

## ***Title VI Plan***

**SPARTAN Transportation/  
South Plains Community Action Association, Inc.**

**August 15, 2023**

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## Section 1: Title VI Plan Approval and Revision Log

Title VI Plan Adopted on: August 15, 2023

Adopted by: South Plains Rural Transit District Board of Directors

Signature, board representative: \_\_\_\_\_

Printed Name: Judge Marty Lucke

Date: August 15, 2023

Please see Appendix A for documentation of approval.

### Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
August 15, 2023	Section 8	Updated public outreach activities
August 15, 2023	Section 9, Section 10	Updated demographic information

## **Section 2: Description of Service**

### **1. A general introduction/summary of your organization**

SPARTAN Transportation is a program division of South Plains Community Action Association, Inc., a private, non-profit agency with headquarters in Levelland, Texas. SPCAA has been in operation since 1964 and provides services in over 100 counties in the state. In 2021, the agency provided 1.77 million units of service in its seven program divisions – Child Care Services, Community Services, Head Start/Early Head Start, Health Services, Housing/Weatherization, SPARTAN Transportation, and Workforce.

At the current time SPARTAN's service area includes Bailey, Cochran, Crosby, Dickens, Floyd, Garza, Hale, Hockley, King, Lamb, rural Lubbock, Lynn, Mitchell, Motley, Scurry, Terry, and Yoakum counties.

### **2. The type of service you provide; such as fixed-route, deviated route, or demand response service**

SPARTAN currently operates the following services:

*SPC Express Commuter Service.* SPARTAN offers express scheduled service to and from South Plains College's Levelland and Reese campuses.

*Scheduled Route Service.* Scheduled route service is available Monday through Saturday and provides trips on shared ride vehicles that have usual, customary travel paths. All passengers must have reservations at least 24 hours in advance for scheduled route service, curb-to-curb service, and non-emergency medical transportation. Reservations are honored on a first-call, first-served basis based on availability of a driver and vehicle. Passengers wishing to use scheduled route service should schedule their trip at least 24 hours in advance, and no later than 3:00 p.m. on the day prior to the trip. Customers can subscribe to scheduled route service for regular standing-order trips.

*Curb to curb service.* This personalized demand-response service is available on designated days and times in specified counties of the rural transit district. Curb to curb service is the standard level of service, with door to door service available upon request for elderly persons or persons with disabilities.

*Medical Transportation.* SPARTAN is an approved contractor to provide non-emergency medical transportation services for Medicaid and Medicare approved clients in SPARTAN's service area. To obtain medical transportation, clients must contact Medicaid or their Medicare plan administrator to get a trip confirmation number prior to scheduling their trip on SPARTAN.

*School Tripper Routes.* SPARTAN provides rural bus service to students who live outside the normal bus routes in Brownfield, Littlefield, and Levelland.

*Business Transportation.* SPARTAN can offer a variety of services that can help businesses recruit and retain quality employees by offering reliable and affordable transportation to their employees.

### **3. The number of transit-related employees and the number of revenue service vehicles**

SPARTAN employs 42 transit employees and currently has 47 revenue service vehicles.



### **Section 3: Title VI Policy Statement**

#### **Policy Statement**

**SPARTAN Transportation/South Plains Community Action Association, 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; TxDOT PTN requirements as specified in Master Grant Agreement; and State Management Plan.

#### Section 4: Title VI Notice to the Public

SPARTAN Transportation/South Plains Community Action Association, Inc.'s Notice to the Public is posted in the following locations: *(check all that apply)*

- ☒ Agency website: [www.spartanpublictransit.com](http://www.spartanpublictransit.com) or [www.spcaa.org](http://www.spcaa.org)
- ☐ Public office
- ☒ Reception areas
- ☐ Meeting rooms
- ☒ Inside vehicles
- ☐ Rider Guides/Schedules
- ☐ Transit shelters and stations
- ☐ Other: \_\_\_\_\_

Please note that this information is posted in English and Spanish.

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### SPARTAN PUBLIC TRANSPORTATION TITLE VI NOTICE

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

SPARTAN is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. If you feel you are being denied participation in or being denied benefits of the transit services provided by SPARTAN, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our Title VI Coordinator:

SOUTH PLAINS COMMUNITY ACTION ASSOCIATION

SPARTAN Public Transportation

Attn: Andy Cates

PO Box 610

Levelland, TX 79336

For more information, or to file a complaint not related to Title VI please visit our website at [www.spartanpublictransit.com](http://www.spartanpublictransit.com) or call our office @ 1-800-462-8747 or 1-806-894-3800.

*If information is needed in another language, contact 1-800-462-8747*

*Si necesita información en otra idioma, contacta 1-800-462-8747*

## AVISO DE TÍTULO VI DE SPARTAN PUBLIC TRANSPORTATION

Título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación por motivos de raza, color u origen nacional en los programas y actividades que reciben asistencia financiera federal.

Específicamente, el Título VI establece que "ninguna persona en los Estados Unidos, por motivos de raza, color, u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera Federal" ( 42 USC Sección 2000d ) .

SPARTAN se compromete a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de sus servicios de transporte sobre la base de raza, color, u origen nacional, tal como están protegida por el Título VI de la Administración Federal de Tránsito (FTA) 4702.1.A Circular. Si usted siente que se le niega la participación o se niega los beneficios de los servicios de transporte prestados por SPARTAN, o de otra manera siendo discriminado debido a su raza, color, origen nacional, sexo, edad o discapacidad, puede comunicarse con nuestro Coordinadora del Título VI:

SOUTH PLAINS COMMUNITY ACTION ASSOCIATION

SPARTAN Public Transportation Attn:

Andy Cates

PO Box 610

Levelland, TX 79336

806.894.3800

Para obtener más información o para presentar una queja no está relacionado con el Título VI, por favor visite nuestro sitio web en [www.spartanpublictransit.com](http://www.spartanpublictransit.com) o llame a nuestra oficina @ 1-800-462-8747 o 1-806-894-3800.

*If information is needed in another language, contact 1-800-462-8747*

*Si necesita información en otra idioma, contacta 1-800-462-8747*



## Section 5: Title VI Complaint Procedure

**SPARTAN Transportation/South Plains Community Action Association, Inc.'s Title VI Complaint**  
Procedure is made available in the following locations: *(check all that apply)*

- ☒ Agency website: [www.spartanpublictransit.com](http://www.spartanpublictransit.com) or [www.spcaa.org](http://www.spcaa.org)
- ☐ Public office
- ☒ Reception areas
- ☐ Meeting rooms
- ☒ Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold
- ☐ Other: \_\_\_\_\_

Please note that this information is posted in English and Spanish.

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### Title VI Complaint Procedure

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the **SPARTAN Transportation/South Plains Community Action Association, 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.spartanpublictransit.com](http://www.spartanpublictransit.com), or requested at: 1105 W. Hwy 114, Levelland TX 79336.

**SPARTAN Transportation/South Plains Community Action Association, Inc.** investigates complaints received no more than 180 days after the alleged incident. The **SPARTAN Transportation/South Plains Community Action Association, Inc.** will process complaints that are complete.

Once the complaint is received, **SPARTAN Transportation/South Plains Community Action Association, 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 them whether the complaint will be investigated by our office.

**SPARTAN Transportation/South Plains Community Action Association, Inc.** will investigate the complaint. If more information is needed to resolve the case, **SPARTAN Transportation/South Plains Community Action Association, Inc.** may contact the complainant.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, **SPARTAN Transportation/South Plains Community Action Association, 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, they 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 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.

The complainant may appeal the decision within 10 business days after the date of the closure letter or the LOF.

Complainants 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 1-800-462-8747  
*Si necesita información en otra idioma, contacta 1-800-462-8747*

Please note that this information is posted in English and Spanish.

### **Política de Quejas y Reclamos**

SPARTAN atiende a una gran diversidad de personas de diferentes edades (niños, adolescentes, adultos y ancianos), desafíos físicos, situación económica y financiera y orígenes étnicos.

SPARTAN se asegurará de que ninguna persona será excluida de la participación o negada los beneficios de, o de cualquier otra forma, ser discriminada bajo cualquier programa o actividad emprendida por SPARTAN, únicamente por su raza, color, religión, sexo, edad, discapacidad o cualquier otra característica protegida por la ley. SPARTAN asegura el pleno cumplimiento del Título VI de las Leyes de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, la Ley de Americanos con Discapacidades (ADA) y los estatutos y reglamentos relacionados en todos los programas y actividades.

Es nuestra intención proporcionar servicios corteses y profesionales al público en general. Si una persona tiene una queja, puede seguir los procedimientos de queja.

### **Procedimientos de quejas y reclamaciones**

Como recipiente de los fondos de Transporte Médico y Transporte Público, administrado por el Departamento de Transporte de Texas, SPARTAN por la presente certifica que cumplirá con las pautas de elegibilidad y las prioridades de servicio, según lo estipulado y establecido en los Contratos de la Agencia.

Cualquier persona que crea que se le han negado los beneficios de, excluido de la participación en, o sometido a la discriminación por motivos de raza, color, origen nacional o discapacidad por SPARTAN tiene derecho a presentar una queja formal. Para obtener más información sobre los Derechos Civiles del Título VI o para solicitar un Formulario de Queja de Título VI, llame al 1-800-462-8747 o visite [www.spartanpublictransit.com](http://www.spartanpublictransit.com). En caso de una queja de transporte público, el reclamante debe ponerse en contacto con la oficina administrativa al (806) 894-3800 o 1 (800) 462-8747 o por correo a P.O. Box 610, Levelland, TX 79336. Al recibir la queja, el representante de SPARTAN solicitará el detalle por escrito de la queja o tomará una declaración oral del demandante. La queja debe incluir detalles sobre la situación: I.E. fecha, hora, conductor, problema, etc. Todas las quejas o declaraciones deben ser



firmadas o si por teléfono el demandante real debe ser la persona que llama. Las quejas recibidas por teléfono serán investigadas y resueltas. No se requerirá una respuesta por escrito si el reclamante está satisfecho con la resolución. El Director será notificado al recibir todas las quejas, y el Supervisor de Tránsito o un miembro del personal asignado conducirán una investigación sobre las quejas por escrito. Una vez finalizada la investigación, se emitirá una decisión sobre la queja y se enviará una respuesta por escrito al reclamante a más tardar diez días después de recibir la queja. Una copia de la queja y las medidas adoptadas se enviarán a las oficinas de la fuente de financiamiento según se requiera, y se mantendrá una copia en la Oficina Administrativa de SPARTAN. En caso de que el demandante no esté satisfecho con la decisión y las medidas adoptadas por el Supervisor de tránsito, el reclamante debe notificar al Director General por escrito en esta dirección.

Brian Baker, Director  
SPARTAN Public Transit  
P.O. Box 610, Levelland Texas 79336  
1-800-462-8747

El Director revisará toda la información relacionada con la queja y tendrá la discreción de formar un panel imparcial de revisores para ayudarlo, compuesto por: miembros del Consejo del Distrito de Tránsito o representantes del servicio social público y privado. Tras una revisión de la queja, el Director informará al reclamante de las conclusiones del grupo de revisión o de su decisión y de las medidas adoptadas en relación con la denuncia. Se emitirá una decisión sobre la queja y se enviará una respuesta por escrito a la denuncia a más tardar diez días después de que el Director reciba la queja.

#### **Información adicional sobre quejas**

##### **Denuncias del Título VI:**

Por favor vea los formularios de reclamación del Título VI y el Proceso de Quejas en el Plan de Título VI bajo la Pestaña de Políticas en [www.spartanpublictransit.com](http://www.spartanpublictransit.com).

##### **Transporte Médico bajo HHSC:**

Los clientes deben comunicarse con HHSC al 1-877-633-8747, de lunes a viernes, de 8:00 a.m. - 5:00 p.m.

*If information is needed in another language, contact 1-800-462-8747*

*Si necesita información en otra idioma, contacta 1-800-462-8747*

## Section 6: Title VI Complaint Form

The SPARTAN Transportation/South Plains Community Action Association, Inc. Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- X Agency website: [www.spartanpublictransit.com](http://www.spartanpublictransit.com) or [www.spcaa.org](http://www.spcaa.org)
  - X Hard copy in the central office
  - X Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other: \_\_\_\_\_

<b>Title VI Complaint Form</b>				
<b>Section I:</b>				
Name:				
Address:				
Telephone (primary):		Telephone (secondary):		
Email Address:				
Accessible Format Requirements?	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.				
<b>Section IV</b>				

Have you previously filed a Title VI complaint with this agency?	Yes	No
<b>Section V</b>		
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 contact information for the person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
<b>Section VI</b>		
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:

**SPARTAN Transportation/South Plains Community Action Association, Inc.**  
**ATTN: Human Resources Department**  
**PO Box 610**  
**Levelland, TX 79336**

*If information is needed in another language, contact 1-800-462-8747*

*Si necesita información en otra idioma, contacta 1-800-462-8747*

<b>Título VI: Formulario de Queja por Discriminación</b>				
<b>Sección I:</b>				
Nombre:				
Dirección:				
Número de teléfono en casa:		Otro número de teléfono:		
Dirección de correo electrónico:				
¿Requisitos de formato accesible?	Letra grande		Cinta de audio	
	TDD		Otro	
<b>Sección II:</b>				
¿Está presentando esta queja en su propio nombre?		Sí*	No	
*Si respondió afirmativamente a esta pregunta pase a la Sección III.				
Si no, proporcione el nombre y la relación de la persona por la que se quejas:				
Por favor explique por qué ha solicitado a un tercero:				
Confirme que ha obtenido el permiso de la parte agraviada si presenta la solicitud en nombre de un tercero:		Sí	No	
<b>Sección III:</b>				
¿Cuál de las siguientes opciones describe mejor la razón que usted cree que la discriminación ocurrió? Era porque:				
<input type="checkbox"/> Raza o Origen Nacional <input type="checkbox"/> Color <input type="checkbox"/> Discapacidad				
Fecha de la supuesta discriminación (mes, día, año) _____				
(Debe ser dentro de los últimos 180 días.)				
En sus propias palabras, describe la supesta discriminación. Explique lo que ocurrió y quien considera que fue responsable. Utilice más hojas o el dorso de esta página, si es necesario.)				
<b>Sección IV</b>				
¿Ha presentado previamente una queja de Título VI con esta agencia?		Sí	No	
<b>Sección V</b>				
¿Ha presentado esta queja con cualquier otra agencia federal, estatal, o local, o con cualquier tribunal/corte federal o estatal?				
<input type="checkbox"/> Sí <input type="checkbox"/> No				
Si la respuesta es Sí, marque todas las que correspondan:				
<input type="checkbox"/> Agencia federal: _____				

<input type="checkbox"/> La corte federal: _____	<input type="checkbox"/> La agencia estatal: _____
<input type="checkbox"/> Estado judicial _____	<input type="checkbox"/> Una agencia local _____
Proveer información sobre una persona de contacto en la otra agencia/tribunal corte donde se presente la queja.	
Nombre: _____	
Título: _____	
Agencia: _____	
Dirección: _____	
Número telefónico: _____	
<b>Sección VI</b>	
Nombre de la agencia que presenta la queja: _____	
Persona de contacto: _____	
Título: _____	
Número telefónico: _____	

Por favor, firmar y fechar este formulario a continuación. Usted puede adjuntar cualquier material escrito o información que considere relevante para su queja.

\_\_\_\_\_  
Firma de Querellante

\_\_\_\_\_  
Fecha

Envíe este formulario en persona a la dirección que figura a continuación, o envíe este formulario por correo a:

**SPARTAN Transportation/South Plains Community Action Association, Inc.**  
**ATTN: Human Resources Department**  
**411 Austin Street**  
**PO Box 610**  
**Levelland, TX 79336**

*If information is needed in another language, contact 1-800-462-8747*

*Si necesita información en otro idioma, contacta 1-800-462-8747*

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

The **SPARTAN Transportation/South Plains Community Action Association, 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 **SPARTAN Transportation/South Plains Community Action Association, Inc.** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- Provide for early, frequent and continuous engagement by the public.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Provide childcare and food during meetings, if possible.
- 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 public outreach and involvement activities conducted by the **SPARTAN Transportation/South Plains Community Action Association, Inc.** since the last Title VI Program submission are summarized in the table below.

Event Date	SPARTAN Transportation/South Plains Community Action Association, Inc. Representatives	Activity	Communication Method	Notes
(Outreach events suspended during the pandemic.)				
2/2/21	Supervisor	Head Start	Virtual resource fair	Distributed information on transportation
9/16/2021	Transportation Director	Lions Club, Levelland	Brochures, flyers	Distributed information on transportation
10/20/2021	Supervisor	LCH County-wide Adult Health Fair	Brochures, flyers	Distributed information on transportation
12/11/21	Supervisor	Pancakes with Santa – St. Michael's Catholic Church, Ralls	Brochures, flyers	Distributed information on transportation
6/9/2022	Supervisor	RAIN Tour 2022 – resource fair and tour	Brochures, flyers	Distributed information on transportation
6/16/2022	Transportation Director and Supervisor	UMC Transportation Meeting	Brochures, flyers	Distributed information on transportation
7/12/2022	Supervisor	RAIN Tour, Petersburg	Brochures, flyers	Distributed information on transportation
7/13/2022	Supervisor	RAIN Tour, Tahoka	Brochures, flyers	Distributed information on transportation
7/14/2022	Supervisor	RAIN Tour, Plainview	Brochures, flyers	Distributed information on transportation

7/16/2022	Supervisor	RAIN Tour, Littlefield	Brochures, flyers	Distributed information on transportation
7/21/2022	Supervisor	Hockley County Food Box, Levelland	Brochures, flyers	Distributed information on transportation
7/26/2022	Supervisor	KCBD Community Coverage	Brochures, flyers	Distributed information on transportation
8/5/2022	Supervisor	RAIN Tour, Brownfield	Brochures, flyers	Distributed information on transportation
8/6/2022	Supervisor	Back to School Bash, Littlefield	Brochures, flyers	Distributed information on transportation
9/27/2022	Supervisor	RAIN Tour Outreach Meeting	Brochures, flyers	Distributed information on transportation
10/11/2022	Supervisor	SPCAA Head Start Fall 2022 Resource Fair	Brochures, flyers	Distributed information on transportation
1/26/2023	Supervisor	Lubbock Impact	Brochures, flyers	Distributed information on transportation
1/31/2023	Supervisor	SPC Organization Fair	Brochures, flyers	Distributed information on transportation
3/23/2023	Supervisor	Kinship Alliance Meeting	Brochures, flyers	Distributed information on transportation
4/27/2023	Supervisor	Kinship Alliance Meeting/Salvation Army	Brochures, flyers	Distributed information on transportation
5/23/2023	Supervisor	LBK Community Networking Session	Brochures, flyers	Distributed information on transportation

## Section 9: Language Assistance Plan

As a recipient of federal US DOT funding, the **SPARTAN Transportation/South Plains Community Action Association, 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.

**SPARTAN Transportation/South Plains Community Action Association, 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, **SPARTAN Transportation/South Plains Community Action Association, 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.**

SPARTAN's rural transportation programs serve a 17-county region on the Texas High Plains. The area is mostly rural; Lubbock is the only urbanized area, and Plainview (in Hale County) and Levelland (in Hockley County) are the only small cities. The remainder of the area is made up of small towns and rural areas. Service is provided in Bailey, Cochran, Crosby, Dickens, Floyd, Garza, Hale, Hockley, King, Lamb, rural Lubbock, Lynn, Mitchell, Motley, Scurry, Terry, and Yoakum counties.

	White only	Black	American Indian & Alaskan Native	Asian Alone	Native Hawaiian Pacific Islander	Two or more races	Hispanic or Latino	White alone, not Hispanic or Latino
Bailey	91.6	2.1	3.6	1.0	0.1	1.6	84.9	32.1
Cochran	88.3	5.1	3.8	0.8	0.3	1.7	59.9	33.5
Crosby	91.3	4.3	1.5	0.5	0.1	2.4	57.4	37.6
Dickens	85.7	6.8	2.8	1.6	0.2	3.0	31.3	59.7
Floyd	91.6	6.2	1.6	0.5	0.1	2.0	60.2	54.9
Garza	88.9	6.1	3.3	0.8	0.2	1.8	52.1	38.2
Hale	89.6	5.9	1.9	1.7	0.2	1.6	61.7	36.4
Hockley	92.1	4.4	1.5	0.5	0.1	1.5	30.3	44.3
King	93.4	2.3	1.2	0.0	0.4	2.7	37.8	76.4
Lamb	90.7	4.6	2.0	0.6	0.2	1.8	57.2	37.3
Lubbock	86.4	7.9	1.2	2.4	0.2	1.9	37.3	51.6
Lynn	92.6	2.9	2.0	0.4	0.0	2.0	44.8	51.3
Mitchell	84.3	10.9	1.7	0.8	0.1	2.2	40.8	47.4
Motley	92.4	7.5	2.6	0.2	0.3	1.0	20.4	74.7
Scurry	89.9	5.7	1.4	0.9	0.1	2.0	42.2	54.8
Terry	91.1	5.1	1.4	0.6	0.1	1.7	57.3	36.7
Yoakum	93.8	1.9	2.0	0.7	0.0	1.5	69.1	27.7
Ave %	90.22	5.39	1.97	0.82	0.16	1.91	47.34	46.74

Source: [www.census.gov/quicksfacts](http://www.census.gov/quicksfacts), 2022 estimates

This information shows that 46.6% of the population in SPARTAN's service area reports as being Hispanic or Latino.

As can be expected given the population in the service area, most persons speak English or Spanish, or a combination of both languages. Due to a specific population group in a few rural counties, several people speak primarily German. The wide range of other languages that is reported is due to the more diverse makeup of the city of Lubbock. It is important to note that trips that begin and end within the Lubbock city limits are not part of SPARTAN's service, so the impact of these various languages is negligible:

Primary Language	Including Lubbock County	Excluding Lubbock County
English	65.15	64.65
Spanish	33.66	34.35
Asian-Pacific Islander	1.28	1.26
Indo-European	0.37	0.28
Other	0.12	0.09

Source: <http://www.usa.com/texas-state.htm>

SPARTAN's operations staff interact on a daily basis with LEP persons, particularly with persons for whom Spanish is their primary language. This information generally relates to transit services, including scheduling rides, fare information, purchase of tickets, etc. In addition, such interactions may include, on a less frequent basis, customer surveys and participation in public meetings.

- (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  
A total of 72.8% of the population speaks English only; of the remaining 27.2%, 19.2% report speaking English "very well." This leaves 8.0% of the population who speak English "less than very well"; 7.2% of those are Spanish speakers, with all other languages (other Indo-European, Asian and Pacific Islands, and all other) at a total of less than 1.0%.
- (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.** SPARTAN's staff reviewed the frequency with which the board, office staff, and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, SPARTAN Transportation has had no requests for interpreters and no requests for translated program documents. The board, office staff, and bus/van drivers have had very little contact with LEP persons.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.** There is no large geographic concentration of any type of LEP individuals in SPARTAN's service area. As a result, there are few social, service, professional, and leadership organizations with SPARTAN's service area that focus on outreach to LEP individuals. SPARTAN's board, office staff, and

bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at board meetings.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** SPARTAN Transportation 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 to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed within a reasonable time period. Other language translation would be provided, as required, through a telephone interpreter line; the costs for this type of service vary and are based on actual usage. This cost will never be passed on to customers who need assistance.

Limited English Proficient (LEP) Resource Materials:

### **"I Speak" Language Identification Card**

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

The Texas Transportation Code mandates that the transit board be made up of election officials (mayors, county judges or commissioners, or their appointees) for the component municipalities or counties in the district. There are eight positions on the board at the current time; one position is vacant. The following shows the makeup of the current board structure.

Membership of Board, Committees, Councils, Broken Down by Race						
Body	Caucasian	Hispanic	Black	Asian American	Native American	Two or More Races
Population	91.2%	47.3%	5.4%	0.8%	1.9%	1.9%
Transit Board	57.0%	29.0%	14.0%	0.0%	0.0%	0.0%

### B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, SPARTAN Transportation will continue to actively recruit board members from non-Caucasian population groups within the service area. SPARTAN will utilize agency networks and contacts to extend the recruitment to the fullest extent possible. SPCAA and SPARTAN Transportation have a vast network across the region and are committed to outreach among minority populations for all board and committee appointments. This outreach takes many forms, including direct contact to recruit potential board and committee members; referrals for open positions from current board and committee members and members of the general public; recruitment via social media and other means.

## **Section 11: Providing Assistance to and Monitoring Subrecipients**

SPARTAN Transportation does not provide funding to subrecipients.

## **Section 12: Equity Analysis for Facilities**

During facility planning stages, SPARTAN Transportation will complete a Title VI equity analysis with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. During this process, SPARTAN Transportation will engage in outreach to persons potentially impacted the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives and will occur before the selection of the preferred site.

During the evaluation period, SPARTAN Transportation will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

If SPARTAN Transportation determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the project will only be located in the original location if there is substantial legitimate justification for locating the project there, and where there are not alternative locations what would have a less disparate impact on the basis of race, color, or national origin. The analysis will show how both tests are met, and will consider and analyze alternatives to determine whether those alternative would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

SPARTAN's current facility expansion project takes place on land that was owned prior to the expansion, and the land is located in an industrial part of town and borders on a state highway. Fiscal and programmatic restraints did not allow the agency to consider alternate locations. The adjacent land uses are either vacant land or industrial use; no residents will be impacted by the facility expansion.



## **Appendix A – Minutes of Transit Board Meeting**