

Foundation for the Homeless, Inc.  
Title VI Program



Data collection and reporting requirements for Federal  
Transit Administration (FTA) Recipients under

**Title VI of the 1964 Civil Rights Act**

Submitted In Compliance with:  
FTA circular 4702.1B  
(Effective October 1, 2012)

By  
Cap Metro (FTA Recipient)

2910 East 5th Street  
Austin, Texas 78702

And

Foundation for the Homeless, Inc. (FTA Sub Recipient)  
8505 Cross Park Blvd, Ste. 120  
Austin, Texas 78754

Randal Teich  
Executive Director (Administrator)

Randal Teich  
Title VI Coordinator)  
Program and Client Services Manager position currently  
vacant

October 23, 2018

## **Title VI Agency Profile**

This document contains information regarding transit services administered by Foundation for the Homeless, Inc. (FFH) and is intended to document compliance with Title VI of the 1964 Civil Rights Act. In accordance with FTA Circular 4702.1 B, various data, assurance statements, and transit-related information are provided.

FFH is a local 501(c) 3 public charity serving children and adults in Central Texas who are experiencing or at risk for homelessness and is a sub-recipient of Cap Metro. Through several Job Access/Reverse Commute (JARC) and New Freedom (NF) grants administered by CapMetro, FFH provides transportation to and from work, day care, school, shelter, etc., for families utilizing our shelter and related programs.

FFH provides complementary ADA accessible and other transportation services to assist persons in our shelter and other programs with their transportation needs to and from work, day care, school, shelter, job interviews, medical appointments, etc.

# Title VI

## Board Resolution

TO: Chair and Board of Directors

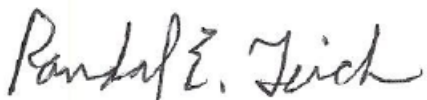
FROM: Randal Teich, Executive Director, Foundation for the Homeless, Inc. (Administrator)  
Adoption of Resolution to Approve the Title VI Program

### Background

Title VI prohibits recipients of Federal financial assistance from discriminating on the basis of race, color, or national origin in their program or activities and it obligates Federal funding agencies to enforce compliance. Further, it requires recipients to reduce language barriers that may impede access to important services to customers who may not be proficient in English.

The FTA requires that all direct and primary recipients document their compliance with the Department of Transportation's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. The FTA Circular 4702.1B as implemented on October 1, 2012, also requires that the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or officials' responsible for policy decisions prior to submission to FTA. As a sub-recipient of JARC funds through CAP METRO and as part of the Interagency Agreement with CAP METRO, FFH certifies compliance with the requirements of Title VI laws and regulations.

Recommendations: Adopt the Resolution.



Randal Teich  
Executive Director (Administrator)

RESOLUTION TO APPROVE THE  
TITLE VI PROGRAM

WITNESSETH

**WHEREAS**, Foundation for the Homeless, Inc. (FFH) is the subrecipient of Federal transit funds; and

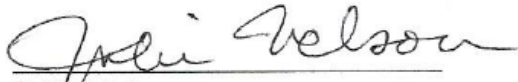
**WHEREAS**, 49CFR Section 21.0(b) required FFH to have a Title VI Program; and

**WHEREAS**, FFH is required to submit its updated Title VI Program to Cap Metro for submission to the Federal Transit Administration; and

**WHEREAS**, the proposed Title VI Program is submitted herein for the Boards review and approval.

**NOW, THEREFORE**, the FFH Board of directors hereby approved the attached Title VI Program.

**APPROVED** by the Board of Foundation for the Homeless, Inc. and **SIGNED** by the Chair this 31<sup>st</sup> day of October, 2018.



Julie Nelson  
Board Chair

# Title VI

## Notice to the Public

FFH has posted the following notice in its transport vans, on its website, in reception area at Paid Job Training office.

### Notifying the Public of Rights under Title VI

## Foundation for the Homeless, Inc.

Foundation for the Homeless, Inc. 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 Foundation for the Homeless, Inc. For more information on Foundation for the Homeless, Inc. Title VI program, and the procedures to file a complaint contact 512-453-6570, or visit our administrative office at 8505 Cross Park Blvd., Suite 120, Austin, Texas 78754. For more information, visit [www.foundationhomeless.org](http://www.foundationhomeless.org).

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 512-615-6800

### Notificar al Publico de los Derechos bajo el Titulo VI

## Foundation for the Homeless, Inc.

Foundation for the Homeless, Inc. opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al Titulo VI de la Ley Civil de derechos. Cualquier persona que cree que el o ella ha sido agravado por cualquier practica discriminatoria ilegal bajo el Titulo VI puede presentar una queja con Foundation for the Homeless, Inc.. Para obtener mas informaci6n sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, Harne al 512-453-6570, o visite nuestra oficina administrativa en 8505 Cross Park Blvd., Suite 120, Austin, Texas 78754. Para mas informaci6n, visite: [www.foundationhomeless.org](http://www.foundationhomeless.org).

Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Atenci6n:

Title VI Program Coordinator, East Building, 5th Floor-TCR,  
1200 New Jersey Ave., Se, Washington, DC 20590

Si se necesita informaci6n en otro idioma, contacte al 512-615-6800.

# Title VI

## Complaint Procedures

Title VI of the Civil Rights Act of 1964 is a Federal statute that provides that no person shall be discriminated against or denied benefits on the ground of race, color, or national origin, in programs and services that receive federal financial assistance. As such, to ensure that FFH trainees are not discriminated against, the agency has adopted policies that promote equal access and quality service to all.

### What Does Title VI Mean to You?

FFH is required to provide services in a fair and equitable manner to all passengers without regard to their race, color or national origin. Title VI also requires FFH to reduce language barriers that may impede access to important services by customers who may not be proficient in English. In addition to the Title VI requirements there are other laws providing similar protection on account of a person's gender, religion, age, disability, sexual orientation, or other protected status. FFH also has a zero-tolerance policy prohibiting any form of unlawful discrimination.

### What Services Are Available to Customers Who Are Not Proficient In English?

Under Title VI, customers who are not proficient in English are entitled to assistance in accessing critical FFH information. If deemed essential or upon request, FFH can obtain and provide translated materials in several languages, including Spanish, Vietnamese and others.

### What Should You Do If You Have A Service Complaint?

All comments and suggestions for improvement in the service are welcome and will be considered. Comments, suggestions or complaints should be submitted to our executive director by calling 512-615-6845.

### What Should You Do If You Have A Title VI Complaint?

To make a formal Title VI complaint, individuals should complete and submit the Title VI complaint form. All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.

FFH investigates complaints received no more than 180 days after the alleged incident. FFH will process complaints that are complete. Within ten (10) working days, FFH will provide the complainant or his/her representative with a written acknowledgment that FFH has received the complaint.

The completed form and letter should be sent to: FFH Re: Title VI 8505 Cross Park Blvd., Suite 120, Austin, TX 78754

Title VI  
Complaint Form



**Filing a complaint will not result in retaliation or a barrier to service. This means that if you report or complain, no one can treat you any differently than before you made the report.**

Name \_\_\_\_\_

Date you filled out the form \_\_\_\_\_ Date the problem happened \_\_\_\_\_

Time: \_\_\_\_\_

Who are you working with? \_\_\_\_\_

\_\_\_\_\_

Who was involved? \_\_\_\_\_

Summary of what happened (discrimination based on race, color, or national origin)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**The rest of this form is to be filled out by FFH staff only.**

Person Receiving Report: \_\_\_\_\_

Date Report Received: \_\_\_\_\_

Findings: \_\_\_\_\_

Decision: \_\_\_\_\_

\_\_\_\_\_

Resolution: \_\_\_\_\_

\_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

FFH Staff Name/Title: \_\_\_\_\_ Date: \_\_\_\_\_

**Presentar una queja no dara lugar a represalias o una barrera para el servicio. Esto significa que si el informe o queja, nadie puede tratarlo de forma diferente que antes de hacer el informe.**

Nombre \_\_\_\_\_

Fecha que lleno la forma \_\_\_\_\_ Fecha el problema ocurri6 \_\_\_\_\_

Tiempo \_\_\_\_\_

Con quien estaba trabajando? \_\_\_\_\_

\_\_\_\_\_

Quien participo? \_\_\_\_\_

\_\_\_\_\_

Explanación de lo sucedido (la discriminación por motivos de raza, color u origen nacional)

\_\_\_\_\_

\_\_\_\_\_

Persona que recibe informe: \_\_\_\_\_

**El resto de la forma debe ser llenado por personal solo FFH**

Fecha del informe recibido: \_\_\_\_\_

Resultados: \_\_\_\_\_

\_\_\_\_\_

Decisión: \_\_\_\_\_

\_\_\_\_\_

Resolución: -----

Firma del Cliente: \_\_\_\_\_ Fecha: \_\_\_\_\_

FFH Nombre Personal/Titulo: \_\_\_\_\_ Fecha: \_\_\_\_\_

# **Title VI**

## **Investigations, Complaints, and**

### **Lawsuits**

Please be advised that there were no Title VI incidents involving FFH employees during the time of September 1, 2010 and September 30, 2018.

# Title VI

## Minority Representation on Planning and Advisory Committees

Please advise that there are no elected transit related planning or advisory committees for Foundation for the Homeless, Inc..

However, each member of our Board of Directors is elected and advise and support all decisions based on transit related planning. Please see the breakdown of board by sex and race below.

Total Board Members	Male	Female	Caucasian	Hispanic	African American
15	60%	40%	87%	13%	0%

Total Advisory Council Members	Male	Female	Caucasian	Hispanic	African American
10	80%	20%	70%	20%	10%

# Title VI

## Public Participation Plan

Community outreach is a requirement of Title VI. FFH, as a recipient of Title VI funding, shall seek out and consider the viewpoints of minority, LEP persons, and low-income populations in the course of conducting public outreach. FFH makes the following community outreach efforts to better include all client populations in decision-making processes:

- Client populations are invited to and encouraged to give feedback on services rendered by FFH via annual satisfaction surveys.
- FFH's Title VI statements are posted in all FFH offices as well as vehicles and online.

FFH has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. To date, we have made the following community outreach efforts:

- Client populations have been invited to give feedback on services rendered by FFH via annual satisfaction surveys
- Board meetings – the Board of Directors holds quarterly meetings which are open to the public
- Citizens may call FFH at 512-615-6845 (Executive Director, Title VI Coordinator) to lodge a complaint or comment. All complaints/comments are logged and investigated.

Failure to exactly comply with all plan elements shall not constitute a failure of public process, nor render any actions or decisions invalid.

# Title VI

## Language Assistance Plan

This Limited English Proficiency Plan has been prepared to address the Foundation for the Homeless, Inc. responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

### **Plan Summary**

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

In order to prepare this plan, Foundation for the Homeless, Inc. used the four-factor LEP analysis which considers the following factors:

1. The number of proportions of LEP persons in the service area who may be served by FFH
  2. The frequency with which LEP persons come in contact with FFH services
  3. The nature and importance of services provided by FFH to the LEP population
  4. The interpretation services available to FFH and overall cost to provide LEP assistance.
- A summary of the results of the four-factor analysis is in the following section.

## Four-Factor Analysis

FFH's program receiving federal funds serves three counties within Central Texas. Those Counties include: Hays, Travis, and Williamson. Our mission is to mobilize faith and community organizations to restore hope and aspiration through transformative opportunities that prevent, end and reduce the suffering of homelessness for adults and children in Central Texas and nurture a more caring, sustainable community. FFH is a locally funded and governed nonprofit organization that provides direct clinical services, job training and other support services to the disability community.

The table below represents the results of the census.

County	Population	# of Persons Speak a Language other than English	# of Persons who do not Speak English 'Very Well'	Spanish	Indo-European	Asian or Pacific Islander or Other
Travis	1,024,331	286,963	123,846	104,076	5,010	14,750
Williamson	422,697	71,473	33,397	17,723	2,238	3,631
Hays	157,112	36,136	5,391	5,244	47	100

1. The number of proportions of LEP persons in the service area who may be served by Foundation for the Homeless, Inc.

FFH staff reviewed the U.S. Census Report and determined that 394,572 persons living in the FFH service area speak a language other than English. Of these persons, 162,652 or 41% have limited English proficiency; that is, they speak English "not well" or "not at all". In the FFH service area, of those persons with limited English proficiency, 127,043 or 78% speak Spanish, 7,295 or 4% speak an Indo-European language, and 18,481 or 11% speak an Asian or other Pacific Islander language.

2. The Frequency with which LEP persons come in contact with Foundation for the Homeless, Inc. services

Foundation for the Homeless, Inc. staff reviewed the frequency with which the office staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, Foundation for the Homeless has had 0 requests for interpreters and 0 requests for translated program documents. The board, office staff and drivers have had minimal reported contact with LEP persons.

3. The nature and importance of services provided by Foundation for the Homeless, Inc. to the LEP population

There is no large geographic concentration of any type of LEP individuals in the service area for Foundation for the Homeless, Inc.. The majority of the population we serve speaks English only. As a result, there are limited services within FFH that focus on outreach to LEP individuals. FFH employees are most likely to encounter LEP individuals through attending our twice Feed My People breakfast, participating in the annual Point in Time homeless count, office visits and phone conversations. We do not currently offer transportation services to attendees of Feed My People or to the public at large.

4. The interpretation services available to Foundation for the Homeless, Inc. and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

FFH reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise and will provide FFH staff that would to provide voluntary Spanish translation if needed within a reasonable time. Additionally, FFH has staff that would be willing to translate themselves or obtain translations of needed documents from English to Spanish.

### Language Assistance

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

How does staff identify an LEP person who needs language assistance?

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons will understand
- All staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When an informational meeting or event, a staff person will greet participants as they arrive and where possible, informally engage participants in conversation. Although translation may not be provided at the event it will help identify the need for future events.

### Language Assistance Measures

Although there is a very low percentage of LEP persons in the FFH service area, FFH will strive to offer the following measures:

- FFH staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English
- The following resources will be available to accommodate ELP persons:



- FFH staff is available for the Spanish language and will be provided within a reasonable time.
- Language interpretation will be accessed for all other languages through a telephone interpretation service as the need arises within a reasonable time.

### **Staff Training**

The following training will be provided to all staff:

- Information about the Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Documentation of language assistance requests
- How to handle a potential Title VI LEP complaint

**All contractors of subcontractors performing work for FFH will be required to follow the Title VI LEP guidelines.**

### **Translation of Documents**

- FFH weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.
- Translation resources have been identified and will be used if the need arises.
- When staff prepares a document, or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population

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

FFH will update the LEP Plan as required. At a minimum, the plan will be reviewed when data the next census is available, or when it is clear that higher concentrations of LEP individuals are present in FFH's service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether FFH's financial resources are sufficient to fund language assistance resources needed
- Determine whether FFH fully complies with the goals of this LEP plan
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

**Dissemination of Foundation for the Homeless, Inc.' LEP Plan**

- Post signs at conspicuous and accessible locations in FFH offices notifying LEP persons of the LEP plan and how to access language services
- State on agendas and public notices in the language that LEP person would understand that documents may be available in that language upon request at 512-615-6804

**Title VI**  
**Siting of Fixed Facilities**

During this reporting period, FFH has not constructed any facilities, the location of which required land acquisition and the displacement of persons from their residences or business.