



**TITLE VI/NONDISCRIMINATION  
ANNUAL WORK PLAN &  
ACCOMPLISHMENTS  
For Calendar Year 2019**



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# INTRODUCTION

The County of Hidalgo, as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, assures that no person shall on the grounds of race, religion (where the primary objective of the financial assistance is to provide employment per 42 U.S.C. §2000d-3), color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation in any federally or non-federally funded program or activity administered by the County of Hidalgo.

This Title VI/Nondiscrimination Annual Work Plan & Accomplishment Report documents Hidalgo County's Title VI Program accomplishments for the reporting period of September 1, 2018 – December 31, 2019 (FY) 2019 and goals for calendar year 2020. (Please note: The reporting period was extended due to revisions made to the Title VI/Nondiscrimination plan policy.)

On or about April 16, 2019, the Hidalgo County Commissioners Court approved a revised version of the Title VI Non-Discrimination Plan Policy. A full copy of Hidalgo County's Title VI Non-Discrimination and Limited English Proficiency (LEP) Plan is available on the Hidalgo County website, [www.co.hidalgo.tx.us](http://www.co.hidalgo.tx.us).

This report is prepared in accordance with 23 CFR 200.9 and the Federal Highway Administration's Title VI/Nondiscrimination Program.

# TITLE VI/NONDISCRIMINATION COMPONENT

*This section contains the Title VI accomplishments of the County of Hidalgo's Executive Office that are not included in other sections of this report.*

## Title VI Plan Improvements

In contrast to the year before, no outside agencies contacted the County with concerns for requests to modify the Title VI plan.

Modifications to the Title VI complaint process and flowchart were approved by Hidalgo County Commissioners Court on 4/16/2019.

## State Desk Audit

Hidalgo County did not receive any requests for desk audits related to the Title VI plan in place, during the reporting period of September 01, 2018 through December 31, 2019.

# PROGRAM MONITORING

*This section describes reporting period accomplishments and calendar year 2020 goals related to internal and external monitoring, including the data collection and Limited English Proficient (LEP) component, of the County of Hidalgo's Title VI Program.*

## **Title VI Reviews Conducted During Reporting Period**

For reporting period of September 01, 2018 – December 31, 2019, the County Executive Officer, Title VI/Nondiscrimination Coordinator utilized the Department of Human Resources and worked with the District Attorney's Office, Civil Litigation Division to provide a countywide internal training of the Title VI Plan to Chiefs of Staff, Department Heads and/or other individual(s) designated by each Elected Official /County Department Head to be Title VI liaisons at their respective offices.

### *The training objectives included:*

- Review each part of the currently adopted Title VI Nondiscrimination Plan via the County's website found at [www.co.hidalgo.tx.us](http://www.co.hidalgo.tx.us) to provide departments with a basic understanding of the Civil Rights Act of 1964 requirements.
- For department liaisons to gain knowledge of the provisions and compliance requirements of Title VI and outline steps for implementation of plan requirements and reporting.
- Explain the role of the departments to ensure Title VI compliance.
- Department Liaisons will be responsible for ensuring Title VI plan requirements are implemented and to ensure training of other employees at their respective department/offices.

### ***Dissemination of Title VI Information***

On behalf of the Title VI Coordinator, The Department of Human Resources collaborated with the District Attorney's Civil Litigation Division, to deliver Title VI training to 86 Title VI Liaisons representing Hidalgo County departments /offices. Each participant was required to acknowledge receipt of the two packets containing display materials of the Title VI Plan requirements, to be

displayed in conspicuous locations within each department building as per the Title VI plan and applicable law (**EXHIBIT A**). The packets included:

- External Complaint Posters (English and Spanish)
- LEP Interpreter Posters (English and Spanish )
- Title VI Brochures (English and Spanish)
- U.S. Census Bureau – I speak cards and;
- Data collection and reporting requirement forms including instructions pertaining to all Title VI provisions

Additionally, a memorandum was sent to each department liaison as a reminder that the required reporting information was to be submitted to the Title VI Coordinator, by the established deadline of February 01, 2020, in preparation of the annual accomplishment report. (**Exhibit B**)

New employees are being provided with Hidalgo County's Title VI Plan and instructed on policies pertaining to Title VI Nondiscrimination Provisions and its Limited English Proficiency (LEP) Plan during New employee orientation.

Title VI and LEP Plan Statement Acknowledgement Forms were returned to the department of Human Resources upon completion of each training. The acknowledgement of receipt signed by each employee will be kept in each employee's file.

As of March 01, 2020, approximately 75% of county employees have been trained.

### **Title VI Results of Reviews Conducted During Reporting Period**

In an effort to assist County Departments/offices Liaisons when training their respective employees the District Attorney's Civil Litigation Division developed a PowerPoint presentation (**Exhibit C**) as a follow-up to the Title VI training, covering various aspects of the Title VI Plan. The presentation was disseminated by the Department of Human Resources via email to all Title VI Department Liaisons.

A video of the training is available at the Department of Human Resources for County Departments/Offices liaisons as a refresher if necessary.

Review of requested information provided by county departments liaisons were determined to be following the Title VI/Nondiscrimination Plan trainings held internally.

The majority of the responses received by department liaisons included Employee Language Reports, LEP logs, and annual reporting information indicating compliance of all plan requirements and reporting.

### **Calendar Year 2020 Goals**

The Title VI Coordinator will continue to work with all County departments to ensure compliance with the County's Title VI/Nondiscrimination Plan. The County's CY2020 Goals include:

1. Research more training tools to provide department liaisons with useful information, reminders about Title VI reporting requirements, and website links that will assist them in learning more about complying with regulations and requirements of Title VI.
2. All newly hired employees will continue to be presented with the Title VI training presentation and policies, and obtain signed acknowledgments of receipt.
3. Correspond with department liaisons to ensure they are up to date on Title VI implementation related topics, changes and/or revisions made to the existing Title VI plan.
4. Develop a questionnaire for Title VI department liaisons to provide feedback on their Title VI implementation efforts, challenges, as well as to make it available to address questions or concerns.
5. Coordinate with department liaisons to collect a list of all programs and activities that are offered by Hidalgo County and ensure that a record is maintained of related public engagement activities. Attend meetings with regards to public participation to explore ideas and best practices to remain committed to continuous public engagement within County projects.

# LIMITED ENGLISH PROFICIENCY (LEP)

In order to fulfill the responsibilities in regards to compliance with the Title VI LEP Plan, the County continued to require Limited English Proficiency (LEP) related information from County Departments/Offices for use in its annual report. This annual report assists the County to accurately identify and address the changing needs of their LEP communities which, in turn, can help inform the Title VI Coordinator whether there should be changes to the quantity or type of language assistance services. As previously noted, County Departments/Offices were trained and informed on the implementing Plan requirements. As such, for this reporting period, information gathered is detailed below.

From September 1, 2018 through December 31, 2019, the following County departments, submitted reports related to Limited English Proficiency (LEP) encounters:

1. County Auditor
2. Constable Precinct 2
3. District Clerk
4. Elections Department
5. Fire Marshall's Office
6. Health and Human Services Department
7. Juvenile Department
8. Law Library
9. Planning Department
10. County Commissioner Precinct 3
11. County Commissioner Precinct 4
12. Public Defender
13. Safety Division
14. Sheriff's Office
15. Urban County
16. WIC Program

The most frequently requested language was Spanish. The LEP service most frequently used was verbal translation and the most frequent method rendered

was through voluntary interpretation by employees found within each department.

Employee language logs were submitted by these departments listing employees who possess language skills other than English and who are willing to voluntarily assist with LEP related requests.

Furthermore, upon gathering and reviewing each department(s) individual LEP Annual report, submitted by the departments listed above, as part of the Annual reporting information, the following was noted:

- There were no LEP related expenditures for this reporting period
- There were no LEP complaints received for this reporting period
- There were an additional 63 documents translated by requests received at the Law Library department as noted on the LEP annual report.

As noted in the County's LEP Plan, a large portion of the County's population speaks the English language less than very well. Further, the Spanish language is spoken by a large portion of individuals in the County. As such, Hidalgo County Offices/Departments consistently reported that the numerous verbal LEP encounters received occurred in Spanish and were addressed internally at each Department/Office by Spanish speaking employee(s). As indicated above, due to the significant frequency and volume of these verbal encounters on a daily basis, it is difficult and highly impractical for County Offices/Departments to report/document each of these LEP encounters. Based on the information collected from each office/department, approximately 85% of these type of encounters occurred in Spanish.

Due to the challenge of recording the volume of Spanish language LEP encounters, many County Departments/Offices reported these encounters and how they were addressed in the form of a statement.

### **Calendar Year 2020 Goals**

1. The Title VI Coordinator will continue to remind all County Departments/Offices via e-mail memorandums to document Title VI/Nondiscrimination related information and report it to ensure the most common languages spoken are being provided and recorded.

2. Identify department/offices still needing training and continue to follow-up with department/offices to verify all training efforts are being made.
3. The Title VI coordinator will make additional efforts to arrange on-site visits to confirm the implementation of required notices to the public pertaining to language assistance services, (i.e.: verify use of “I speak” cards, LEP posters, etc.) are being displayed at respective county department/offices.

# ENVIRONMENTAL JUSTICE

The County of Hidalgo addresses environmental justice issues and outreach through general and grant funded programs through our county departments/offices that provide social services to disproportionate families or the minority population through Community Development Block Grants (CDBGs), rental assistance, housing repairs, and food vouchers.

Our County will continue to strive in ensuring compliance of all federal requirements including but not limited to compliance with Title VI/Nondiscrimination Plan. Our Title VI Coordinator, in coordination with county departments, will gather data to establish demographic characteristics and trends. The data will assist in identifying and engaging traditionally underserved populations, including those covered under existing Environmental Justice policies, as well as populations with Limited English Proficiency (LEP).

County departments assist with public involvement activities throughout the county for projects/programs coordinated through their offices. County Departments gather and include reports and other relevant information in making Environmental Justice evaluations. Departments may conduct demographic surveys and collect public meeting comment forms to comply with the County's Title VI Plan and ensure public participation is considered during the development and implementation of county projects.

# TITLE VI TRAINING SUMMARY

*This section provides an overview of training activities conducted by the County of Hidalgo's Title VI Coordinator for FY2018.*

## **Training provided by the County of Hidalgo**

The Hidalgo County's Title VI Coordinator authorized the County Department of Human Resources with assistance from the District Attorney's Civil Litigation Division to develop and present an official training of the Title VI Plan to each assigned Department /Office Liaison. The training and questions and answer sessions took place during the months of September and October of 2019.

## **Training attended by the County of Hidalgo**

Information related to attendance by County personnel at outside Title VI relevant trainings is unavailable or unknown. The report will be supplemented if necessary should information be obtained.

## **Calendar Year 2020 Goals**

Attempts will continue to be made to develop and implement trainings to county departments to include:

1. Have full implementation of countywide telephone language interpretation services and sign language interpretation services and train department/offices on call-in procedures. Disseminate user guides to all Title VI Department Liaisons via e-mail and provide instructions to access these services when need arises. Some departments already utilize these services based on grant requirements.
2. Keep a current list of federally funded grants, projects and activities to ensure that nondiscrimination language continues to be integrated in the contracts.
3. Explore methods to identify staff within each office/department responsible for ensuring environmental integrity as it pertains to Title VI compliance regulations.
4. Develop specific training videos/presentations that concentrate on other Title VI topics (i.e. Environmental Justice, Public Participation monitoring and reporting, etc.).

# TITLE VI COMPLAINTS SUMMARY

On or about January 2019, the County of Hidalgo received one external discrimination complaint related to alleged violations of the County's Title VI during this reporting period of September 01, 2018 – December 31, 2019.

In response, the County initiated the processes and procedures found in the Complaint section of the County's Title VI Plan. As per the Plan, the County conducted an internal investigation and prepared a final report which concluded that there was insufficient evidence to support a finding of the allegations. The Title VI Coordinator then provided notification of the findings to the complainant. Complainant filed an appeal of the decision. In accordance with the Plan, an Appeal committee was convened to review the decision. The Committee upheld the findings and Complainant was informed of the appeal decision. This information was sent to the overseeing grant agency concluding not enough evidence was found to substantiate the claim. However, although this was the finding, the County took steps to address the constituent's needs.

The County's full Title VI complaint process and instructions are available on line at: <https://www.co.hidalgo.tx.us>.

# COMMISSIONERS' COURT ACKNOWLEDGEMENT

The County of Hidalgo, as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, religion (where the primary objective of the financial assistance is to provide employment per 42 U.S.C. §2000d-3), color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation in any federally or non-federally funded program or activity administered by the County of Hidalgo.

This annual report was adopted by the County of Hidalgo Commissioner's Court on the \_\_\_\_\_ day of \_\_\_\_\_, 2020.

## Hidalgo County Commissioners' Court

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Richard Cortez, Hidalgo County Judge

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David Fuentes  
Commissioner, Precinct 1

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Eduardo Cantu  
Commissioner, Precinct 2

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Jose M. Flores  
Commissioner, Precinct 3

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Ellie Torres  
Commissioner, Precinct 4