

CENTRAL FLORIDA REGIONAL PLANNING
COUNCIL
Title VI Plan



February 2016



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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

Central Florida Regional Planning Council assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Central Florida Regional Planning Council further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Central Florida Regional Planning Council.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Date: 2/10/16

Signature 

Patricia M. Steed, Executive Director

2.0 Introduction & Description of Services

Central Florida Regional Planning Council submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Central Florida Regional Planning Council is a sub-recipient of FTA funds and provides service in Hardee, Highlands, and Okeechobee Counties. A description of the current Central Florida Regional Planning Council system is included in Appendix B.

Title VI Liaison

Central Florida Regional Planning Council Liaison Name: Patricia M. Steed

Title: Executive Director

Phone Number: (863) 534-7130

Address: 555 East Church Street, Bartow, FL 33830

Alternate Title VI Contact

Alternate Title VI Contact Name: Jennifer Codo-Salisbury

Title: Planning Director

Phone Number: (863)534-7130

Address: 555 East Church Street, Bartow, FL 33830

Central Florida Regional Planning Council must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

Central Florida Regional Planning Council is not a first time applicant for FTA/FDOT funding. The following is a summary of Central Florida Regional Planning Council's current and pending federal and state funding.

Current and Pending FTA Funding

1. Federal Transit Administration 5310 Operating, January 2015,\$333,467 [Pending]

FTA Circular 4702.1B, Chapter iii, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

2. Federal Transit Administration 5311 Operating, January 2015, 596,494 [Pending]

During the previous three years, the Federal Transit Administration or the Florida Department of Transportation did not complete a Title VI compliance review of Central Florida Regional Planning Council.

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Central Florida Regional Planning Council will remain in compliance with this requirement by annual submission of certifications and assurances as required by [FDOT] and/or [other primary recipient].

2.3 Title VI Plan Concurrence and Adoption

The Central Florida Regional Planning Council adopted this plan at their February 10, 2016 meeting. See meeting minutes excerpt on page C-2.

FDOT concurrence letter is not available at this writing but will be included in Appendix C of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice is translated into Spanish. Translation into other languages will be done as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Central Florida Regional Planning Council's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Central Florida Regional Planning Council's office(s) including the office bulletin board, and on the Central Florida Regional Planning Council's website at cfrpc.org. Additionally, Central Florida Regional Planning Council will post the notice on transit vehicles.

A sample version of this notice is included in Appendix D of this Plan along with a Spanish version.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Central Florida Regional Planning Council may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Central Florida Regional Planning Council investigates complaints received no more than 180 days after the alleged incident. Central Florida Regional Planning Council will process complaints that are complete.

Once the complaint is received, Central Florida Regional Planning Council will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Central Florida Regional Planning Council has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Central Florida Regional Planning Council may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Central Florida Regional Planning Council can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on Central Florida Regional Planning Council's website (www.cfrpc.org)

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on Central Florida Regional Planning Council's website (www.cfrpc.org)

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Central Florida Regional Planning Council will submit Title VI Plans to FDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

Central Florida Regional Planning Council has three (3) sub-recipients listed below. Central Florida Regional Planning Council is required by FTA to ensure that sub-recipients of federal funds comply with all Title VI requirements. To meet this mandate, Central Florida Regional Planning Council monitoring consists of collecting data through site visits, day-to-day technical assistance, and reports/forms. Central Florida Regional Planning Council uses reports and site visits to determine if the sub-recipients are complying with the Title VI requirements as outlined in FTA Circular 4702.1B and their Title VI Plan.

Title VI Complaint procedures, Title VI Complaint Form, and a sample Title VI Notice have been developed and distributed by Central Florida Regional Planning Council to its sub-recipients. Central Florida Regional Planning Council also assists the sub-recipients with demographic maps for Title VI purposes upon request.

List of Central Florida Regional Planning Council Sub-recipients

- Sub-recipient 1: MV Transportation, Inc.
- Sub-recipient 2: Hayes Medical Transport
- Sub-recipient 3: Positive Medical Transport

4.5 Contractors and Subcontractors

Central Florida Regional Planning Council is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. Central Florida Regional Planning Council, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, Central Florida Regional Planning Council shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to

any subcontract or procurement as the Central Florida Regional Planning Council, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a part of the Joint Participation Agreement (JPA) with FDOT, Central Florida Regional Planning Council and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Central Florida Regional Planning Council and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of FDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a part of the JPA with FDOT, vendors and contractors of Central Florida Regional Planning Council shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with Central Florida Regional Planning Council. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for Central Florida Regional Planning Council shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for Central Florida Regional Planning Council.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Central Florida Regional Planning Council must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Central Florida Regional Planning Council in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to [FDOT] and/or [other primary recipient].

Central Florida Regional Planning Council has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	None	None	N/A	N/A
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes 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 Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Central Florida Regional Planning Council was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Central Florida Regional Planning Council. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Central Florida Regional Planning Council services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Central Florida Regional Planning Council is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Central Florida Regional Planning Council's recent, current, and planned outreached activities.

- Activity 1 – The Central Florida Regional Planning Council hold the required public hearings for FTA grants. In addition, public hearing notices are published in the State Florida Administrative Register and local newspapers. Flyers are distributed to clients on vehicles two weeks prior to the date of public hearings.
- Activity 2 – Public meetings are advertised for the Transportation Disadvantaged Local Coordinating Board (TDLCB) meetings. These meetings are advertised in the State Florida Administrative Register and local newspapers. Agendas include opportunity for public comments and participation.
- Activity 3 – Quarterly meetings of the TD LCB give opportunity for social service, civic and governmental entities to comment on service needs.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Central Florida Regional Planning Council, together with the Community Transportation Coordinator, operates a paratransit demand response system within Hardee, Highlands, and Okeechobee counties. The Language Assistance Plan (LAP) has been prepared to address Central Florida Regional Planning Council's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Central Florida Regional Planning Council service area there are 16,750 residents or 11% who describe themselves as not able to communicate in English very well (Source: US Census). Central Florida Regional Planning Council is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Central Florida Regional Planning Council has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Central Florida Regional Planning Council does not have a transit-related committee or board, therefore this requirement does not apply.

Central Florida Regional Planning Council will make efforts to encourage minority participation at all meetings pertaining to mobility in the service area.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, Central Florida Regional Planning Council will ensure the following:

1. Central Florida Regional Planning Council will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Central Florida Regional Planning Council will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, Central Florida Regional Planning Council will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If Central Florida Regional Planning Council determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, Central Florida Regional Planning Council may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Central Florida Regional Planning Council must demonstrate and document how both tests are met. Central Florida Regional Planning Council will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

The Central Florida Regional Planning Council has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Central Florida Regional Planning Council does not have any Title VI Equity Analysis reports to submit with this Plan. Central Florida Regional Planning Council will utilize the demographic maps included in Appendix I for future Title VI analysis.]

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Central Florida Regional Planning Council is not a fixed route service provider.

11.0 Appendices

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Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
- Service standards
 - o Vehicle load for each mode
 - o Vehicle headway for each mode
 - o On time performance for each mode
 - o Service availability for each mode
- Service policies
 - o Transit Amenities for each mode
 - o Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.
Central Florida Regional Planning Council's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

The Central Florida Regional Planning Council is the recipient of Federal Transit Funds and acts as a conduit to pass those funds to the Community Transportation Coordinator (CTC) (Chapter 427, F.S. Transportation Disadvantaged Program). The CTC is currently a private for-profit organization and is therefore not eligible to be a direct recipient of federal funds.

As the recipient of federal funds, the Central Florida Regional Planning Council is required to meet the federal rules and regulations of funding sources. When funds are passed through to the CTC, all federal rules are also passed on to the CTC as well and they are monitored for compliance. The CTC is the actual agency that takes transportation reservations. The CTC contracts with private for-profit operators who provide direct transportation trips to system clients. Therefore, when reporting the number of employees in the transportation system, the numbers apply only to the CTC staff and the contract operators in the system.

The transportation system is made up of 50 full-time employees, 13 part-time employees, and no volunteers. The CTC General Manager of the service area is responsible for all of the day-to-day operations of the transportation service. The CTC also reports directly to the Local Coordinating Board who gives information and direction regarding service. The CTC provides services in accordance with the Community Coordinator's approved Operations Manual/System Safety/Security program and its Transportation Disadvantaged Service Plan (TDSP).

3. Indicate if your agency is a government authority or a private non-profit agency.
Central Florida Regional Planning Council operates as a State agency with an agreement with the CTC to pass Federal funds through to that company.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

The Community Transportation Coordinator (CTC) is responsible for training and management of our transportation program. All safety sensitive employees are required to complete FDOT approved safety and security training course as part of their new hire orientation. All new employees are also

required to complete on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The CTC General Manager is responsible for annual renewal of all liability insurance for both FDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

5. Who provides vehicle maintenance and record keeping?

Maintenance on all agency vehicles is provided by contract carriers or outside vendors. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at each contract carrier's base. Location of each carrier is as follows:

Hayes Medical Transport

3884 NE Highway 70

Arcadia, FL 34266

Positive Medical Transport

201 Commercial Court

Sebring, FL 33876

All records are maintained and retained for a minimum of four (4) years.

6. Number of current transportation related employees

Our transportation department has a total of 63 employees that include: 30 full-time drivers, 16 part-time drivers, 8 administrators and 9 support staff.

7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to the general public. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Approximately 100% of the medical trips we provide are to medical facilities in and out of the service area; therefore, our out of county services are directed to the nearby highway corridors that surround this community for optimum efficiency of trip duration and the most convenient route. Currently, we use a variety of vehicles to provide passenger services. Eighty percent + (80%+) of the fleet which includes vans and modified vans are

equipped for wheelchair service. We prioritize grouping trips and multi-loading to the maximum extent possible. We make approximately 260 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter

Central Florida Regional Planning Council Meeting
February 10, 2016
Curtis Ezelle Complex
Hardee County Government Services Building
315 North 6th Avenue
Wauchula, FL 33873
9:30 a.m.

Excerpt from the Meeting Minutes

AGENDA ITEM #4 FEDERAL TRANSPORTATION ADMINISTRATION TITLE VI PLAN

Marcia Staszko, Transportation Disadvantaged Director, stated that the Council, as a recipient of Federal Transportation Administration (FTA) funds, is required to develop, adopt, and implement a Title VI Policy and Plan that complies with the requirements of FTA Circular 4702.1B. Title VI is a federal statute that provides for non-discrimination within the Transportation Disadvantaged federally funded program. The draft Title VI Plan was provided to each member for their review and consideration. Discussion followed.

MOTION

Pat Huff moved to adopt the Federal Transportation Administration Title VI Plan as presented. Joe Fink seconded.

Motion carried unanimously.

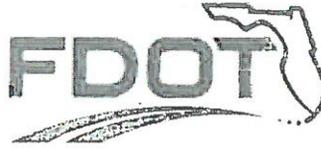
CERTIFICATION

I CERTIFY that the above is a true and exact excerpt from the official minutes of the Central Florida Regional Planning Council as contained in motion duly made and passed by the Council at its regular meeting of February 10, 2016.

This 16th day of February, 2016.



Patricia M. Steed, Executive Director



Florida Department of Transportation

RICK SCOTT
GOVERNOR

801 North Broadway Avenue
Bartow, Florida 33830

JIM BOXOLD
SECRETARY

February 17, 2016

Central Florida Regional Planning Council
Ms. Marcia Staszko
555 East Church Street
Bartow, FL 33830

Re: Title VI Plan

Dear Ms. Staszko:

The Florida Department of Transportation, District One concurs with the Title VI Plan for Central Florida Regional Planning Council as required for all Federal Transit Administration recipients as per the FTA Circular C4702.1B. This concurrence means that Central Florida Regional Planning Council meets the requirements as set out in the Circular and may receive grant funds. Please continue to follow the requirements set forth in the stated Circular.

Should you have any questions, please contact Michelle S. Peronto via e-mail at michelle.peronto@dot.state.fl.us or by phone at 863-519-2390.

Sincerely,

Michelle S. Peronto
Transit Projects Coordinator

Cc: Pat Steed, Central Florida Regional Planning Council
Sherry Carver, Central Florida Regional Planning Council
Richard P. Shine, District Transit Programs Administrator, FDOT

Appendix D

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Central Florida Regional Planning Council

- The Central Florida Regional Planning Council, through the Community Transportation Coordinator (per Chapter 427, F.S.) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Central Florida Regional Planning Council.
- For more information on the Central Florida Regional Planning Council's civil rights program, and the procedures to file a complaint, contact Patricia M. Steed, psteed@cfrpc.org; or visit our administrative office at 555 E. Church Street, Bartow, FL 33830. For more information, visit cfrpc.org.
- If information is needed in another language, contact (863)534-7130.

Translated in Spanish

La Region Central de la Florida a traves de el Comité Cordinador de Transportacion Publica (Capitulo 427, F.S.) opera sus programas y servicios sin tomar en cuenta Raza, Color, u Origen Etnico en concordancia con el Capitula VI de los Derechos Civiles. Culaquier persona que 3este de acuerdo bajo el Capitula VI puede formular una queja a traves de el Comité de la region Central de la Florida.

Para mas informacion de el POrograma de los Derechos Civiles de el Comité de la Region Central de la Florida, y los p rocedimientos de como formular una queja, contactar a Patricia M. Steed psteed@cfrpc.org o visitar nuestra oficina administrativa a la siguiente direccion 555 E. Church Street, Bartow, FL 33830. Si necesta informacion en otro idioma, llame al (863) 534-7130.

Appendix E

Title VI Complaint Form

Central Florida Regional Planning Council

Title VI Complaint Form

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age
<input type="checkbox"/> Disability	<input type="checkbox"/> Family or Religious Status	<input type="checkbox"/> Other (explain) _____	
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No

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

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

Signature and date required below

Signature Date

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

Central Florida Regional Planning Council
 Title VI Liaison
 555 E. Church Street
 Bartow, FL 33830

Comite De Planificacion De La Region Central De La Florida

Titulo V1 Formulario De Queja

Seccion1:

Nombre:

Direccion:

Telefono (casa):

Telefono (trabajo):

Correo Electronico:

Formato Requerido Accesible?

Letra Grande

Casette Audio

TDD

Otro

Seccion II:

Estas formulando esta queja por tu persona?

Si*

No*

Si no, porfavor de suplir el nombre y la relacion por quien usted esta formulando la queja:

Porfavor explique la razon por que usted esta utilizando una tercera persona:

Porfavor confirme que usted ha obtenido el permiso de la persona agravada si es que usted esta formulando por tercera persona.

Si

No

Seccion III:

Yo creo que la discriminacion que experimente fue basada en (Marca todas las que apliquen):

Raza

Color

Origen Nacional

Edad

Incapacidad

Familia o Religion

Otro (explicar)

Fecha de alegada discriminacion (Mes, Dia, Año):

Explique lo mas claro posible que sucedio y por que usted cree que fue discriminado. Describa personas envuelta. Incluya nombre y la informacion de contacto para persona (as) que lo discriminaron (si sabe) al igual que los nombres y la informacion de contacto de cualquier testigo. Si mas espacio es necesitado, porfavor escriba en la parte de atras de este formulario.

Seccion IV

Ha usted anteriormente formulado bajo Titulo VI una queja con esta agencia?

Si

No

Seccion V

Ha usted anteriormente sometido una queja con otra agencia Federal, Estatal, o Agencia Local, Corte Federal, o Estatal? Si No

Si es la respuesta es Si, marque todas las que apliquen:

Agencia Federal: Corte Federal Agencia Del Estado

Corte Estatal Agencia Local

Porfavor de proveer informacion de contacto, sobre la persona en la agencia/corte de donde la queja fue sometida.

Nombre:

Titulo:

Agencia:

Direccion:

Telefono:

SeccionVI

Nombre de Agencia por la cual queja esta siendo formulada:

Persona de contacto:

Titulo:

Telefono:

Usted puede añadir cualquier material u otra informacion que sea revelante a su queja.

Firma y fecha requerida abajo

Firma

Fecha

Favor de someter este formulario en persona a la direccion aqui abajo, o enviar por correo:

Central Florida Regional Planning Council

Titulo VI Liaison

555 E. Church Street

Bartow, Fl 33830

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Central Florida Regional Planning Council was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Central Florida Regional Planning Council. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Central Florida Regional Planning Council services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Central Florida Regional Planning Council also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, communitybasedorganizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Central Florida Regional Planning Council and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Central Florida Regional Planning Council will proactively reach out and engage low-income, minority, and LEP populations for the Central Florida Regional Planning Council service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Central Florida Regional Planning Council will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Central Florida Regional Planning Council. Central Florida Regional Planning Council intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Central Florida Regional Planning Council will conduct community meetings and listening sessions as appropriate with passengers, employers, communitybased organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Central Florida Regional Planning Council website (cfrpc.org) and all feedback on the site will be recorded and passed onto Central Florida Regional Planning Council management. The public will also be able to call the Central Florida Regional Planning Council office at (863)534-7130 during its hours of operation. Feedback collected over the phone will be recorded and passed onto Central Florida Regional Planning Council management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Central Florida Regional Planning Council will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers distributed to clients riding vehicles
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to communitybased organizations, particularly those that target LEP population
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing

The Central Florida Regional Planning Council holds public hearings when required by grant submittals. In addition, as staff to the Transportation Disadvantaged program in Hardee, Highlands, and Okeechobee counties, a public hearing is conducted once a year. Notifications for public hearings are advertised in the State Florida Administrative Register and in local newspapers with wide distribution. Flyers announcing public hearings are also distributed on vehicles starting three (3) weeks prior to the hearing date. Transportation is provided to those persons requesting service to attend the meetings.

LCB Meetings

Local Coordinating meetings are held quarterly. Meeting notifications are published in the Florida Administrative Register as well as local newspapers with wide distribution. Each meeting agenda gives an opportunity for the general public to make comments and voice concerns. A public hearing is conducted once annually. The Central Florida Regional Planning Council maintains a mailing list of persons interested in being notified of meetings. Meeting agendas are mailed/emailed to interested persons. The Central Florida Regional Planning Council makes every effort to provide transportation to qualified customers to attend those meetings.

Appendix G

Language Assistance Plan (LAP)

I. Introduction

Central Florida Regional Planning Council is the conduit for funding the demand response transportation program under the state Transportation Disadvantaged program under the Community Transportation Coordinator with Hardee, Highlands, and Okeechobee counties. The Language Assistance Plan (LAP) has been prepared to address Central Florida Regional Planning Council's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In Central Florida Regional Planning Council service area there are 16,750 residents or 11% who describe themselves as not able to communicate in English "very well" (Source: US Census). Central Florida Regional Planning Council is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Central Florida Regional Planning Council has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available through the Transportation Disadvantaged program. It is important for Central Florida Regional Planning Council be able to communicate effectively with all of its riders. When Central Florida Regional Planning Council is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Central Florida Regional Planning Council is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Central Florida Regional Planning Council undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan

addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Central Florida Regional Planning Council staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Central Florida Regional Planning Council services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Central Florida Regional Planning Council program, activity or service.
2. The frequency with which LEP persons come in contact with Central Florida Regional Planning Council programs, activities or services.
3. The nature and importance of programs, activities or services provided by Central Florida Regional Planning Council to the LEP population.
4. The resources available to Central Florida Regional Planning Council and overall costs to provide LEP assistance

a. Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population

Of the 156,385 residents in the Central Florida Regional Planning Council service *area* 18,341 residents describe themselves as speaking English less than “very well”. People of Hispanic ethnicity descent are the primary LEP persons likely to utilize Central Florida Regional Planning Council services. For the Central Florida Regional Planning Council service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 88% speak English “very well”. For groups who speak English “less than very well”, 10% speak Spanish/Latino.

b. Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Central Florida Regional Planning Council has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. Phone inquiries and staff survey feedback indicated that Central Florida Regional Planning Council dispatchers and drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke English or Spanish. Over the past 25 years, Central Florida Regional Planning Council has had few, if any, requests for translated documents. Information brochures are printed in English and Spanish.

c. Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s *Policy Guidance Concerning Recipient’s Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person’s inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

d. Factor 4: The Resources Available to the Recipient and Costs

Central Florida Regional Planning Council has not completed an assessment of its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. An assessment will be completed by the next plan update.

Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

e. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Central Florida Regional Planning Council has identified a portion of the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 88% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish/Latino (10%). Of

those whose primary spoken language is Spanish/Latino, approximately 51% identify themselves as speaking less than “very well”.

Central Florida Regional Planning Council may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

f. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Central Florida Regional Planning Council has undertaken the following actions to improve access to information and services for LEP individuals:

1. When necessary and cost effective, provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Central Florida Regional Planning Council will utilize the demographic maps provided in Appendix I in order to provide the above efforts to the LEP persons within the service area.

g. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Central Florida Regional Planning Council, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and Spanish.

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Documentation of language assistance requests
3. How to handle a potential Title VI/LEP complaint

h. Element 4: Providing Note to LEP Persons

Central Florida Regional Planning Council will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Central Florida Regional Planning Council office billboard, and on vehicles. Additionally, 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.

i. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Central Florida Regional Planning Council's financial resources are sufficient to fund language assistance resources needed

Central Florida Regional Planning Council understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Central Florida Regional Planning Council is open to suggestions from all sources, including customers, Central Florida Regional Planning Council staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

III. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation

obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Appendix H

Operating Area Language Data:

Central Florida Regional Planning Council

Service Area

<u>Language</u>	<u>Hardee County</u>	<u>Percent of Population</u>
Total	25,401	100%
Speak only English	15,147	59.5%
Spanish or Spanish Creole	9,564	37.6%
Speak English “very well”	4,332	17%
Speak English less than “very well”	5,232	20.6%
French (incl. Patois, Cajun)	92	0.4%
Speak English “very well”	41	0.2%
Speak English less than “very well”	51	0.2%
French Creole	451	1.8%
Speak English “very well”	170	0.7%
Speak English less than “very well”	281	1.1%
Italian	13	0.1%
Speak English “very well”	13	0.1%
Speak English less than “very well”	0	0.0%
Portuguese or Portuguese Creole	34	0.1%
Speak English “very well”	34	0.1%
Speak English less than “very well”	0	0.0%
German	20	0.1%
Speak English “very well”	20	0.1%
Speak English less than “very well”	0	0.0%
Yiddish	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Other West Germanic languages	11	0.0%
Speak English “very well”	11	0.0%
Speak English less than “very well”	0	0.0%
Scandinavian languages	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Greek	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Russian	32	0.1%
Speak English “very well”	32	0.1%
Speak English less than “very well”	0	0.0%
Polish	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Serbo-Croatian	0	0.0%

Language	Hardee County	Percent of Population
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Slavic Languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Armenian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Persian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Gujarati	31	0.1%
Speak English "very well"	24	0.1%
Speak English less than "very well"	7	0.0%
Hindi	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Urdu	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Indic languages	3	0.0%
Speak English "very well"	2	0.0%
Speak English less than "very well"	1	0.0%
Other Indo-European Languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Chinese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Japanese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Korean	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Mon-Khmer, Cambodian	3	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	3	0.0%
Hmong	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%

Language	Hardee County	Percent of Population
Thai	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Laotian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Vietnamese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Asian languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Tagalog	22	0.1%
Speak English "very well"	22	0.1%
Speak English less than "very well"	0	0.0%
Other Pacific Island languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Navajo	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Native American languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Hungarian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Arabic	13	0.1%
Speak English "very well"	13	0.1%
Speak English less than "very well"	0	0.0%
Hebrew	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
African languages		0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other and unspecified languages	3	0.0%
Speak English "very well"	3	0.0%
Speak English less than "very well"	0	0.0%

<u>Language</u>	<u>Highlands</u>	<u>Percent of Population</u>
Total	93,359	100%
Speak only English	75,745	81.1%
Spanish or Spanish Creole	14,615	15.7%
Speak English “very well”	7,830	8.4%
Speak English less than “very well”	6,785	7.3%
French (incl. Patois, Cajun)	411	0.04
Speak English “very well”	320	0.3
Speak English less than “very well”	91	0.1%
French Creole	335	0.4%
Speak English “very well”	205	0.2%
Speak English less than “very well”	130	0.1%
Italian	165	0.2%
Speak English “very well”	118	0.1%
Speak English less than “very well”	47	0.1%
Portuguese or Portuguese Creole	173	0.2%
Speak English “very well”	102	0.1%
Speak English less than “very well”	71	0.1%
German	282	0.3%
Speak English “very well”	206	0.2%
Speak English less than “very well”	76	0.1%
Yiddish	23	0.0%
Speak English “very well”	23	0.0%
Speak English less than “very well”	0	0.0%
Other West Germanic languages	66	0.1%
Speak English “very well”	66	0.1%
Speak English less than “very well”	0	0.0%
Scandinavian languages	15	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	15	0.0%
Greek	110	0.1%
Speak English “very well”	82	0.1%
Speak English less than “very well”	28	0.0%
Russian	1	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	1	0.0%
Polish	81	0.1%
Speak English “very well”	49	0.1%
Speak English less than “very well”	32	0.0%
Serbo-Croatian	0	0.0%
Speak English “very well”	0	0.0%

Language	Highlands	Percent of Population
Speak English less than “very well”	0	0.0%
Other Slavic Languages	37	0.0%
Speak English “very well”	37	0.0%
Speak English less than “very well”	0	0.0%
Armenian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Persian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Gujarati	64	0.1%
Speak English “very well”	64	0.1%
Speak English less than “very well”	0	0.0%
Hindi	9	0.0%
Speak English “very well”	9	0.0%
Speak English less than “very well”	0	0.0%
Urdu	32	0.0%
Speak English “very well”	15	0.0%
Speak English less than “very well”	17	0.0%
Other Indic languages	194	0.2%
Speak English “very well”	15	0.0%
Speak English less than “very well”	179	0.2%
Other Indo-European Languages	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Chinese	69	0.1%
Speak English “very well”	33	0.0%
Speak English less than “very well”	36	0.0%
Japanese	12	0.0%
Speak English “very well”	1	0.0%
Speak English less than “very well”	11	0.0%
Korean	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Mon-Khmer, Cambodian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Hmong	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Thai	0	0.0%

Language	Highlands	Percent of Population
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Laotian	89	0.1%
Speak English "very well"	12	0.0%
Speak English less than "very well"	77	0.1%
Vietnamese	164	0.2%
Speak English "very well"	162	0.2%
Speak English less than "very well"	2	0.0%
Other Asian languages	89	0.1%
Speak English "very well"	89	0.1%
Speak English less than "very well"	0	0.0%
Tagalog	522	0.6%
Speak English "very well"	341	0.4%
Speak English less than "very well"	181	0.2%
Other Pacific Island languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Navajo	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Native American languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Hungarian	16	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	16	0.0%
Arabic	22	0.0%
Speak English "very well"	22	0.0%
Speak English less than "very well"	0	0.0%
Hebrew	2	0.0%
Speak English "very well"	2	0.0%
Speak English less than "very well"	0	0.0%
African languages	16	0.0%
Speak English "very well"	16	0.0%
Speak English less than "very well"	0	0.0%
Other and unspecified languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%

<u>Language</u>	<u>Okeechobee</u>	<u>Percent of Population</u>
Total	37,039	100%
Speak only English	27,934	75.4%
Spanish or Spanish Creole	8,232	22.2%
Speak English “very well”	3,499	9.4%
Speak English less than “very well”	4,733	12.8%
French (incl. Patois, Cajun)	114	0.3%
Speak English “very well”	51	0.1%
Speak English less than “very well”	63	0.2%
French Creole	82	0.2%
Speak English “very well”	82	0.2%
Speak English less than “very well”	0	
Italian	38	0.1%
Speak English “very well”	38	0.1%
Speak English less than “very well”	0	0.0%
Portuguese or Portuguese Creole	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
German	57	0.2%
Speak English “very well”	53	0.1%
Speak English less than “very well”	4	0.0%
Yiddish	3	0.0%
Speak English “very well”	3	0.0%
Speak English less than “very well”	0	0.0%
Other West Germanic languages	122	0.3%
Speak English “very well”	122	0.3%
Speak English less than “very well”	14	0.0%
Scandinavian languages	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Greek	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Russian	16	0.0%
Speak English “very well”	10	0.0%
Speak English less than “very well”	6	0.0%
Polish	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Serbo-Croatian	12	0.0%
Speak English “very well”	0	0.0%

<u>Language</u>	<u>Okeechobee</u>	<u>Percent of Population</u>
Speak English less than “very well”	12	0.0%
Other Slavic Languages	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Armenian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Persian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Gujarati	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Hindi	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Urdu	22	0.0%
Speak English “very well”	22	0.0%
Speak English less than “very well”	0	0.0%
Other Indic languages	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Other Indo-European Languages	15	0.0%
Speak English “very well”	15	0.0%
Speak English less than “very well”	0	0.0%
Chinese	17	0.0%
Speak English “very well”	15	0.0%
Speak English less than “very well”	2	0.0%
Japanese	51	0.1%
Speak English “very well”	18	0.0%
Speak English less than “very well”	33	0.1%
Korean	11	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	11	0.0%
Mon-Khmer, Cambodian	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Hmong	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Thai	0	0.0%

Language	Okeechobee	Percent of Population
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Laotian	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Vietnamese	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Asian languages	7	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	7	0.0%
Tagalog	113	0.3%
Speak English "very well"	23	0.1%
Speak English less than "very well"	90	0.2%
Other Pacific Island languages	5	0.0%
Speak English "very well"	5	0.0%
Speak English less than "very well"	0	0.0%
Navajo	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other Native American languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Hungarian	17	0.0%
Speak English "very well"	17	0.0%
Speak English less than "very well"	0	0.0%
Arabic	10	0.0%
Speak English "very well"	10	0.0%
Speak English less than "very well"	0	0.0%
Hebrew	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
African languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%
Other and unspecified languages	0	0.0%
Speak English "very well"	0	0.0%
Speak English less than "very well"	0	0.0%

Appendix I

Demographic Maps

None

Appendix J

Title VI Equity Analysis

Title VI Equity Analysis

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” Central Florida Regional Planning Council did not have the need to complete a Title VI equity analysis during this period.

Purpose and need for the facility:

N/A

Service area population characteristics:

The 2010 Census defined the following population characteristics for the Central Florida Regional Planning Council Service Area]:

County	Percent White Only	Percent Black Only	Percent Hispanic/Latino
Hardee	72.4%	12.6%	16.3%
Highlands	81.0%	9.4%	17.4%
Okeechobee	77.5%	8.0%	23.9%

2010 Quickfacts

Alternative locations considered:

N/A

Equity impacts of siting alternatives:

No Action Alternative

N/A

Alternative 1 N/A

Alternative 2 N/A

Alternative 3 N/A

Outreach activities: N/A

Preferred alternative: N/A

Mitigation: N/A

Central Florida Regional Planning Council

February, 2016