

Title VI Plan
Panhandle Independent Living Center
(PILC)

Revised 1/16/2024

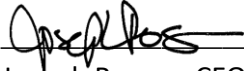
(TVI plan expires 3 years from date listed above)

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Section 1: Title VI Policy Statement

PILC, 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.



Joseph Rogers, CEO
Panhandle Independent Living Center

January 16, 2024

Date

Section 2: Description of Organization and Service Provided

PILC is a private nonprofit, non-residential organization dedicated to advancing full participation in society by people with disabilities ("consumers"). Established in 1988, PILC serves a 26-county catchment area, offering the core services of Advocacy, Peer Counseling, Life Skills Training and Information and Referral. Other significant services include employment guidance, housing/relocation assistance, youth transition, transit travel training and an array of support groups and Life Skills classes.

PILC is guided by a Board of Directors that provides oversight to a twelve-member staff at one accessible location. PILC serves approximately 275 active consumers of all ages annually. Consumers comprise a cross-disability population. Services are provided at no cost and without regard to race, color, or national origin. PILC's two, primary resources include continuation funding from the U.S. Department of Health and Human Services and the Texas of Health and Human Services Commission. Other services include a third-party contract with City of Amarillo and Panhandle Community Services. This demand response service provides transit to the elderly and disabled within the urbanized area of Amarillo.

PILC does not provide transit services directly nor does PILC own transit vehicles. Urbanized service is limited to Randall and Potter Counties.

Section 3: Notice to the Public (English & Spanish)

TITLE VI Notice to the Public (English)

If information is needed in another language, contact 806-374-1400.

ü Si necesita información en otro idioma, Contacta con 806-374-1400.

PILC's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

PILC

- ✓ PILC 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 PILC.
- ✓ For more information on the PILC's civil rights program, the procedures to file a complaint or to file a complaint contact 806-374-1400, website at: <http://www.pilc.org/Transportation>; email pware@pilc.org or visit our administrative office at 417 West 10th Avenue, Amarillo, Texas 79101.
- ✓ 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 806-374-1400.
- ✓ ü Si necesita información en otro idioma, Contacta con 806-374-1400.

PILC's Notice to the Public is posted in the following locations: *(check all that apply)*

- Agency website: <http://www.pilc.org/Transportation>
- Public office
- Reception areas
- Meeting rooms
- Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- Other, _____

Titulo VI Aviso Al Publico (Español)

ü Si necesita información en otro idioma, Contacta con 806-374-1400.

If information is needed in another language, contact 806-374-1400.

PILC de aviso al público es el siguiente:

Notificar al público de los derechos bajo título VI

PILC

- ✓ PILC 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 PILC).
- ✓ ü Para más información sobre el programa derechos civiles el PILC de, los procedimientos para presentar una queja o presentar una queja con 806-374-1400, sitio web en: <http://www.pilc.org/Transportation> correo electrónico pware@pilc.org o visite nuestra oficina administrativa en 417 oeste 10th Avenue, Amarillo, Texas 79101.
- ✓ ü También puede presentar una queja directamente con la:

Departamento de transporte de Texas, Att: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, o

Federal de tránsito administración, oficina de derechos civiles, atención: título de Coordinador del programa VI, edificio este, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ ü Si necesita información en otro idioma, Contacta con 806-374-1400.
- ✓ If information is needed in another language, contact 806-374-1400.

PILC de aviso al público se encuentra en las siguientes localidades: (*cheque todos que aplican*)

- Sitio web de la Agencia: <http://www.pilc.org/Transportation>
- Cargo público
- Recepciones
- Salas
- Dentro de vehículos
- Líder guías/horarios
- Transporte refugios y estaciones
- Otero, _____

Section 4: Title VI Complaint Procedure (English & Spanish)

Title VI Complaint Procedure (English)

ü Si necesita información en otro idioma, Contacta con 806-374-1400.

If information is needed in another language, contact 806-374-1400.

PILC's Title VI Form and Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website: <http://www.pilc.org/Transportation>
 - Public office
 - Reception areas
 - Meeting rooms
 - Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold
 - Other, _____
-

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the PILC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: <http://www.pilc.org/Transportation> or at the main office at 417 West 10th Avenue, Amarillo, Texas 79101.

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

Once the complaint is received, PILC 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.

PILC has 10 days to investigate the complaint. If more information is needed to resolve the case, PILC may contact the complainant.

The complainant has 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 10 business days, PILC can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the: Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, or Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact 806-374-1400. Si necesita información en otro idioma, contacte con 806-374-1400.

Título VI Procedimiento de Denuncia (Español)

ü Si necesita información en otro idioma, Contacta con 806-374-1400.

If information is needed in another language, contact 806-374-1400.

PILC del título VI forma y procedimiento de quejas está a su disposición en los siguientes lugares: *(cheque todos que aplican)*

- Página Web: <http://www.pilc.org/Transportation>
- Oficina pública
- Áreas de recepción
- Salas
- Disponible en idiomas apropiados para las poblaciones de LEP, conocer el umbral de puerto seguro
- Otero, _____

Cualquier persona que cree que él o ella ha sido discriminado sobre la base de raza, color u origen nacional por el PILC puede presentar una queja de título VI rellenando y enviando el formulario de denuncia de la Agencia título VI. Formularios de queja pueden encontrarse en <http://www.pilc.org/Transportation> o en la oficina principal en 417 oeste 10th Avente, Amarillo, Texas 79101.

PILC investiga denuncias recibidas no más de 180 días después del presunto incidente. PILC procesará las denuncias que se completa.

Una vez recibida la queja, PILC lo revisaremos para determinar si nuestra oficina tiene jurisdicción. (Una copia de cada título VI recibidas se remitirá al Coordinador de transporte público de TxDOT dentro de diez 10 días calendario del recibo.) La organización querellante recibirán una carta de reconocimiento le informa si la denuncia será investigada por nuestra oficina.

PILC tiene 10 días para investigar la denuncia. Si necesita más información para resolver el caso, PILC ponerse en contacto con el denunciante.

El demandante tiene 10 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 la organización querellante o no recibe la información adicional dentro de 10 días hábiles, PILC administrativamente pueden cerrar el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir su caso.

Después el investigador revisa la queja, él/ella emitirá uno de 2 dos letras al demandante: una carta de cierre o una carta de encontrar (LOF).

- ✓ Una carta de cierre resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado.
- ✓ Una carta de encontrar (LOF) resume las denuncias y las entrevistas en relación con el incidente y explica si cualquier acción disciplinaria, formación complementaria de lo miembro del personal, u otra acción ocurrirá.

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

Una persona también puede presentar una queja directamente con el: Departamento de transporte de Texas, Att: TxDOT-PTN, 125 E. 11 Street, Austin, TX 78701-2483, o administración de tránsito Federal, oficina de derechos civiles, atención: Coordinador del programa Título VI, edificio Oriente, piso 5 º-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Si necesita información en otro idioma, contacte con 806-374-1400.

If information is needed in another language, contact 806-374-1400.

Section 5: Title VI Complaint Form (English & Spanish)

Title VI Complaint Form (English)

If information is needed in another language, contact 806-374-1400.

Si necesita información en otro idioma, contacte con 806-374-1400 o consulte la página 11 de este documento.

PILC's Title VI Complaint Form and Procedure is made available in the following locations: (*check all that apply*)

- Agency website: <http://www.pilc.org/Transportation>
- 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 Requirements?	Format	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 IV					
Have you previously filed a Title VI complaint with this agency?			Yes	No	

Título VI Forma (Español)

PILC del título VI forma y procedimiento de quejas está a su disposición en los siguientes lugares:
(*cheque todos que aplican*)

If information is needed in another language, contact 806-374-1400.

- Página web: <http://www.pilc.org/Transportation>
- Copia en la oficina central de
- Disponible en los idiomas apropiados para las poblaciones de LEP, conocer el umbral de puerto seguro.
- Otero, _____

Sección I:				
Nombre:				
Dirección:				
Teléfono (casa):			Teléfono (trabajo):	
Dirección de correo electrónico:				
¿Requisitos de formato accesible?	Letra de gran tamaño		Cinta de audio	
	TDD		Otros	
Sección II:				
¿Está presentando esta denuncia en su nombre?			Sí *	No
* Si contestaste "sí" a esta pregunta, vaya a la sección III.				
Si no, por favor suministrar el nombre y la relación de la persona para quien se quejan:				
Por favor explique por qué han presentado por un tercero:				
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero.			Sí	No
Sección III:				
Creo que la discriminación que viví fue basada en (marqué todos que aplican): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> origen nacional Fecha de la supuesta discriminación (mes, día, año): _____ Explicar lo más claramente posible lo que sucedió y por qué usted cree que fueron discriminados. Describir a todas las personas que participaron. Incluir el nombre e información de contacto de la persona que discriminó (si se conoce) así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, utilice el dorso de este formulario.				
Sección IV				
¿Usted ha presentado anteriormente una queja del título VI con esta agencia?			Sí	No

Sección V
¿Se presentó esta queja con cualquier otro Federal, estado o agencia local o con cualquier Tribunal Federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No En caso afirmativo, marque todas las que aplican: Agencia Federal para el <input type="checkbox"/> : _____ Tribunal Federal de <input type="checkbox"/> <input type="checkbox"/> la agencia estatal _____ Tribunal del estado <input type="checkbox"/> <input type="checkbox"/> Local Agencia _____
Sírvanse facilitar información sobre una persona de contacto en la Agencia/tribunal donde se presentó la queja.
Nombre:
Título:
Agencia:
Dirección:
Teléfono:
Sección VI
Nombre de denuncia de la agencia está en contra de:
Persona de contacto:
Título:
Número de teléfono:

Usted puede conectar cualquier material escrito u otra información que crees que es relevante a su queja.

Firma y fecha especificadas a continuación

Firma Fecha

Por favor enviar este formulario personalmente en la siguiente dirección, o enviar por correo este formulario a:

PILC
Avenida 417 oeste 10
Amarillo, Texas 79101

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

PILC 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.*

Program Year 2023 through 2026

<u>Action</u>	<u>Date</u>	<u>Summary</u>	<u>Status</u>	<u>Action Taken</u>
Investigation	N/A	N/A	N/A	N/A
Complaints	N/A	N/A	N/A	N/A
Lawsuits	N/A	N/A	N/A	N/A

PILC will maintain a log of all investigations, lawsuits, and/or complaints naming PILC, in accordance with the guidelines specified by FTA C4702.1B. A copy of the Complaint form that will be used to track such complaints is available to track complaints is available on page 10-13 of this document. Each file listed on the log shall itself contain the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by PILC in response, or final findings related to, the investigation, lawsuit, or complaint. PILC will notify TxDOT promptly of all transit related Title VI complaints, investigations, and lawsuits.

The Executive Director or designated representative is responsible for all recordkeeping and reporting requirements under this policy and procedure.

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation but limited to available resources, PILC will attempt to 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

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

- PILC, through its annual Consumer Needs Assessment Survey, offers consumers opportunities to evaluate PILC services and programs. This process also enables full participation in the development of programs, activities and services provided to the disability community and general public. Additionally, the survey seeks to evaluate the delivery of services and employee responsiveness to consumer needs relative to Title VI requirements, the Americans with Disabilities Act, and the Rehabilitation Act of 1973, as amended.
- PILC employees participate in the community-based Panhandle Regional Organization to Maximize Public Transportation (PROMPT), a public forum administered by the Panhandle Regional Planning Commission. The PROMPT Advisory Board develops coordinated regional transportation plans that require public comment gathered during publicized hearings conducted in the 26-county catchment area.
- As members of PROMPT, PILC assists in developing the region's Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan), which requires that projects selected for funding under the Elderly and Individuals with Disabilities Program (Section 5310) be derived from a coordinated plan.
- PILC maintains a Travel Training program as an element of the Coordinated Plan. PILC employees provide one-on-one field training to fixed route students to promote accessibility and awareness of passenger guidelines.
- PILC conducts outreach to area public schools, senior centers, health fairs and employment forums. These outreach activities include distribution of materials that promote equal access to PILC services and programs.
- One PILC employee serves on the Advisory Commission for People with Disabilities (ACPD), an appointed counsel of the Amarillo City Commission. The ACPD is coordinated by Amarillo City Transit and responds to issues relating to public access to municipal services, programs, and facilities.

- As an agency that serves people with disabilities, applicants to the Center for services read, or have read to them, the Consumer Grievance Procedure at the time of application. All consumers indicate awareness and understanding of the Consumer Grievance Procedures by signing the Consumer Grievance Procedure form prior to receiving services from the Center.

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

Enter specific Public Participation activities in the table below.

Event Date	PILC Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
Feb. 8, 2020	Chelsie & Isabel	Community Health fair "Becoming Agents of Change"	Added to attendance list for conference/health fair.	Spoke with public that attended the health fair
November 8, 2021	Chelsie & Isabel	COVID-19 Vaccine Clinic	Posted Flyers in service area & City of Amarillo	Spoke with public that attended the vaccine clinic.
December 6, 2021	Isabel & Chelsie	COVID-19 Vaccine Clinic 2nd shot	Posted Flyers in service area & City of Amarillo	Spoke with public that attended the vaccine clinic.
March 7, 2022	Isabel & Chelsie	Trip Planning Training Fixed Route	Social Media, Posted Flyers & Announced to allied agencies	Assisted with reading Route Maps & Time Management Planning
March 14, 2022	Isabel & Chelsie	Trip Planning Training Fixed Route	Social Media, Posted Flyers & Announced to allied agencies	Training of Route stops and transfer procedures.
March 21, 2022	Isabel & Chelsie	Ride Fixed Route to popular locations	Social Media, Posted Flyers & Announced to allied agencies	Training of Fixed Route ensuring that individuals can navigate the fixed route system.
April 4, 2022	Isabel & Chelsie	City Bus Code of Conduct presentation	Social Media, Posted Flyers & Announced to allied agencies	Went of the Code of Conduct with individuals interested in using public transportation.
May 2, 2022	Isabel & Chelsie	City Bus Etiquette & COVID precautions	Social Media, Posted Flyers & Announced to allied agencies	Covered the current requirements for COVID precautions while using public transportation.
October 3, 2022	Isabel & Chelsie	Fixed Route Training Polling locations in Amarillo	Social Media, Posted Flyers & Announced to allied agencies	Training of route maps for finding the correct route from current location to polling location of choice
March 14, 2023	Isabel & Chelsie	Superior Hygiene Closet	Social Media, Posted Flyers & Announced to allied agencies	Provided information of fixed routes to individuals attending.
July 8, 2023	Chelsie, Victoria, Carmen & Georgianna	Route 66 abilities conference Presentation and Health Fair Booth	Added to attendance list for conference/health fair.	Spoke with public that attended the health fair
July 26, 2023	Chelsie &	ADA Celebration	Press Release, Social Media, Posted Flyers & Announced to allied agencies	Spoke with the public that attended the ADA Celebration.
September 18, 2023	Chelsie &	Amarillo Flu Immunization Clinic	Social Media, Posted Flyers & Announced to allied agencies	Spoke with public that attended the Amarillo Flu Immunization Clinic
October 17, 2023	Chelsie, Victoria, & Amber	Independence Village Flu Immunization Clinic	Posted Flyers for residence of Independence Village	Provided Information of public transportation services & GAP Services to attendees
2023-2026 Will attend Future Events	Staff	Health Fairs, Presentations & Resource Events	Post Flyers, Mailout of Flyers, Social Media Post & Announce to Allied Agencies	Provide information of public transportation, GAP Services to the public and allied agencies within service area.

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, PILC 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.

PILC has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined 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.

PILC's 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 PILC 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. PILC staff reviewed the 2020 U.S. Census Report (Table 1) and determined that 244,987 persons in PILC service area [20.8%] speak a language other than English. Of those 50,918 persons, 18,710 have Limited English proficiency; that is, they speak English "less than very well". This is .08% of the overall population in the service area. In PILC service area, breakdown of those that speak languages other than English, 39,231 speak Spanish, 2,277 speak Indo-European, 6,305 speak Asian and Pacific Island and 3,105 speak other languages. No individual Asian or Pacific Islander language exceeds 12,249 or 5%, whichever is less, of the total population of persons eligible to be served or likely affected or encountered.

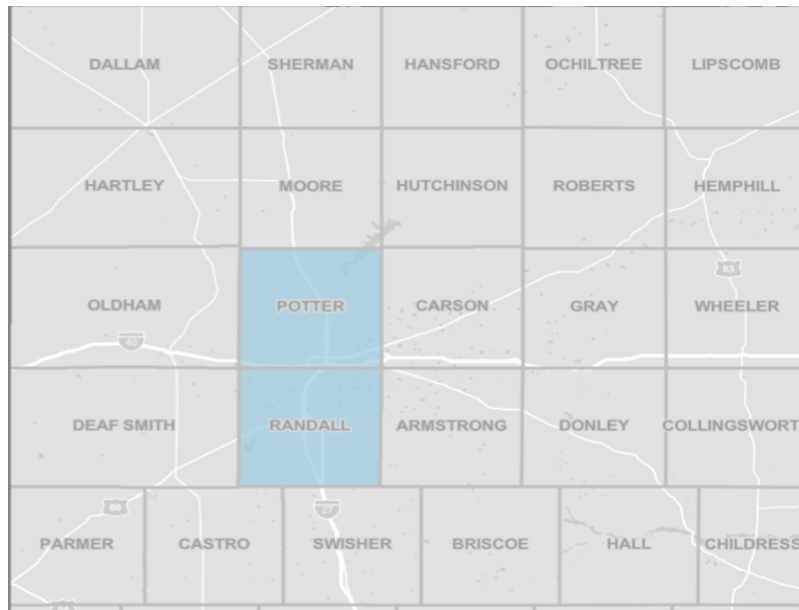


Table 1 U.S. 2020 Census Map

Factor 2: The frequency with which LEP persons come into contact with the program.

PILC’s staff reviewed the frequency with which the board/council, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, PILC has had one request for interpreters and no requests for translated program documents. The board/council, 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. The importance of the programs and services provided by the PILC cannot be understated. PILC manages the GAP Program, which provides funding to Amarillo City Transit. However, PILC does not provide direct transportation services. PILC also works with Amarillo City Transit to help consumers learn to navigate fixed route bus systems and provide transportation to seniors and people with disabilities during limited hours. While PILC does not provide transportation services directly, PILC is committed to ensuring that all segments of the population, including LEP persons, are involved or at the very least have the opportunity to be involved in the transportation planning process and benefit from programs such as GAP Program Etc.

There is no large geographic concentration of any type of LEP individuals in the service area for Panhandle Independent Living Center. The overwhelming majority of the population, 76%, speaks only English. As a result, there is little social, service, professional and leadership organizations within Panhandle Independent Living Center's service area that focus on outreach to LEP individuals. PILC board/council, 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/Council meetings.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. PILC 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 would be provided through a telephone interpreter line for which the PILC would pay a fee.

Language Assistance

Staff reviewed the 2020 U.S. Census Report and determined that 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 LEP person and may be entitled to language assistance with respect to PILC 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.

How PILC staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All PILC staff are provided with "I-Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All PILC staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When PILC holds a meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

PILC will strive to meet the following objectives:

1. PILC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. PILC staff will ensure that resources will be available to accommodate LEP persons including language interpretation that can be accessed through a telephone interpretation service.

Staff Training

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Staff is trained to enlist volunteer interpreters if needed, but to avoid engaging the client's friends, family members or underage interpreters for interpretive services.
- Use of the "I-Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

Translation of Documents

PILC weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated. At this time, we have translated an introductory passage so that LEP individuals know how to request translated documents in their native language

Due to the very small local LEP population, PILC does not have a formal outreach procedure in place, as of 2020 census. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, PILC will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is

expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Dissemination of PILC LEP Plan

PILC will post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services. When PILC sponsors an informal meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.

Monitoring and Updating the LEP Plan

PILC will review the LEP Plan as part of PTN's Annual Certifications and Assurances self-certification procedure per 49 U.S.C. chapter 53, when new U.S. Census data is available, or when higher concentrations of LEP individuals are present in PILC service area.

The review, if necessary, will include:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether PILC financial resources are sufficient to fund language assistance resources needed.
- Determine whether PILC fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

Relevant data will be retained to support agency conclusions.

“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 vaø oâ naøÿ neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

PILC's Board of Directors meets six times annually with meetings open to the public. Regular meetings occur at 5:00pm the third Monday in January, March, May, July, September, and November. The Board's annual meeting is conducted in September.

A. Minority Representation Table

PILC does not collect information Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	%	%	%	%	%	%
Name of committee 1	%	%	%	%	%	%

B. Efforts to Encourage Minority Participation

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

Section 10: Providing Assistance to and Monitoring Subrecipients

PILC will provide assistance to its sub recipients. PILC will obtain assistance from PTN including, but not limited to rules, regulations, forms, tools, reports, and provide on-site training if requested.

Section 11: Title VI Plan Revision Log

Date	Section Revised	Summary of Revisions
9/29/23	2023-2026 Update: All	Update per 2020 Census