

***Title VI Plan***

**Permian Basin Community Centers**

**May 31, 2017**

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## Section 1: Title VI Plan Approval

Title VI Plan TBD

Adopted on: \_\_\_\_\_

Adopted by: Ramona Thomas

## Title VI Plan Revision Log

<b>Date</b>	<b>Section Revised</b>	<b>Summary of Revisions</b>
4/24/2017	Description of Organization	Added comprehensive program description with indication of the geographic service area, number of transit employees, and number of revenue vehicles.
4/24/2017	Title VI Notice to the Public	Added complaint information for TXDOT. Addressed areas for posting.
4/24/2017	Title VI Complaint Procedure	Added notification to TXDOT within 10 days of receipt
4/24/2017	Public Participation Plan	Added listing of transportation outreach events.
4/24/2017	Language Assistance Plan	Added a Four Factor Analysis and supporting language

## Section 2: Description of Organization and Service Provided

**Permian Basin Community Centers (PBCC)** is a Community Mental Health and Individuals with Intellectual and Developmental Disabilities (IDD) Center established under Health and Safety Code Title 7, Subtitle A, Section 534, Subchapter A. PBCC is recognized as the local Mental Health and Individuals with IDD authority by the Health and Human Services Commission (HHSC). In addition to performing the above functions, PBCC operates programs funded by HHSC for Early Childhood Intervention, Substance Use Inpatient and Outpatient Services, HIV treatment assistance, social and medical case management, as well as, programs funded by the Texas Department of Housing and Community Affairs for rental assistance.

The 5310 Program operated by PBCC offers demand response door to door transportation based on the individual service plans of our IDD individuals who need access to an ADA accessible van to attend day habilitation workshops, socialization activities, and medical appointments.

The PBCC service area includes the below counties with services offered by the Center in Midland, Ector, Pecos, Brewster, Culberson, Jeff Davis, Presidio, and Hudspeth. The 5310 transportation services could be available as needed in all counties but are provided in majority in Midland and Ector county where the Center has IDD residential homes and day programs

PBCC has 20 transit-related employees who provide transportation services while working in our IDD residential homes, day programs, supported home living program, and respite services program. PBCC operates three (3) handicap accessible wheelchair vans that are not revenue vehicles because all programs they support being funded through other sources.



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## Section 3: Title VI Policy Statement

## Policy Statement

PBCC as a recipient of Federal Transit Administration (FTA) grant dollars through the Texas Department of Transportation (TxDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and TxDOT PTN requirements as specified in Master Grant Agreement, and State Management Plan.

## TITLE VI Notice to the Public

### Dissemination

The following notice is posted on the PBCC website at [www.pbmhmr.com](http://www.pbmhmr.com), in each 5310-funded transit vehicle, at the reception desk and public meeting rooms located at our Midland IDD Day Program, Odessa IDD Day Program, and our Midland IDD Administration Buildings.



## Notification of Public Rights Under Title VI Permian Basin Community Centers

PBCC operates its program and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

For more information on the PBCC civil rights program, and the procedures to file a complaint contact the following:

Phone: 432-570-3333

Email: [title.vi.complaint@pbmhm.com](mailto:title.vi.complaint@pbmhm.com)

Physical Address: 401 E. Illinois Ave., Suite 301, Midland, TX 79701

For more information, visit our website at [www.pbmhm.com](http://www.pbmhm.com)

A complainant may also file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights at the following:

Attention: Title VI Program Coordinator

Office of Civil Rights, East Building

5th Floor-TCR

1200 New Jersey Ave.

SE, Washington DC, 20590

A complainant may also file a complaint directly with the Texas Department of Transportation: by filing a complaint at the following:

TxDOT - PTN

125 E. 11th Street

Austin, Tx 78701-2483

If information is needed in another language, contact 1-800-555-1212.

Si se necesita información en otro idioma, comuníquese con 1-800-555-1212.

## Title VI Complaint Procedure

The **Permian Basin Community Centers (PBCC)** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website: [www.pbmhmr.com](http://www.pbmhmr.com)
- Hard copy at the PBCC Administrative Offices, 401 E. Illinois, Midland, Tx 79701
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Permian Basin Community Centers (PBCC) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: [www.pbmhmr.com](http://www.pbmhmr.com), or requested at: 401 E. Illinois, Suite 301, Midland, Texas, 79701.

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

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

The **PBCC** has sixty (60) days to investigate the complaint. If more information is needed to resolve the case, PBCC may contact the complainant.

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

If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, PBCC 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 ten (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 (800) 555-1212.  
Se necesita informacion en otro idioma, llame al (800) 555-1212.

## **Título VI Procedimientos de Reclamación**

El Título VI Procedimientos de Reclamación de **Permian Basin Community Centers (PBCC)** está disponible en los siguientes lugares:

- [ x ] Sitio web de la Agencia en [www.pbmhmr.com](http://www.pbmhmr.com)
- [ x ] Copia impresa en la oficina administrativa, 401 E. Illinois, Suite 301, Midland, Tx 79701
- [ x ] Disponible en los idiomas apropiados para las poblaciones LEP, cumpliendo con el Umbral de Puerto Seguro.

Cualquier persona que crea que ha sido discriminado/a por razón de raza, color o nacionalidad por parte de Permian Basin Community Centers (PBCC) podrá realizar una reclamación en base al Título VI, cumplimentado y presentando el Formulario de Reclamación del Título VI. Los formularios de quejas se pueden encontrar en este documento, en línea en [www.pbmhmr.com](http://www.pbmhmr.com), o puede solicitarse en PBCC, 401 E. Illinois, Suite 301, Midland, Texas, 79701.

Al recibir la queja, PBCC la revisará para determinar si nuestra oficina tiene jurisdicción sobre el asunto.

Una copia de cada reclamación de Título VI será enviada a TxDOT Coordinador de Transporte Público dentro de los diez (10) días naturales siguientes a su recepción. El reclamante recibirá una carta de reconocimiento le informa si la queja será investigada por nuestra oficina.

PBCC tiene sesenta (60) días para investigar las quejas. Si se necesita más información para resolver el caso, PBCC puede contactar al reclamante.

El reclamante tiene diez (10) días naturales desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso..

Si el investigador no es contactado por el reclamante o no recibe la información adicional dentro de diez (10) días, la agencia puede cerrar administrativamente el caso. Un caso también puede ser cerrado administrativamente si el reclamante ya no desea seguir su caso. Después de que el investigador revise la queja, enviará una carta. Las dos posibilidades son (1) una carta de cierre; o (2) una carta con las conclusiones (LOF).

- ✓ Una carta de clausura resume las alegaciones y establece o bien que no hubo ninguna violación del Título VI, o que faltaban datos suficientes para determinar si hubo o no una violación.
- ✓ Una carta con las conclusiones (LOF), resume las alegaciones y las entrevistas en relación al incidente acontecido, y explica si habrá una acción disciplinaria, una formación adicional para los miembros del personal, o si tendrá lugar alguna otra acción.

Si el reclamante desea apelar la decisión, tiene diez (10) días desde la fecha de la carta para hacerlo. Una persona también puede presentar una queja directamente con:

Texas Department of Transportation, Atención: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, o Federal Transit Administration, Office of Civil Rights, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Se necesita información en otro idioma, llame al (800) 555-1212.

If information is needed in another language, then contact (800) 555-1212.

## **Title VI Complaint Form**

The **Permian Basin Community Centers (PBCC)** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website: [www.pbmhmr.com](http://www.pbmhmr.com)
- Hard copy at the PBCC Administrative Offices, 401 E. Illinois, Midland, Tx 79701
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.





# Permian Basin Community Centers

## Title VI Complaint Form

Title VI of the Civil Rights Act provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any PBCC program or activity that receives federal funding.

If you have a complaint under Title VI, complete this form and submit it to PBCC, Attention: Compliance Officer, 401 E. Illinois, Suite 301, Midland, Texas, 79701.

Si se necesita information en otro idioma, llame al 1-800-555-1212.

### I. COMPLAINANT INFORMATION

Name	
Address	
City – State – Zip Code	
Telephone	Email Address
Accessible Format Requirements? <input type="checkbox"/> Large Print <input type="checkbox"/> TDD <input type="checkbox"/> Audio Tape <input type="checkbox"/> Other	

### II. PRIMARY/THIRD PARTY INFORMATION

<p>Are you filing this complaint on your own behalf?</p> <p><input type="checkbox"/> YES &gt; If you answered “YES” to the question, go to Section III.</p> <p><input type="checkbox"/> NO &gt; If you answered “NO” to the question, answer the following questions:</p>
<p>a. Please supply the name and relationship of the person for whom you are complaining?</p>
<p>b. Please explain why you have filed for a third party?</p>
<p>c. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party <input type="checkbox"/> YES <input type="checkbox"/> NO</p>

### III. COMPLAINT BASIS

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 side of this form or a separate sheet of paper.

### IV. COMPLAINT FILING CONTACTS

Have you previously filed a Title VI complaint with PBCC? <input type="checkbox"/> YES <input type="checkbox"/> NO
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"/> State Agency <input type="checkbox"/> Local Agency <input type="checkbox"/> Federal Court <input type="checkbox"/> State Court
Please provide information for a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
City – State – Zip Code
Telephone:

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

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Complainant's Signature

Date



## Permian Basin Community Centers Formulario de Denuncia del Título VI

El Título VI del Acta de Derechos Civiles prevé que ninguna persona, por motivos de raza, color u origen nacional, podrá ser excluida de participar, denegada de sus beneficios, o ser sujeta a discriminación bajo ningún programa o actividad de PBCC que reciba fondos federales.

Si tiene una denuncia de trasgresión del Título VI, complete este formulario y envíelo a PBCC, Atención: Oficial de cumplimiento, 401 E. Illinois, Suite 301, Midland, Texas, 79701.

Si se necesita information en otro idioma, llame al 1-800-555-1212.

### V. INFORMACIÓN DEL DENUNCIANTE

Nombre	
Dirección	
Ciudad-Estado-Código Postal	
Teléfono	E-mail
¿Requerimientos de Formato Accesible? <input type="checkbox"/> Letras Grandes <input type="checkbox"/> Dispositivos de Telecomunicaciones para personas sordas <input type="checkbox"/> Cinta de Audio <input type="checkbox"/> Otro	

### VI. INFORMACIÓN SOBRE LA PRINCIPAL/TERCERA PARTE INVOLUCRADA

¿Está llenando esta denuncia en su propia representación <input type="checkbox"/> Sí > si responde “Sí”, vaya a la Sección III. <input type="checkbox"/> No > si responde “NO” a la pregunta, respond alas siguientes preguntas:
d. Por favor indique el nombre y su relación con la persona para la cual está llenando esta denuncia.
e. Por favor explique porqué presenta la denuncia de un tercero.
f. Por favor confirme que ha obtenido el permiso de la parte agraviada, si está presentando la denuncia en representación e un tercero <input type="checkbox"/> Sí <input type="checkbox"/> No

## VII. BASES DE LA DENUNCIA

Creo que la discriminación que experimenté se basó en (marque todas las que apliquen):  [ ] Raza [ ] Color [ ] Origen Nacional
Fecha de la Discriminación Alegada (Mes, Día, Año)
Explique lo más claramente posible lo sucedido y por qué piensa que ha sido victim de discriminación. Describa a todas las personas involucradas. Incluya el nombre e information de contacto de la(s) persona(s) que lo discriminaron (si tene esos datos) así como los nombre e información de contacto de los testigos. Si necesita más espacio, por favor utilice la parte de atrás de este formulario o una hoja aparte.

## VIII. CONTATOS ANTERIORES DEL DENUNCIANTE

¿Alguna vez había presentado una denuncia por trasgresión del Título VI a PBCC antes? [ ] Sí [ ] No
¿Ha presentado esta denuncia a otra agencia federal, estatal o local o ante alguna corte federal o estatal? [ ] Sí [ ] No Si Sí, por favor marque todas las opciones que apliquen: [ ] Agencia Federal [ ] Agencia Estatal [ ] Agencia Local [ ] Corte Federal [ ] Corte Estatal
Por favor brined información sobre una persona de contacto en la agencia o corte en la que hizo la denuncia.
Nombre:
Título:
Agencia:
Dirección:
Ciudad – Estado – Código Postal
Teléfono:

Puede adjuntar cualquier material escrito u otra información que considere releante a su denuncia.

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Firma del Denunciante

Fecha

## Public Participation Plan

### Strategies and Desired Outcomes

To promote inclusive public participation, PBCC will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous involvement in the development of transportation plans from LEP stakeholders to assure clients and families have meaningful access to services.
- ✓ Provide open and visible decision-making processes for LEP clients of PBCC to assure equal access to transportation to and from our service programs, community events, and medical appointments.
- ✓ Assure the addressing of LEP barriers during intake assessment processes and Person Directed Planning Meetings so that comprehensive transportation plans can be utilized to access services.

### Public Outreach Activities

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

Event Date	Staff Members Present)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
2 <sup>nd</sup> Wed each month	Production Coordinator	Regionally Coordinated Transportation Planning group	E-blast and word of mouth invitations to all social service agencies in the Permian Basin	Share brochures in Spanish/English, description of services, discussion of how to fill transportation gaps, share in cross-referrals of clients. The committee is well-represented across race, color and national origin in terms of those who attend as well as those whom they represent.
Quarterly	Service Coordinators and Provider Case Coordinators	Family Health Coalition	Public Notice	Share brochure that describe the services and discuss various barriers to services in the community
Annual on individual client treatment anniversary dates	Service Coordinator	Individual Client Person Directed Planning Meeting	Direct Contact with the IDD Client and Family Representative	Review the client's individual treatment plan and assess any changes necessary, including the best means of transportation for the consumer. ADA accessible transport is discussed and coordinated as needed.
Every Monday	IDD Intake Coordinators	Consumer Intake Assessment	Direct Contact with the IDD Client and Family Representative	Complete all assessment paper work to enroll clients in services with PBCC. ADA accessible transport is discussed and coordinated in conjunction with the other services offered by PBCC as needed.

## Minority Representation Table

The Board of Trustees of PBCC is appointed by our local counties and cities. The Planning and Network Advisory Committee (PNAC) is appointed by the PBCC Board of Trustees and oversees the Title VI Plan. The composition of the Board of Trustees and the PNAC as compared to the overall population for the counties of Midland and Ector where 5310 transportation services are provided is shown below.

Body	Hispanic Ethnicity	White	African American	American Indian or Alaskan	Asian	Hawaiian or Pacific Islander	Multi-racial
Midland and Ector County Combined	47%	46%	5%	0%	1%	0%	1%
Board of Trustees	22%	67%	11%	0%	0%	0%	0%
PNAC	25%	62%	13%	0%	0%	0%	0%

### Efforts to Encourage Minority Participation

PBCC specializes in delivering Mental Health, Substance Use, and IDD services to a very diverse population across an eight (8) county service area. The Board Chair for PBCC makes recommendations for appointment to the Cities and Counties for the full Board of Trustees and makes appointments to the PNAC with the intention of representing the cultural diversity of our service area in our governing bodies.

To encourage minority participation on the Board and in the PNAC, PBCC works to create a pipeline of diverse board member candidates utilizing the public connections of the individual trustees, the Chief Executive Officer, various Center staff members, representatives from our local government bodies, and the various committee members. Within the meeting environment, everyone is treated equally, and discussions are open regarding topics of diversity. In all meetings, there is openness to confront difficult issues and answer tough questions. The members are comfortable serving on the board and committees, and the environment is inclusive and welcoming.

### Limited English Proficiency (LEP)

A *Limited English Proficiency (LEP) Plan* is in place which addresses PBCC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with LEP. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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

### LEP Plan Summary

It shall be the policy and practice at all PBCC offices to fulfill equal opportunity and equal access to all LEP persons. In reviewing the delivery systems, efforts shall be made to determine if any program system limits participation or denies participation to a significant proportion of the population it serves relative to language barriers.

PBCC has developed this *LEP Plan* to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

PBCC used the four-factor LEP analysis to prepare this plan which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by PBCC.
2. The frequency with which LEP persons come in contact with PBCC services.
3. The nature and importance of services provided by PBCC to the LEP population.
4. The interpretation services available to PBCC and overall cost to provide LEP assistance.

#### **Meaningful Access: Four Factor Analysis**

1. The number or proportion of LEP persons in the service area who may be served by or are likely to require PBCC services.

PBCC staff reviewed the 2010 U.S. Census Report and determined that 83,224 persons in the PBCC service area [16.02% of the population] speak a language other than English. Of these 83,224 persons, 34,156 [41.04%] have limited English proficiency; that is, they speak English “not well” or “not at all”. This is 6.59% of the total population in the service area. In the PBCC service area, of those persons with limited English proficiency, 33,195 [6.39%] speak Spanish, 375 [.08%] speak Indo-European, 493 [.10%] speak Asian or other Pacific Islander Languages.

2. The frequency with which LEP persons come in contact with PBCC services.

PBCC provides services to approximately 9,338 individuals across eight counties, based on the statistics for the general population, 615 of those individuals would have LEP with 596 of the 615 being fluent in Spanish.

3. The nature and importance of services provided by PBCC to the LEP population.

By their nature, the mental health, substance use, HIV treatment, Early Childhood Intervention, and Individual with Developmental Disability services provided by PBCC are essential to the daily lives for our clients which in turn carries forward to the LEP subset.

4. The resources available at PBCC and the overall costs to provide LEP assistance.

PBCC has prepared through the hiring of bilingual staff members and the translation of pertinent documentation and postings to provide services efficiently in both English and Spanish. Other languages are accommodated on an as needed basis utilizing a 1-800 translation number. In addition, services are offered and performed proficiently to individuals with hearing loss, blindness, and other non-verbal communication barriers. Recipients of PBCC services are not required to pay for the translation services.

**Permian Basin Community Centers  
Language Characteristics of Area Served - Based on the 2006-2010  
American Community Survey 5-Year Estimates**

County	Population	Speak only English	Speak Language other than English	Spanish-speakers who speak English less than "very well"	Indo-European who speak English less than "very well"	Asian/Pacific Islander who speak English less than "very well"	"Other" lang. spoken who speak English less than "very well"	Spanish-speakers who speak English "not at all"	Indo-European who speak English "not at all"	Asian/Pacific Islander who speak English "not at all"	"Other" language speakers who speak English "not at all"
Midland	121,465	86,434	35,031	12,958	143	249	16	2,060	0	0	0
Ector	121,199	73,006	48,193	14,732	202	215	77	3,445	30	29	0
<b>TOTALS</b>	<b>242,664</b>	<b>159,440</b>	<b>83,224</b>	<b>27,690</b>	<b>345</b>	<b>464</b>	<b>93</b>	<b>5,505</b>	<b>30</b>	<b>29</b>	<b>0</b>

<b>% of Total Population</b>	<b>46.71%</b>	<b>30.69%</b>	<b>16.02%</b>	<b>5.33%</b>	<b>0.07%</b>	<b>0.09%</b>	<b>0.02%</b>	<b>1.06%</b>	<b>0.01%</b>	<b>0.01%</b>	<b>0.00%</b>
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**Language Assistance Services**

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

Individuals with LEP are identified during the intake assessment processes present in each PBCC program. Posting of LEP services in areas accessible to new and enrolled clients in both English in Spanish which covers 99.82 % of the service population. Bilingual staff are available in the eight counties where PBCC provides services who speak proficient Spanish and can provide interpretation and translation services. When LEP is identified, accommodations are arranged immediately to prevent a delay in the client enrolling in services. As stated in PBCC Administrative Procedure No.1 AD073, for languages that PBCC does not have staff members proficient in speaking a 1-800 number is available and all staff are authorized to access these services.

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

The **Permian Basin Community Centers (PBCC)** 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>		<b>None at this time</b>		
<b>1.</b>				
<b>Lawsuits</b>				
<b>1.</b>				
<b>Complaints</b>				
<b>1.</b>				

## **Language Assistance Measures**

PBCC will strive to meet the following objectives:

1. PBCC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
  - a. Bilingual staff for persons who speak Spanish are available and will be provided within a reasonable time.
  - b. Language interpretation will be accessible for all other languages through a telephone interpretation system.

## **Staff Training**

The following training will be provided to all transportation staff:

1. PBCC Administrative Procedure No. 1 AD 073 will be provided to all staff by their supervisor.
2. Information on the Title VI Policy and LEP responsibilities will be provided to all transportation staff.
3. Documentation will be kept of all language assistance requests.
4. Transportation staff will be trained in proper procedure for handling a potential Title VI/LEP compliant.

**All transportation contractors and subcontractors performing work for PBCC will be required to follow the Title VI LEP guidelines.**

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

PBCC will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when new U.S. Census data is available, or when higher concentrations of LEP individuals are present in the PBCC service area. Updates will include the following:

1. How the needs of the LEP clients have been addressed.
2. Determination of the current LEP population in the service area.
3. Determination of any changes needed in the available translation services.
4. Determination of whether the PBCC financial resources are sufficient to address the changes in LEP needs.
5. Determination whether PBCC is complying with the goals of this LEP Plan.
6. Review of any Title VI complaints received and the Corrective Actions taken.
7. Maintain a Title VI complaint log, including LEP to identify reoccurring issues.

## **Dissemination of the PBCC LEP Plan**

1. Post signs at conspicuous and accessible locations notifying LEP clients of the LEP Plan and how to access language services.
2. Posting of the LEP Plan on the PBCC website.

## **Providing Assistance to and Monitoring Subrecipients**

1. The agency does not have sub-recipients.

## **TVI Equity Analysis for Facilities**

1. The agency has not constructed any facilities