



Title VI Plan

2020-2023

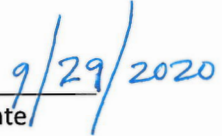
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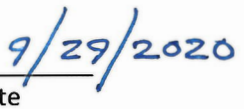
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Section 1: Title VI Plan Approval

Signature(s): 
Hartley Sappington, Board Chairman


Date


Andrea Richardson, Executive Director


Date

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Description of Organization and Service Provided

Bluebonnet Trails Community Services serves as a local authority and service provider for services in eight counties in central Texas. Services include Early Childhood Intervention, Intellectual and Developmental Disability, Autism, Family Health Care, Behavioral Health and Substance Abuse Services, Crisis Services, Criminal Justice Services and more.

Bluebonnet Trails Community Services assist individuals with their transportation needs by offering local transportation options that include transportation vouchers for local transport and door to door transport or fixed route transport via third party vendors and relief pool drivers, as appropriate. Transportation assistance is coordinated through our mobility manager and local case managers across all our counties: Bastrop, Burnet, Caldwell, Fayette, Gonzales, Guadalupe, Lee, Williamson.

Transportation Staff Includes:

- Mobility Manager
- Two part time relief pool drivers

Bluebonnet Trails Community Services does not currently use any of its fleet vehicles for revenue producing transportation.



Section 3: Title VI Policy Statement

Policy Statement

Bluebonnet Trails Community Services 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, and TxDOT PTN requirements as specified in Master Grant Agreement, and State Management Plan.

TITLE VI Notice to the Public

*See Attachments for Spanish Version

Bluebonnet Trails Community Services Notice to the Public is posted in the following locations: *(check all boxes for Required)*

Required:

- Agency website
- Public areas of the agency's office
- Reception desk
- Meeting rooms
- Notice at stations or stops and or inside transit vehicles

Optional:

- Rider Guides/Schedules
- Other _____

Section 4: Title VI Complaint Procedure

Bluebonnet Trails Community Services Title VI Complaint Procedure is made available in the following locations: *(check box for Required)*

Required:

Agency website: <https://bbtrails.org/get-help/>

Optional:

Public office

Reception areas

Meeting rooms

Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold

Other _____



Notifying the Public of Rights Under Title VI Bluebonnet Trails Community Services

- ✓ Bluebonnet Trails Community Services operates its' programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Bluebonnet Trails Community Services.
- ✓ For more information on Bluebonnet Trails' Rights Protection Office, obtain the procedures to file a complaint, or to file a complaint contact our Rights Protection Officer 512-244-8324 complaints@bbtrails.org; or contact the HHSC Civil Rights Office at 1-800-735-2982.
- ✓ A complaint may also be filed 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 our Rights Protection Officer 512-244-8324 or complaints@bbtrails.org
Si necesita información en otro idioma contacte 512-244-8324 or
complaints@bbtrails.org

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Bluebonnet Trails may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: <https://bbtrails.org/get-help/> or requested at: complaints@bbtrails.org

Bluebonnet Trails Community Services investigates complaints received no more than 180 days after the alleged incident. Bluebonnet Trails Community Services will process complaints that are complete.

Once the complaint is received, Bluebonnet Trails Community Services 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 acknowledgment letter informing her/him whether the complaint will be investigated by our office.

Bluebonnet Trails Community Services has 20 business days to investigate the complaint. If more information is needed to resolve the case, Bluebonnet Trails may contact the complainant.

The complainant has 3 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 3 business days, Bluebonnet Trails Community Services 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 5 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, please contact a Rights Protection Officer at 512-244-8324.

***See Attachments for Spanish Version**

Section 5: Title VI Complaint Form

Bluebonnet Trails' Title VI Complaint Procedure is made available in the following locations: (*check box for Required*)

Required:

Agency website: <https://bbtrails.org/get-help/>

Hard copy in the central office

Available in appropriate languages for LEP populations meeting the Safe Harbor Threshold

Other, _____

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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
Section III:				
I believe the discrimination I experienced was based on (check all that apply): [] Race [] Color [] National Origin Date of Alleged Discrimination (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

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

Bluebonnet Trails 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 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, Bluebonnet Trails 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

Below is a list of annual Public Events. Local events are posted in clinics in the event service area and all events are posted on social media which can be accessed via Facebook, Twitter and our website.

Month	Event Name	Description
January	First Episode Psychosis Presentation	Georgetown Behavioral Health Institute presentation on First Episode Psychosis
January	Mental Health Wellness Expo	Wellness expo
February	Destination...LIFE Transition Fair	Transition fair for those with disabilities
March	Regional Transition Fair	Round Rock ISD transition fair for students with disabilities
April	Health Screening Fair	Free event with Hepatitis C testing, blood pressure checks, glucose checks, eye checks, and chair massages. Hosted by Samaritan Health Ministries
April	National Prescription Drug Take Back Day	Williamson County drop-off of unused and expired medications
April	Medical Mission at Home	Day of free medical care at Seton Medical Center Williamson
June	Night at the Races	Event benefitting the Sandbox at Madeline's Place scholarship fund
June	Listening Session on Youth Substance Use & Recovery	Substance use event for youth, parents and allies of young adults with drug and alcohol problems
June	Out of the Darkness Walk	American Foundation for Suicide Prevention walk
June	Overdose Management Training	Life Step Council event to help recognize and respond to an opioid overdose

June	Back-to-School Event	Back-to-school event with supplies hosted by the Seguin Family Health Center and the Bluebonnet Trails Community Services Youth and Family program
July	First Episode Psychosis Presentation	Austin Oaks presentation on First Episode Psychosis
July	First Episode Psychosis Presentation	Georgetown Behavioral Health Institute presentation on First Episode Psychosis
August	Back-to-School Bash	School supplies and backpacks are given to children and youth in services in all 8 counties
August	Hutto ISD Back-to-School Rally	Back-to-school event with Hutto ISD
August	Overdose Awareness Day	Annual Williamson County Overdose Awareness Day Memorial Walk and Flower Release
August	First Episode Psychosis Presentation	Monthly Williamson County Child and Youth Taskforce
August	First Episode Psychosis Presentation	Rock Springs presentation on First Episode Psychosis
August	First Episode Psychosis Presentation	Blue Cross Blue Shield of Texas presentation on First Episode Psychosis
August	Special Health Care Needs Transition Age Youth and Parents: A Conversation	A conversation and virtual resource fair
September	First Episode Psychosis Presentation	Insight Behavioral Health presentation on First Episode Psychosis
September	First Episode Psychosis Presentation	Georgetown ISD presentation on First Episode Psychosis
September	Workforce Wednesdays Virtual Career Expo	Virtual career expo
September	First Episode Psychosis Presentation	Hutto ISD presentation on First Episode Psychosis
September	STAR Kids Enrollment	STAR Kids enrollment help event
September	First Episode Psychosis Presentation	Taylor ISD presentation on First Episode Psychosis
October	Out of the Darkness Walk	American Foundation for Suicide Prevention walk
October	Mental Health in Schools Conference	Annual mental health conference

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, Bluebonnet Trails 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.

Bluebonnet Trails 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, the **Bluebonnet Trails** 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. In addition to the number or proportion of LEP persons served Bluebonnet Trails will identify the following persons using 2010 census data and the electronic medical records of all individuals who are authorized for services across our eight-county service area:

- (a) How LEP persons interact with our 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
- (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 could include:

- (a) center attendance and program participation- referral for transportation assistance
- (b) crisis evaluation and referral for transportation assistance

- (c) Participation in public meetings or events; request for information and assistance
- (d) Consumer service interactions; feedback on current services and interactions

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Generally speaking, the more important the program for the individual, the more frequent the contact the individual has with Bluebonnet and the likelihood that language services will be needed will be significant factors in frequency of language assistance.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Due to the large number of individuals served a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low cost methods Bluebonnet Trails uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Section 9: Language Assistance Plan

Item #1 – Results of the Four Factor Analysis <i>(including a description of the LEP population(s) served)</i>
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Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered. (see FTA C 4702.31B, page Ch. III-7 for specific information needed for Factor 1.)

- Currently, Spanish speaking individuals are largest population of language assistance users. They constitute 2% of the population served (roughly 720 individuals annually) served

Factor 2: The frequency with which LEP persons come into contact with the program. (see FTA C 4702.31B, page Ch. III-7 for specific information needed for Factor 2.)

- Staff receives monthly reports on all translation services broken down by location and language and number of encounters.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. (see FTA C 4702.31B, page Ch. III-7 and Ch. III - 8 for specific information needed for Factor 3.)

- Bluebonnet Trails staff reviewed the nature and importance of the service and found that consistent and timely translation services are needed in all counties across all types of service.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.
(see FTA C 4702.31B, page Ch. III-7 and Ch. III - 8 for specific information needed for Factor 4.)

- Bluebonnet Trails reviewed its available resources for LEP outreach and found that Spanish is the most needed outreach secondary language.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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- Language Assisted Services are provided as need via phone translation, online video translation and in person translation

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

- Posters are clearly displayed in all clinic locations. Posters include written statements in American Sign language, Spanish, Arabic, Bengali, Burmese, Cantonese, Farsi, French, Hindi, Italian, Japanese, Korean, Mandarin, Napali, Polish, Portuguese, Punjabi, Russian, Romanian and Vietnamese. Any individual needing assistance can point to the language that best supports them.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

- Center Directors and Program managers receive feedback from office staff and case managers. Monthly statements that include all translation services and languages are available for review as needed. Any additional language requests can be requested through a third party translation service and available within 24 hours.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Trainings on translation services have been given to all Program Directors, Clinic Support staff and Case Managers.

Limited English Proficient (LEP) Resource Materials:

***“I Speak”* Language Identification Card**

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	ॢ ॣ । ॥ ० ॡ ॢ ॣ । ॥ ० ॡ	Hindi

LanguageLine Postings are in local clinic offices
 Bureau website **Note:** For additional languages visit the US Census
<http://www.lep.gov/ISpeakCards2004.pdf>

Section 10: Minority Representation Information

- We do not have transit related non-elected Board Members.

Efforts to Encourage Minority Participation

- There are no non-elected transit-related boards, committees, or councils.

Section 11: Providing Assistance to and Monitoring Sub recipients

Bluebonnet Trails does not provide funding to sub recipients.

**Title VI Program
Attachment A
Spanish Procedures**

PROPÓSITO: Establecer un procedimiento relativo al derecho de una persona a presentar una queja bajo el Título VI.

Bluebonnet Trails Servicios Comunitarios el procedimiento de reclamación del Título VI está disponible en los siguientes lugares:

Necesario:

Sitio web de la agencia: <https://bbtrails.org/get-help/>

Opcional:

Oficina pública

Zonas de recepción

Salas de reunión

Disponible en los idiomas apropiados para las poblaciones de LEP, cumpliendo con el Umbral de Puerto Seguro

Otro: _____

Cualquier persona que crea que ha sido discriminado por raza, color o origen nacional por Bluebonnet Trails Servicios Comunitarios puede presentar una queja de Título VI completando y presentando el Formulario de Queja de Título VI de la agencia. Los formularios de quejas pueden encontrarse en: <https://bbtrails.org/get-help/> or requested at: complaints@bbtrails.org.

Bluebonnet Trails Servicios Comunitarios investiga las quejas recibidas no más de 180 días después del presunto incidente. Bluebonnet Trails Servicios Comunitarios tramitará las quejas que están completos.

Una vez recibida la queja, Bluebonnet Trails Servicios Comunitarios la revisará para determinar si nuestra oficina tiene jurisdicción. (Se enviará una copia de cada denuncia de Título VI recibida al Coordinador de Transporte Público de TxDOT dentro de los diez (10) días calendario de haberla recibido). El demandante recibirá una carta de reconocimiento informándole si la queja será investigada por nuestra oficina.

Bluebonnet Trails Servicios Comunitarios tiene 20 días hábiles para investigar la queja. Si se necesita más información para resolver el caso, Bluebonnet Trails Servicios Comunitarios puede contactar al demandante.

El denunciante tiene 3 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 3 días hábiles, Bluebonnet Trails Servicios Comunitarios puede cerrar administrativamente el caso. Un caso puede ser administrativamente cerrado también si el demandante ya no desea seguir su caso.

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

- Una carta de cierre resume las alegaciones e indica que no hubo una violación del Título VI y que el caso será cerrado.
- Una carta de hallazgo (LOF) resume las alegaciones y las entrevistas con respecto al supuesto incidente, y explica si ocurrirá alguna acción disciplinaria, entrenamiento adicional del miembro del personal u otra acción.

Si el querellante desea apelar la decisión, tiene 5 días después de la fecha de la carta o del LOF para hacerlo.

Una persona también puede presentar una queja directamente con: Departamento de Transporte de Texas, a la atención de:

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.

- Si se necesita información en otro idioma, comuníquese con un Oficial de Protección de Derechos al 512-244-8324.

**Title VI Program
Attachment B
Spanish Public Notice**



Notificar al público de los derechos bajo Title VI Servicios de Comunidad de Bluebonnet Trails

- ✓ Servicios de Comunidad de Bluebonnet Trails opera sus ' programas y servicios sin importar raza, color y origen nacional según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Servicios de Comunidad de Bluebonnet Trails.
- ✓ Para mayor información sobre la oficina de protección de los derechos de Servicios de Comunidad de Bluebonnet Trails, obtener los procedimientos para presentar una queja, o para presentar a un contacto de queja nuestro oficial de protección de los derechos 512-244-8324 complaints@bbtrails.org; o comuníquese con la oficina de derechos civiles de la HHSC en 1-800-735-2982.
- ✓ También puede presentar una queja directamente con la:
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.
- ✓ Si necesita información en otro idioma, comuníquese con nuestro oficial de protección de los derechos 512-244-8324 or complaints@bbtrails.org.
- ✓ Si necesita información en otro idioma contacte 512-244-8324 or complaints@bbtrails.org.

**Title VI Program
Attachment C
Spanish Complaint Form**

Sección I					
Nombre:					
Dirección:					
Teléfono (Casa):			Teléfono (Trabajo):		
Dirección de correo electrónico:					
¿Requisitos accesibles?	Formato grande	Impresión		Cinta de audio	
	TDD			Otro	
Sección II					
¿Está presentando esta queja en su propio nombre?			Sí	No	
* Si contestó "sí" a esta pregunta, vaya a la Sección III.					
Si no es así, proporcione el nombre y la relación de la persona por la que se queja:					
Explique por qué ha presentado un tercero: _____					
Si usted está archivando en nombre de un tercero, ¿ha obtenido el permiso de la parte agraviada?			Sí	No	
Sección III					
Sección IV					
¿Ha presentado previamente una queja de Título VI con esta agencia?			Sí	No	
Sección V					
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal? Sí No					
En caso afirmativo, marque todas las que correspondan:					
Agencia Federal: _____					
Corte federal: _____			Agencia del estado: _____		
Tribunal del Estado: _____			Agencia local: _____		

Proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.
Nombre:
Título:
Agencia:
Dirección:
Número de teléfono:
Sección VI
El nombre de la queja de la agencia está en contra:
Persona de contacto:
Título:
Número de teléfono:

Usted puede adjuntar cualquier material escrito u otra información que considere pertinente a su queja.

Firma y fecha se requiere a continuación.

<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Firma	<hr style="border: 0; border-top: 1px solid black; margin-bottom: 5px;"/> Fecha
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Si se necesita información en otro idioma, comuníquese con un Oficial de Protección de Derechos al 512-244-8324.

Por favor envíe este formulario en persona a la dirección abajo, o envíe este formulario a:

Bluebonnet Trails Community Services
Office of Rights Protection/Complaints
1009 N. Georgetown St.
Round Rock, Texas 78664

complaints@bbtrails.org