

EXHIBIT

A



City of Round Rock
Title VI Program Update 2027-2029



Submitted in fulfillment of Title VI of the Civil Rights Act of 1964

Adopted April 2016
Updated August 2020
Updated June 2023
Updated April 2026

Title VI Policy Statement

It is the policy of the City of Round Rock (CORR), Texas, that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied or, be subjected to discrimination as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

Since 1964, additional statutes have prohibited discrimination based on sex (Federal-aid Highway Act of 1973), age (Age Discrimination Act of 1975), and disability (Section 504 of the Rehabilitation Act of 1973 and Americans with Disabilities Act of 1990). Taken together, these requirements define an over-arching Title VI/Nondiscrimination Program. Additionally, the Civil Rights Restoration Act of 1987 defined the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.

Declaración de Política del Título VI

Es la política de la Ciudad de Round Rock (CORR), Texas, que ninguna persona, por motivos de raza, color u origen nacional, sea excluida de la participación, se le niegue o sea sometida a discriminación según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y estatutos relacionados.

Desde 1964, estatutos adicionales han prohibido la discriminación basada en sexo (Ley Federal de Carreteras de 1973), edad (Ley de Discriminación por Edad de 1975) y discapacidad (Sección 504 de la Ley de Rehabilitación de 1973 y Ley de Estadounidenses con Discapacidades de 1990). Tomados en conjunto, estos requisitos definen un Programa de Título VI/No Discriminación integral. Además, la Ley de Restauración de Derechos Civiles de 1987 definió la palabra “programa” para dejar claro que la discriminación está prohibida en toda la agencia si alguna parte de la agencia recibe asistencia federal.

Craig Morgan, Mayor
City of Round Rock, Texas

Date

Introduction

The City of Round Rock (CORR), as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); 49 C.F.R. Part 21; and related statutes and regulations. CORR acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

This plan explains how CORR incorporates the requirement of Title VI and related legal authorities into its operations. The plan will be used as a reference for CORR and informational resource for the public. The plan is updated every 3 years to reflect changes in Title VI compliance operations.

Discrimination under Title VI

It is the responsibility of every CORR employee to prevent, minimize, and eradicate any form of discrimination. There are two types of discrimination prohibited under Title VI and its related status: (1) disparate treatment that alleges similarly situated persons are treated differently because of their race, color, or national origin (i.e., intentional discrimination); and (2) disparate impact/effects when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of protected group. The focus of disparate impact is on the consequences of a decision, policy or practice rather than the intent.

Prohibited forms of discrimination may include, but not be limited to, the following:

- The denial of services, financial aid, or other benefits provided under a program.
- Distinctions in the quality, quantity, or manner in which a benefit is provided.
- Segregation or separation of persons in any part of the program.
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others.
- Differing standards or requirements for participation.
- Methods of administration that directly or indirectly, or through contractual relationships would defeat or impair the accomplishment of effective nondiscrimination, or
- Discrimination in any activities or services related to a highway, infrastructure or facility built or repaired in whole or in part with federal funds.

CORR efforts to prevent such discrimination must address, but not be limited to, how a program or activity:

- Impacts the public.
- Provides accessibility.
- Provides equal access to benefits.
- Encourage participation.
- Provides services equitably.
- Initiates contracting and training opportunities
- Investigates complaints
- Allocates funding
- Prioritizes projects

Authorities

The authorities applicable to CORR Title VI/Nondiscrimination Program include:

- Title VI of the Civil Rights Act of 1964 (42. U.S.C. §2000d et seq., 78 stat.252), (prohibits discrimination of the bases of race, color, national origin).
- Federal Transit Laws, Title 49, USC, Chapter 53
- 49 CFR Part 21 (entitled *Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964*).
- 23 CFR Part 200 (FHWA's Title VI/Non-discrimination Regulation).
- 28 CFR Part 42.01
- Title 43, Texas Administrative Code (TAC), §31.48(c)(1), Project Oversight, Civil Rights.

Organizational Chart

The Transit Coordinator serves as the Title VI Coordinator for the Transportation Department. The Title VI Coordinator works to ensure the requirements of Title VI are enforced.



General Requirements

This section addresses the General Requirements of FTA Circular 4702.1B. The following information addresses the reporting requirements as described under Chapter III of the Circular.

Notification of Title VI Protection

The City of Round Rock is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. Notice regarding the City's Title VI policy and procedures on how to request additional information and how to file a complaint have been posted on the city buses, at the Transit Center and on the city's website at roundrocktexas.gov/city-departments/transportation/public-transportation/title-vi-program/

Title VI Complaint Process & Complaint Form

Any person who believes that he or she, individually, or as a member of any specific class has been subject to discrimination, may file a complaint. A complaint may also be filed by a representative on behalf of such a person group. Title VI complaints must be filed within 180 days of the date of the alleged act of discrimination.

The Title VI Complaint Process and where to access the complaints forms are included as Appendix C and will be published and translated into Spanish, for access on the city website or by calling and requesting the forms be mailed or emailed to them.

Appeal

If no violation is found and the complainant wishes to appeal, the complainant may appeal directly to the City Manager's Office City of Round Rock, 221 E. Main Street, Round Rock, Texas 78664. If the complaint is against the City on a transportation-related complaint it will be forwarded to TxDOT or FTA within 10 days.

Program Reviews

Special emphasis program reviews will be conducted on activities, accomplishments, and issues. The reviews will be conducted by the Title VI Program Coordinator to assure effectiveness in their compliance with Title VI provisions. The Title VI Program Coordinator will coordinate efforts to ensure equal participation in all programs and activities at all levels.

Limited English Proficiency Program

The Language Assistance Plan is included in Appendix B. The Language Assistance Plan uses the Four Factor Analysis to identify limited English proficient (LEP) persons that need language assistance is available and describes how staff considers LEP persons. In accordance with Safe Harbor Provision, CORR has analyzed which language groups exceed the 1,000 persons or 5 percent threshold. Spanish is the only group in the City meeting this threshold, therefore vital documents as listed in Appendix B will be translated into Spanish.

Public Participation Plan and Policy

The City of Round Rock believes that effective community involvement improves the quality of decision-making processes and builds public trust in the City. The city developed a public participation plan and policy to inform, consult, involve, collaborate, and empower the public in understanding the problem, alternatives, opportunities and/or solutions. The Plan is included as Appendix A.

Title VI Reviews on Sub-Recipients for Transit (if applicable)

The City does not have any Sub-recipients.

Title VI Plan Updates

The City will review the need for any updates to its Title VI Assurances every three years or as necessary.

Remedial Action

The City will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program's administrative requirements. When deficiencies are found, procedures will be promptly implemented to correct the deficiencies and to put in writing the corrective action(s).

Training

The City will provide training on Title VI and its related status, including Limited English Proficiency, for managers, supervisors and staff, especially those with frequent public interaction. The Transit Coordinator completed NTI overview of Title VI and Advance Title VI & Public Transit in 2023 & 2024.

Title VI Contract Provisions

Federal aid construction contracts must include provisions which require compliance with Title VI. The specific contract provision language to be included can be found on the Federal Highway Administration website at highways.dot.gov/civil-rights/title-vi-civil-rights-act-1964-and-additional-nondiscrimination-requirements. Instructions for certifications and assurances for Federal Transit Authority (FTA) grants can be found on the FTA website at transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances.

City contracts will contain the following or similar language and other related assurances and standards regarding compliance and Civil Rights laws:

Compliance with Civil Rights Laws: Contractor hereby assures that it will comply with Subchapter VI of the Civil Rights Act of 1964, 42 USC Sections 2000 (e)(17), to the end that no person shall, on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits or, or be otherwise subjected to discrimination under this Contract or under any project, program or activity supported by this Contract.

Site and Facility Location

The City shall not select a site or location of a facility for participants and beneficiaries of the City's federal aid programs if that selection could exclude individuals from participation in, or deny them the benefits of, or subject them to discrimination on the grounds of race, color and national origin or could substantially impair the accomplishment of the objectives of nondiscrimination on the aforesaid grounds.

Data Collection

The City will gather, analyze, and maintain statistical data on race, color and national origin to determine the investment benefits and burdens to the eligible population, including minority and low-income populations. Data gathering procedures will be reviewed regularly to ensure sufficiency of the data administration. The City will regularly analyze and evaluate the data collected and data-collecting procedures to determine the effectiveness of outreach methods in meeting requirements of the Title VI Program to ensure no group is excluded during the decision-making process or is not given an opportunity to voice their opinions or concerns.

Transit-related, non-elected, Committees or Councils

The City does not have any transit-related, non-elected, planning boards, advisory councils, or committees.

List of Complaints, Title VI Investigations and Lawsuits

The City maintains a complaint log, which documents all activity related to the complaint. The complaint log is included as Appendix D in this plan and shall include the following information:

- Date complaint filed.
- Complainant identification – name, race, color, gender, and/or national origin.
- Nature of complaint.
- Who the complaint is against.
- Date investigation completed.
- Result of investigation.
- Date complainant notified of the result of the investigation.

Record & Summary of Title VI Complaints Investigation, Lawsuits 2024-2026

The City has not received nor been notified by the Department of Transportation or Federal Transit Administration or other programs of any Title VI complaints. The City's legal team keeps records of any lawsuits regarding Title VI.

Public Participation Plan

In June 2023, CORR City Council adopted Resolution R2023-181 Public Participation Plan to assure meaningful access to public involvement and community outreach programs for minority, low-income, and LEP populations. The policy formally incorporated practices and strategies that have been in use and continued development. CORR Public Participation Plan (Appendix A) provides an overview of those practices and strategies for inclusive public participation.

The policy applies to planning and service aspects of CORR Transit projects. It reaffirms the city's commitment that it will continue to include low-income, minority, and limited English groups in its public involvement and community outreach programs, including service changes, fare changes and future service planning. During this reporting period, the city did not have any outreach or public involvement activities.

Language Assistance Plan

CORR has a Language Assistance Plan (Appendix B) in place to ensure that LEP persons have access to programs, services, and public participation opportunities. A first step in providing meaningful access to services for LEP individuals and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through analysis of available data. For this Program Update, CORR updated its Four Factor Analysis that relied on recently available data for the US Census American Community Survey.

Appendix A

Public Participation Plan

Introduction

As a recipient of federal funds from the Department of Transportation (DOT), the City is subject to legal requirements to create and implement a public participation plan that identifies and describes the City's policies and procedures for public participation and to ensure meaningful access to benefits, services and information. The City has written a separate LEP Plan to address the specific communication needs of LEP populations; the communication strategies identified in this Public Participation Plan (PPP) will be coordinated with the policies and procedures identified in the LEP Plan

Public Participation Plan and Policy

The City of Round Rock believes that effective community involvement improves the quality of decision-making processes and builds public trust in the City. The goal of the public participation policy is to inform, consult, involve, collaborate and empower the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.

The City of Round Rock maintains a comprehensive community involvement program for their transportation programs that includes plans for receiving public comments for major decision-making processes including, but not limited to, policy development, strategic planning, budgeting, capital projects planning, fare adjustments and transit service changes. The City will also develop methods to provide the public with access to accurate, understandable, and timely information to facilitate effective involvement in the decision-making process.

Existing Public Involvement Strategies, Procedures and Desired Outcomes

The City uses a mix of print and electronic media as well as in-person communication strategies to share information about planned events, City news and happenings, and to provide notification, background, and progress information about City projects.

Print Media

The City uses several forms of print media:

Publications that can be sent with the monthly utility bills. City surveys have shown that this publication is among the most effective means of communication the City uses. This print medium is primarily used to announce planned events and/or to provide information about project updates.

Fliers are produced in a fact sheet format and are used primarily for project-specific information about project activities that will occur in the surrounding area. They are distributed by hand to potentially affected stakeholders. This print medium can be translated into Spanish and can be interpreted into other languages, upon request.

Formal Letters are produced on standard City letterhead and mailed; they are used to communicate with specific individuals and/or business, and they serve primarily as project notification and/or correspondence.

Electronic & Web-based Media

The City also makes use of electronic and web-based media to communicate information about planned activities and on-going projects:

Round Rock Electronic Newsletter/Electronic Newsletter Blasts serve as the electronic version of the News Flash; however, the electronic version allows for more content and connectivity to other electronic/web-based media. Surveys can be tied to the newsletter to gather feedback.

Press Releases are used to announce events that will occur within two weeks or to communicate project milestones, immediate releases of information and/or to provide notice of closures.

Social Media – Blogs/Facebook/Twitter is used to provide communications about project progress and allow for interaction among and between stakeholders and the City. These social media outlets can also be used to generate a historical record of project progress and commentary provided by the community.

Online Public Engagement Tools, included on the City's website and third-party websites, provide the ability to host virtual meeting materials and gather comments from the public on projects or topics of interest.

Public Meetings

The City employs several different types of public meetings based on the communication needs:

Public Meetings generally involve a discussion between City staff and community members about specific concerns related to projects which directly impact them. The function of these meetings is to provide information and receive feedback about a proposed project, ensure public participation in the development of the project, and to keep the community informed during the project's life cycle.

Open Houses are generally informal meetings that allow for participants to come and go as they please, ask questions of City staff, and provide written and/or verbal comments. The City uses this meeting format to provide information to the community and to solicit community feedback on proposed projects. These meetings are often conducted when a program or service is beginning terminated and/or changing.

Close the Loop

It is very important after a public involvement activity occurs to let the participants know what information was gained from this activity and how it will be used in the decision-making process. This can be accomplished in meeting summaries by sending postcards, emails, letters to participants; or in the case of an on-going committee, it could be a regular agenda item.

Communication Strategies and Consideration for Minority, Low-Income, and/or LEP Populations

There are many ways that the City can help ensure meaningful communications are provided to minority, low-income and/or LEP populations. One way the City can provide effective communications to the local minority, low-income, and/or LEP community is to tailor public involvement activities to the local population they are trying to reach. The City can tailor neighborhood meeting format and content to unique minority, low-income and/or LEP communities based on demographic information and input from stakeholder interviews. Locations should be convenient to transit. These could be a community center, a church, a store, etc.

All meetings should be held in ADA-compliant facilities. Invitation and meeting announcements will offer to accommodate special needs upon request. Special needs could include those related to physical, mental, sensory, and other disabilities. Meetings should be set up in the format that a person with a wheelchair would be able to fully participate in all activities.

Translate Outreach Materials

A Spanish interpreter can be present to provide interpretive services for other public involvement activities, such as surveys and meetings. The City has many employees who are fluent in Spanish and are available for interpretations. The presence of the interpreter should be identified at meetings with notices posted to let participants know that this service can be made available.

Meeting materials (including exhibits, agendas, comment cards, handouts, presentations, pocket cards, postcards, newsletters, etc.) can be translated into Spanish or other languages, as needed and if requested in advance, or the interpreter would provide competent oral translation of meeting materials. Other technical exhibits could use pictograms and photos to communicate the intended message with fewer words.

Public meeting announcements should be translated into Spanish. Translated notification could be added to the English version of these announcements indicating that interpretive services are available upon request and free of cost. The City should reconsider the effectiveness of their communication strategies and procedures every three years (on the same schedule as the re-evaluation of the LEP Plan).

Conduct Internal Monitoring

It is important to obtain informal feedback from internal as well as external stakeholders. This could be in the form of a team meeting including City staff and any consultants who may be involved in the process. Questions that could be discussed in this meeting include:

- Is the input received from the public useful in the decision-making process? If so, how has it been useful? If not, how could it be improved?
- Did the public receive the information they needed to provide meaningful input

Obtain Feedback from Community Organizations

Community and civic organizations and businesses may be useful outlets to contact when planning and/or implementing future public involvement activities. This outreach allows the City to determine if there have been any noticeable changes in the demographics of the population in their service area. It would provide input on whether the public involvement strategies currently in place and efforts to inform the EJ and LEP communities of the availability of language assistance are working and to continue to inform the LEP community of new or updated language assistance.

Meeting Evaluations

A short, to-the-point questionnaire could be used at the end of public meetings to get a sense of how effective the meeting was perceived to be by the public. This questionnaire could be placed on the back of a comment card or provided as a separate handout. Typical questions include:

- How did you hear about tonight's meeting?
- On a scale from 1 (did not like) to 5 (liked very much), rate the location of this meeting?
- On a scale from 1 to 5, rate the information presented and on display?
- On a scale from 1 to 5, how would you rate the "Open House" format used for tonight's meeting?
- In which language do you prefer to receive project information?
- Do you have any other comments?

Make Modifications to PPP Plan as Necessary

Based on the feedback received from the internal monitoring and feedback from community organizations, the City would make changes to the public involvement strategies as well as staff training. Please review the LEP Plan for more information on how language assistance measures will be monitored and reevaluated.

Capital Area Metropolitan Planning Organization (CAMPO)

CAMPO was established in 1973 and serves as the federally designated MPO for the Central Texas region, including the City of Round Rock. In cooperation with the state transportation department and transit operators, CAMPO develops the Transportation Improvement Program (TIP).

In developing the TIP, CAMPO provides citizens, affected public agencies, representatives of transportation agency employees, other affected employee representatives, private providers of transportation, and other interested parties with a reasonable opportunity to comment on the proposed program. According to Texas Administrative Code, Title 43, Chapter 16, Section 101(b), the TIP shall be updated and approved at least every two years. The TIP development process, including public involvement activities and opportunities for public review and comment, is being used to satisfy program or project requirements of the Federal Transit Administration Urbanized Area Formula Program. The City of Round Rock participates in CAMPO's planning projects by providing and listing city transportation projects.

Appendix B

Limited English Proficiency Plan (LEP) City of Round Rock

Purpose

The City of Round Rock (CORR) is committed to ensuring that limited English proficient (LEP) persons have meaningful access to the benefits, services, information, and other activities and programs provided by the City. Accordingly, CORR continuously seeks to improve the services it provides to enable communication between persons with LEP and the agency. This Language Assistance Plan (LAP) reevaluated at least once every four years, includes an analysis that identifies the LEP populations served by CORR and information on how the agency provides language assistance.

Goals

It is essential that City staff be informed about their diverse clientele from a linguistic, cultural, and social perspective. The goal in providing meaningful access is to ensure that LEP persons can communicate effectively, and act appropriately based on that communication. The minimum reasonable measures would be to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in programs or activities.

The City will take reasonable steps to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate effectively in recipient programs or activities, where appropriate.

Safe Harbor

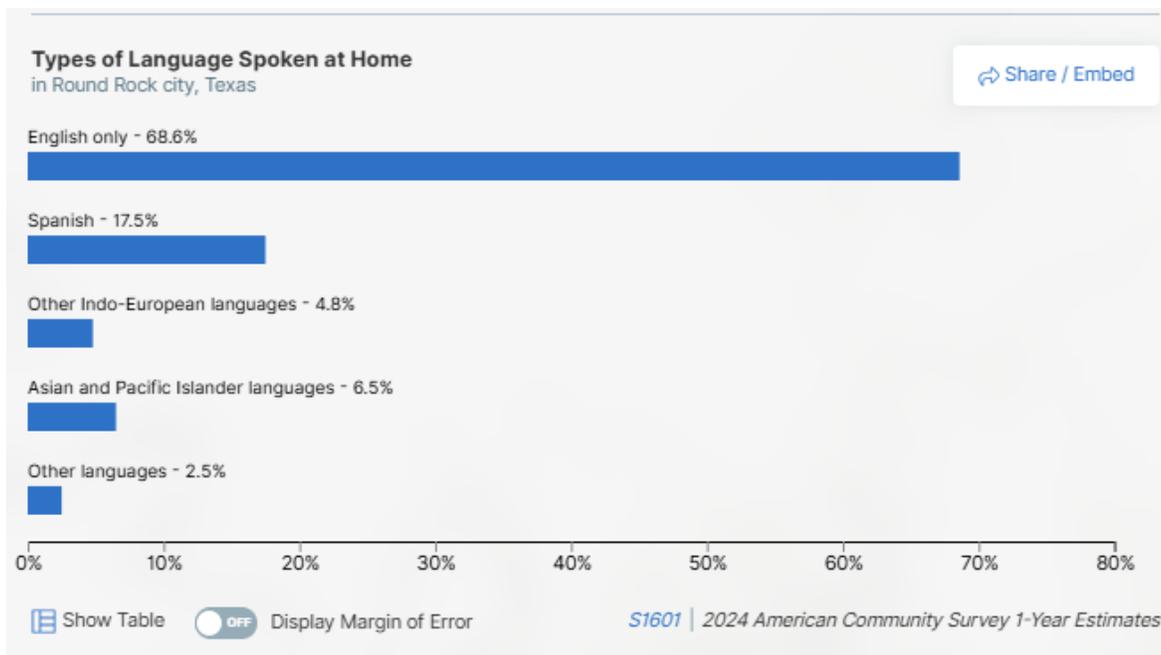
The City defines the LEP population that speak English less than "very well" and the Spanish speaking population exceeds 1,000 persons threshold. There are 22,743 Spanish-speaking persons that speak English less than "very well" in the City of Round Rock. To meet the Safe Harbor provisions, the City's transit services will provide additional vital documents for its services for Spanish-speaking persons.

Four Factor Analysis

The DOT Four Factor Analysis provides guidance to transit agencies receiving federal financial assistance in taking reasonable steps to ensure meaningful access to all of its services, programs, and activities utilized by LEP persons. The DOT guidance states transit agencies will provide written translation of vital documents for each eligible LEP language group that meets the Department of Justice (DOJ) Safe Harbor provision of five (5) percent of the population or 1,000 persons, whichever is less, identified as a limited English proficiency speaker within the service area. Such practices will be considered strong evidence of compliance with written-translation obligations. The Four Factor Analysis assesses the following criteria:

Factor 1: The number or proportion of LEP persons in the service area who may be served by the City.

City staff reviewed the 2024 United States Census Bureau to determine the approximate number of LEP persons age 5 years and older in the City of Round Rock. 31.4% of the City's population spoke a language other than English at home.



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

Through the analysis of demographic data and the findings of the community surveys, the Factor 1 analysis identified LEP populations in the City. The second step of the four-factor LEP needs assessment is to evaluate the frequency with which LEP individuals come into contact with the programs, activities, and services associated with the Transportation Department projects.

Summary of Interpretation Services from Language Line

The table below shows how many calls were received each fiscal year and the average duration of each call. There were no requests for assistance for any other language besides Spanish.

Date	Call Frequency	Average Call Time
2020	1 call	5 minutes
2021	0 call	0 minutes
2022	0 call	0 minutes
2023	1 call	12 minutes
2024	0 call	0 minutes
2025	0 call	0 minutes

The city has staff available to assist with calls and provide information. The language line helps when staff is unavailable to take the call or provide assistance.

Factor 3: Importance of City Projects to LEP Persons

City projects typically affect the citizens who live in close proximity to the project, more than those that do not. However, it can be interpreted that all projects conducted by the City are important to the citizens of Round Rock. Therefore, any project that is occurring in the City may be important to LEP persons.

Factor 4: Resources Available to the City of Round Rock

This step will allow the City to weigh the demand for language assistance against the current and projected financial and personnel resources. This analysis will help determine if the current language assistance measures are cost effective and help plan for future investments that will provide the most needed assistance to the greatest number of LEP persons within the resources available to the City.

Inventory of Language Assistance Measures Currently Being Provided.

City staff has the following options available to them to help assist someone who is having trouble communicating due to a language barrier:

- Language Line Services – City staff are able to access interpretation services, via the phone, for more than 170 languages. This service facilitates a clear, three-way conversation between the citizen, the staff member and an interpreter.
- Bilingual City Staff – Spanish speaking City staff are available to communicate with the public over the phone, through email, and in person.
- To supplement the existing language services, the city is also using new technology like Google Translate for text and for live speech-to-speech translation.

Conclusion

This four-factor analysis will help develop new language assistance services and/or suggest modifications to the existing language assistance measures currently being provided.

LEP Implementation Plan

The City has developed an implementation plan to address the needs of the LEP population. This plan includes five elements:

- Identifying LEP individuals who need language assistance.
- Providing language assistance measures.
- Training staff.
- Providing notice to LEP persons; and
- Monitoring and updating the plan.

Identification of LEP Individuals Who Need Language Assistance

This section of the LEP Implementation Plan overlaps with Factor One and Factor Two in the four-factor analysis.

Language Assistance Measures

City staff have the following options available to them to help assist someone who is having trouble communicating due to a language barrier:

- Language Line Services – City staff are able to access interpretation services via the phone for more than 170 languages. This service facilitates a clear, three-way conversation between the citizen, the staff member and an interpreter.
- City website offers Google Translate buttons on the bottom of every page.
- Bilingual City Staff – Spanish speaking City staff are available to communicate with the public over the phone, through email, and in person.
- Qualified Interpreter will be provided if requested in advance.

Non-English Language Relay Service

A telecommunications relay service that allows persons with hearing or speech disabilities who use languages other than English to communicate with voice telephone users in a shared language other than English, through a communications assistant who is fluent in that language.

Written Language Services

FORMS [Identify specifically, as appropriate]	Languages	Timeframe
Documents relating to service changes and general information:	English Spanish	At least within 60 days of change
Documents relating to routes and schedules, including riding rules.	English Spanish	At least within 60 days of change
Title VI Complaint Process	English Spanish	Ongoing
Documents relating to eligibility (ADA) of services:	English Spanish	Ongoing
Notices and posters containing important information on the availability of language services:	English Spanish	Ongoing
Documents relating to fare changes or fare media changes	English Spanish	60 -90 days before change
Documents relating to complaints: Note: Determination of complaints is going to be given to the person submitting the complaint in the initial language submitted.	English Spanish	Ongoing

Using the four-factor analysis, the City will translate vital written materials into languages in Spanish.

Staff Training Programs

Ongoing and thorough training will be important to assure that staff members are knowledgeable about LEP processes and procedures. Initial and periodic training for staff, coming into contact with LEP people, or any other aspect of this Plan. Include training on the Policy and the LEP Plan for new employees. Provide access to the language line video training for employees on the internet.

Providing Notice to LEP Persons

Based on the analysis of demographic data, surveys of community organizations and citizens (including LEP persons), the City can provide notification of the availability of interpretive services, upon request and free of charge, could be placed on public meeting announcements and/or other outreach materials and could be sent to community organizations, radio stations, television stations and newspapers, including Spanish papers and television stations.

LEP Plan Re-evaluation and Revision Policy

Evaluation can help track outreach efforts, discover dissemination problems early, and find out whether

language services have impacted relations with local immigrant communities.

The following will be considered when addressing changes:

- Frequency of encounters with LEP language groups. Nature and the importance of activities to LEP persons. Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
- Whether existing assistance is meeting the needs of LEP persons.
- Whether staff understands the LEP plan and how to implement it.
- Whether identified sources for assistance are still available and viable.

Modifications to LEP Plan

Based on the feedback received from the internal monitoring and feedback from community organizations, the City may need to make incremental changes to the type of written and oral language assistance measures provided as well as staff training and community outreach programs. The cost and effectiveness of language assistance measures should be considered during this process.

Depending on the results of the internal monitoring and feedback from community organizations, the City may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective.

Appendix C

Filing a Title VI Complaint with City of Round Rock

Any person who believes they have been discriminated against, on the grounds of race, color, national origin or gender can file written complaint with the City within 180 days of the alleged complaint.. A complaint may also be filed by a representative on behalf of such a person.

1. Complaints shall be submitted in writing on the City's Civil Rights Complaints form (links below) and must be signed by the complaint and/or the complaints representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.
roundrocktexas.gov/city-departments/transportation/public-transportation/title-vi-program/
2. Mail the completed form to City of Round Rock, Attn: Title VI Complaints, 3400 Sunrise, Round Rock, Texas 78665.
3. Upon receipt of the complaint, the City will acknowledge receipt of the allegation to the complaint. The City shall also notify appropriate parties within the Transportation Department. The City shall review the complaint, policies and procedures associated with the complaint, circumstances under which the alleged discrimination occurred and any other pertinent factors. Within 30 days of the receipt of the complaint, the City shall respond in writing of the results.
4. If no violation is found and the complainant wishes to appeal, the complainant may appeal directly to the City Manager's Office at: Human Resources Department, Attn: Director of HR, City of Round Rock, 221 E. Main street, Round Rock, Texas 78664.

Filing a Discrimination Complaint with the Federal Transit Administration

Any person who believes they have been discriminated against, on the grounds of race, color, national origin, may also file a complaint with FTA and may also be filed by a representative on behalf of such a person.

1. Complaints shall be submitted in writing to FTA, by visiting their website for complaint forms and information at: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta> and must be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.
2. Mail the completed form to the Office of Civil Rights, Attn, Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Filing a Discrimination Complaint with the Texas Department of Transportation (TxDOT)

Any person who believes they have been discriminated against, on the grounds of race, color, or national origin, may also file a complaint with TxDOT and may also be filed by a representative on behalf of such a person.

1. Complaints shall be submitted in writing to TxDOT, by visiting their website for complaint forms and information at: <https://www.txdot.gov/about/programs/civil-rights/title-vi-nondiscrimination.html> and must be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.
2. Mail the completed form to Texas Department of Transportation, Office of Civil Rights, 125 East 11th Street, Austin, Texas 78701.

Information in Another Language

If you need this information in another language, please call (512) 671-2888.

Appendix D

TITLE VI COMPLAINT LOG

Date Complaint Filed	Complainant Identification	Nature of the Complaint	Who the Complaint is Against	Date Investigation Completed	Result of Investigation	Date Notified Result of Investigation
FFY 2019	No Complaints Filed					
FFY 2020	No Complaints Filed					
FFY 2021	No Complaints Filed					
FFY 2022	No Complaints Filed					
FFY 2023	No Complaints Filed					
FFY 2024	No Complaints Filed					
FFY 2025 thru Jan 2026	No Complaints Filed					

Attachment A

FTA Title VI Specific Requirements

Transit-related, non-elected, Committees or Councils

The City does not have any transit-related, non-elected, planning boards, advisory councils or committees.

Transit Service Provided

The City through an Interlocal Agreement with Capital Metro provides two fixed routes and one express route. The City also provides on-demand & ADA paratransit service through contract with zTrip.

Public Participation & Outreach

The City completed a Transit Development Plan (TDP) in 2022. As part of the plan extensive outreach and community engagement was conducted. The City also completed a Title VI Service Analysis to determine the impacts on low-income and minority populations for the proposed changes as outlined in the TDP. The changes were to remove one of the fixed routes and implement an on-demand transit service. The study showed no disproportionate impact on access to mobility for minority or low-income. In fact, the new service would provide more accessibility to minority and low-income than the current fixed routes. No fare increases or other changes were made. The public meetings and involvement were undertaken during the development of the transit plan.

The following table shows the impact on changes to fixed route and with the implementation of the new on-demand (MOD).

Table 1: Fixed Route Impacts within ¼-mile of Service

2020 ACS 5-year	Square Miles	Population	Young Adults	Older Adult (Over 65)	Employment	Households	Low Income	Minority Population	Zero Vehicle Households	LEP
Existing Network	8	31,133	4,774	2,820	18,087	10,968	1,173	9,658	411	2,086
New Network ¹	6	21,157	3,453	1,738	12,373	7,364	782	7,129	204	1,455
Percent Change	-24.6%	-32.0%	-27.7%	-38.4%	-31.6%	-32.9%	-33.3%	-26.2%	-50.2%	-30.2%

¹ Buffer does not include Route 152 Express (closed door portion of route on I-35)

Table 2: MOD Impacts within ¼-mile of Service

2020 ACS 5-year	Square Miles	Population	Young Adults	Older Adult (Over 65)	Employment	Households	Low Income	Minority Population	Zero Vehicle Households	LEP
Existing Network	8	31,133	4,774	2,820	18,087	10,968	1,173	9,658	411	2,086
MOD Ph 1	21	81,158	11,788	6,873	45,655	27,093	2,226	24,106	826	3,814
Percent Change	177.6%	160.7%	146.9%	143.7%	152.4%	147.0%	89.8%	149.6%	101.2%	165.7%
MOD Ph 2	38	118,159	16,783	10,546	64,925	38,052	2,606	33,881	987	6,009
Percent Change	395.9%	279.5%	251.5%	274.0%	259.0%	246.9%	122.2%	250.8%	140.4%	188.0%

Monitoring

The City developed monthly procedures for reporting and listing Title VI complaints received by Capital Metro, who provides the fixed route service and for the on-demand paratransit service. The City also monitors both fixed route and on-demand paratransit operators to ensure Title VI posting located in a location's visible to the public and are posted both in English & Spanish.

Sub-Recipients

The City does not have any sub-recipients.

Fare & Major Service Reduction Policy

A Fare & Service Reduction Policy was developed to establish goals, objectives and guidelines to assist the City of Round staff in making decisions regarding adjustments to fares and major service reductions.

Goal

The goal of this Policy is to support the City of Round Rock's overall strategic mission to provide quality public transportation choices for our community which meets the needs of our growing region.

Fares

Objectives: The following objectives are designed to support the City of Round Rock's policy goal and balance the desire to keep fares affordable for Round Rock public transportation customers with the need to maximize fare revenue to help maintain and expand operations.

All fare adjustments will follow the process as outlined in this policy.

1. Customer/Community: City staff will consider what impact setting or restructuring fares has on customers and the community. The City seeks to set fares which are equitable to the widest possible range of existing and potential users. The fare structure will always take into account the socioeconomic make-up of our customers. The City will establish fares which are uniform and easy to understand for all public transportation options provided by the City.
2. Financial: Fare revenue is an important component of the operating budget for public transportation provided by the City. Fare revenue helps offset the cost of operating the system; the City's fare structure will support a predictable fare revenue stream. Setting or restructuring fares should ensure the total fare revenue stream is maintained at an appropriate level. The City Council and staff will consider what the financial impact of setting or restructuring fares has on the long-term sustainability of public transportation provided by the City. The City will monitor ridership, operational productivity, and efficiency and propose fare adjustments, as necessary.

Fare Change Process: The following guidelines outline the required steps for developing, evaluating and implementing fare changes.

1. Recommendations for setting or restructuring fares will be developed by city staff, in keeping with this policy. Multi-year increases may be proposed.
2. City staff will complete or have completed an operations and ridership analysis to evaluate the overall costs of operating the service and levels of ridership.
3. Public outreach will be conducted to solicit public comments on any fare increases. There will be a minimum of ten (10) calendar day notice prior to the meeting. Public outreach can be in the form of a public meeting, survey, social media, newspapers, and/or email, mail and phone. All public comments will be considered by the City before any fare adjustments are made.
4. All fare structure changes: adjustments or increases must be approved by the City Council.

5. Once fare increase(s) have been approved by the City Council, appropriate ads will be placed with local media outlets, posted on public transportation vehicles and posted on the City's website 30 days prior to the effective date of the fare increase.

Fare Policy Review: The City of Round Rock will review its fare policy and pricing with the expected fares may be adjusted as necessary to keep pace with the rate of increase in the cost of operations. Generally, fare changes will become effective at the beginning of the fiscal year, October 1st. The City reserves the right to make fare adjustments at any time due to unexpected operational impacts.

The City of Round Rock's fixed route service is provided by Capital Metro, which provides not only local service but allows for a streamlined fare collection for persons traveling in the Capital Metro and Round Rock region. When Capital Metro has any fare changes, they will follow their requirements of fare changes equity analysis according to Title VI Circular 4702.1B to meet the legal test as described in the circular. Capital Metro will include the Round Rock area to ensure there is no disparate impact and disproportionate burden on minority and low-income riders respectively.

Major Service Reduction Policy

Definition: A major service reduction is defined as a reduction in service which impacts at least half (50%) of the users of the City's public transportation.

Objective: The City Council and staff will consider the impact that reducing service has on customers and the community.

Major Service Reduction Process: The following guidelines outline the required steps for developing, evaluating and implementing service reduction.

1. Recommendations for major service reductions will be developed by city staff, in keeping with this policy.
2. City staff will complete or have completed an analysis to evaluate the overall impact of the service reduction.
3. A public hearing is required for any major service reduction, with a minimum 21 calendar day notice prior to such hearing.
4. All major service reductions must be approved by the City Council.
5. Once major service reductions have been approved by the City Council, appropriate ads will be placed with local media outlets, posted on public transportation vehicles and posted on the City's website 30 days prior to the effective date of the service reduction.

Major Service Reduction Review: The City of Round Rock will review its public transportation service annually with the expectation service may be adjusted, as necessary.

Emergencies: Notwithstanding the above policy, the City Council or City Manager may, with no notice, make reductions in service in times of emergencies, such as adverse weather, mass evacuations, etc. Once the emergency has ended the service will be returned to its pre-emergency service level. The return to pre-emergency service level may be done in stages.

Facility Construction Equity Analysis

The City has not constructed any facilities since the last Title VI Program update.

Distribution of Transit Amenities

The City has two guidelines to guide the placement of amenities at bus stops:

- Bus stops generating at least 20-50 daily boarding's qualify for a shelter.
- Bus stops generating at least 10-15 daily boarding's qualify for a bench.

Amenities may be placed at locations not meeting these guidelines if the stop is located nearby:

- Major activity/employment centers
- Hospitals or social service agencies
- Apartments with 250+ units
- Schools
- Route intersections
- Service frequency greater than 30 minutes

Currently the City has 13 bus stops with benches and trash cans and 12 bus stop shelters.

Service Standards

The City of Round Rock, through an Interlocal Agreement with Capital Metro, for the fixed route service and for consistency between the two agencies, the city uses the Capital Metro guidelines and service standards. Capital Metro standards are set higher as they operate over 50 vehicles in peak service. These service standards provide a framework for the provision, design, and allocation of service. Capital Metro staff will conduct a review of service guidelines and standards biennially to ensure alignment with goals, objectives, and resource availability.

The core services provided by Capital Metro in Round Rock are:

- Express – One stop in Round Rock connecting to Downtown Austin
- Fixed Route- Local stop service on primary corridors in Round Rock.

The Vehicle Headway or Service Frequency:

- Express 60 minutes am & pm
- Fixed Route 60 minutes midday

The fixed routes are 60 minutes, from Tech Ridge to Acc Campus in Round Rock.

On-time performance:

- On-time depart 30 seconds earlier or 5 minutes and 30 seconds later than scheduled.
- On-time performance should not fall below 80%

Service availability: Residential and employment density are primary influences on transit demand. Service coverage guidelines reflect industry standards for minimum density needed to support cost-effective transit service. Contiguous areas of the following densities are deemed transit supportive and should be prioritized for transit service within walking distance (¼ mile):

- Residential densities of 16 persons per acre or
- Employment densities of 8 employees per acre

Vehicle Assignment:

As part of Capital Metro's planning process and when service changes are made the planning department recommends the type and size of vehicle to be used in service. Two types of vehicles are currently in use for Round Rock Service, the 40' & 45' vehicles. Both vehicles use different seating types suited for services to be provided in Round Rock. The City of Round Rock staff monitors those vehicles put into service in Round Rock to ensure there are no problems with the assigned vehicles.

Demographics and Service Maps

The City of Round Rock does not have a population greater than 200,000 people; the City does not operate 50 or more vehicles. For this reason, this section is not required.

Monitoring Report of Service Standards and Policies

The City of Round Rock does not have a population greater than 200,000 people; the City does not operate 50 or more vehicles. For this reason, this section is not required.

Public Engagement Process for Recipient's Title VI Policies

See The City Public Participation Policy.

Results of Service and Fare Equity Analyses

The following can be concluded based on the findings of the Title VI equity analysis for Round Rock Transit:

No disproportionate impact on access to mobility for minority or low-income populations
MOD service greatly increases access to mobility for all socioeconomic groups. The introduction of MOD service increases access to mobility for all, including to the local fixed route service (Route 50) and the commuter services (Route 980) and express (Route 152)

City Management Approval of the Title VI Program

The Title VI Program will be presented to the City Council for approval prior to it being submitted to FTA in April 2026

Conclusion

The City's Title VI Program represents the City's continued efforts to maintain strict compliance with all Title VI regulations. Furthermore, this program also shows the City's continued commitment to serving the diverse population within its service area. The City of Round Rock strives to ensure individuals of all backgrounds have equal access to programs, services and activities.