



TITLE VI PLAN

Adopted by the Board of Directors

September 16, 2023

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Section I: TITLE VI Plan Approval

Span provides demand-response transportation services in North Central Texas (Denton County).

This TITLE VI plan was approved by the Span Board of Directors on AUGUST 30, 2023. Board meeting minutes reflecting approval of the plan are attached.

Revisions to the plan referred to above are noted below.

Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
7/17/2020	Section VII: Public Plan Participation	Updated Community Outreach Events
7/17/2020	Section VII: Language Assistance Plan	Updated Census Data on Four Factor Analysis
7/17/2020	Section X: Minority Representation Information	Updated Minority Representation to reflect status of current Span Board of Directors.
1/21/2022	Section VII: Public Plan Participation	Updated Community Outreach Events
1/21/2022	Section X: Minority Representation Information	Updated Minority Representation to reflect status of current Span Board of Directors.
7/30/2023	Revision of Entire Document	Formatting, content update, forms recreation, and added missing assurances. Limited English Proficiency Plan and Minority Representation updated.

Section II: TITLE VI Policy Statement

Span, Inc., as a recipient of Federal Transit Administration (FTA) grant money either directly 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 the Master Grant Agreement, and State Management Plan.

Michelle McMahon

Michelle McMahon
Executive Director
Span, Inc.

9/1/23

Date

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 they have been aggrieved by any unlawful discriminatory practice under TITLE VI may file a complaint with Span.
- For more information on Span's TITLE VI plan, the procedures to file a complaint, or to file a complaint, contact the Executive Director at 940-382-2224; email span@span-transit.org; or visit our administrative office at 1800 Malone Street, Denton, Texas 76201. For more information, visit www.span-transit.org.
- *Span opera sus programas y servicios sin distinción de raza, color, o origen nacional de conformidad con el TITULO VI de la Ley de Derechos Civiles. Cualquier persona que cree que el o ella ha sido perjudicada por una practica discriminatoria ilegal bajo el TITULO VI puede presentar una queja con Span.*
- *Para obtener más información sobre Span's TITULO VI programa, los procedimientos para presentar una queja, o para presentar una queja contacto el Director Ejecutivo al 940382-2224; lapso de correo electrónico span@span-transit.org; o visite nuestra oficina administrativa en 1800 Malone Street, Denton, Texas 76201. Para obtener más información, visite www.span-transit.org.*
- *A complaint may also be filed directly (Tambien se puede presentar una denuncia directamente):*

Texas Department of Transportation, Civil Rights Division, Attn: TITLE VI
Administrator, 125 E. 11th Street, Austin, Texas 78701-2483

Federal Transit Administration, Office of Civil Rights, Attn: 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 940-382-2224. *Para más información, llame a este numero 940-382-2224.*

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

- On Span's website at www.span-transit.org
- At Span's reception desk and public meeting rooms at its administrative office at 1800 Malone Street, Denton, Texas 76201.
- On all Span vehicles.
- In Span's Policies and Procedures for riders.

Section IV: 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
- Span's administrative office at 1800 Malone Street, Denton, Texas 76201
- By mail by contacting Span at 940-382-2224 and requesting a form.

Any person who believes they have 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 Civil Rights Division within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by our organization. Span will notify their PTC by email or fax of any TITLE VI-related complaints received within 10 working days of the receipt of the complaint.

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, they 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, they have 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the entities listed below:

Texas Department of Transportation
Civil Rights Division
Attn: TITLE VI Administrator
125 E. 11th Street
Austin, Texas 78701-2483

Federal Transit Administration
Office of Civil Rights
Attn: 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 940-382-2224. *Para más información, llame a este numero 940-382-2224.*

Section V: TITLE VI Complaint Forms

Located on next page.

TITLE VI COMPLAINT FORM

Section A					
Name:					
Address:					
Phone (Home):			Phone (Work):		
Email:					
Accessibility	Large Print	TDD	Audio Recording	Other:	
Section B					
Are you filing this complaint on your own behalf?				Yes*	No
*If you answered "yes" to this question, go to Section C .					
If not, please supply the name and relationship of the person for whom you are filing:					
Please explain why you have filed for a third party:					
Please confirm that you have obtained the permission of the aggrieved party to file on their behalf:				Yes	No
Section C					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="radio"/> Race <input type="radio"/> Color <input type="radio"/> National Origin					
Date of Alleged Discrimination (Month, Day, Year): _____					
<p>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.</p>					

Section D		
Have you previously filed a TITLE VI complaint with this agency? If so, when?	Yes	No
Section E		
Have you filed this complaint with any other Federal, State, or local agency or with any Federal or State court?		
<input type="radio"/> Yes <input type="radio"/> No		
If "yes", check all that apply:		
<input type="radio"/> Federal Agency: _____ <input type="radio"/> Federal Court: _____ <input type="radio"/> State Agency: _____ <input type="radio"/> State Court: _____ <input type="radio"/> Local Agency: _____		
Please Provide information about the contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Phone:		
Section F		
Name of agency complaint is against:		
Contact person:		
Title:		
Phone:		

You may attach any written materials, photos, or other relevant information to this complaint.

-Signature and date required below-

Signature

Date

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

**Attn: Executive Director- Span, Inc.
1800 Malone Street · Denton, Texas 76201**

TITULO VI FORMULARIO DE DENUNCIA

Sección A					
Nombre:					
Dirección:					
Teléfono (Hogar):			Teléfono (Trabajar):		
Correo Electronico:					
Accesibilidad	Letra Grande	TDD	Grabacion de Audio	Otra:	
Sección B					
¿Esta presentando esta queja en su propio nombre?				Sí*	No
*Si respondió que "sí" a esta pregunta, vaya a Sección C .					
Si no, por favor proporcione el nombre de la persona por la cual y cuales su relación a usted esta presentado este formulario:					
Por favor explique por qué ha presentado este formulario por esa persona:					
Por favor confirme que tiene el permiso de esa persona para presentar en su nombre:				Sí	No
Sección C					
Creo que la discriminación que experimente se basó en (marcar todo lo que corresponda):					
<input type="radio"/> La Raza <input type="radio"/> El Color <input type="radio"/> Origen Nacional					
Fecha de la Supuesta Discriminación (Mes, Dia, Año): _____					
<p>Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describir a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona que lo discrimino (si se conoce) así como los nombres y la información de contacto de los testigos. Si necesita más espacio, puede utilizarla parte de atrás de este formulario.</p>					

Sección D		
¿Ha presentado previamente una queja de Título VI con esta agencia? ¿Si es así cuando?	Sí	No
Sección E		
¿Ha presentado una demanda de Título VI ante esta otra agencia o tribunal Federal, Estatal, o local?		
<input type="radio"/> Sí <input type="radio"/> No		
Si es así, marque todo lo que corresponda:		
<input type="radio"/> Agencia Federal: _____ <input type="radio"/> Tribunal Federal: _____		
<input type="radio"/> Agencia Estatal: _____ <input type="radio"/> Tribunal Estatal: _____		
<input type="radio"/> Agencia Local: _____		
Por favor proporcione información sobre donde se presentó la queja.		
Nombre:		
Título:		
Agencia/Tribunal:		
Dirección:		
Telefonó:		
Sección F		
Nombre de la Agencia de la cual presento la queja:		
Persona de Contacto:		
Título:		
Telefono:		

Puede añadir cualquier material escrito, fotos, u otra información relevante a esta queja.

-Firma y fecha requeridas a continuación-

Firma

Fecha

Puede traer el formulario en persona a nuestra oficina o lo puede enviar por correo a:

**Attn: Executive Director- Span, Inc.
1800 Malone Street · Denton, Texas 76201**

Section VI: List of Transit-Related TITLE VI Investigations, Complaints, and Lawsuits

Span, Inc. maintains a list or log of all TITLE VI investigations, complaints, and lawsuits pertaining to its transit-related activities.

Check One:

There have been NO investigations, complaints, and/or lawsuits filed against us since the last plan submission/approval.

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

Investigation, Complaint, or Lawsuit	Date	Summary (include basis of complaint)	Status	Action Taken

Section VII: Public Participation Plan

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 with the public.
- Select accessible and varied meeting locations and times.
- Employ different meeting sizes and formats.
- Use social media in addition to other resources to facilitate public involvement.
- Use available outlets to reach and include LEP populations.
- Expand traditional outreach methods by visiting community centers, libraries, faith-based institutions, local festivals, etc.

Public outreach activities have and may include senior groups, senior centers, health fairs, nonprofit collaboration meetings, public meetings held by local municipalities, local festivals, LEP/Minority group meetings, council meetings, networking groups, online/virtual meetings, etc.

Outreach Activities Table

Date	Staff	Activity	Communication Method	Notes
3/8/22	Mobility Mgr.	Premiere Networking Group	In Person	Outreach
5/13/22	Compliance	Flower Mound Blood Drive	In Person	Community Event
6/6/22	Compliance	NCTCOG DBE Meeting	In Person	DBE
6/17/22	Mobility Mgr.	Women of Influence	In Person	Outreach
6/23/22	Mobility Mgr.	Lake Dallas City Council	In Person	Public Meeting
7/18/22	Mobility Mgr.	Flower Mound City Council	In Person	Public Meeting
7/19/22	Mobility Mgr.	The Colony City Council	In Person	Public Meeting
8/8/22	Mobility Mgr.	Shady Shores City Council	In Person	Public Meeting
8/23/22	Mobility Mgr.	Coppell City Council	In Person	Public Meeting
8/24/22	Compliance, HR	TWC Job Fair	In Person	Outreach/Recruiting
9/9/22	Mobility Mgr.	Flower Mound Health Fair	In Person	Outreach

9/17/22	Staff	Rhythms at the River Walk	In Person	Community Event
10/18/22	Mobility Mgr.	Flower Mound Chamber of Commerce	In Person	Meeting
11/9/22	HR, Operations	TWC Job Fair	In Person	Outreach/Recruiting
12/1/22	HR, Operations	Goodwill Job Fair	In Person	Outreach/Recruiting
1/13/23	Compliance	Premiere Networking Group	In Person	Outreach
2/27/23	Compliance	Premiere Networking Group	In Person	Outreach
3/24/23	HR	Women of Influence	In Person	Outreach
3/27/23	Compliance	Premiere Networking Group	In Person	Outreach
4/24/23	Compliance	Premiere Networking Group	In Person	Outreach
5/22/23	Compliance	Premiere Networking Group	In Person	Outreach
5/24/23	HR, Operations	TWC Job Fair	In Person	Outreach/Recruiting
6/26/23	Compliance	Premiere Networking Group	In Person	Outreach
7/10/23	Compliance	Premiere Networking Group	In Person	Outreach
7/13/23	Director of Operations	Lake Dallas City Council	In Person	Public Meeting
7/21/23	HR	Women of Influence	In Person	Outreach
7/31/23	Director of Operations	Hickory Creek City Council	In Person	Public Meeting
8/3/23	Director of Operations	Texas Veterans Resource Sharing Network	In Person	Outreach
8/10/23	Director of Operations	Corinth City Council	In Person	Public Meeting
8/14/23	Director of Operations	Shady Shores City Council	In Person	Public Meeting
8/14/23	Compliance	Premiere Networking Group	In Person	Outreach
8/15/23	Director of Operations	The Colony City Council	In Person	Public Meeting
8/21/23	Director of Operations	Flower Mound City Council	In Person	Public Meeting

Section VIII: 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 facilitate unfettered access to services by those with limited English proficiency.

Plan Summary

Span has developed this Limited English Proficiency (LEP) Plan in response to Federal requirements for Subrecipients. It will help to identify reasonable steps to provide language assistance for LEP persons not able to communicate effectively in English in order to facilitate meaningful access to Span Transit services. A limited English proficient person is one who does not speak English as their primary language and who has not developed the ability to effectively read, speak, write, or understand English. This plan outlines procedures to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, and methods to notify LEP persons that assistance is available. In developing the plan, Span undertook a U. S. Department of Transportation four factor LEP analysis.

We considered 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 latest US Census American Community Survey Data available (2020) and was able to determine that approximately 2.9% or 8,996 people in Denton County are reported to have a "limited" ability to communicate in English. Spanish speakers comprised the largest non-English speaking language group. Other language groups in Denton County include Indo-European and Asian-Pacific Islander languages. The greatest concentration of residents who speak Indo-European or Asian-Pacific Islander languages appear to reside within the cities of Denton, Lewisville, and Carrollton. Those areas are primarily served by DCTA and are not in

Span's main service area. They may be served through specific programs such as Medicaid non-emergency medical transportation or other programs offered by Span.

2. The frequency with which LEP individuals participate in 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, however the percentage of LEP persons encountered is very small. 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 demand-response 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, 76.66%, speak only English and only 2.9% of non-English speakers are considered LEP.

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 have determined that Span has one dispatcher, one Customer Service Supervisor, and one driver who are bilingual in English and Spanish. No other languages are represented. 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 In Need of Language Assistance

1. Examine recorded requests for language assistance from meetings and events and prepare to provide assistance at upcoming meetings.
2. Review existing and new rider applications for LEP individuals and/or requests.
3. Survey drivers, dispatchers, and other front-line staff on an annual basis at the end of each fiscal year regarding their experience with direct or indirect contact with LEP

individuals. Document contacts with non-English or Spanish speaking individuals, identifying what language and/or dialect is spoken, if possible.

Language Assistance Measures

Span has the following mechanisms in place for LEP contingencies. Our methodology is based upon the percentage of LEP individuals in our service area, the low number of riders/potential riders seeking/needing language assistance, and the lack of resources available to provide on-site interpreters:

- When a Spanish-speaking interpreter is needed, in person or on the telephone, Span will access available bilingual staff members to assist the LEP individual.
- When a bilingual staff member is not available, technology such as Google Translate or AT&T Translator app will be used.
- When a language other than Spanish is involved, technology such as Google Translate or AT&T Translator app will be used.
- Use of alternative language devices/services will be evaluated as the need is discovered.
- Key documents have been translated into Spanish, including complaint forms and procedures. TITLE VI notices, notices of denials, losses, or decreases in service will be maintained in Spanish. Translation into other languages will occur as needed.

Span Staff

All Span Transit staff will be advised of the LEP Plan and will be instructed on procedures to follow. Key points will include:

- Understanding the TITLE VI policy and LEP responsibilities.
- What language assistance Span can offer.
- Documentation of language assistance requests.

Span does NOT have subrecipients or utilize subcontractors for transit operations.

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 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.

- Key print materials will be translated and made available as needed and practicable at the Span Administrative Office, on board vehicles, on our website, and at meetings held 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 easily adapt to changes in demographics. The following events may trigger an LEP Plan review and/or update:

1. New LEP persons are encountered in significant concentrations within Span’s service area.
2. New Census data is released for our service area.
3. Annual TITLE VI policy review.
4. Complaints, investigations, and/or lawsuits falling under TITLE VI.

Dissemination of Span’s Limited English Proficiency Plan

Span’s LEP will be included within the TITLE VI document posted on our website (www.span-transit.org) together with complaint procedures and forms. 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 refers to the LEP Plan’s availability. Any person, agencies, nonprofit, law enforcement and other community partners with internet access will be able to access the plan. Copies of the LEP Plan will be provided upon request to anyone via phone, mail, or email. LEP persons may obtain copies/translations upon request.

LEP Encounters Log

Date	Time	Language Spoken	Contact Info	Service Requested	Follow up?	Staff	Notes

***We have not had an LEP encounter since the previous 1/2022 update. However, we do encounter riders and applicants who choose to speak Spanish with our bilingual dispatcher, but none that have been unable to communicate effectively in English or have requested language assistance.**

Section IX: Minority Representation Information

Recipients that have transit-related, non-elected planning boards or advisory councils whose membership is selected by the recipient must provide a table depicting the racial breakdown of the membership of said board, committee, or council. A description of efforts made to encourage the participation of minorities in such entities must be included.

Minority Representation Table

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	64.5%	15%	11.9%	5%	0.8%	2.8%
Board of Directors	73.3%	6.6%	6.6%	6.6%	0%	6.6%

Efforts to Encourage Minority Participation

The members of the Board of Directors actively identify and cultivate candidates from diverse backgrounds that are truly representative of the demographic of our service area. Prospects for board membership are asked to submit a completed application which is used to evaluate the candidate against existing board demographics. Span recruits board members in a manner in which accurately reflects the demographics of our service area in regard to race, gender, age, ethnicity, and background.