no more than 180 days after the alleged incident. Span will process complaints that are complete.

Once the complaint is received, Span will review it to determine if our organization 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 organization.

Span has 60 days to investigate the complaint. If more information is needed to resolve the case, Span may contact the complainant. The complainant has 30 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 30 business days, Span 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 10 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, then contact 940-382-2224. Para más información llame a este número 940-382-2224.

*El procedimiento de reclamación y el formulario de quejas de Title VI de Span están disponibles en los siguientes lugares:*

- *Sitio web de Span en [www.span-transit.org](http://www.span-transit.org)*
- *La oficina administrativa de Span en 1800 Malone Street, Denton TX 76201.*
- *Por correo entrando en contacto con Span en 940-382-2224.*

*Cualquier persona que crea que ha sido discriminado por raza, color o origen nacional por Span puede presentar una queja de Título VI completando y presentando el Formulario de Queja de Título VI de la agencia.*

*Span investiga las quejas recibidas no más de 180 días después del presunto incidente. Span procesará quejas completas.*

*Una vez recibida la queja, Span Lo revisará para determinar si nuestra organización tiene jurisdicción. (Una copia de cada denuncia recibida de Título VI será enviada al Coordinador de Transporte Público de TxDOT dentro de los diez (10) días*

naturales de haber recibido). El reclamante recibirá una carta de reconocimiento informándole si la organización investigará nuestra denuncia.

Span tiene 60 días para investigar la queja. Si se necesita más información para resolver el caso, Span puede contactar al demandante. El reclamante tiene 30 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 30 días hábiles, Span puede cerrar administrativamente el caso. Un caso puede ser administrativamente cerrado también si el demandante ya no desea seguir su caso.

Después de que el investigador revise la queja, emitirá una de dos (2) cartas al demandante: una carta de cierre o una carta de hallazgo (LOF).

- Una carta cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará.
- Una carta de encontrar (LOF) resume las alegaciones y las entrevistas sobre el supuesto incidente, y explica si posibles medidas disciplinarias, se producirá una formación adicional del miembro del personal, u otra acción.

Si el querellante desea apelar la decisión, tiene 10 días después de la fecha de la carta o del LOF para hacerlo.

Una persona también puede presentar una queja directamente con el Departamento de Transporte, la atención de Tejas: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78.701-2483, o la Administración Federal de Tránsito, Oficina de Derechos Civiles, Atención: Título VI Programa Coordinador, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Si se necesita información en otro idioma, entonces llame al 940-382-2224. Para más información llame a este número 940-382-2224.

### Section 5: Title VI Complaint Forms

<b>Section I:</b>					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Requirements?	Format	Large Print		Audio Tape	
		TDD		Other	
<b>Section II:</b>					
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	
<b>Section III:</b>					
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?

Yes

No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Court \_\_\_\_\_

State Agency \_\_\_\_\_

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 **Required**

\_\_\_\_\_  
Date

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

**Span, Inc.**  
**1800 Malone Street**  
**Denton TX 76201**  
**Attn: Executive Director**

**If information is needed in another language, contact 940-382-2224. Si la información es necesaria en otro idioma, entonces contacte Span en 940-382-2224**



# Forma Externa de Queja Discriminación

Enviar forma firmada al Span, Inc., 1800 Malone Street, Denton TX 76207 o por fax al 940-383-8433.

Apellido		Nombre		
Dirección		Ciudad	Estado	Código Postal
Teléfono	Teléfono Alternativo	Correo Electrónico		
Indica por favor la(s) base(s) de su queja. Raza _____ Edad _____ Origen Nacional _____ Color _____ Sexo _____ Discapacidad _____				
Fecha y lugar de la(s) presunta(s) acción(es) discriminatoria(s). Favor de incluir la primera fecha de la presunta discriminación y la fecha más reciente de la presunta discriminación.				
¿Cómo se discriminó contra usted? Describa la naturaleza de la acción, decisión o las circunstancias de la presunta discriminación. Explique, de la manera mas clara posible, que sucedió y porqué cree usted que su estatus protegido fue un factor en la discriminación. Incluya como otras personas fueron tratadas de distinta manera que usted. (Adjunte hojas adicionales de ser necesario).				
La ley prohíbe intimidación o represalias contra cualquier persona ya sea por tomar acción o por participar en la toma de acción para asegurar los derechos protegidos por estas leyes. Si usted siente que se han tomado represalias en su contra, aparte de la presunta discriminación mencionada anteriormente, favor de explicar las circunstancias a continuación. Explique la acción que usted tomó que cree sea la causa de la presunta represalia.				
Nombre de los individuos responsables de la(s) acción(es) discriminatoria(s):				

Nombre de personas (testigos, compañeros de trabajo, supervisores u otros) a quienes podamos contactar para obtener información adicional para respaldar o aclarar su queja: (Adjunte hojas adicionales de ser necesario).

	<u>Nombre</u>	<u>Dirección</u>	<u>Teléfono</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

¿Alguna vez ha presentado, o tiene la intención de presentar, una queja con respecto a esta situación con cualquiera de las organizaciones que se mencionan a continuación? De ser así, favor de proporcionar las fechas en que se presentaron. Marque todas las que apliquen.

- Departamento de Transporte de los EE.UU. \_\_\_\_\_
- Administración Federal de Carreteras de los EE.UU. \_\_\_\_\_
- Administración de Transporte Federal de los EE.UU. \_\_\_\_\_
- Oficina de Programas de Cumplimiento de Contratos Federales de los EE.UU. \_\_\_\_\_
- Comisión para la Igualdad de Oportunidades en el Empleo de los EE.UU. \_\_\_\_\_
- Tribunal Federal o Estatal de los EE.UU. \_\_\_\_\_
- Otros \_\_\_\_\_

¿Ha hablado sobre la queja con algún representante de TxDOT? De ser así, favor de proporcionar el nombre y puesto de la persona y la fecha en la que tuvo la conversación.

Explique brevemente que remedio, o acción está usted buscando por la presunta discriminación.

Favor de proporcionar cualquier información adicional y/o fotografías, si son pertinentes, que usted crea ayudaran el la investigación.

No podemos aceptar una queja sin firma. Favor de incluir su firma y la fecha a continuación:

**Firma del Demandante**

**Fecha**

**Si la información es necesaria en otro idioma, entonces contacte Span en 940-382-2224.**

UNICAMENTE PARA USO OFICIAL

Fecha de Recibo de Queja:

No. de Caso:

Procesado por:

Fecha Remitida:

Remitida a:

Other

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

Span 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.*

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

## Section 7: Public Participation Plan

### Strategies and Desired Outcomes

To promote inclusive public participation in decision making and project planning processes that affect the public, Span 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.
- ✓ 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 community centers, libraries, faith-based institutions, local festivals, etc.

### Public Outreach Activities

The public outreach and involvement activities conducted by Span since the last Title VI Program submission are summarized in the table below.

Event Date	Span Staff)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
11/16/2015	Executive Director	Coppell public meeting re: new service	Coppell web site; utility flyers; Span website; newspaper, Facebook	Most communications provided by City of Coppell
11/17/2015	Mobility Manager	"	"	"
11/23/2015	Exec Dir	Little Elm public meeting for fare increase	Newspaper, Span website	Fare increase per new contract with Town of Little Elm

## Section 8: Language Assistance Plan

### Purpose

It is the policy of SPAN that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity provided by SPAN.

Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. SPAN therefore has adopted this policy to maximize access to services by those with limited English proficiency.

### Plan Summary

SPAN has developed this Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to SPAN services. A limited English proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining SPAN's extent of obligation to provide LEP services, SPAN undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons in the SPAN service area who may be served or likely to encounter a SPAN program, activity, or service; 2) the frequency with which LEP individuals come in contact with SPAN services; 3) the nature and importance of the program, activity or service provided by SPAN to the LEP population; and 4) the resources available to SPAN and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

### Four Factor Analysis

#### **1. The number or proportion of LEP persons in the SPAN service area who may be served or likely to encounter a SPAN program, activity, or service.**

SPAN examined the US Census American Community Survey report from 2011 and was able to determine that approximately 8.5% or 50,626 people in Denton County speak English less than "very well". Spanish speaking persons comprised the largest non-English speaking language group. Of the 8.5% of the Denton County population reporting they speak English less than "very well", 5.9% are Spanish speaking. Other groups that reported speaking English less than "very well" included those speaking Indo-European languages (0.7%) and Asian-Pacific Islander languages (1.8%). The greatest concentration of residents who speak Indo-European or Asian-Pacific Islander languages appears to reside in the cities of Denton, Lewisville and Carrollton.

Denton and Lewisville are not in SPAN Transit's main service area (being served by DCTA), but may be served through Medicaid non-emergency medical transportation or other programs offered by SPAN.

## **2. The frequency with which LEP individuals come in contact with a SPAN program, activity, or service.**

SPAN assessed the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes surveying drivers and dispatchers and monitoring requests from the community. Spanish-speaking individuals are frequently served. Other than Spanish-speaking persons, SPAN has encountered almost no non-English speaking persons regarding requests for services, assistance or other activities.

## **3. The nature and importance of the program, activity, or service provided by SPAN to LEP community.**

SPAN considers public transportation to be a valuable service to all members of our community. However, there is no large geographic concentration of any one type of LEP individuals in the SPAN service area. The overwhelming majority of the population, 79% or 471,264, speak only English. The majority of persons speaking English less than "very well" are Spanish-speaking.

## **4. The resources available to SPAN and overall costs.**

SPAN assessed its available resources that could be used for providing LEP assistance. Upon evaluating SPAN's current resources we determined that SPAN has two dispatchers and three drivers that are bilingual in the English and Spanish languages. We have not been able to determine any significant need for services to other LEP individuals in SPAN's service area. After analyzing the four factors, SPAN developed the plan outlined in the following section for assisting persons of limited English proficiency.

### **LIMITED ENGLISH PROFICIENCY PLAN OUTLINE**

#### **How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- Review existing and new applications for LEP individuals.

- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or in direct contact with LEP individuals. Document contacts with non-English or Spanish speaking individuals, identifying what language is spoken if possible.
- Monitor use of Spanish SPAN Transit website.

### **Language Assistance Measures**

SPAN has or will implement the following LEP procedures. The creation of these steps is based on the very low percentage of persons speaking other languages or not speaking English at least “very well,” and the lack of resources available in the SPAN service area:

- When a Spanish-speaking interpreter is needed, in person or on the telephone, SPAN will have a bilingual SPAN dispatcher interpret for the LEP individual.
- Utilize AT&T Translator Service for individuals who require assistance with languages other than English and Spanish.
- Develop language assistance devices such as Braille on an as needed basis.
- Translate key documents into Spanish, including transportation policies, applications, complaint procedures, Title VI notices and complaint form, notices of denials, losses or decreases in benefits or services, etc. and maintain a website in Spanish. Notices shall advise LEP individuals of free language assistance services.

### **SPAN Staff Training**

All SPAN Transit staff will be advised on the LEP Plan and will be educated on procedures to follow. This information will also be part of the SPAN staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services SPAN offers;
- Documentation of language assistance requests.

### **Outreach Techniques**

- If staff knows that they will be presenting a topic that could be of potential

importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.

- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (*insert alternative language*) translator will be available”. For example: “Un traductor del idioma español estará disponible” means “A Spanish translator will be available”.
- Key print materials will be translated and made available at the SPAN Administrative Office, on board vehicles, on our website and in communities when a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, SPAN will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the SPAN service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified SPAN programs? Are there other programs that should be included?
- Has SPAN’s available resources, such as technology, staff, and financial costs changed?
- Has SPAN fulfilled the goals of the LEP Plan?
- Were any complaints received?



## **Dissemination of SPAN's Limited English Proficiency Plan**

SPAN will include the LEP plan on the SPAN website ([www.span-transit.org](http://www.span-transit.org)) together with its Title VI Policy and Complaint Procedures. SPAN's Notice of Rights under Title VI to the public is posted in the SPAN Administrative Office, on all SPAN vehicles, and in selected printed materials and also refers to the LEP Plan's availability. Any person, agencies including social service, non-profit, and law enforcement and other community partners with internet access will be able to access the plan. Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the SPAN Title VI Coordinator at:

1800 Malone St, Denton TX 76201  
Phone: 940-382-2224

Email: [span@span-transit.org](mailto:span@span-transit.org)  
Fax: 940-383-8433

## “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 naøÿ neáu quyù vò bieát ñoïc vaø noùi ñöôïc 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
	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	% 78.5	% 19.2	% 9.8	% 8.2	% 0.9	% 2.5
Board of Directors	% 81.8	% 0	% 9.1	% 9.1	% 0	% 0

**B. Efforts to Encourage Minority Participation**

To encourage participation on its boards, committees and councils, Span reviews its board needs assessment grid to identify areas that require greater diversity. Diverse candidates are identified and cultivated. Prospects for board membership are asked to submit a completed individual assessment form, which is then compared to the board needs assessment grid used to maximize diversity of the board in regard to race, gender, age, ethnicity and background/expertise.