



EL PASO  
TRANSPORTATION  
AUTHORITY

# Title VI Program October 1, 2025 to September 30, 2028



October 2025

**RECIPIENT INFORMATION**

**RECIPIENT:** El Paso Transportation Authority (ETA)

**SUBMITTAL DATE:** March 1, 2026

**PROGRAM UPDATE:** October 1, 2025, for the incorporation of Federal Transit Administration policy and Governing Board adoption on a minimum three-year period.

**EXPIRATION YEAR:** 2028

**CONTACT INFORMATION:** John C. Andoh, Executive Director  
800 East Overland Avenue, Room 423  
El Paso, TX 79901  
Phone: 915.273.3838, ext. 1226  
[director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org)

## **PROVISION OF TITLE VI ASSURANCES**

The El Paso Transportation Authority (ETA) hereby certifies that, in accordance with 49 CFR Section 21.7(a), it will ensure that:

1. ETA shall submit, on an annual basis, its Title VI Assurances, as part of its annual Certification and Assurances submission to the FTA
2. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits
3. ETA will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B
4. ETA will make it known to the public that persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the FTA and/or the U.S. Department of Transportation (USDOT).

### **I. TITLE VI COMPLIANCE HISTORY**

1. There are no outstanding lawsuits or complaints naming ETA which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
2. During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to ETA and, to the best of our knowledge, there are presently not any ongoing civil rights compliance review activities being conducted with respect to ETA.
3. There are currently no pending construction projects which would negatively impact minority communities being performed by ETA.

### **II. INCORPORATION OF THE PROGRAM**

The El Paso Transportation Authority (hereinafter referred to as “ETA” or “Recipient”) hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives. No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which ETA receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically, and without limiting the above general assurance, ETA hereby gives the following specific assurances with respect to its Federal Transit Administration program:

1. That ETA agrees that each “program” and each “facility”, as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated, in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That ETA shall insert the following notification in solicitations for sealed bids and request for

proposals for large procurements related to work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements:

*ETA, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.*

3. That ETA shall insert the applicable clauses as per the most recent version of the FTA's Best Practices Procurement Manual in every contract subject to this Act and the Regulations.
4. That ETA shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest herein.
5. That where ETA receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where ETA receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That ETA shall include the appropriate clauses as per the most recent version of the FTA's Best Practices Procurement Manual as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by ETA with other parties: (a) for the subsequent transfer of real property acquired or improved under Federal Transit Administration programs; and (b) for the construction or use of, or access to, space on, over, or under real property acquired, or improved under Federal Transit Administration programs.
8. That this assurance obligates ETA for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates ETA or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which ETA retains ownership or possession of the property.
9. ETA shall provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. ETA agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

11. ETA assures that the level and quality of transit service and related benefits are provided in a manner consistent with the Title VI of the Civil Rights Act of 1964.
12. ETA assures that the public will be given notice and engaged in a public hearing for service and fare adjustments in accordance with the adopted ETA policy.

THESE ASSURANCES are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to ETA by the United States Department of Transportation under the Federal Administration and is binding on it, other recipients, subgrantees, contractors, transferees, successors in interest and other participants in the Federal Transit Administration programs.

The person whose signature appears below is authorized to sign these assurances on behalf of ETA.



John C. Andoh III  
Executive Director

January 28, 2026  
Date

# GENERAL GUIDELINES/REQUIREMENTS

## I. Annual Certification and Assurance

As stated in Section I, ETA shall submit annually, its Title VI assurance, as part of its annual Certification and Assurance submission to the FTA. The most recent submission for ETA was executed and submitted to the FTA on July 30, 2025.

## II. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), ETA has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. ETA's complaint procedures and complaint form are contained herein as [APPENDIX A](#).

## III. Record Title VI Activities

In compliance with 49 CFR Section 21.9(b), ETA shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming ETA that allege discrimination on the basis of race, color, or nation origin. contained herein as [APPENDIX B](#). Such list shall include:

1. Date the investigation, lawsuit, or complaint was filed
2. Summary of the allegation(s)
3. The status of the investigation, lawsuit, or complaint
4. Actions taken by ETA in response to the investigation, lawsuit or complaint

## IV. Access for LEP Persons

ETA shall take 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). ETA will assist persons with limited English proficiency to participate in the transportation planning process. ETA Staff will make every effort to provide translators and document translation, where feasible, upon request. ETA's LEP Plan is contained herein as [APPENDIX D](#).

## V. Public Notification

In compliance with 49 CFR Section 21.9(d), ETA shall provide information to the public regarding its Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI by the following notice:



EL PASO  
TRANSPORTATION  
AUTHORITY

## Public Rights Under ADA, Title VI, and LEP

The El Paso Transportation Authority (ETA) prohibits discrimination and ensures equal opportunity for persons with disabilities in transportation in accordance with the Americans with Disabilities Act (**ADA**); operates services without regard to race, color, and national origin in accordance with **Title VI** of the Civil Rights Act; and follows Executive Order 13166 in identifying and engaging Limited English Proficiency (**LEP**) populations to ensure their involvement and knowledge of transportation planning and projects in and around their communities.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with El Paso Transportation Authority (**ETA**) For more information or to file a complaint, contact (915) 273-3838, ext. 1226, email [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org) or visit [www.elpasotransportationauthority.org](http://www.elpasotransportationauthority.org).

A complainant may file a complaint directly with the Federal Transit Administration through the Office of Civil Rights by calling 888-446-4511 or visiting <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta> or with the Texas Department of Transportation by writing to Texas Department of Transportation, Attn: TxDOT-PTN 125 E. 11th Street, Austin, Tx. 78701-2483 or visiting: <https://www.txdot.gov/about/programs/civil-rights/title-vi-nondiscrimination.html>

The ETA Notice of Rights under Title VI to the public, shown above, is posted in the ETA Administrative Offices and on buses, shown online at [www.elpasotransportationauthority.org](http://www.elpasotransportationauthority.org), and within the ETA Rider's Guide.

## **VI. Additional Information**

ETA acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1B, may be requested in writing of ETA, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

## **VII. Timely Submission**

ETA acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to its FTA Office of Civil Rights once every three (3) years. The submission shall include but is not limited to:

1. A summary of public outreach and involvement activities undertaken since the last submission and a description of any steps taken to ensure that minority and low-income people had meaningful access to these activities in [APPENDIX C](#)
2. ETA's process for persons with Limited English Proficiency (LEP)
3. Title VI complaint and Tracking procedures
4. A list of any Title VI investigations, complaints or lawsuits filed since the latest submission.
5. A copy of ETA's public notice regarding Title VI compliance and public access and instructions to ETA Title VI complaint procedures.

## **VIII. Environmental Analysis of Construction Projects**

ETA shall integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects of which require NEPA. If a Categorical Exclusion (CE) is performed, ETA shall complete the FTA's standard CE checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), ETA shall integrate into its documents, the following:

1. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population
2. A discussion of all adverse effects that would affect the identified minority and low-income population
3. A discussion of all positive effects that would affect the identified minority and low-income population
4. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project.

And if applicable:

5. A discussion of the remaining effects, if any, and why further mitigation is not proposed
6. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, ETA shall describe why this is the case.

## **IX. Public Participation**

ETA shall seek out and consider viewpoints of minority, low-income and LEP populations in the course of conducting public outreach and involvement activities in regard to proposed transportation decisions. ETA shall make every effort to include the following practices, consistent with the El Paso Metropolitan Planning Organization adopted Public Involvement Plan (available <https://www.elpasompo.org/PublicParticipationPlan>); not withholding the public participation plan adopted by the ETA Board of Directors as part of the Title VI Program:

1. Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities
2. Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments
3. Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities
4. Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities
5. Implementation of USDOT's policy guidance regarding ETA's responsibilities to LEP persons.

Each time ETA implemented changes to its operations, public outreach activities were designed and accomplished to ensure the public was aware of such changes. For fare and route adjustments, changes to service announcements were made 30 calendar days prior to the adjustment to encourage feedback from passengers and a draft of the route schedule was posted to the website. A survey or communication channel was established for passengers to provide their feedback and then those comments were analyzed and taken into consideration. The public was made aware of changes through various channels including public notice on website, notice in newspaper (as necessary), social media announcements, email announcements, text messages, signage at bus stops, and flyers on buses. Final adjustments were then prepared and, if necessary and required, presented to the ETA Access Advisory Committee for information and feedback and ultimately the ETA Board of Directors to have a vote and establish the date the adjustments to become effective.

ETA encourages the public to attend any ETA Access Advisory Committee and ETA Board of Directors meeting. A two (2) to three (3) week period of time was provided for passengers to see the final adjustments, ask questions, and understand the adjustments prior to it becoming effective. Announcements of final adjustments were made through similar channels as the initial announcement to encourage passengers to review the adjustments.

### **Public Participation Plan**

#### **Strategies and Desired Outcomes**

To promote inclusive public participation, ETA will employ the following strategies, as appropriate:

- Provide for frequent and continuous engagement by the public
- Select varied meeting locations and times that are convenient and accessible for minority and Limited English Proficient (LEP) communities
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP populations
- Use media in addition to other resources as a way to gain public involvement to include publications, notifications, and invitations that serve LEP populations

ETA is committed to informing and involving the public in the planning and delivery of public transportation services in its service area and will comply with state and federal laws and regulations including Title VI of the Civil Rights Act of 1964 which states that “no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Pursuant to the Federal Transportation Administration Title VI Circular FTA C 4702.1B, “Every Title VI program shall include an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI submission.”

The ETA Board of Directors allows for public participation for all transit items that require the Board’s approval which include: funding agreements, procurement of subcontractors, and purchase of service agreements. The ETA Board of Directors also allows public comment on all agenda items it considers. In addition, any member of the public may address the ETA Board of Directors on any non-agenda item, including transit, at any of its regular meetings. Meeting agendas are posted at least 72 hrs. in advance of the meeting and are available at [www.elpasotransportationauthority.org](http://www.elpasotransportationauthority.org).

ETA actively participates in the Far West Texas/El Paso Regional Transportation Coordination Committee (WTEP). WTEP facilitates human services – public transportation coordination and requires that all transportation providers submitting funding proposals to the state transportation agency, the Texas Transportation Department of Transportation (TxDOT), or El Paso Metropolitan Planning Organization (MPO) present proposed projects in order to obtain the WTEP endorsement. All WTEP meetings are open to the public and announced 72 hrs. in advance with agendas posted at <https://projectamistad.org/wtep/>. Included under the MPO is the Transportation Project Advisory Committee (TPAC), which is comprised of 16 voting members. TPAC reviews and makes recommendations to the Transportation Policy Board (TPB) on Metropolitan Transportation Plan(s) (MTP), Transportation Improvement Program(s) (TIP), Unified Planning Work Program(s) (UPWP), Congestion Management Process (CMP), project selection criteria, and special Transportation Planning Studies. The TPB ensures all regional transportation studies are performed in accordance with local governments’ desires and pursuant to federal and state laws, rules and regulations. TPB is comprised of 30 elected and/or appointed public officials from the local governments that have authority for project implementation; membership also includes local and county elected officials, State Senators, and State Representatives.

ETA actively participates in the development of the Transportation Improvement Program (TIPs) administered by El Paso MPO. TIP must include all major capital projects in order to receive federal funding. TIP meetings are open to the public with agendas posted 72 hrs. in advance and available on the MPO website at <http://www.elpasompo.org/>. ETA continues to participate in regional WTEP and MPO meetings and follows the appropriate posting requirements for meeting times.

ETA conducts regular surveys of its ridership and maintains a record of all complaints. This information is reviewed and considered when relevant projects, service changes, or other operational issues are being planned or considered. ETA has conducted transportation studies, led by the Texas A&M Transportation Institute (TTI), for transit service needs. All studies and any possible proposed service changes were discussed/presented in several stakeholder and public meetings (for each study) to adequately obtain the public’s input. Other methods of public outreach were done by press release and the use of social media outlets.

ETA may also conduct public informational meetings to obtain public comment when it is considering fare changes, significant route alterations, major capital improvements, or other service or system changes for which the County believes public input is warranted. ETA may also proactively schedule presentations before faith-based organizations, community organizations or at community gatherings where members of the public are likely to be in attendance and use County transit services that may be affected by proposed changes.

In such cases, the following process will be utilized:

ETA Public Participation Process

- Outline project for which public participation process is sought
- Prepare/update mailing and email lists of key stakeholders and community interests
- Prepare/post/publish, as appropriate, notice of public participation opportunity which may take the form of surveys, public meetings, invitation for comment or other in-put mechanisms
- Develop and make available project outline and information materials along with relevant ETA standards/policies, project goals and objectives and how to provide input.
- Maintain a record of public input process, activities and input received.

Since the previous Title VI submittal, ETA has conducted regular community engagement and outreach via traditional media, social media, and through on-board customer service.

See [APPENDIX C](#) for a summary list of dates over the past three (3) years that ETA has adjusted routes or fares.

## **X. Public Hearing Process for Service and Fare Changes**

ETA will advertise in accordance with the ETA Public Participation Plan to conduct any public hearing when considering proposed fare and major service changes. Public hearings are a key element of the decision-making process used by the ETA Board of Directors to assess the potential impact proposals that may have on ETA passengers and residents of El Paso County.

### Policy

Public Hearings will be scheduled by the ETA Board of Directors for fare and major service change proposals except as otherwise provided below.

### Definitions

A major service or fare change is any change or series of changes that directly affect:

1. 25 percent or more reduction of transit route revenue hours of ETA system-wide service.
2. 50 percent or more reduction of transit route revenue hours of a single ETA route computed on an annual basis.
3. The implementation of a new transit route.
4. 25 percent or more on the implementation of a passenger fare adjustment on an annual basis.

### Procedure

Proposed major service changes and fare and fare media pricing shall be evaluated for compliance with the FTA Office of Civil Rights guidance regarding potential discriminatory impacts on minority and low-income populations. The evaluation will include proposed actions ETA may apply to minimize, mitigate, or offset the adverse effects the changes could have on these populations, as described in FTA Circular 4702.1B, "Title VI and Title VI-Dependent Guidelines."

Prior to the institution of a fare change or major service change, a notice of intent to hold a public hearing will be published following the ETA adopted public participation plan. The notice will also be published in newspapers oriented to specific groups or neighborhoods that may be affected.

The notice will be published at least 30 calendar days prior to the hearing.

The notice will contain descriptions of the changes and the time and place of the hearing.

ETA shall ensure that all programs, services, activities, and benefits are implemented without discrimination. Any person who believes that he or she, individually, or as a member of any specific class or persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected class interests, may file a signed written complaint with ETA or FTA at the addresses listed below:

- ETA Executive Director  
El Paso Transportation Authority  
800 East Overland Avenue, Room 423  
El Paso, TX 79901  
Email: [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org)
- Federal Transit Administration Office of Civil Rights  
Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

If you are unable or incapable of providing a written statement and desire ETA or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. You may call ETA at 915.273.3838, ext. 1226. The complainant will be interviewed by the ETA Executive Director to receive complaints. If necessary, the official will assist the complainant in converting verbal complaints in writing. All Complaints must be signed by the complainant or his/her representative.

### Exceptions

1. Changes in fares and fare media pricing are subject to public hearing requirements with the exception of the following:
  - Reduced fare for less than 180 days
  - Free-fare promotions
2. Service changes are subject to public hearing requirements with the exception of the following:
  - Standard seasonal variations.
  - Changes instituted in response to an emergency situation in effect for 90 days or less.
  - Experimental service changes are instituted for 180 days or less.

Nothing in this section precludes the ETA Board of Directors from setting a public hearing on any matter associated with fares and service that it chooses.

Furthermore, all changes contemplated by ETA will be reviewed by the ETA Access Advisory Committee prior to submission to the ETA Board of Directors.

## **XI. Plan Monitoring and Evaluation**

Evaluation of the success of any involvement efforts must be result-oriented. It is never safe to assume that just because people don't come to an event that they are uninterested in the project. The goal is to

educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes.

### Tracking Efforts and Success

In order to track our public participation efforts, it is necessary that the individuals involved record their efforts.

1. ETA will keep records of outreach activities. See a summary in [APPENDIX C](#).
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after meetings regarding the overall tone of the meetings and any ideas or observations made regarding the process.

### Efforts of Monitoring and Evaluation of the LEP Plan

1. Provide day-to-day administration of ETA's LEP Plan, ensuring compliance and correct implementation.
2. Seek feedback from LEP communities, including customers and community-based organizations, about the effectiveness of ETA's LEP Plan.
3. Translate ETA's Title VI complaint procedure and form in multiple languages.
4. Establish an ETA procedure that requires all written translation requests be routed through and managed by the Title VI coordinator to ensure consistency.
5. Create one-stop LEP information center for ETA riders.
6. Conduct an evaluation every three (3) years of ETA's LEP Plan to gauge its effectiveness and determine if updates are needed. ETA staff will lead the evaluation with the help of staff familiar with Title VI language access requirements and the LEP Plan. The evaluation may include the following:
  - Determine the number of LEP individuals in ETA's service area.
  - Assess whether existing language assistance services are meeting the needs of LEP persons.
  - Assess whether staff members understand ETA's LEP Plan, how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.

## **XI. Monitoring Subrecipients**

ETA does not have any sub-recipients. So, no oversight is needed in this area.

## **XII. Minority Representation on Planning and Advisory Bodies**

### **El Paso Transportation Authority (ETA) Board of Directors Membership as of October 2025**

Jackie Butler  
David Stout  
Joel Bishop  
Art Rubio  
David Ruiz  
Eddie Conde  
Andrea Carrillo  
Daniel Vallejo

Arnulfo "Arnie" Castaneda  
 Jessica Mayeux  
 Karl Rimkus  
 Harrison Plourde  
 Xavier Banales  
 Alejandra Valadez  
 Lorraine Quimiro

Race	Quantity
White	5
African American	0
Asian/Pacific Islander	0
American Indian or Alaskan Native	0
Native Hawaiian or Other Pacific Islander	0
Multi Race	0
Hispanic	10

**El Paso Transportation Authority (ETA) Access Advisory Committee Membership as of October 2025**

Molly Saenz  
 Luis Enrique Chew  
 Yvette Lugo  
 Josue Rodriguez  
 John Estrada  
 Mike Palomar  
 Kristi Lai  
 Ryan Trujillo  
 Agnet Lopez

Race	Quantity
White	0
African American	0
Asian/Pacific Islander	1
American Indian or Alaskan Native	0
Native Hawaiian or Other Pacific Islander	0
Multi Race	0
Hispanic	8

**XIII. Title VI Equity Analysis**

ETA has not constructed a facility such as a vehicle storage facility, maintenance facility, or operations center. Should this be constructed, an equity analysis will be prepared.

**XIV. Service Standards**

Vehicle Load Standard

ETA operates local bus transportation services throughout El Paso County. The average of all loads during the peak and off-peak operating periods should not exceed the load factor of 1.125. Refer to chart below for current standards:

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Load Factor
25' Cutaway	16	5	21	1.125
20' Van	9	0	9	1.125

### Vehicle Headways

Services	AM Peak	Midday	PM Peak	Evening	Saturday	Sunday
Intercity	90 min	90 min	90 min	90 min	120 min	120 min
Circulator	60 min	60 min	60 min	60 min	60 min	60 min
Commuter	180 min	180 min	180 min	180 min	None	None

*Peak 6 am – 9 am, 3 pm – 6 pm, Off-Peak 9 am – 3 pm, Evening 6 pm – 9:15 pm; “—” = no service.*

### On-Time Performance Standard

ETA routes are to be considered on time if they are no more than “0” minute early and no more than “5.5” minutes late leaving a time-point on a scheduled trip. The on-time performance goal is set at 90% or greater. ETA will continuously monitor the various routes throughout the system to maintain this standard.

### Service Availability Standard

ETA routes are designed to serve El Paso County, outside the City limits of El Paso. ETA provides access to major employment centers, schools, universities and hospitals. Access is made available through the use of designated stops with connections to Sun Metro, South Central Regional Transit District and New Mexico Department of Transportation Park and Ride bus service, as well as Sun Metro LIFT and Socorro microtransit demand response service. Stops are generally spaced every ½ to 1.5 mile along the routes.

## **XV. Service Policies**

### ETA Amenities Policy

**Policy:** In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of ETA to assign amenities without regard to race, color, ethnicity and national origin. Amenity assignment refers to the process of placing amenities along various routes within the ETA system.

**Procedure:** The installation of transit amenities shall be primarily based on the number of passenger boarding’s at bus stops and Park & Ride Lots along the route. These amenities include but are not limited to the following: seating, benches, shelters, informational signs, maps and schedules, digital and electronic signs, solar lighting and waste receptacles. Additional requirements for placement include safety, proper zoning approval if necessary and meeting all applicable building and construction laws. Request for transit amenities can be submitted through our Call Center or at [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org). Each request will be reviewed in a timely manner.

### ETA Vehicle Assignment Policy

**Policy:** In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of ETA to assign vehicles without regard to race, color, ethnicity and national origin.

**Procedures:** All bus routes are ADA accessible and are equipped with a voice annunciation stop

announcement system, wheelchair ramps, bus kneeling feature, bicycle racks, air conditioning, heating and destination signage.

Bus assignments consider the operating characteristics such as length, width, height and the turning radius of the bus. The physical route requirements are taken into consideration when assigning buses.

Related Documents:

- FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients

The person whose signature appears below is authorized to sign on behalf of ETA.



John C. Andoh III  
Executive Director

October 1, 2025  
Date



## **APPENDIX A : TITLE VI COMPLAINT PROCEDURES**

### **Title VI Information, Limited English Proficient (LEP) information and Complaint Process**

*(Printed materials, website, and other mediums upon request)*

The El Paso Transportation Authority (ETA) grants all citizens equal access to all its transportation services. It is further the intent of ETA that all citizens are aware of their rights to such access. This is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefits of ETA's programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI? Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

What is LEP? As part of Title VI requirements, ETA has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to ETA services as required by the Federal Transit Administration "Improving Access to Services for Persons with Limited English Proficiency." A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

ETA's Complaint and Investigation Procedures These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by ETA. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and ETA may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

#### **Title VI Complaint Procedure**

Title VI complaint forms may download from [www.elpasotransportationauthority.org](http://www.elpasotransportationauthority.org) or requested from (ETA).

The complainant may also submit a written statement that contains all the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint (race, color, national origin).
3. The date or dates on which the alleged discriminatory event or events occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.

5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where the complaint may have been filed and a contact name.
7. Complainant's signature and date.

If the complainant is unable to write a complaint, ETA staff will assist the complainant. If requested by complainant, ETA will provide a language or sign interpreter.

Complainants have the right to complain directly to the appropriate federal agency. Complaints must be filed within one-hundred eighty (180) calendar days of the alleged incident.

ETA will begin an investigation within fifteen (15) working days of receipt of a complaint.

ETA will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed. If the complainant fails to provide the requested information in a timely basis, ETA may administratively close the complaint.

ETA will complete the investigation within ninety (90) days of receipt of the complaint. If additional time is needed for investigation, complainant will be contacted. A written investigation report will be prepared by the investigator. This report shall include a summary description of the incident, findings and recommended corrective action.

A closing letter will be provided to the complainant and the respondent or respondent department. Parties will have five (5) working days from receipt of the closing letter to appeal. If neither party appeals, the complaint will be closed.

If required, the investigation report will be forwarded to the appropriate federal agency.

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Or

Texas Department of Transportation (TxDOT)  
Attn: TxDOT-PTN  
125 E. 11th Street,  
Austin, TX 78701-2483

FTA or TxDOT complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov) or <https://www.txdot.gov/about/programs/civil-rights/title-vi-nondiscrimination.html>. These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

A Title VI complaint must be submitted in writing. ETA strongly encourages the use of the **ETA Title VI Complaint Form** or sending an email when filing official complaints. Upon completion of an ETA Title VI Complaint Form, send it to: **email [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org) or by mail to: 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator.**



**TITLE VI COMPLAINT FORM**

The El Paso Transportation Authority (ETA) operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI must file a complaint within 180 days of the alleged occurrence to any of the following by mail, in person, fax and/or email as explained at the end of the form.

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>		
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 <input type="checkbox"/> Disability
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.		
_____		
_____		
_____		
<b>Section VI:</b>		
Have you previously filed a discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint.		
_____		
_____		

<b>Section V:</b>
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:
Agency:
Address:
Telephone:
<b>Section VI:</b>
Name of agency complaint is against:
Name of person complaint is against:
Title:
Location:
Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Mail, email or deliver completed form to:

- El Paso Transportation Authority (ETA), 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.
- Texas Department of Transportation (TxDOT), Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX, 78701-2483.

If any transit related information is needed in an alternative language, contact the email [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org) or by mail to: 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator.



## TÍTULO VI FORMULARIO DE QUEJA

ETA opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI debe presentar una queja dentro de los 180 días de la supuesta ocurrencia a cualquiera de los siguientes por correo, en persona, fax y / o correo electrónico como se explica al final del formulario.

<b>Sección I:</b>		
Nombre:		
Teléfono (Casa):		
Telephone (Home):	Teléfono (Trabajo):	
Dirección de correo electrónico:		
Requisitos de formato accesible?	<input type="checkbox"/> Impresión grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
<b>Sección II:</b>		
¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> Sí *	<input type="checkbox"/> No
* Si respondió "sí" a esta pregunta, vaya a la Sección III.		
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja.		
Explique por qué ha solicitado un tercero:		
Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero	<input type="checkbox"/> Sí	<input type="checkbox"/> No
<b>Sección III:</b>		
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Discapacidad		
Fecha de presunta discriminación (mes, día, año): _____		
Explique con la mayor claridad posible qué sucedió y por qué cree que fue discriminado. Describe a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.		
_____		
_____		
_____		
<b>Sección VI:</b>		
¿Ha presentado anteriormente una queja por discriminación con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
En caso afirmativo, proporcione cualquier información de referencia con respecto a su queja anterior.		
_____		
_____		
<b>Sección V:</b>		

<p>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</p> <p><input type="checkbox"/> Sí                      <input type="checkbox"/> No</p> <p>En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Tribunal Federal:</p> <p><input type="checkbox"/> Tribunal Federal: _____ <input type="checkbox"/> Agencia Estatal: _____</p> <p><input type="checkbox"/> Tribunal estatal: _____ <input type="checkbox"/> Agencia local: _____</p>
<p>Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.</p>
<p>Nombre: _____</p>
<p>Título: _____</p>
<p>Agencia: _____</p>
<p>Dirección: _____</p>
<p>Teléfono: _____</p>
<p><b>Sección VI:</b></p>
<p>El nombre de la queja de la agencia está en contra: _____</p>
<p>La queja del nombre de la persona es contra: _____</p>
<p>Título: _____</p>
<p>Ubicación: _____</p>
<p>Número de teléfono (si está disponible): _____</p>

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo. Su firma y fecha son requeridas a continuación

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Envíe por correo, correo electrónico o entregue el formulario completo a:

- El Paso Transportation Authority (ETA), 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator.
- Federal Transit Administration (FTA), Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington, DC 20590.
- Texas Department of Transportation (TxDOT), Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX, 78701-2483.

Si necesita información sobre el transporte público en otro idioma, puede contactar con nosotros a través del correo electrónico [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org) o por correo postal a la siguiente dirección: 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator.

**APPENDIX B: LIST OF INVESTIGATIONS, LAWSUITS AND COMPLAINTS**

	<b><u>Date (Month, Day, Year)</u></b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b><u>Status</u></b>	<b><u>Action(s) Taken</u></b>
<b><u>Investigations</u></b>	None	None	None	None
<b><u>Lawsuits</u></b>	None	None	None	None
<b><u>Complaints</u></b>	None	None	None	None

## **APPENDIX C: SERVICE CHANGES AND OUTREACH SUMMARY**

### **Fare and Service Changes:**

- Revisions to Route 20 - June 2023
- Implement Americans with Disabilities Act (ADA) Paratransit (ETA access) – August 2024
- Eliminate Sun Metro Route 84 – December 2024
- Revisions to Route 40 and 50 – December 2024
- Implement service reductions to Routes 30, 31, 40 and 50 in Socorro – June 2025
- Implement service enhancements to Routes 30, 31, 40 and 50 in Socorro and launched ETA andale in San Elizario and Clint – October 2025
- Fare Free – December 2025
- Extend service to Mebane – September 2024
- Extend service to Haw River and Green Level – November 2025

### **Public Outreach:**

Throughout Federal Fiscal Year (FFY) 23-25, ETA depended on the ETA website, social media outlets, direct emails and communication with passengers at community events and on buses.

1. Public outreach for all service adjustments throughout FFY 23-25 were made a month in advance when planning was possible and included direct email to customers on e-mailing lists for effected routes, ETA website, social media and passenger apps.
2. Occasionally driver shortages did not allow for 30 days' notice that a certain trip or trips on one or more routes would be cancelled for a particular period. Nonetheless outreach to notify the public included direct email to customers on e-mailing lists for effected routes, ETA website, social media and passenger app announcements
3. Announcements for inclement weather were announced via the ETA website, passenger apps, social media and emails when the weather affected service delivery.
4. Periodic announcements on the federal mask mandate for transit passengers and staff were made throughout the pandemic via social media and email. The mandate was posted on buses and at all ETA facilities and the ETA website.
5. Outreach was made ahead of the for free rides via email, rider alerts, flyers, brochures, website and social media.
6. Holiday service levels were announced via the ETA website, passenger apps, social media and emails. A calendar of holiday service levels is posted on ETA fixed route vehicles, on the website and in public areas of ETA facilities.
7. Changes in passenger apps were announced via electronic means and printed signs on ETA vehicles and facilities.

### EPATS Community Meetings From 2017 to 2025

<b>Study</b>	<b>Community Meeting Date</b>
El Paso County Regional Transit Feasibility Study Round 1	6/7/17, 6/8/17, 6/10/17
El Paso County Regional Transit Feasibility Study Round 2	12/5/17, 12/6/17, 12/7/17, 12/9/17
El Paso County Transit Study Phase 2 Round 1	2/25/20, 2/26/20, 2/27/20
El Paso County Transit Study Phase 2 Round 2	No Meetings. Public feedback received virtually September-October 2020.
ETA Paratransit Plan	4/27/24, 4/29/24, 4/30/24
El Paso County General Public Demand Response Study Round 1	Pop-Up Meetings 4/14-18/25
El Paso County General Public Demand Response Study Round 2	9/8/25, 9/9/25, 9/10/25

The dates in the table above represent *community meetings* – specific synchronous events that occurred in-person, virtually, or both – at which members of the public could engage with the study.

## **APPENDIX D: LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

### **Introduction**

El Paso Transportation Authority (ETA) understands that transportation is critically important to the daily lives of our community members. The purpose of this limited English proficiency plan is to comply with ETA's responsibilities to limited English proficient (LEP) persons consistent with Title VI of the Civil Rights Act of 1964 and its implementing regulations. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, provides that no person shall be subjected to discrimination on the basis of race, color or national origin under any program or activity that receives federal financial assistance.

ETA provides services to connect residents and visitors to quality-of-life opportunities throughout El Paso County. ETA is proposed to be a direct recipient of Sections 5307 and 5339 funds to urbanized areas and fully implements the provisions of federal and state guidance to meet the requirements to provide public transit services. ETA may also apply for discretionary funds via the Texas Department of Transportation (TxDOT) processes for Sections 5310 and 5339 funds or El Paso Metropolitan Transportation Organization for Section 5310 funds.

### **Purpose**

The purpose of this policy plan is to ensure compliance with Title VI of the Civil Rights Act of 1964. "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

### **Applicability**

All federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as ETA, private and non-profit entities, and sub-recipients.

### **Plan Summary**

ETA has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to ETA services as required by the Federal Transit Administration. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

### **Definitions**

Limited English Proficiency (LEP) individual – Any prospective, potential, or actual recipient of services from ETA who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with ETA staff.

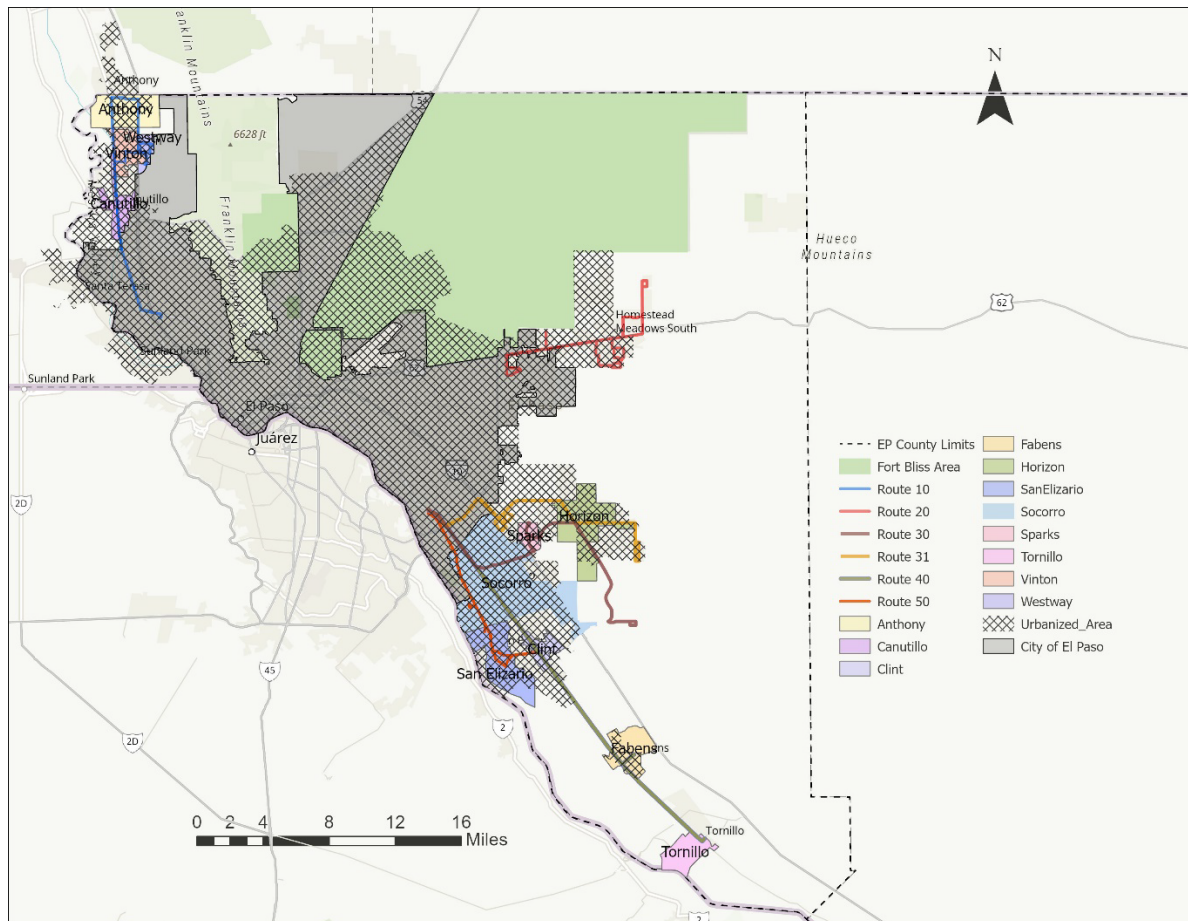
Vital Documents – Forms that include but are not limited to; applications consent forms, letters containing important information regarding participation in a program, notices pertaining to the reduction, denial, or termination of services, the right to appeal such actions, or that require a response from notices advising LEP persons of the availability of free language assistance, and other outreach materials.

Title VI Compliance Officer – The ETA point of contact concerning Title VI related items, who is the Executive Director.

Substantial number of LEP (Safe Harbor Threshold) – 5% or 1,000 people, whichever is smaller, are prospective, potential or actual recipients of service and speak a primary language other than English and have Limited English Proficiency or who cannot read, write or understand the English language at a level that permits them to interact effectively with English-only speaking members of ETA staff.

**Demography**

ETA operates transit services throughout El Paso County as part of the El Paso Urbanized Area. The following information is based on 2020 US Census information. See below for the service area including the routes and paratransit service area of ETA. The overall square miles of ETA’s service area is 723 within the 259 square miles in the El Paso Urbanized Area. The data presented below relates to El Paso County as ETA services primarily operate within El Paso County, but outside the City of El Paso.



The ETA service area (or ride-shed) has a population of 62,532 of the 179,165 individuals based on the U.S. Census Bureau, 2023 American Community Survey.

**Racial Breakdown** – 82.80% service area’s population is Hispanic. 10.90% is White/Caucasian. 3.10% is African-American. The next largest racial group is Two or more races at 1.50%.

**Spoken Language** – More than two-thirds of the population of El Paso County (69.8%) speaks a language other than English, with the majority of these individuals (74.8%) being bilingual. Specifically, 72.8% of the population speaks Spanish or Spanish Creole, with 59.5% of them reporting that they speak English 'very well.' Among these Spanish speakers, 40.5% report speaking English 'less than very well.' In addition to Spanish, there are smaller populations speaking other Indo-European languages (1.0%), of which 76.1% report speaking English 'very well' and 23.9% 'less than very well.' Furthermore, 0.8% of the population speaks Asian and Pacific Island languages, with 51.2% indicating proficiency in English and 48.8% reporting limited English proficiency. The remaining 0.3% speak other languages, with 71.8% indicating proficiency in English and 28.2% reporting limited English proficiency. Given the substantial bilingual and Spanish-speaking population, service providers are likely to have a significant number of Spanish-speaking staff members who can effectively communicate with Spanish-only speakers utilizing their services.

El Paso County, Texas			
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
Label	Estimate	Estimate	Estimate
Population 5 years and over	706,977	69.8%	30.2%
Speak only English	25.2%	(X)	(X)
Speak a language other than English	74.8%	59.7%	40.3%
Spanish or Spanish Creole	72.8%	59.5%	40.5%
Other Indo-European languages	1.0%	76.1%	23.9%
Asian and Pacific Island languages	0.8%	51.2%	48.8%
Other languages	0.3%	71.8%	28.2%
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>			
Spanish or Spanish Creole	515,008	59.5%	40.5%
Other Indo-European languages	6,718	76.1%	23.9%
Asian and Pacific Island languages	5,404	51.2%	48.8%
Other languages	1,973	71.8%	28.2%

U.S. Census Bureau. "LANGUAGE SPOKEN AT HOME." *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601*, 2021, <https://data.census.gov/table/ACSST5Y2021.S1601?q=el+pas+tx>. Accessed on October 27, 2023.

**Household Language by Linguistic Isolation** – A "limited English-speaking household" is a household in which no household member 14 years old and older (1) speaks only English or (2) speaks a non- English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulties speaking English. These residents have a particular challenge navigating American transit, and transit systems have a challenge providing a simple, no-hassle rider experience to members of these households.

Additional details on the demographics of the ETA service area are shown below at the end of the LEP.

## Action Steps

The following pages lists the details of implementing, maintaining, and monitoring ETA's LEP program plan to ensure federal compliance and meaningful service available to all non-English speakers using ETA services.

ETA will use the USDOT four factor LEP analysis to determine the LEP language groups present in the area and specific language services that are needed. The four factor analysis considers the following: 1) The number or proportion of LEP persons eligible in the ETA service area who may be served or likely to encounter a ETA program, activity, or service; 2) the frequency with which LEP individuals come in contact with a ETA service; 3) the nature and importance of the program, activity or service provided by ETA to the LEP population; and 4) the resources available to ETA and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## Four Factor Analysis

1. **The number or proportion of LEP persons eligible in ETA service territory who may be served or likely to encounter an ETA program, activity, or service.**

ETA has examined American Community Survey data table C16001 from US Census to determine the demographic makeup of the community. To get specific data related to prospective, potential, or actual recipient of services from ETA who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with agency staff, ETA has utilized the geographic area that constitutes its service area and 0.75-mile buffer on all other ETA stops. The total area covered is 723 square miles with a total population of 62,532.

Based on review of the data and calculating the Safe Harbor Threshold, ETA has identified the LEP population languages in the area as Spanish. There are over 1,000 individuals in the ETA service area who speak English less than very well and are fluent in Spanish.

2. **The frequency with which LEP individuals come in contact with an ETA service, activity, or service.**

While we understand anecdotally that LEP persons use ETA services, the frequency is low. This is based on the low numbers of complaints, requests, and failed communication efforts experienced by the ETA staff.

**Language Spoken at Home for Those Who Speak English Less Than 'Very Well'.**

	El Paso County, Texas		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
Label	Estimate	Estimate	Estimate
Population 5 years and over	706,977	69.8%	30.2%
Speak only English	25.2%	(X)	(X)
Speak a language other than English	74.8%	59.7%	40.3%
Spanish or Spanish Creole	72.8%	59.5%	40.5%
Other Indo-European languages	1.0%	76.1%	23.9%
Asian and Pacific Island languages	0.8%	51.2%	48.8%
Other languages	0.3%	71.8%	28.2%
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>			
Spanish or Spanish Creole	515,008	59.5%	40.5%
Other Indo-European languages	6,718	76.1%	23.9%
Asian and Pacific Island languages	5,404	51.2%	48.8%
Other languages	1,973	71.8%	28.2%

U.S. Census Bureau. "LANGUAGE SPOKEN AT HOME." *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601*, 2021, <https://data.census.gov/table/ACSST5Y2021.S1601?q=el+passo+texas>. Accessed on October 27, 2023.

ETA will assess the frequency at which staff, ETA drivers, and customer service employees have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying ETA drivers. ETA had no requests for interpreters, and no requests for translated documents in FFY 2022-2025, however, ETA does use Language Line to translate documents via telephone or online.

Due to the high impact from the Hispanic community, this presents a great opportunity for outreach to the LEP population. As our communities grow and interactions with LEP persons increases ETA wishes to ensure appropriate measures are taken to communicate effectively with persons needing language assistance.

**3. The nature and importance of the program, activity, or service provided by ETA to the LEP community.**

ETA understands that transportation is critically important to the daily lives of our community members. Certain aspects of our services are of critical importance and this plan will be used to meet the needs of the LEP community. ETA provides important transportation services to the public throughout its service area. ETA connects the major cities and towns of El Paso County to quality-of-life opportunities. ETA riders utilize services to commute to work, going to school/universities, occasionally for special events and also in lieu of reliance on a personal automobile.

#### 4. The resources available to ETA and costs.

ETA staff reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if need should arise.

##### 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 LEP person and may be entitled to language assistance with respect to ETA 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 ETA staff may identify a LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Selected ETA staff and contractors will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When ETA sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator or interpreter (sign language for hearing impaired individuals). Additionally, a staff member may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be provided at the event it will help identify the need for future events.

##### Language Assistance Measures

There is a significant percentage of LEP individuals in El Paso County, that is, persons who speak English "not well" or "not at all" and ETA will implement the following measures:

- ETA 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 LEP persons:
  - Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.

##### Staff Training

The following training will be provided to all ETA Staff:

- Information on 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 or subcontractors performing work for ETA will be required to follow the Title VI LEP guidelines.

##### Translation Documents

ETA 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 documents will only be translated into Spanish. Due to the large Spanish

speaking population alongside the significant LEP Spanish speaking population, El Paso County does not have a formal outreach procedure in place.

However, when and if the need arises for LEP outreach, ETA will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

ETA staff has yet to outsource translation services for any public notices, meetings, or outreach, as in-house staff has been able to accommodate these services.

ETA has identified in-house staff with language abilities apart from English, and this staff has some availability to assist with requests related to ETA services. This is the case with ETA and the ETA contractor staff. ETA has also identified some businesses and technological solutions that provide translation and interpretative services, these services would be utilized on as needed basis.

ETA website has the capability to translate all the information to multiple languages including Spanish through Google Translate.

ETA used Language Line as an opportunity to provide additional verbal translation assistance to ETA staff with the ability to translate over 135 different languages.

Based on the Four Factor Analysis, ETA determined to have a Language Assistance Plan for the Spanish Population.

# El Paso County, TX

County in: [Texas](#), [United States](#)

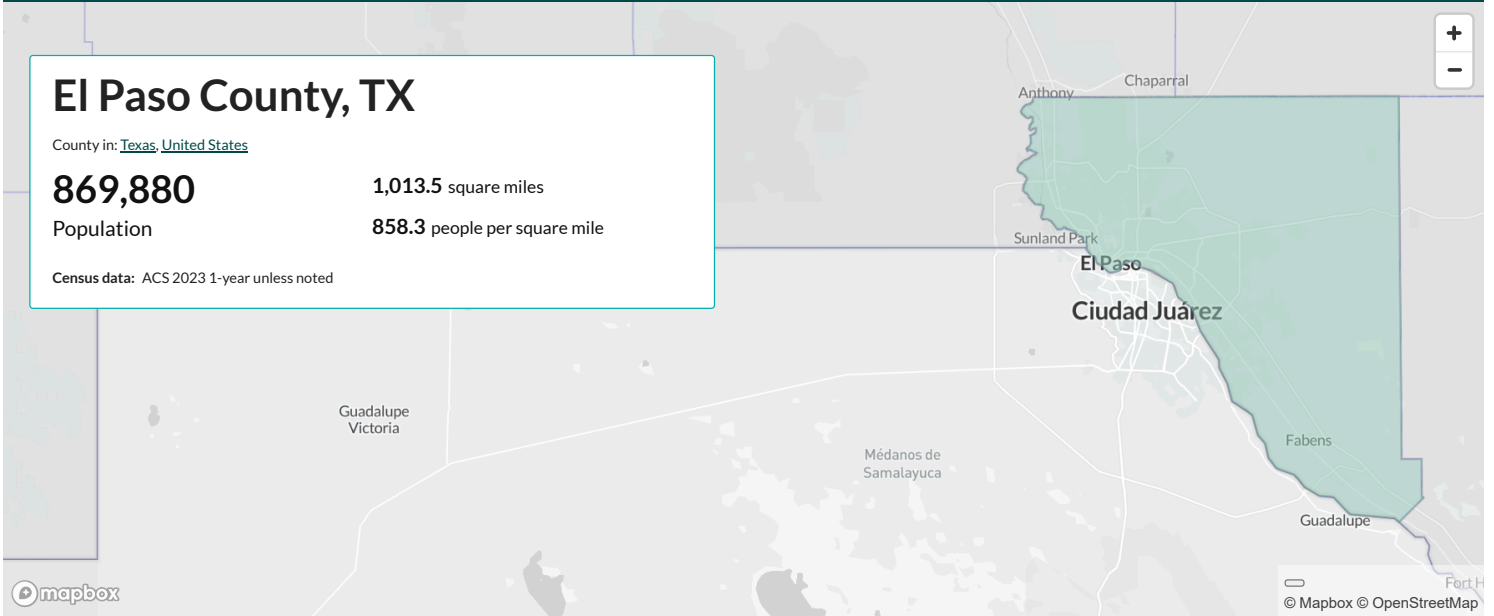
**869,880**

Population

1,013.5 square miles

858.3 people per square mile

Census data: ACS 2023 1-year unless noted



Find data for this place

Hover for margins of error and contextual data.

Demographics

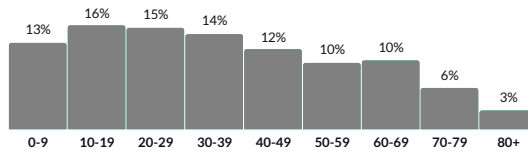
Age

**33.9**

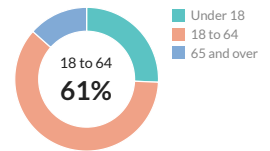
Median age

a little less than the figure in Texas: 35.9  
about 90 percent of the figure in United States: 39.2

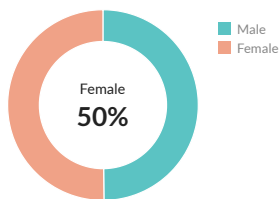
Population by age range



Population by age category



Sex



Race & Ethnicity

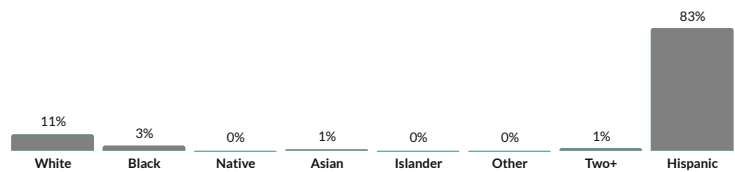


Table B03002 [View table](#)

Column	El Paso County		Texas		United States							
White	10.9%	±0%	94,780	±709	38.7%	±0%	11,817,333	±13,983	57.1%	±0%	191,347,650	±60,466
Black	3.1%	±0%	26,888	±2,647	12%	±0%	3,658,953	±21,768	11.8%	±0%	39,569,312	±95,079
Native	0.3%	±0%	2,210	±663	0.2%	±0%	45,679	±3,347	0.5%	±0%	1,733,272	±16,041
Asian	1.1%	±0%	9,368	±1,171	5.6%	±0%	1,707,260	±12,126	5.9%	±0%	19,769,752	±44,702
Islander	0.2%	±0%	1,357	±182	0.1%	±0%	35,135	±10,498	0.2%	±0%	592,077	±19,817
Other	0.2%	±0%	2,090	±1,982	0.5%	±0%	139,867	±12,347	0.6%	±0%	1,949,065	±39,660
Two+	1.5%	±0%	12,625	±2,909	3.2%	±0%	963,386	±25,823	4.4%	±0%	14,813,501	±122,033
Hispanic	82.8%	±0%	720,562	±0	39.8%	±0%	12,135,688	±0	19.5%	±0%	65,140,276	±8,848

[Hide data](#)

Economics

Income

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

**\$27,750**

Per capita income

about two-thirds of the amount in Texas: \$39,775

about two-thirds of the amount in United States: \$43,313

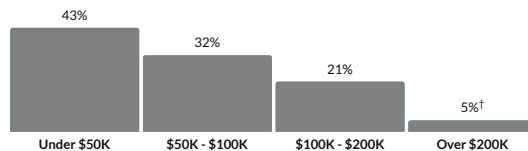
**\$58,971**

Median household income

about 80 percent of the amount in Texas: \$75,780

about three-quarters of the amount in United States: \$77,719

Household income



[Show data / Embed](#)

Poverty

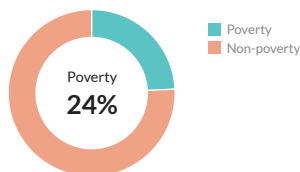
**18.5%**

Persons below poverty line

about 1.4 times the rate in Texas: 13.7%

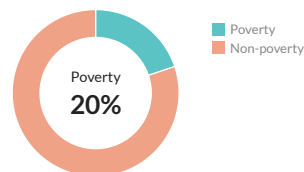
about 1.5 times the rate in United States: 12.5%

Children (Under 18)



[Show data / Embed](#)

Seniors (65 and over)



[Show data / Embed](#)

Transportation to work

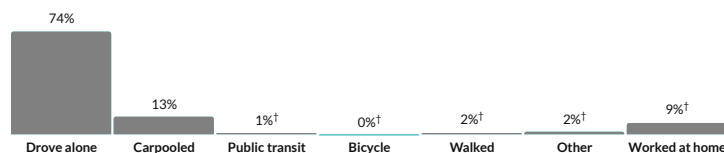
**24.5 minutes**

Mean travel time to work

about 90 percent of the figure in Texas: 27.2

about 90 percent of the figure in United States: 26.8

Means of transportation to work



\* Universe: Workers 16 years and over

[Show data / Embed](#)

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Families

Households

**301,198**

Number of households

Texas: 11,260,645

United States: 131,332,360

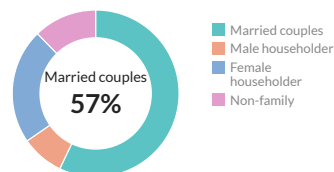
**2.8**

Persons per household

about 10 percent higher than the figure in Texas: 2.7

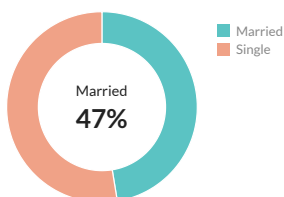
about 10 percent higher than the figure in United States: 2.5

Population by household type



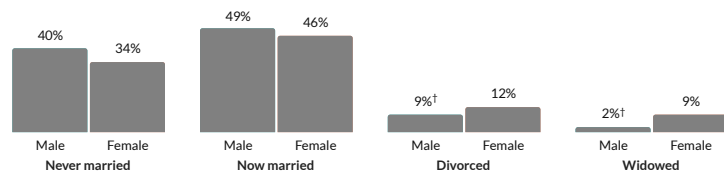
[Show data / Embed](#)

Marital status



\* Universe: Population 15 years and over [Show data / Embed](#)

Marital status, by sex



[Show data / Embed](#)

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Fertility

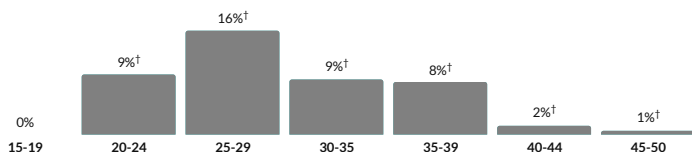
**6.6%**

Women 15-50 who gave birth during past year

about 20 percent higher than the rate in Texas: 5.5%

about 25 percent higher than the rate in United States: 5.2%

Women who gave birth during past year, by age group



† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Housing

Units & Occupancy

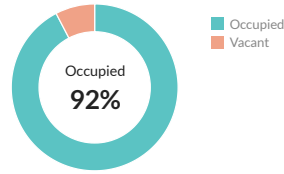
**326,149**

Number of housing units

Texas: 12,394,809

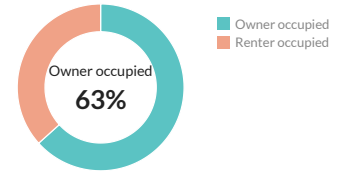
United States: 145,333,460

Occupied vs. Vacant



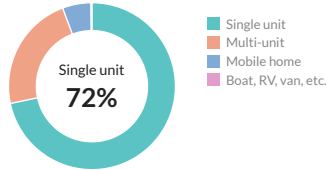
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Ownership of occupied units



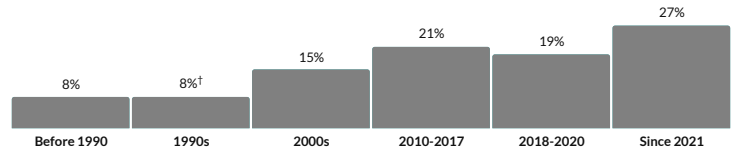
Show data / Embed

Types of structure



Show data / Embed

Year moved in, by percentage of population



Show data / Embed

Value

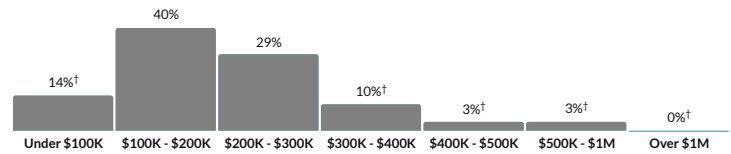
**\$191,100**

Median value of owner-occupied housing units

about two-thirds of the amount in Texas: \$296,900

about three-fifths of the amount in United States: \$340,200

Value of owner-occupied housing units



Show data / Embed

Geographical mobility

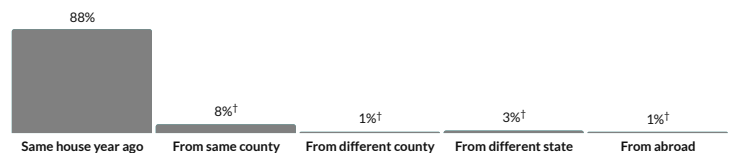
**12.3%**

Moved since previous year

about 90 percent of the rate in Texas: 14.1%

about the same as the rate in United States: 12.1%

Population migration since previous year



Show data / Embed

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

Social

Educational attainment

**81.1%**

High school grad or higher

a little less than the rate in Texas: 86.3%

about 90 percent of the rate in United States: 89.8%

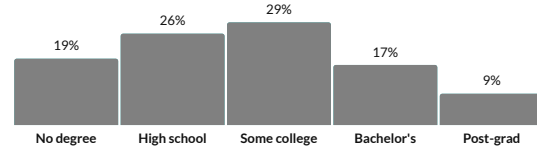
**26%**

Bachelor's degree or higher

about three-quarters of the rate in Texas: 34.2%

about three-quarters of the rate in United States: 36.2%

Population by highest level of education



\* Universe: Population 25 years and over

Show data / Embed

Language

**N/A**

Persons with language other than English spoken at home

Language at home, children 5-17

No data available

Language at home, adults 18+

No data available

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

### Place of birth

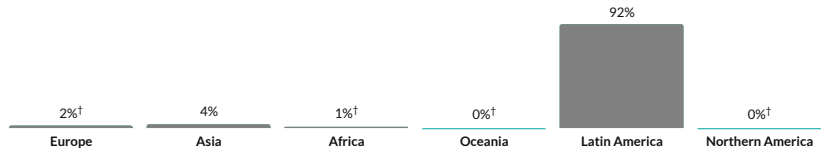
# 22.5%

### Foreign-born population

about 25 percent higher than the rate in Texas: 17.9%

about 1.5 times the rate in United States: 14.3%

### Place of birth for foreign-born population



\* ACS 2023 5-year data

[Show data / Embed](#)

† Margin of error is at least 10 percent of the total value. Take care with this statistic.

### Veteran status

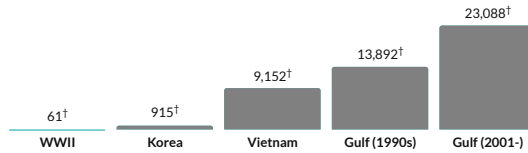
# 7.3%

### Population with veteran status

about 20 percent higher than the rate in Texas: 6.1%

about 20 percent higher than the rate in United States: 6.1%

### Veterans by wartime service



\* Civilian veterans who served during wartime only

[Show data / Embed](#)

**45,813** Total veterans

**40,321** Male

**5,492** Female

Hover for margins of error and contextual data.

*This profile displays data from more than one ACS release. Charts not derived from ACS 2023 1-year data are noted with an \*.*

**Citation:** U.S. Census Bureau (2023). *American Community Survey 1-year estimates*. Retrieved from *Census Reporter Profile page for El Paso County, TX* <<http://censusreporter.org/profiles/05000US48141-el-paso-county-tx/>>

**Citation:** U.S. Census Bureau (2023). *American Community Survey 5-year estimates*. Retrieved from *Census Reporter Profile page for El Paso County, TX* <<http://censusreporter.org/profiles/05000US48141-el-paso-county-tx/>>

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## LANGUAGE ASSISTANCE PLAN

### Implementation Methods

How to Identify an LEP Person who Needs Language Assistance – These methods may be used to help identify persons who may need language assistance:

1. Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
2. When public meetings are held, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.

Language Assistance Measures - ETA may implement the following LEP procedures as appropriate:

1. ETA has identified in-house staff with other language abilities and this staff has some availability to assist with requests related to ETA services, including transit.
2. Public notice, publications, and other material, including webpage content, may be made available in other languages.
3. Utilize translators at select public meetings; and
4. Use a telephone translation service such as Language Line, and web translation applications such as Google Translate.

Training – ETA implements training for ETA front-line contracted employees on Title VI and LEP considerations through the contractor. These training opportunities occur on planned schedules and include opportunities for virtual training seminars provided from the video session from LEP.gov. Front-line employees or contractors who come in contact with LEP individuals are Bus Operators, Customer Service Representatives and Road Supervisors. LEP training include understanding Title VI responsibilities, what procedures to follow when encountering a LEP person and how to potentially handle a Title VI complaint.

Outreach – Specific outreach efforts will be evaluated on a case-by-case basis. Some or all the following methods may be used:

1. Posters and brochures will be made available through local Universities and Community Colleges, City and Town offices, and other locations.
2. ETA website will indicate ways in which LEP persons can access information about our services.
3. The ETA Notice of Rights under Title VI to the public is available at the ETA office, on buses, online at [www.elpasotransportationauthority.org](http://www.elpasotransportationauthority.org), and within the Ride Guide.
4. If staff knows that they will be presenting a topic that could be of importance to an LEP individual or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be available in an alternative language, based on known LEP population in the area.

### Monitoring, Evaluating and Updating the LEP & LAP Plans

This plan is designed to be flexible and is one that can be easily updated. At a minimum, ETA will follow the Title VI Program update schedule for the LEP plan. Future plan updates will include the most current data available. The results may change based on the timing of the plan update.

Each update will examine all plan components such as:

1. How many LEP persons were encountered?
2. Were their needs met?
3. What is the current LEP population in ETA service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Is there still a need for continued language assistance for any previously identified ETA programs? Are there other programs that should be included?
6. Have ETA's available resources, such as technology, staff, and financial costs changed?
7. Has ETA fulfilled the goals of the LEP Plan?
8. Were any complaints received?

### **Dissemination of the LEP & LAP Plans**

Copies of the LEP plan will be on file at the ETA office. The LEP plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. The plan will also be available on the ETA website.

Any questions or comments regarding this plan should be directed to the El Paso Transportation Authority (ETA), 800 East Overland Avenue, Room 423, El Paso, TX 79901, Attn: ETA Title VI Administrator or email [director@elpasotransportationauthority.org](mailto:director@elpasotransportationauthority.org).