

Transit Program Title VI Report Update for Laredo Transit Management Inc.

**May
2025**

CITY OF LAREDO, TEXAS

RECIPIENT I.D. 2069

Submitted May 2025

Contact Name: Robert J. Garza, General Manager



Table of Contents

1. INTRODUCTION	3
2. TITLE VI ASSURANCES	4
3. TITLE VI PROGRAM GENERAL REQUIREMENTS.....	4
3.1. Copy of the LTMI’s Title VI Notice	6
3.2. Procedure and Form for filing complaints	6
3.3. Title VI Complaint Form.....	8
3.4. Public Transportation related Title VI Investigations, Complaints, or Lawsuits Public Participation Plan.....	12
3.5. Boards and Committees	13
3.6. Language Assistance Plan	17
3.7. Summary of compliance with Title VI by LTMI and its Subrecipient(s).....	33
3.8. Title VI Equity Analysis for Construction of Facilities.....	51
4. TITLE VI REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS	54
4.1. System-Wide Service Standards and Policies.....	54
4.2. American Fact Finder Language Spoken in Laredo	56

Attachments

A. LTMI 5310 Oversight Procedures.....	36
B. Mass Transit Board Resolution Approving of the 2022 Title VI Report	52

1.INTRODUCTION

History/Demographics

Laredo is the county seat of Webb County, Texas, United States, located on the north bank of the Rio Grande in South Texas, across from Nuevo Laredo, Tamaulipas, Mexico. According to the 2020 Census, the city population was 265,761 making it the 10th largest city in Texas and the 81st largest city in the United States. Laredo's economy is based on international trade with Mexico. Most major transportation companies have a facility in Laredo. Laredo's location along the southern end of I-35 close to the manufacturers in North Mexico promotes its vital role in trade between the United States and Mexico.

Laredo has the distinction of flying seven flags (the Flag of the Republic of the Rio Grande in addition to the Six Flags of Texas). Founded in 1755, Laredo grew from a villa to the capital of the brief Republic of the Rio Grande to the largest inland port on the United States-Mexican Border. Today, it has four international bridges and one railway bridge. Laredo's weather is semi-arid during the summer and mild during the winter.

Areas of Service – Laredo Transit System

Mass transit

El Metro is the mass transit system that operates in Laredo with 24 fixed routes and Paratransit services with approximately 1.9 million passengers per year. El Metro works with a fleet of over 46 fixed-route buses, 1 trolley, and 16 Paratransit/El Lift vans. El Metro hub is located in downtown Laredo at El Metro Transit Center. The Center also houses Greyhound Bus Lines and provides fee-based daily parking for downtown shoppers and workers.

Rural transit

Rural transportation is provided by the Webb County, operated "El Aguila Rural Transportation" (the Eagle) bus services. El Aguila provides fixed daily routes from Rural Webb County (Bruni, El Cenizo, Miranda City, Oilton, and Rio Bravo) to the downtown Laredo Transit Center.



2. TITLE VI ASSURANCES

The annual Title VI Certification and Assurances were provided to the FTA via an update in the FTA's web-based Transit Award Management System (TrAMS). The LTMI certifications and assurances, signed by City Attorney, were recently updated on 3/12/24. A signed copy of the certifications and assurances are attached in Appendix C.

The Grantee hereby gives the following specific assurances:

- That LTMI complies with all applicable Federal statutes and regulations to carry out any FTA-funded project.
- That LTMI, under a continuing obligation, complies with the terms and conditions of the FTA Grant Agreement or Cooperative Agreement for its Project, including the FTA Master Agreement incorporated by reference and made part of the latest amendment to the Grant Agreement or Cooperative Agreement.
- That LTMI recognizes that Federal laws and regulations may be modified from time to time and those modifications may affect Project implementation.
- That LTMI understands that Presidential executive orders and Federal guidance, including Federal policies and program guidance, may be issued concerning matters affecting Applicant or its Project.
- That LTMI agrees that the most recent Federal laws, regulations, and guidance will apply to its Project unless FTA determines otherwise in writing.
- That LTMI, in light of recent FTA legislation applicable to FTA and except as FTA determines otherwise in writing, agrees that requirements for FTA programs may vary depending on the fiscal year for which the funding for those programs was appropriated.

LTMI requires that all Section 5310 subrecipients submit all appropriate FTA certifications and assurances to LTMI prior to funding agreement execution and annually thereafter when FTA publishes the annual list of certifications and assurances. LTMI will not execute any funding agreements prior to having received these items from the selected subrecipients. LTMI, within its administration, planning, and technical assistance capacity, also will comply with all appropriate certifications and assurances for FTA assistance programs and will submit this information to the FTA as required.

3. TITLE VI PROGRAM GENERAL REQUIREMENTS

3.1 Title VI Notice to the Public including a list of locations where the notice is posted

Background

This Title VI notice to the public is posted at the El Metro Transit Center, 1301 Farragut Street, Laredo, Texas, 78040. All El Metro routes start and end each trip at this location. The notice is also posted at the El Metro Operating and Maintenance Facility, 401 Scott Street, Laredo, Texas, 78040 plus included in the following:

- All LTMI Transit Vehicles
- LTMI website, www.elmetrotransit.com
- Laredo Morning Times (advertised annually)
- El Manana. A Spanish-language newspaper was published in the border city of Nuevo Laredo, Tamaulipas, Mexico. El Manana has high readership and circulation in Laredo, Texas. (advertised annually)

Sample Title VI Notification to the Public

Notifying the Public of Rights under Title VI

THE CITY OF LAREDO

Transit System (El Metro)

- The City of Laredo, (El Metro), 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 the City of Laredo Transit System (El Metro).
- For more information on the City of Laredo's El Metro Civil Rights Program, and the procedures to file a complaint, contact 956-795-2288, Ext. 284, or visit our administrative office at 1301 Farragut St., Laredo, Texas 78040.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the 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 956-795-2288, Ext. 284.

3.2 Title VI Complaint Procedure, City of Laredo Transit System (El Metro)

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Laredo Transit System (hereinafter referred to as “El Metro” Or “LTM”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. El Metro investigates complaints received no more than 180 days after the alleged incident. El Metro will process complaints that are complete and signed.

Once the complaint is received, El Metro will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

El Metro has 30 days to investigate the complaint. If more information is needed to resolve the case, El Metro may contact the complainant. The complainant has 30 days from the date of the letter to send the 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 15 days, El Metro can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A 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 30 days after the date of the letter or the LOF to do so.

If information is needed in another language, contact us at 956-795-2288 extension 284. A person may also file a complaint directly with the Federal Transit Administration, At the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

3.3 Title VI Complaint Form

Section I					
Name:					
Address:					
Telephone (Home):		Telephone (Work)			
Electronic Mail 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):					
<input type="checkbox"/>	Race	<input type="checkbox"/>	Color	<input type="checkbox"/>	National Origin
Date of Alleged Discrimination (Month, Day, Year): _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Section IV

Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V

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

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

Signature and Date required below

Signature

Date

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

El Metro General Manager

1301 Farragut St., 3rd Floor West, Laredo, Texas 78040

LAREDO TRANSIT MANAGEMENT INC.
TITULO VI FORMA DE QUEJA

Sección I				
Nombre:				
Domicilio:				
Teléfono (Casa):			Teléfono (Trabajo):	
Dirección de correo electrónico:				
Requerimientos de formato accesible?	Texto Grande		Audio	
	TDD		Otro	
Sección II				
¿Presenta esta demanda por su cuenta?			Sí*	No
*Si su respuesta a esta pregunta fue "sí", diríjase a la Sección III.				
Si su respuesta es "no", por favor indique el nombre y la relación de la persona en cuya representación presenta la demanda:				
Por favor explique porqué presenta una demanda en nombre de un tercero:				
Por favor confirme que obtuvo el permiso de la parte agraviada si usted presenta esta demanda en nombre de un tercero.			Sí*	No
Sección III				
Considero que la discriminación que experimenté se basó en (marque las que correspondan):				
<input type="checkbox"/>	Raza	<input type="checkbox"/>	Color	<input type="checkbox"/> Origen nacional
Fecha de la discriminación alegada (Mes, día, año): _____				
<p>Explique con la mayor claridad posible qué ocurrió y porqué considera que fue discriminado/a. Describa todas las personas involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo/la discriminaron (si lo sabe) como así también los nombres e información de contacto de cualquier testigo. Si necesita más espacio, por favor use la parte posterior de este formulario.</p> <hr/> <hr/> <hr/>				

Sección IV

¿Ya presentó alguna demanda sobre el Título IV con esta agencia?	Sí	No
--	----	----

Sección V

¿Presentó esta demanda ante cualquier otra agencia local, Federal o Estatal o ante cualquier otro tribunal Federal o Estatal?

☐ Sí ☐ No

Si respondió "sí", marque lo que corresponda:

☐ Agencia Federal: _____

☐ Tribuna Federal: _____ ☐ Agencia Estatal: _____

☐ Tribuna Estatal: _____ ☐ Agencia local: _____

Nombre:
Título/Cargo:
Domicilio:
Teléfono:

Sección VI

Nombre de la agencia a la que va dirigida la demanda:
Persona de contacto:
Título/Cargo:
Teléfono:

Puede adjuntar cualquier material escrito u otra información que considere relevante a su Demanda.

A continuación debe colocar su firma y fecha:

Firma

Fecha

Por favor presente este formulario personalmente en la dirección a continuación, o envíelo por correo a:
El Metro General Manager
1301 Farragut St., 3rd Floor West
Laredo, Texas 78040

3.4 LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS PUBLIC PARTICIPATION PLAN

Background

El Metro prepares and maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and,
- Complaints naming the recipient.

This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and, actions taken by the recipient in response or final readings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint; race, color, or natural origin)	Status	Action(s) Taken
Investigations				
1.	None			
2.				
Lawsuits				
1.	None			
2.				
Complaints				
1.	None			

There have not been any Title VI Investigations, Complaints, or Lawsuits relation to LTMI's activities and programs.

Public Participation Plan

1. Purpose

The purpose of this Public Participation Plan is to establish background and procedures that all and encourage and monitor the participation of all citizens in the City of Laredo including but not limited to low-income and minority individuals and those with limited English proficiency. The intent of the effort is to take reasonable actions throughout the planning process to provide opportunities for historically underserved populations to participate in accordance with Circular FTA C 4702.B and as guidance Circular 4703.1 Environmental Justice Policy Guidance for Federal Transit Administration Recipients.

2. General Public Outreach and Ongoing Involvement Activities include:

3.5 BOARDS AND COMMITTEES

Laredo Transit Management Inc. (LTMI) is a Municipal Transit Department as defined under section 453 of the Texas Transportation Code. Section 453 enables Texas municipalities with over 50,000 populations to develop transit departments with sales and use tax-levying ability to fund the operating and capital needs of the transit system. A sales tax election was held in the early 1990s where the voters of the City of Laredo voted to levy a ¼-cent sale and use tax to support the operation of the transit system.

The City Council of Laredo serves as the Mass Transit Board for LTMI. The Council sitting as the Mass Transit Board is composed of the Laredo Mayor elected at large and eight (8) City Council members elected from individual districts. The Mayor and Council all serve four-year terms and are elected in staggered terms with elections in even-numbered years. The Council meets twice each month. When there is transit business, the Council convenes as the Mass Transit Board as part of the regular Council meeting agenda. Under Section 453, the Board is provided broad policy powers with the ability to issue revenue-raising bonds, enter into contracts, levy fares, approve route changes, and approve the budget and other matters necessary for the management and operation of the transit system.

The City Council and the Mass Transit Board are supported and advised by a number of

Committees and Subcommittees. In most cases, the adopted LTMI Policies and Procedures define the entities or agencies to be represented, leaving the membership to be designated by the specified entities and agencies.

There is one committee whose membership is at the discretion of the Board and that is the Paratransit Advisory Committee (PAC). The PAC assist and advises the LTMI management on the paratransit program and transportation services for the elderly and disabled.

Mayor and City Council have a number of public outreach efforts including public hearings at Council meetings and workshops and other events in individual Council districts. The City of Laredo is a Council-Manager form of government with an organizationally strong City Manager that is the administrative head of the City. Public outreach efforts in the City Manager's office include the employment of a Public Information Officer who works with the Mayor/City Council and other city departments including El Metro.

The City of Laredo currently contracts with Hendrickson Transportation Group (HTG), a third-party contractor to operate the system. HTG employs a full time General Manager approved by the City and two (2) Assistant General Managers. These individuals are responsible for day-to-day management of the transit system and working with City officials for public outreach activities specific the transit system and FTA requirements. The General Manager reports directly to an Assistant City Manager and in a number of respects, functions like a City department head.

Under its contract with the City of Laredo, HTG is also responsible for creating Laredo Transit Management, Inc., a Texas non-profit corporation, set up to employ the transit staff including front line management, bus operators and maintenance personnel.

Public Comment on Fare and Service Changes

This document included in this public participation section, governs how public input will be obtained when fare and service changes are being considered. The document references the need for Title VI and LEP considerations in the specific planning processes necessary when considering fare and service changes. The policy indicates that the transit staff will conduct public meetings held inaccessible locations in areas where citizens impacted by proposed changes in service or fare reside and/or work. The General Manager and his/her staff are responsible for summarizing the input and making recommendations to the City Manager, Mayor, and Council. All City Council meetings and their committee meetings are publicly advertised are open for public comment and are held at the Laredo City Hall near the main transfer station of the El Metro system in downtown Laredo.

Participation with MPO

El Metro staff cooperates with the Laredo Urban Transportation Study (LUTS), which includes the area's Laredo Webb County Area Metropolitan Planning Organization (MPO). Since the last Title VI Update in 2011, LUTS retained a consultant to complete an ADA Paratransit Plan Update. This project-evaluated compliance with the ADA requirements, reviewed the overall management, and operating structure of the paratransit operation, the eligibility determination process as well as policies and procedures.

The consultants held a well-attended public meeting to receive public input. Members of the Paratransit Advisory Committee (PAC) attended the meeting to both observe and participate in the process. A Spanish language translator who practices in the local court system was available and assisted with the communication from the consultant to the public a high portion of which could only speak and understand Spanish. On April 2013, the ADA Paratransit Plan Update was completed and presented to the MPO Policy Committee and the Laredo Mayor and City Council in their role as the Mass Transit Board. Both the MPO Policy Committee and the City Council meet in public session and El Metro staff made additional efforts to communicate the agendas, time, and place that the meetings held to transit users including minorities, low-income individuals, and the LEP community.

In 2021, a Comprehensive Operational Analysis (COA) was initiated and funded by Laredo Webb County Area Metropolitan Planning Organization in coordination with the Laredo Transit Management, Inc. (LTMI). The participants from the MPO, LTMI, and other stakeholder groups included:

- City of Laredo city management and department directors
- Texas Department of Transportation
- El Aguila Rural Transportation
- South Texas Development Council
- Councilors and representatives
- Kansas City Southern
- First Transit
- Laredo Independent School District
- United Independent School District
- Texas A&M International
- Laredo Community College

The prime consultant for the COA study was Stantec Consulting Services Inc. (Stantec), a global architecture and design consulting firm with over 22,000 employees across the globe and six office locations across Texas. Stantec held stakeholder and public engagement meetings such as advocacy groups, active transportation and community development organizations, representatives from colleges, public officials the other leaders of the community.

Current and Future Outreach Efforts

Public Information Meetings are intended to provide an opportunity for the public to submit comments and learn more about the LTM's program of projects, plans, and services. Members of the public are able to provide input and feedback at the public information meetings through the public comment process. Public meetings and presentations such for service changes or fare changes will be used to present draft materials, educate the public and solicit information from the public. Contact information including e-mail addresses is collected at all public meetings. Public meeting attendees are encouraged to use comment cards to submit comments, suggestions, and unresolved questions. Comment cards are given out at all outreach activities and public meetings including Mass Transit Board meetings. The following are strategies that could be used to engage the public:

- Meeting venue is determined and times are slotted that capture different audiences at different times to ensure as many people as possible attend
- Advertisements appear 14 days prior to the date of the scheduled public meeting
- Laredo Times Newspaper
- Display boards are created with simplified messaging that is pertinent to the subject of the Meetings
- Sign-In Sheets
- News Releases to local television, radio and print media
- Public meeting flyers are posted in all the Transit Center and all buses and vans
- Information is posted to the El Metro Web site
- The Transit Center and all transit buses and vans will have information posted in regard to route changes, fares and time changes
- Sending emails to local non-profit organizations such as the Laredo Chamber of Commerce, Laredo Main Street, community leaders and elected officials regarding to transit information such as route changes, events, public meetings, press releases, etc.
- LTMI has an online app to download that has route information, real-time bus passenger information, just like the website.
- Transit information is given to drivers to pass on to passengers regarding route changes, time

and fare changes.

- New online social media now on Facebook page for the public.

Public Comment on Fare and Service Changes

City of Laredo

Laredo Transit Management, Inc. (LTMI)

July 2012 (approved)

The City of Laredo and LTMI recognize a major service change as any change impacting 10% or more of total system operating hours and any changes in fare. Either or both of these events require the Public Comment on Service and Fare Change process.

- Confirm that proposed schedule changes exceed the 10% in daily service hour threshold. This is an automatic in the case of fare changes.
- Review service changes against Title VI plan looking for potential disparate impacts.
- Schedule public meetings in accessible locations along routes affected at times when customers can more easily attend. Specify the room set-up in regards to tables, chairs, audio visual equipment, etc.
- Determine who on El Metro staff will attend public meeting, make presentations and receive public input.
- Publish notice of meeting(s) 14 or more days in advance.
- Place flyers on buses and at Transit Center notifying the public of the meetings.
- Consistent with Title VI, publish public notices in line with LEP considerations.
- Publish notice on El Metro website.
- Arrange for a sign language interpreter as necessary.
- Complete presentation materials such as maps, descriptions, handouts and audio-visual materials for the meetings.
- El Metro staff conducts public meetings to:
 - Encourage public to sign in
 - Present proposals and distribute handouts
 - Hold Question and Answer sessions and capture public comments of all types
- Summarize in writing the input from various sources for review and evaluation by El Metro management staff.
- Make final El Metro staff recommendations based on public input to Laredo City

Manager

- Laredo City Council sitting as Laredo Mass Transit Board receives input on proposed changes.
- Laredo City council acts on proposed changes.
- El Metro staff communicates the adopted changes through flyers, public notices and on website.

3.6 LANGUAGE ASSISTANCE PLAN (LAP)

BACKGROUND AND LEGAL BASIS FOR LANGUAGE ASSISTANCE REQUIREMENTS

The City of Laredo and LTMI (El Metro) recognizes the importance of effective and accurate communication between its personnel and the community that they serve. Language barriers can impede effective and accurate communication in a variety of ways. Language barriers can sometimes inhibit or even prohibit individuals with Limited English Proficiency (LEP) from accessing and/or understanding important rights, obligations and services, or from communicating accurately and effectively in difficult situations. Ensuring maximum communication ability between the Authority and all segments of the community serves the interest of both.

The purpose of this plan is to establish effective guidelines, consistent with U.S. Department of Transportation (USDOT) policy, for the LTMI to follow when providing services to, or interacting with, individuals who are LEP.

TITLE VI POLICY STATEMENT SUMMARY

El Metro is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964 and all related USDOT regulations and directives. LTMI assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regards to any LTMI service, program, or activity. LTMI also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the Authority will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

LEP SERVICES POLICY STATEMENT

LTMI will, as a normal part of doing business, commit to ensuring that publications intended for public outreach or public involvement, where appropriate, will be also offered in Spanish – the predominant native language of LEP individuals in the LAREDO TRANSIT MANAGEMENT INC. service area.

LTMI strives to provide effective, efficient, and equitable service to all individuals regardless of

their ability to speak, read, or write English. Service delivery options (translation of publication, oral language assistance etc.) shall be available to LEP individuals, enabling them to communicate effectively with the Authority in person, over the phone, in writing, and through electronic media.

EXECUTIVE SUMMARY

On December 14, 2005, USDOT published revised guidance for its recipients on the Implementation of Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English. The foregoing Executive Order states that Title VI and its implementing regulations require that USDOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the USDOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. The LAREDO TRANSIT MANAGEMENT INC. supports the goals of the USDOT LEP Guidance to provide meaningful access to its services by LEP persons. LTMI will devote resources to provide oral and written language assistance services to LEP individuals.

LEP individuals (those over the age of 5 who speak a native language other than English and who speak English less than "very well") amounted to 55.6% of the LTMI service area. Among languages spoken by LEP individuals, Spanish was the native language in 95% of the cases. In no other case did LEP individuals speaking a certain language constitute a significant population (significant here meaning 1,000 persons or more). Given this data, LTMI resources available, language assistance is to be provided regularly for Spanish language speakers and on a case-by-case basis depending on available resources for other language groups.

LTMI has not maintained data to document the frequency of contact by LEP persons with its services largely because of the unique nature of the Laredo community and its transit users. Laredo is largely a bi-lingual community with a vast majority of citizens either being bi-lingual (English and Spanish) or proficient only in Spanish. Currently LTMI customer service is available for Spanish speakers, bus stop announcements are in both English and Spanish, and policies are posted on vehicles and at stations in both English and Spanish.

To meet the needs of the substantial and growing LEP population in the LAREDO TRANSIT MANAGEMENT, INC. service area, the following either exist or will be phased in over the next 12 months:

- Adopt procedures to be used by all LTMI frontline employees and contractors when encountering an LEP customer and provide training on procedures.
- Provide Spanish language assistance for all public input opportunities.
- Post notification of Title VI rights and complaint procedures in both English and Spanish.
- Provide route and service information in Spanish on printed materials including system maps, bus books, ride guides, or other similar information.
- Advertise that customer service information is available in Spanish.
- With the exception of the current General Manager all LTMI employees having contact with the public are either bi-lingual or are proficient in Spanish.
- LTMI maintain its approach that all employees having contact with the public be either be bi-lingual in English and Spanish or be proficient in Spanish.
- Where applicable, consider increased use of pictographs or other symbols throughout the LTMI system to convey messages on how to safely use LAREDO TRANSIT MANANAGEMENT INC.

AUTHORITY AND GUIDANCE

Presidential Executive Order (EO) 13166 – Improving Access to Services for Persons with Limited English Proficiency is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Discrimination in providing services to LEP persons is covered in Title VI under national origin discrimination.

The 1987 Civil Rights Restoration Act broadened the coverage of Title VI to include all of a federal fund recipient's programs and activities, whether they are federally funded or not. These requirements filter down through LAREDO TRANSIT MANANAGEMENT INC. to all operating contractors or grant sub-recipients. EO 13166 states that recipients must provide LEP persons an equal opportunity to benefit from and ensure meaningful access to its programs and services that are normally provided in English.

The USDOT published revised guidance for its recipients on December 14, 2005. This document states that Title VI and its implementing regulations require that USDOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the USDOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the USDOT LEP guidance in its Circular 4702.1B, "Title VI and Title VI-Dependent Guidelines for FTA Recipients," effective October 1, 2012. Chapter III part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the USDOT LEP Guidance. The USDOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The USDOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways; agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the US DOT LEP Guidance) send a positive message to these persons that their business service parameters are responsive to the needs of these populations, additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

LIMITED ENGLISH PROFICIENCY

Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English.

Given its proximity to Mexico, Laredo has traditionally been a largely bilingual community. Currently, over 90% persons in the LAREDO TRANSIT MANAGEMENT INC. service area speak Spanish at home. The number of Spanish speakers and particularly those with Limited English Proficiency is likely to continue in the future due to immigration and a continuation of residents of Mexico crossing into Laredo on a daily basis. It therefore is critical that the Laredo Transit Management Inc. be innovative and proactive in engaging people from different cultures, backgrounds and businesses in the public involvement aspect of planning and project development and other program areas such as: service modifications, transit development, and other programs or services involving the public.

In response to the needs of the Spanish-speaking population, the Authority has Spanish-speaking customer-service representatives and provides Spanish bus stop announcements and posts rider rules in Spanish.

3.5.2 LANGUAGE ASSISTANCE NEEDS ASSESSMENT – FOUR FACTOR ANALYSIS

This plan outlines how to identify a person who may require language assistance, the ways in which the LTMI provides such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis, as recommended by USDOT. The four factors are:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by LTMI services and programs.**
- Factor 2: The frequency with which LEP persons come into contact with LTMI services and programs.**
- Factor 3: The nature and importance of the LTMI's services and programs in people's lives.**
- Factor 4: The resources available to the LTMI for LEP outreach, as well as, the costs associated with the outreach.**

In the following analyses each factor is considered first in relation to the services provided by LTMI Transit.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by LTMI services and programs.

The decision to provide language assistance services included an assessment of the number or proportion of LEP persons from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. Generally, identifying any community where the LEP population **equals 5 percent** or more in a given language automatically triggers providing language assistance services as a mandatory and normal part of your program operation.

- **Frequency of Contact** – The more frequent the contact with a particular language group, the more likely that enhanced services in that language are needed. Laredo Transit Management Inc. has considered the frequency of contact that patrons who speak different languages may have with Laredo Transit Management Inc. services. For example, frequent contact with individuals who speak Spanish and who are also LEP does require bilingual staffing. LAREDO TRANSIT MANAGEMENT INC. will begin tracking contact with all persons who

are LEP.

- **Importance of Contact** – Once a provider has assessed what language to consider by looking at important the activity, information, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services will be needed. If the denial or delay of access to services or information could have serious implications for the LEP individual, procedures should be in place to provide language assistance to LEP persons as part of standard business practices.
- **Resources** – Laredo Transit Management Inc. has resources available to ensure that we will be able to provide language assistance to LEP persons who speak Spanish participating in our programs or activities. Demographics, frequency and importance of contact will dictate the level of language services Laredo Transit Management Inc. will commit to provide. Some language services can be provided at little or no cost, such as using community volunteers or bilingual staff as interpreters. For languages other than Spanish, Laredo Transit Management Inc. will work with the community to finding effective ways to meeting the needs of these communities. Laredo Transit Management Inc. will carefully explore means of delivering competent and accurate language services before deciding to limit services due to resource concerns.

Laredo Transit Management Inc. will weigh the costs and benefits of translating documents for potential LEP customers considering the expense of translating the Documents; the barriers to meaningful translation or interpretation of technical transit information, the likelihood of frequent changes in documents, the apparent literacy rate in an LEP group and other relevant factors. The Authority will undertake this examination when an eligible LEP group constitutes 1,000 persons.

a. Identification of LEP individuals in Laredo Transit Management, Inc. Service area that need language assistance

USDOT Guidance: *“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.*

The LTMI used data from the 2020 American Community Survey 5-Year Estimates to identify LEP language groups within the service area. Table 1 provides data on the number of LEP individuals for each language or language group. Spanish is the only language that meets the threshold in the Laredo Service area.

Table 1: LEP Population by Language

Language	Number	Pct. of Service Area Population
Spanish	211,986	89.7%
Other Indo-European	407	0.2%
All Asian languages	1,078	0.4%

Factor 2: The frequency with which LEP persons come into contact with LTMI services and programs.

USDOT Guidance: *“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.”*

Transit Services

Typically, the front-line staff such as the bus drivers, dispatchers and customer service staff are the primarily in direct contact with LEP individuals on a daily basis. They are the ones answering to inquiries made regarding transit and paratransit services or activities. Currently, some non-speaking Spanish (only English) riders will ask translation assistance either an LTMI driver or road supervisor or any other LTMI staff will assist and translation services for other languages are extremely rare.

Laredo Transit Management Inc. does not currently collect data from its riders on their level of English proficiency. As part of this plan, Laredo Transit Management Inc. will begin to capture and monitor contact with LEP individuals. Customer Service and other departments with contact with LEP individuals will record when an individual desires to communicate in a language other than English.

Factor 3: The nature and importance of the LTMI’s services and programs in people’s lives.

USDOT Guidance: *“The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ; for example, from those who provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life- threatening implications for the LEP individual...”*

Based on the guidance provided, Laredo Transit Management Inc. has identified several areas for focus in providing in access to LEP individuals. Information or material in these categories should be accessible to LEP persons as a matter of ordinary practice.

- Information on routes and services which are essential or important for using the service, this includes regular services and irregular but important services including disaster evacuation.
- Opportunities for input by the public
- Notification of rights, important policies and LAREDO TRANSIT MANAGEMENT, INC. rules

Factor 4: The resources available to the LTMI for LEP outreach, as well as, the costs associated with the outreach.

Available Resources and Costs of Providing Language Assistance Services

USDOT Guidance: *“A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns”*

Laredo Transit Management Inc. is committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. LTMI currently employs a large number of persons who know how to speak Spanish.

LTMI has hired professional Spanish interpreters for public meetings such in the case we had in 2012 in one of our Paratransit Advisory Committee (PAC) meeting. An outside consultant was doing a study for the Paratransit service and an interpreter was present for translating the meeting in Spanish. LTMI will provide bilingual interpreters for public hearings or meetings including filing a Title VI complaint.

In addition, LTMI will assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that LTMI could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. After further research, the cost

of an interpreter and translator with certification, well-trained in the skills, ethics, and subject-matter language is approximate \$90 per hourly rate and \$0.15 per word.

For other languages, resources should be located in an effective way on a case-to-case basis.

PROVIDING NOTICE TO THE LEP COMMUNITY

Where Laredo Transit Management Inc. determines a need for language assistance, it is important to let LEP persons know that those services are available and that they are free of charge. This information should be provided in a notice in a language LEP persons will understand. Some notification ideas include:

- Posting signs in areas where the public is likely to read them
- Stating in outreach documents (brochures, booklets, pamphlets, flyers) that language services are available free of charge
- Working with community-based organizations to inform LEP persons of the language assistance available
- Using a telephone voice mail menu in Spanish
- Notices in local newspapers in languages other than English
- Providing notices in non-English language radio and television stations about the availability of language assistance services for important events
- Presentations and/or notices at schools and religious organizations for important actions or where community involvement is critical

IMPORTANCE TO LEP PERSONS OF OUR BUS SERVICES AND ACTIVITIES

Access to public transportation in a large urban setting is vital, because of concentrations of people that are transit dependent and live in a near poverty level in some parts of the city. The DOT's LEP guidance states that "providing public transportation access to LEP persons is crucial." An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment. Because of LTMI's service to important areas in our community like employment, and its access to two hospitals and seven dialysis centers and other medical facilities, LTMI's services must be considered vital for LEP individuals and all residents in Webb county.

It is because of this importance that LTMI has outlined language assistance features. In addition, LTMI will use methods outlined in its Public Participation Plan to provide information to persons with limited English proficiency via multiple platforms. LTMI will, via outreach methods described here and in LTMI's Public Involvement Plan, identify the LTMI service or services deemed most important to those citizens with limited English proficiency. LTMI has and will continue to participate in several outreach engagements including the following:

- National Night Out
- Meet your Councilperson and
- Public Meetings

The National Night Out consists of inviting all the city service departments such as the Police, Fire, Public Works, Health, and others including LTMI to a community meeting inviting all the public citizens and ask about the city's services. The Meet Your Councilperson is also inviting all the public to come and talk to your councilman or councilwoman to voice concerns or hear about other city department services which LTMI has participated. Public Meetings (LTMI) are held in relating to change of bus services in which the local school districts have been active stakeholders and partners for these meetings.

The LTMI's most critical public transit services are:

- Fixed route services – these services are vital due to the high number of riders who utilize our services for transportation to and from their work locations and are transit dependent for their livelihood; and
- ADA Paratransit services- these services are vital due to the diversity of clientele and critical transportation we provide to those riders who cannot use the regular fixed route bus.

An LEP person's inability to utilize effectively these services may adversely affect his or her ability to obtain health care, education, or access to employment. Critical information from LTMI which can affect access includes:

- Route and schedule information
- Fare and payment information
- Public service announcements
- System rules and information about how to ride
- Safety and security announcements
- Communication related to transit planning

LTMI's public engagement process and tools used to solicit LEPs about transit projects are listed below. This engagement process includes the translation of vital documents and discussions of on-time performance measurements in the LTMI bus system.

1. Public meetings at accessible hours
2. Formal presentations
3. Paratransit Advisory Committee meetings
4. Workshops in the community
5. City Council Public hearings
6. Transit tours
7. Townhouse use meetings

LTMI is actively seeking public participation and the above tools are some of the strategies LTMI uses to seek out community involvement and public engagement and feedback.

Last, LTMI is critical in notifying LEPs on transit issues and services changes as a result the following communication tools are used to achieve the LEPs.

- Newsletters
- Mailed notifications
- Fliers
- Fact sheets (rack cards)
- Website home page
- News articles
- Press releases
- Stakeholder announcements
- Public service announcements (paper, tv)
- Facebook social media

REVIEW INPUT FROM COMMUNITY ORGANIZATIONS AND LEP PERSONS

Some LTMI departments require interaction with the public as a part of daily operations and include contact with LEP populations. If these interactions include letters or notices, or forms and the nature of these documents would be considered of critical importance to the LEP person, consideration shall be given to the written translation of the documents or forms.

It is important to make an assessment as to the population percentage, and the frequency and importance of the contact while considering the potential for translating these documents. Examples of vital documents that require consideration for translation in Spanish are as follows:

- Title VI Complaint Process
- Bus schedules and other service guides
- Notices of proposed public hearings regarding proposed transportation plans, projects, or changes
- Emergency transportation information
- Other documents about other services such as ADA services and real time bus information

Whether or not a document (or the information it solicits) is “vital” will depend on the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not accurate or timely disseminated. Where appropriate, management staff will rigorously evaluate over time, what documents are “vital” to the meaningful access of the LEP populations they serve.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights and services is an important part of “meaningful access”, as a lack of awareness may effectively deny LEP individuals meaningful access.

Where LTMI is engaged in community outreach efforts as part of its programs and activities, it should assess the needs of the LEP population affected by the program to determine whether certain critical outreach materials should be translated.

Community organizations will be used to determine what outreach materials may be most helpful to translate, and some translations may be made more effective when done in tandem with outreach methods including using ethnic media, schools, and religious and community organizations to spread a message.

Sometimes a very large document may include both vital and non-vital information. This may also be the case when the title and a phone number for obtaining more information on the contents of the document infrequently encountered languages other than English is critical, but the document is sent out to the general public and cannot reasonably be translated. In a case like this, vital information may include, for instance, providing information in Spanish regarding where an LEP person might obtain an interpretation or translation of the document.

THE RESOURCES AVAILABLE TO THE RECIPIENT AND COSTS

LTMI will not pass on the cost to our customers for providing language assistance to meet its LEP requirements. With the exception of translating written materials, the cost of language assistance is generally fairly minimal. LTMI will provide competent interpreters and other oral language assistance in a timely manner as needed.

INVENTORY LANGUAGE ASSISTANCE MEASURES CURRENTLY BEING PROVIDED

LTMI has provided the following language assistance measures to date:

- Oral interpretation services - Bilingual staff that are competent in the skill of interpreting
- Written language services
- Volunteer interpreters from community organizations who are trained and competent in the skill of interpreting
- Qualified paid interpreters
- Translating documents upon request
- Bilingual (English and Spanish) notices regarding service changes, public hearings, and capital projects
- General transit information on fares, service hours, routes, schedules, and how to use the bus and rules in English and Spanish.
- Provide a bilingual El Lift Paratransit Rules and Procedures manual and ADA certification application.

- Bilingual passenger information announcements are made electronically by LCD monitors at the main terminal.
- Bus personnel are predominately bilingual and automatically respond in Spanish when Spanish-speaking commuters interact with staff.
- At public hearings or meetings, the audience is asked whether the meeting should be conducted in Spanish as well as English. Staff responds according to the preference of the audience. Meetings are usually interpreted.

The costs of these measures have not been separated since they are generally accepted business practice and fully integrated into the LTMI daily operations.

Training staff on the procedures of providing language assistance and how to determine whether and what type of language services a customer needs, is essential to bridging the gap between policies or procedures and actual practices. Training should include how to obtain language assistance services and how to communicate needs to interpreters and translators.

Providing language assistance in some areas may also mean training staff to avoid using acronyms or industry jargon when communicating with LEP individuals. Although the use of an interpreter who is qualified is essential, it does not necessarily mean formal certification as an interpreter is required. Certification may be helpful, but at a minimum, a qualified paid interpreter needs to:

- Be proficient in and have the ability to communicate accurately in both English and in the other language.
- Have knowledge in both languages of any specialized terms or concepts particular to the program.
- Understand and follow confidentiality and impartiality rules to the same extent as the LEP person for whom they are interpreting or to the extent that their position requires.
- Understand and adhere to their role as an interpreter without deviating into a role as counselor, legal advisor, or another inappropriate role.

PROCEDURES FOR ACCESSING INTERPRETATION SERVICES

Providing interpretation services in Laredo are reserved for events and circumstances when formal presentations are being made by speakers that are not bi-lingual. The availability of bi-lingual employees for customer service and other customer contacts makes the need for day to day communications minimal.

- **Telephone communication with LEP Callers:** LTMI requires bi-lingual employees in all customer contact positions including telephone

communication because of the necessity in the Laredo community to have individuals that can speak Spanish.

- **Communication by other front line employees:** LTMI personnel in the field in need of interpretation services will attempt to contact Customer Service or other competent staff to assist with communication to LEP individuals.

ANALYZING THE BUDGET

LTMI's FY 2025 budget was \$22.7 million dollars which \$36,515 was budgeted for LEP materials such as printing of bus schedules, system maps, webpage design and translation even though this primarily is done by staff in-house is still is considered an expense.

TRAINING STAFF

The Title VI Officer will ensure that employees are knowledgeable about the Authority's obligations to provide meaningful access to information and services for LEP persons, ensuring that employees having contact with the public have experience in the following areas:

- Policies and procedures of language access;
- Resources available to determine the language needs of a customer;
- Resources available to ensure that access is provided in a timely and effective manner
- Working effectively with language interpreters
- Available documents that have been translated into languages other than English
- Types of language services available;
- How staff can obtain those services;
- How to respond to written communication from LEP persons and;
- How to respond to LEP individuals who have in-person contact with staff.

LEP PLAN DISTRIBUTION

The LEP Plan will be:

1. Distributed to all Laredo Transit Management, Inc. management staff, especially those leading departments with direct contact with the community.
2. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.

MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

Laredo Transit Management Inc. will monitor its language assistance program minimally every

three years to assess the following: the current LEP makeup of its service area, the current communication needs of LEP applicants and customers, whether existing assistance is meeting the needs of such persons, whether the staff is knowledgeable about policies and procedures and how to implement them, and whether sources of and arrangements for assistance are still current and viable. It is LTMI's intent to continually evaluate effectiveness and based on the results, make modifications where necessary.

Staff will evaluate LTMI's Limited English Plan by seeking feedback from the community, and assess potential plan modifications based on:

- Current LEP population in the service area or population encountered or affected;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances, additional resources, and the cost imposed;
- Whether staff know and understand the LEP plan and how to implement it; and,
- Whether identified sources for assistance are still available and viable.

In monitoring compliance, an assessment will be made of whether LTMI's procedures allow LEP persons to overcome language barriers and participate in a meaningful way in the program activities and services. The program area's appropriate use of methods and options detailed in this LEP Plan will demonstrate their intent to comply with LEP requirements and Title VI of the Civil Rights Act of 1964.

COMPLIANCE & REPORTING

All LTMI management staff is responsible for ensuring that meaningful services to LEP persons are provided in their respective departments/offices. This Plan must be incorporated by reference into the appropriate departmental procedure manuals in order to ensure that employees are aware of their obligations for compliance.

The General Manager will monitor the Authority's programs to ensure LEP requirements are fulfilled.

CONCLUSION

Providing meaningful access to LEP persons to El Metro programs, services, and activities is an

important effort that will help enable the Authority to achieve its mission to ensure equal access to transit throughout LTMI's service area. Through implementation of this plan, LEP persons will gain equal opportunity to benefit from meaningful access to Laredo Transit Management Inc.'s programs and services.

3.7 Sub-recipient Monitoring and Compliance

3.7.1 Subrecipients Monitoring

LTMI will coordinate a subrecipient orientation workshop after the funding award to provide technical assistance on the process that would need to be followed and the federal requirements that would have to be met to receive the federal funds. LTMI will also schedule regular meetings with the subrecipients to discuss issues or concerns regarding their projects and to provide assistance during implementation to ensure projects are consistent with the funding agreement. Subrecipients will also be required to provide quarterly progress reports and an annual report during the period in which they invoice for eligible activities until grant close-out. In this regard, sub-recipients need to keep track of the performance measures identified for their projects in the CONTRACT AGREEMENT.

Subrecipients would also need to provide supporting documentation when invoicing LTMI for expenses incurred. Subrecipients will not be paid in advance of costs incurred. Instead, funds from the 5310 programs will be paid to the subrecipient on a reimbursement basis only. LTMI will monitor closely all activities by the sub-recipient and take corrective actions to resolve any non-compliance issues, including informing the sub-recipients if they are at risk of losing any of the funding that was awarded. The subrecipients need also to comply with the auditing requirements specified in the CONTRACT AGREEMENT.

3.7.2 Administration of 5310 Programs

The following summarizes the responsibilities of LTMI as the designated recipient.

- Assists subrecipients or potential sub-recipients with technical support to:
 - I. Establish project eligibility;
 - II. Manage and administer sub-recipients;
 - III. Understand grantee (LTMI) and federal compliance policies
 - a. Procurement guidelines
 - b. Required matching funds
 - IV. Understand the conditions on how federal grant funds can be spent.

One of the primary means of assistance can be sponsoring and hosting pre-proposal seminars prior to call-for-projects. LTMI may host a grantee introduction seminar for all new sub-recipients after each selection process. The meeting will allow LTMI the opportunity to discuss with all of the new subrecipients the general and specific performance goals to be achieved, their reporting, the administrative responsibilities and LTMI's standardized invoicing practices.

In order to clarify the goals of each project and assist the subrecipients in the development of good progress reporting and accounting practices, LTMI will meet individually with each of the subrecipients before the beginning of grant expenditures. The meetings will include, but are not limited to the following actions:

- Ensures that subrecipients adhere to the FTA Master Agreement, LTMI's CONTRACT AGREEMENT, and other federal and state requirements, as applicable, to ensure federal

funds are used according to the established contractual requirements. This activity will be accomplished with site visits and a review of sub-recipients records.

- Seeks from the sub-recipients an annual signed certification that affirms sub-recipients compliance with the standard terms and conditions governing the administration of projects funded with federal dollars awarded by the FTA through LTMI, as described on the CONTRACT AGREEMENT or the FTA Master Agreement. This information is provided to the auditors as part of LTMI's compliance monitoring effort.
- Provides the program of projects funded with the 5310 program to the MPO for inclusion in the Transportation Improvement Program.
- Prepares a summary of the funds available for distribution upon approval of the federal budget for the federal year that starts October 1, 2015, and corresponding federal transportation appropriations sometime thereafter and their publication in the Federal Register.
- Initiates the development of the grant applications for the FTA and upon FTA's award, initiates the funding agreements with the sub-recipients.
- Coordinates regular workshops or meetings with sub-recipients to ensure agencies have the technical capabilities to assist their customers with transportation needs and to manage their projects.
- Organizes an annual workshop for the region's stakeholders to review project results, evaluate overall program accomplishments, and discuss opportunities for improvements. Unsuccessful applicants from previous call-for-projects cycles will also be contacted and invited to the workshop to familiarize themselves with the grant programs, the development of a successful application, and the implementation of projects and programs funded by the 5310 programs. Unsuccessful applicants will also have the opportunity to meet with LTMI staff.
- Assures sub-recipients development performance measures for each 5310 funded project to monitor and report the benefits of the federal investment.
- LTMI will maintain a good working relationship and coordination with the federal, state, regional, and local agencies regarding human services transportation projects and programs funded with the 5310 funds.
- Analyzes federal, state, and local legislation and policies relevant to the 5310 program.
- Makes recommendations to the LTMI Mass Transit Board for improvements in managing and administering the 5310 programs.
- Serves as the point of contact for any activities related to the 5310 programs, such as coordinating the reviews and audits performed by the FTA.

3.7.3 Title VI, Section 504, and ADA Compliance

LTMI requires subrecipients to document that they distribute FTA funds without regard to race, color, national origin, disability or discrimination against disadvantaged business enterprises among applicable civil rights requirements. Not all applicable civil rights requirements are discussed in the PMP.

LTMI complies with FTA's Title VI requirements in the following manner:

- i. Provision of an annual Title VI certification and assurance;
- ii. Development of Title VI complaint procedures;
- iii. Record keeping of all Title VI investigations, complaints and lawsuits;

- iv. Provision of meaning access to persons with Limited English Proficiency;
- v. Notification to beneficiaries of protection under Title VI;
- vi. A requirements that each subrecipient develops a Title VI program or becomes part of LTMI's submittal of its Title VI program to the FTA's regional civil rights officer once every three years.

Within each of these broad categories are specific requirements for survey and other data collection, analysis, and information distribution that cover transportation programs, construction programs, transit service planning, operations, and service/fare changes.

LTMI's promotion, administration and distribution of information and funding relevant to the 5310 programs is consistent with LTMI's Title VI Policy, which is made part of this document by reference.

In order to fulfill Section 504 obligations, LTMI plans on working closely with its sub-recipients to ensure the goals of their federal 5310 grants are being met. In order to track this progress, LTMI will review each submitted invoice and ensure that all required backup material is attached and correct in order to validate funds spent, work to resolve any potential ineligibility issues with any sub-recipient, and obtain the return of any funds paid out that have been found to have been ineligible. In addition, LTMI will review all quarterly and annual reports to ensure consistency with the terms of the federal grant and the CONTRACT AGREEMENTs. Finally, LTMI will make annual site visits to each sub-recipient to ensure purchased items, services, and/or training funded by the federal grant are in full service, being maintained as per manufacturer's recommendations and are being used to meet the performance measures set in the CONTRACT AGREEMENT and in federal guidelines.

LTMI will evaluate all projects receiving grant funds for compliance with all relevant ADA laws, regulations, and policies. Moreover, LTMI will work with sub-recipients to provide technical assistance.

3.7.4 Management of 5310 Programs

The following describes the activities to be performed by LTMI to ensure federal funds are not lost (lapsed) to the region. The activities described below are part of the oversight and project management activities necessary to ensure that projects funded with 5310 funds are implemented in accordance with the FTA program guidelines and funding agreements.

- Monitor expenses and reimbursements to sub-recipients to ensure compliance with the federal grant award and the CONTRACT AGREEMENT.
- Work with LTMI's Finance Department to include project-related information in LTMI's financial system, such as project identification number, grant number, amount, and funding sources. This information is needed for accounting and monitoring project funding and expenses.
- Review sub-recipient invoices for accuracy and eligibility, ensure that the required documentation is on file and payments are made as approved.
- Compile and distribute FTA procurement guidelines to all subrecipients. Work with all grantees to analyze, evaluate and answer any particular procurement questions they may have relevant to their project(s).

- Prepare quarterly status progress reports, and financial reports and report to FTA's Transit Award Management System (TrAMS) prior to the deadlines.
- Monitor, through yearly (or more often) site visits, project implementation activities and ensure compliance with federal and contractual requirements.
- Analyze project activities and determine if any changes to the budget, scope or schedule are required. Accordingly, initiate and prepare any needed grant and CONTRACT AGREEMENT amendments prior to requesting FTA's approval to grant revisions.
- Analyze monthly or quarterly project expenses and reimbursements from the FTA and reconcile with FTA's TrAMS system for accuracy.
- Prepare and file grant budget revisions.
- Evaluate, prepare and file grant and CONTRACT AGREEMENT closeout documents.
- Work with sub-recipients to set performance measures through the life of the project to track its effectiveness and progress as described in Section 7.6 and in the CONTRACT AGREEMENT.

3.7.5 Performance Measures

Consistent with federal guidelines sub-recipients will be asked to show (as applicable) all increased activity due to the grant-funded project, such as:

- Actual or estimated annual number of rides (as measured by one-way trips) as a result of the implementation of the 5310 program.
- Annual increases or enhancements related to geographic coverage, service quality, and/or service times that impact the availability of transportation services for individuals with disabilities.

The subrecipients will also work jointly with LTMI to establish other performance indicators that are more specific to their projects to measure relevant outputs, service levels, and outcomes. Subrecipients will be required to report these performance measures on a quarterly basis and on an annual basis and as required by LTMI and the FTA.

3.7.6 Oversight Procedures

Subrecipients must comply with the LTMI's Oversight Procedures which are found in Attachment A. Subrecipients are responsible for maintaining compliance with the LTMI's oversight policies, which are revised periodically. See attachment A.

3.7.7 Program Management Plan Updates

As stated earlier, the PMP is a living document. It will be updated regularly to incorporate any expansions and enhancements of the 5310 programs, as well as any revisions to the programs' management, requirements or guidelines. It will also be updated per the request of the FTA or based on significant input submitted from subrecipients, eligible applicants and the general public. All significant changes to the PMP will require FTA approval. At minimum, the PMP will be updated every three to four years.

Attachment A: Laredo Transit Management Inc. Oversight Procedures

LAREDO TRANSIT MANAGEMENT INC. CONTRACTOR AND SUBRECIPIENT OVERSIGHT PROCEDURES

September 20, 2018

Purpose

The purpose of these Contractor and Subrecipient Oversight Procedures is to:

- Ensure that all technical specifications and contract requirements are met by contractors and sub-recipients.
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are maintained by subrecipients, leased to service providers, or maintained under contract by other than the Laredo Transit Management Inc. employees.
- Identify performance issues and address them in a timely manner.
- Track information regarding performance quality for the purposes of evaluating contractors for future procurements.
- Ensure that all construction(if applicable) is performed in accordance with the design intent agreed upon in the original contract or through an approved change order or modification.

These procedures explain methods of monitoring, persons responsible, frequency, and expected deliverables associated with managing performance and compliance monitoring systems for rolling stock, construction, ADA paratransit, and fixed route services. Performance and compliance monitoring for third-party contractors is distinguished from compliance monitoring of subrecipients and public entities operating federally-funded services, rolling stock, and facilities.

Scope and Applicability

The Procedure applies to monitoring performance and compliance for the following types of projects/programs:

- Rolling Stock
- Construction (if applicable)
- ADA Paratransit, and/or Elderly and Disabled Transportation Services

The frequency and type of monitoring will be based upon the following: a) size of the grant or contract, b) associated risks, c) service complexity, and d) type of grant or contract.

References to Legislative and Regulatory Documents

- FTA Circular 4220.1F, "Third Party Contracting Guidance"
- 49 CFR Part 18
- OMB Super Circular

Definitions

- **Contractor Performance Monitoring:** The process by which the Laredo Transit Management Inc. oversees and tracks contractor performance to ensure that the performance and quality assurance standards set forth in the contract/solicitation are met. Performance requirements are specified in solicitations such as Request for Proposals and are included in contracts. Performance measures typically relate to scheduling/timeliness, customer service, and nonconformance. Performance data is also considered in the evaluation of a particular contractor for participation in future projects.
- **Contractor Compliance (if applicable) Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a contractor other than The Laredo Transit Management Inc., they must be subject to regular reviews by the LTMI to ensure compliance with FTA requirements.
- **Subrecipient Compliance Monitoring:** When federally-funded services, rolling stock, and facilities are operated by a subrecipient or public entity other than the Laredo Transit Management Inc., they must be subject to regular reviews by the Laredo Transit Management Inc. to ensure compliance with FTA requirements.

General Oversight Procedures for Services Providers

- **Title VI Monitoring Procedures**

The subrecipient or third-party contractor must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program, or activity receiving Federal financial assistance. The subrecipient must ensure that Federally supported transit services and related benefits are distributed in an equitable manner. Subrecipients and third-party contractors are responsible for ensuring that they comply with Title VI requirements such as; notifying customers of their rights under Title VI; having Title VI complaint procedures; taking reasonable steps to ensure access to Limited English Proficiency (LEP) populations; and seeking out the viewpoints of minority, low-income and LEP populations when conducting public outreach and involvement activities. The Laredo Transit Management Inc. should be informed of any Title VI complaints received by its sub-recipients or third-party contractors.

Key Requirements:

- Subrecipients and third-party contractors delivering transportation services with FTA funds must notify the LTMI's Grant Manager immediately (within 48 hours) of any complaints received.
 - Revisions to Title VI Plans must be submitted for approval to the LTMI. Revisions by sub-recipients will be required every three years when FTA requires the LTMI to update its Title VI program.
- Equal Employment Opportunity (EEO):

Subrecipients and third-party contractors must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.) Subrecipients and contractors that receive capital or operating assistance in excess of \$1 million or planning assistance in excess of \$250,000 and employ 50 or more transit-related employees must submit to the Laredo Transit Management Inc. an EEO plan. Program updates are due every three years.
- Compliance Record-Keeping

The Laredo Transit Management Inc. must fully document all compliance monitoring efforts conducted on subrecipients and third-party contractors. A "Compliance Monitoring File" should be created and maintained for each organization, which includes the following items:

 - Pre-award assessment checklist
 - Individual grant monitoring plan worksheet
 - Periodic reports from subrecipient or third-party contractor
 - Desk review monitoring report
 - On-site visit report
 - Telephone contact report
 - Assistance report
 - Corrective action plan
 - Annual reports checklist

- Copies of e-mail, memos, or other written correspondence, including notification informing subrecipient or third-party contractor of the results of monitoring

In addition, the Laredo Transit Management Inc. maintains evidence that vendors and contractors are being monitored to ensure they perform in accordance with the terms, conditions and specifications contained in their contracts or purchase orders. All records of inspections and approvals, deliverables provided or services performed are kept for evidence that the Laredo Transit Management Inc. is making sure vendors and contractors adhere to contract requirements. The correspondence between the City and its contractors is stored for evidence of ongoing contract administration. Once an issue is discovered, the City follows up with its contractor to ensure that corrective action is taken. Efforts, including the follow-up on findings, are documented.

- Public Comment Procedures

Public Comment management is critical to successful program implementation. The Laredo Transit Management Inc. receives daily comments and elicits public comments during each planning process. Additionally, LTMI must ensure that sub-recipients and third-party contractors are meeting the needs of the public as well. The following method will be used to track public comments;

Conduct a bi-annual review of public comment data collected by sub-recipients and third-party contractors. The Laredo Transit Management Inc. maintains a formal Procedure for Considering Public Comments; this procedure applies to sub-recipients and third-party contractors providing transit services unless the subrecipient/contractor develops a procedure specific to their operations that is approved by the Laredo Transit Management Inc..

- Final Financial and Program Reports Closeout

The final financial and program reports must be submitted within 90 days of project completion or expiration of funding. All expenditure obligations must be paid prior to filing the final reports. The closeout reports should be clearly identified as final. They must show that all activities and expenditures associated with the grant are completed and the grant is ready to close. The final program report should include a detailed description of the project with a focus on program outcomes.

The program report should include quantitative data regarding the effectiveness of the program, if applicable. The program report will detail how the program met the identified needs and the specific intentions of the grant award. If the subrecipient is unable to use all funds in a grant, Laredo Transit Management Inc. will reconcile and de-obligate the remaining funds in the grant and will return the remaining funds to the FTA or other applicable grant-making body.

The sub-recipient and contractor will be required to maintain all books, documents, payroll documentation, accounting records, and other evidence pertaining to costs incurred under a federal grant award during the period of the grant and for three years thereafter. These records must be available for inspection by any authorized representatives of the Laredo Transit Management Inc. or the Federal Government.

Rolling Stock Oversight Procedures

To monitor FTA-funded vehicles or facilities (if applicable) that are maintained under contract by other than the Laredo Transit Management Inc. employees, the City requires that contractors or sub-recipients address maintenance standards or maintenance performance indicators. Contractors and sub-recipients are required to develop their own maintenance plan and submit periodic written reports on maintenance activities. The Laredo Transit Management Inc. must also conduct reviews of maintenance records and inspections of FTA-funded vehicles and facilities.

- Buy America Pre-Award and Post-Delivery Audits

A subrecipient or third-party contractor that purchases rolling stock for transportation of passengers in revenue service must conduct, or cause to be conducted, a pre-award audit before entering into a formal contract for the purchase of rolling stock, and certify that a post-delivery audit is complete before title to the rolling stock is transferred to the sub-recipient, or the rolling stock is put into revenue service, whichever occurs first. Pre-award and post-delivery audits verify the accuracy of the Buy America certification, purchaser's requirements certification, and certification of compliance with or inapplicability of Federal motor vehicle safety standards in 49 CFR part 571 (49 CFR part 663)

- Disadvantaged Business Enterprise (DBE) Monitoring

Subrecipients or third-party contractors shall require that, as a condition to bid on a transit vehicle procurement in which FTA funds are involved, each transit vehicle manufacturer certifies that it has complied with the requirements of 49 CFR section 26.49. The Laredo Transit Management Inc. may, with FTA approval, establish project-specific goals for DBE participation in the procurement of transit vehicles that a manufacturer must meet (49 CFR section 26.49(d)). All sub-recipients and contractors must require that each transit vehicle manufacturer (TVM), as a condition of being authorized to bid on transit vehicle procurements funded by FTA, certify that it has complied with the requirements of 49 CFR 26.49. Subrecipients and contractors are required to include a provision in its bid specifications requiring the certification from TVMs as a condition of permission to bid. DBE reports are generated every 6 months.

Construction Oversight Procedures (if applicable)

Construction oversight is designed to ensure that the project is progressing in accordance with specifications, special provisions and plans, and methods and practices specified in construction manuals.

- Contract Administration and Performance Monitoring (if Program)

The Laredo Transit Management Inc. will implement the following Quality Assurance controls in the contract administration and monitoring of construction contractors:

- Labor Compliance: Spot-checked construction logs/diaries against certified payrolls for Davis-Bacon compliance. (Check 3 months after the start of construction and quarterly for QA.)
- Measurement and Payment: Monitor that source documents supporting progress payments made to the contractor are available. (Spot-check after second progress payment to the contractor.)
- EEO/Wage Rate Posters – Observe the construction site, the contractor’s office at the contractor office, or another central gathering point to verify that posters are visible for every worker to see. (Check one month after the start of construction.)
- Buy America - Review the construction area and the contractor’s on-site yard, quarterly, and check to make sure foreign iron and steel products are not being incorporated into the project without the resident engineer’s approval or an FTA waiver.

Disadvantaged Business Enterprise (DBE) Monitoring

Third-party contractors must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Written DBE programs are required of FTA subrecipients of planning, capital, and/or operating assistance that will have contracting opportunities (excluding transit vehicle purchases) exceeding \$250,000 with those funds in a Federal fiscal year.

The Laredo Transit Management Inc. and its sub-recipients are required to follow the Laredo Transit Management Inc. approved DBE program. The program will be updated by Laredo Transit Management Inc. every three years or when significant changes occur.

Subrecipients and prime contractors must follow all aspects of the Laredo Transit Management Inc. DBE Program:

1. A contract clause ensuring non-discrimination,
2. A contract clause requiring prompt payment and retainage,
3. Provision for DBE subcontractor termination and
4. Project invoicing must explicitly show progress on DBE goals.

DBE liaison must be invited to all project meetings to make sure DBE requirements and goals are met. Project updates must include an update on payments to DBE’s and the overall DBE goal. DBE reports are generated every 6 months by the DBELO.

ADA Paratransit, Elderly and Disabled Transportation Services Oversight Procedures

In prohibiting discrimination in the provision of transportation services against persons with disabilities, the Americans with Disabilities Act of 1990 requires that vehicles purchased or leased after August 25, 1990, and new and altered facilities designed and constructed (as marked by the notice to proceed) after January 25, 1992, must comply with the applicable standards of accessibility in 49 CFR parts 37 and 38 (42 USC 12101-12213). The Laredo Transit Management Inc. must ensure that sub-recipients and third-party contractors comply with these standards of accessibility, including the provision of equivalent services.

- **ADA Compliance Monitoring Procedures**

Subrecipients and third-party contractors are required to follow titles II and III of the Americans with Disabilities Act (ADA) of 1990. ADA provides that no organization shall discriminate against an individual with a disability in connection with the provision of transportation services. The law sets forth specific requirements for a sub-recipient's vehicle and facility accessibility and the provision of service, including complementary paratransit service.

The Laredo Transit Management Inc. utilizes the following monitoring methods to ensure that third-party contractors or sub-recipients operating ADA Paratransit services are in compliance:

1. Review the third-party contractor or subrecipient's ADA-related policies and monitor compliance with the policies. Review ADA complaints and the process & procedures for addressing Americans With Disabilities Act complaints.
2. Inform subrecipients and third-party contractors of the ADA requirements via training. This training is required to ensure that personnel operates vehicles and equipment safely, assist passengers properly, and treat persons with disabilities who use the service in a respectful and courteous way, with appropriate attention to the differences among persons with disabilities. All contracts for the operation of ADA Paratransit service must include mandatory driver training requirements. Training provisions must include requirements regarding curriculum, length of the training period, resources, and assurances. Contracts must call for initial driver training and annual refresher training. Training programs must also include passenger assistance techniques and disability sensitivity modules.
3. Employ surveys, checklists, and interview forms, as well as follow-up correspondence to effectively document compliance. All documentation reflecting monitoring results is maintained as evidence of oversight.
4. Maintain a record-keeping system for monitoring on-time performance and tracking these indicators of capacity constraints. At any given time, the Laredo Transit Management Inc. should be able to demonstrate that the denials it does have, as well as the missed trips, late pickups, etc., are not an operational pattern or practice that significantly limits the availability of ADA paratransit service.
5. Track ADA-eligible trips separately from non-eligible trips. Periodic reservation line calls must be conducted at various times of the day to determine if a caller can

reach a reservation agent. If third-party contractors or subrecipients have communication systems that provide data on average call wait time, number of missed calls, call abandonment rates, and other indicators of performance, such data must be collected and reviewed to determine compliance.

6. Monitor service capacity constraints and review no-show policies.
7. Ensure that all subrecipient and third-party contractor vehicle accessibility features, such as wheelchair lifts, ramps, securement devices, signs, and communication equipment for persons with disabilities, be maintained and operational.

- Subrecipient Maintenance Monitoring

Subrecipients must keep Federally-funded equipment and facilities in good operating order and maintain ADA accessibility features.

- Subrecipients are required to have a current written maintenance program for FTA-funded rolling stock that documents the maintenance plan. The subrecipient must follow its maintenance program for facilities and equipment.
- The sub-recipient's FTA-funded vehicles and facilities must be maintained regardless of who operates and maintains them. Third-party contractors and lessees "stand in the shoes" of the sub-recipient and the Laredo Transit Management Inc. as far as FTA maintenance requirements are concerned.
- If the subrecipient or contractor has equipment under warranty, FTA requires that the subrecipient or contractor have a system for identifying warranty claims, recording claims, and enforcing claims with the manufacturers.

- Frequency of Performance Reviews and Oversight

- At a minimum, formal performance reviews should be completed quarterly, with documented corrective actions, for larger and more complex projects.
- For contractors with multi-year contracts (if applicable), a formal review every 12 months is necessary to assist in determining whether the contract should be extended.

LAREDO TRANSIT MANAGEMENT INC.

Subrecipient / Service Provider Compliance Monitoring Checklist

Evaluation Area	Q1	Q2	Q3	Annual Onsite
Vehicle Maintenance Reviews (including wheelchair lifts and other accessibility features)				
Warranty Recovery Program				
Physical Inventory of FTA Property				
Vehicle Control System (including verification of intended use)				
Safety Policy Changes (Training)				
Driver Training				
Security & Emergency Mgmt Policy Changes (Training)				
Farebox Cash Counting Policy				
ADA Compliance				
Title VI Compliance				
DBE Goal Attainment				
Drug and Alcohol Contractor Monitoring				
Annual MIS Reports for D&A				

Additional Information:

Signatures:

Laredo Transit Management Inc. Representative/Date

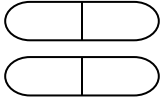
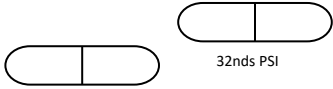
Agency/ Agency Representative/Date



Current Mileage:				Miles Last P.M.:	
Inspection Code:	✓ OK	0	Follow-Up Needed	X	Adjusted/Serviced/Repaired

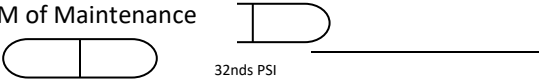
[illegible]

Check for proper tire matching.		
Check wiper blades and arms.		
Check mirror condition and mounting.		
Check for leaks at wheel seals and axle flanges.		



The above tire prints are to be used to record existing tread depths and air pressure.

A.G.M of Maintenance



EL METRO OVERSIGHT ON SUBRECIPIENTS

Philosophy and Purpose

El Metro will assist the sub-recipient in providing the highest quality of service in keeping vehicles in safe, reliable, and operational condition.

The purpose is to provide oversight to sub-recipients by developing and implementing consistent maintenance procedures critical to maximizing efficiency while maintaining its assets to the State of Good Repair (SGR).

Goals & Objectives

The goal is to provide oversight procedures to ensure the sub-recipient is in compliance with federal requirements and performance goals. LTMI will assist sub-recipients with checklists/monitoring materials, and training materials.

Objective #1 - To ensure the sub-recipient is performing on-time Preventive Maintenance Inspections (PMI's).

Objective #2 - To ensure that vans are properly maintained and meet the • Original Equipment Manufacturer (OEM) required maintenance schedule.

Objective #3 - To ensure sub-recipients are tracking warranty and recovering warranty claims.

Scope of Work

El Metro's Assistant General Manager of Maintenance will review maintenance records on sub-recipients.

Preventive Maintenance records will be reviewed quarterly and logged on the *"Preventive Maintenance Inspection (PM/) Audit Report"*. (Exhibit 5)

AGM will verify that PMI's are performed at 3,000 Intervals

(500+/- miles). AGM will review sub-recipients Maintenance

Plan on an annual basis.

AGM will perform an " *Oversight Inspection on Subrecipient- Maintenance Performance Report*" report on each van quarterly. Thirty-eight (38) items are inspected including In-Van Inspection, Circle Inspection, Engine Compartment, and Under-Van Inspection. (See Exhibit 6)

After inspections are completed and documented these reports will be submitted to FTA.

LTMI Maintenance and Facility Plan

3.8 Title VI Equity Analysis

There has been no construction of any new facilities including a vehicle storage facility, maintenance facility, operation center, etc.

Attachment B: Title VI copy of Resolution showing Mass Transit Board Approval

The Laredo City Council/Mass Transit Board meeting was held on June 16, 2025 to approve the LTMI Title VI program. Attached is Resolution No. 2025-RT-29 approving the Title VI Program.

Add the resolution once it's signed.

Requirements of Transit Providers (Chapter IV)

Service Standards and Service Policies

Vehicle Load Standards

Vehicle Type	Average Passenger Capacities			Maximum Load Factor
	Seated	Standing	Total	
30' Standard Champion	32	12	44	1.4
35' Low Floor Gillig	32	15	47	1.5
40' Low Floor Gillig	38	15	53	1.4
35' Standard Blue Bird	32	15	47	1.5
30' Low Floor Gillig	28	12	40	1.4

Vehicle Headway Standards

Urban radial routes are defined as those with headways operating at least every 30 minutes Monday through Saturday from 6:00 a.m. through 6:00 p.m. these routes carry the highest ridership. Secondary radials are defined as those with headways of 60 minutes or more Monday through Saturday from 6:00 a.m. through 6:00 p.m. serving areas with lower ridership and demand.

Sunday service is provided on urban radials at no more than 45 minute headways and on secondary radials at no more than 90 minute headways.

On-Time Performance Standards

Ninety (90) percent of El Metro's scheduled services will complete their scheduled runs no more than 5 minutes late in comparison to the established public timetables.

Service Availability Standards

Local bus stops will be not more than 3 city blocks apart. The exception to this is any El Metro service that operates on Interstate 35 as part of the regular route where it is not possible or safe to stop.

Vehicle Assignment Policy

Vehicle assignments take into consideration the ridership on the route and other operating characteristics including turning radius, passengers with disabilities and the availability of voice annunciation automated stop announcement systems.

Transit Amenities Policies

Installation of transit amenities including benches and shelters are based on the number of customer boarding's at stops along the routes. This policy is a guide to the placement of transit amenities. Other factors including need for additional ADA accessibility and retail facilities are also considered in the placement of transit amenities.

El Metro currently operates 35 Peak Hour vehicles serving the Laredo, TX UZA and is exempt from the other submittals at this time.

U. S. Census Bureau American Fact Finder
Laredo, Texas
Languages Spoken at Home

Table Notes

LANGUAGE SPOKEN AT HOME

Survey/Program: American Community Survey

Year: 2020

Estimates: 5-Year

Table ID: S1601

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2020, the 2020 Census provides the official counts of the population and housing units for the nation, states, counties, cities, and towns. For 2016 to 2019, the Population Estimates Program provides estimates of the population for the nation, states, counties, cities, and towns and intercensal housing unit estimates for the nation, states, and counties.

Source: U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see ACS Technical Documentation). The effect of nonsampling error is not represented in these tables.

The 2016-2020 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances, the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineation lists due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Explanation of Symbols:

-

The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution.

N

The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area.

(X)

The estimate or margin of error is not applicable or not available.

median-

The median falls in the lowest interval of an open-ended distribution (for example "2,500-")

median+

The median falls in the highest interval of an open-ended distribution (for example "250,000+").

**

The margin of error could not be computed because there were an insufficient number of sample observations.

The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution.

A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

LANGUAGE SPOKEN AT HOME



Note: This is a modified view of the original table produced by the U.S. Census Bureau.
This download or printed version may have missing information from the original table.

Laredo city, Texas			
Total			
Label	Estimate	Margin of Error	
▼ Population 5 years and over	236,347	±256	
Speak only English	22,741	±1,575	
Speak a language other than English	213,606	±1,550	
▼ SPEAK A LANGUAGE OTHER THAN ENGLISH			
▼ Spanish	211,986	±1,482	
5 to 17 years old	51,791	±900	
18 to 64 years old	138,176	±1,018	
65 years old and over	22,019	±364	
▼ Other Indo-European languages	407	±240	
5 to 17 years old	29	±47	
18 to 64 years old	248	±143	
65 years old and over	130	±101	
▼ Asian and Pacific Island languages	1,078	±195	
5 to 17 years old	202	±96	
18 to 64 years old	871	±157	
65 years old and over	5	±7	
▼ Other languages	135	±117	
5 to 17 years old	0	±33	
18 to 64 years old	134	±117	
65 years old and over	1	±2	
▼ CITIZENS 18 YEARS AND OVER			
▼ All citizens 18 years old and over	131,557	±1,798	
Speak only English	12,246	±955	
▼ Speak a language other than English	119,311	±1,840	