

LOUISE GRAHAM REGENERATION CENTER

TITLE VI PLAN

ADOPTED: December 17, 2019

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].

Louise Graham Regeneration Center 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.

Louise Graham Regeneration Center 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. Develop a complaint process and attempt to resolve complaints of discrimination against Louise Graham Regeneration Center .
4. Participate in training offered on the Title VI and other nondiscrimination requirements.
5. 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.
6. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
7. 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.

Signature



Debra Ballinger

Executive Director/Signatory Authority, Your Community Transit, Date: December/17/2019

Title VI Plan Concurrence and Adoption

Your Agency will submit the Title VI Plan to FDOT for concurrence every three (3) years or any time a major change in the Plan occurs.

This Plan was approved and adopted by Louise Graham Regeneration Center during an Executive Committee meeting held on December 17, 2019. A copy of the meeting minutes is included in **Appendix A** of this Plan.

1.0 Title VI Notice to the Public

1.1 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 to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow to file a discrimination complaint against the grantee

A sample of the notice is included in the **Appendix B** of this Plan. The sample notice should be translated into other languages, as necessary.

1.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Louise Graham's Regeneration Center 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 Louise Graham's Regeneration Center office(s) including the reception desk and meeting rooms, and on the Louise Graham's Regeneration Center website at www.louisegraham.org Additionally, Louise Graham Regeneration Center may also post the notice on transit vehicles.

A sample version of this notice is included in **Appendix B** of this Plan along with any translated versions of the notice, as necessary. The public notice must be provided in any other language which meets the Safe Harbor threshold (See Appendix E).

2.0 Title VI Procedures and Compliance

2.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Louise Graham Regeneration Center may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (see **Appendix C**). Louise Graham Regeneration Center investigates complaints received no more than 180 days after the alleged incident. Louise Graham Regeneration Center will process complaints that are complete.

Once the complaint is received, Louise Graham Regeneration Center 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.

Louise Graham Regeneration Center has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Louise Graham Regeneration Center 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, Louise Graham Regeneration Center 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 Louise Graham's Regeneration Center website (www.louisegraham.org).

2.2 Complaint Form

A copy of the complaint form in English and Spanish or Spanish Creole is provided in the **Appendix C** and on Louise Graham's Regeneration Center website (www.louisegraham.org). The complaint form must be provided in any languages spoken by the LEP population which meet the Safe Harbor threshold (See **Appendix C**).

3.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Louise Graham Regeneration Center 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 Louise Graham Regeneration Center 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.

Louise Graham Regeneration Center 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. A summary of these incidents is recorded in Table 1.

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				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

4.0 Public Participation Plan

The Public Participation Plan (PPP) for Louise Graham Regeneration Center 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 Louise Graham Regeneration Center . The PPP is included in **Appendix D** to this Title VI Plan.

Current Outreach Efforts

LGRC serves a population that is traditionally underserved. All persons who receive transit services are developmentally disabled and low income, and are clients funded by the Agency for Persons with Disabilities (APD). At least annually the Center:

- Provides opportunity for clients to provide feedback on agency services.

- Engages in outreach to enroll clients by periodically informing APD-funded case managers about LGRC's Adult Day Training services. This outreach primarily is done via email and personal contact. It is done currently and has been done for at least the past three years.
- Periodically surveys client case managers about the services received.

5.0 Language Assistance Plan

Louise Graham Regeneration Center operates a transit system within Pinellas County Area. The Language Assistance Plan (LAP) has been prepared to address Louise Graham's Regeneration Center 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 Louise Graham Regeneration Center service area there are 26,544 residents or 4.9% who describe themselves as not able to communicate in English very well (Source: US Census). Louise Graham Regeneration Center 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. Louise Graham Regeneration Center 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 E**.

Transit Planning and Advisory Bodies

Louise Graham Regeneration Center does not have a transit-related committee or board; therefore, this requirement does not apply.

6.0 Title VI Equity Analysis

Louise Graham Regeneration Center has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Your Community Transit does not have any Title VI Equity Analysis reports to submit with this Plan. Your Community Transit will utilize the demographic maps included in Appendix I for future Title VI analysis.

7.0 Appendices

APPENDIX A	TITLE VI PLAN ADOPTION MEETING MINUTES
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX C	TITLE VI COMPLAINT FORM
APPENDIX D	PUBLIC PARTICIPATION PLAN
APPENDIX E	LANGUAGE ASSISTANCE PLAN
APPENDIX F	OPERATING AREA LANGUAGE DATA: LOUISE GRAHAM REGENERATION CENTER SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAPS (COULD BE OPTIONAL)

Appendix A

Title VI Plan Adoption Meeting Minutes

2301 3rd Avenue South
St. Petersburg, FL 33712
(727) 327-9444
fax: (727) 327-9649
www.louisegraham.org

Debra Ballinger
Acting Executive Director

Administration
4140 49th Street N.
St. Petersburg, FL 33709
(727) 578-5437

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Eddie Pringle
Jeffrey Smith
Irene Sullivan
Dr. Yvonne Williams



Secure Shred is a division of
the Louise Graham Regeneration Center
1-877-857-9620
727-577-5462
www.SecureShredFL.com

Supported in part by:

Agency for Health
Care Administration
Agency for Persons
with Disabilities
City of St. Petersburg
Jacarlene Foundation



Louise Graham Regeneration Center, Inc.

Serving persons with disabilities since 1949.

RESOLUTION

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of Louise Graham Regeneration Center, Inc. that:

- (1) Pursuant to the FTA Circular 4702.1B Reporting Requirements for Transit Providers in the Title VI Plan originally approved by the Board on January 28, 2016, the Board has reviewed and approved the Title VI Program.

APPROVED by the Executive Committee of the Board of Directors of
Louise Graham Regeneration Center, Inc. via electronic vote.

Dennis Ruppel, President
Board of Directors

12/17/19

Date

Appendix B

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

LOUISE GRAHAM REGENERATION CENTER

- Louise Graham Regeneration Center 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 Louise Graham Regeneration Center.
- For more information on Louise Graham Regeneration Center civil rights program, and the procedures to file a complaint, contact 727-327-9444, (TTY 727-327-9444); email jstottlemeyer@louisegraham.org; or visit our administrative office at 2301 3rd Ave South, St. Petersburg FL, 33712 For more information, visit louisegraham.org.
- If information is needed in another language, contact 727-327-9444.

Notificar al Público de Derechos Bajo el Título VI

LOUISE GRAHAM REGENERATION CENTER

- Louise Graham Regeneration Center Louise Graham Regeneration Center opera sus programas y servicios sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ella o él ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante Louise Graham Regeneration Center.
- Para obtener más información sobre el programa de derechos civiles louise Graham Regeneration Center y los procedimientos para presentar una queja, comuníquese con el 727-327-9444, (TTY 727-327-9444); jstottlemeyer@louisegraham.org de correo electrónico; o visite nuestra oficina administrativa en 2301 3rd Ave South, St. Petersburg FL, 33712 Para obtener más información, visite louisegraham.org.
- Si se necesita información en otro idioma, comuníquese con el 727-327-9444.

Appendix C

Title VI Complaint Form

LOUISE GRAHAM REGENERATION CENTER

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 _____				
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:

JoAnn Stottlemeyer
2301 3rd Ave S
St. Petersburg, FL 33712

LOUISE GRAHAM REGENERATION CENTER

Formulario de queja del Título VI

Sección I:				
Nombre				
Nombre: Dirección				
Teléfono (Hogar)			Teléfono (Trabajo)	
Dirección de correo electrónico:				
Acce accesible?	¿Requisitos de formato	de impresión grande	Cinta de audio	
		TDD	Otros	
II:				
¿Está presentando esta queja en su propio nombre?			Sí*	No
*Si respondió "sí" a esta pregunta, vaya a la Sección III				
Si no es así, proporcione el nombre y la relación de la persona para la que se queja:				
Por favor explique por qué ha presentado una solicitud para un tercero:				
Confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero.			Sí	No
Sección III:				
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Edad <input type="checkbox"/> Discapacidad <input type="checkbox"/> Estado familiar o religioso <input type="checkbox"/> Other _____ Fecha de supuesta discriminación (mes, día, año): _____ Explique lo más claramente posible lo que sucedió y por qué cree que fuiste discriminado. Describa a todas las personas que participaron. Incluya el nombre y la información de contacto de la(s) persona(s) que le discriminaron (si se conocen), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario. _____ _____				
Sección IV				
¿Ha presentado previamente una queja del Título VI ante esta agencia?			Sí	No

Sección V
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?
<input type="checkbox"/> Sí <input type="checkbox"/> No
En caso afirmativo, marque todas las que correspondan:
<input type="checkbox"/> Agencia Federal: _____
<input type="checkbox"/> Tribunal Federal <input type="checkbox"/> Agencia Estatal _____
<input type="checkbox"/> Tribunal del Estado <input type="checkbox"/> Agencia Local _____
Proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.
Nombre:
Título:
Agencia:
Dirección:
Teléfono:
Sección VI
El nombre de la queja de la agencia está en contra de:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma y fecha requeridas a continuación

Firma y Fecha

Por favor envíe este formulario en persona a la siguiente dirección, o envíe lo presente por correo a:

JoAnn Stottlemeyer
2301 3rd Ave S
St. Petersburg, FL 33712

Appendix D

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Louise Graham Regeneration Center 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 Louise Graham Regeneration Center. 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 Louise Graham Regeneration Center services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Louise Graham Regeneration Center also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, and community based organizations, 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 Louise Graham Regeneration Center and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Louise Graham Regeneration Center will proactively reach out and engage low-income, minority, and LEP populations for the Louise Graham Regeneration Center 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.
- **Responsive:** Louise Graham Regeneration Center 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 Louise Graham Regeneration Center. Louise Graham Regeneration Center intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Louise Graham Regeneration Center will conduct community meetings and listening sessions as appropriate with passengers, employers, community based 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 Louise Graham Regeneration Center website (www.louisegraham.org) and all feedback on the site will be recorded and passed on to Louise Graham Regeneration Center management. The public will also be able to call the Louise Graham Regeneration Center office at 727-327-9444 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Louise Graham Regeneration Center 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, Louise Graham Regeneration Center will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- Posters or flyers in transit center
- Posting information on website
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population
- 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.

LCB Meetings

Louise Graham does not traditionally attend LCB meetings.

LGRC serves a population that is traditionally underserved. All persons who receive transit services are developmentally disabled and low income, and are clients funded by the Agency for Persons with Disabilities (APD). At least annually the Center:

- Provides opportunity for clients to provide feedback on agency services.
- Engages in outreach to enroll clients by periodically informing APD-funded case managers about LGRC's Adult Day Training services. This outreach primarily is done via email and personal contact. It is done currently and has been done for at least the past three years.
- Periodically surveys client case managers about the services received.

Appendix E

Language Assistance Plan (LAP)

I. Introduction

Louise Graham Regeneration Center operates a transit system within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address Louise Graham Regeneration Center 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 Louise Graham Regeneration Center service area there are 26,544 residents or 4.9% who describe themselves as not able to communicate in English “very well” (Source: US Census). Louise Graham Regeneration Center 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. Louise Graham regeneration Center 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. It is important for Louise Graham Regeneration Center be able to communicate effectively with all of its riders. When Louise Graham Regeneration Center 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. Louise Graham Regeneration Center 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 Louise Graham Regeneration Center 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

- Translation: Providing timely translation of important documents
- Staffing: Identifying Louise Graham Regeneration Center 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 Louise Graham Regeneration Center 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 Louise Graham Regeneration Center program, activity or service.
2. The frequency with which LEP persons come in contact with Louise Graham Regeneration Center programs, activities or services.
3. The nature and importance of programs, activities or services provided by Louise Graham Regeneration Center to the LEP population.
4. The resources available to Louise Graham Regeneration Center 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 889,154 residents in the Louise Graham Regeneration Center service area 26,544 residents describe themselves as speaking English less than “very well”. People of Spanish or Spanish Creole descent are the primary LEP persons likely to utilize Louise Graham Regeneration Center services. For the Louise Graham Regeneration Center service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 8.4% speak English “very well”. For groups who speak English “less than very well”, 2.5% speak Spanish or Spanish Creole and .4% speak Vitetnamese

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the Louise Graham Regeneration Center service area.

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.

Louise Graham Regeneration Center 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. As discussed above, Census data indicates that Spanish or Spanish/Creole is a prominent LEP group. Phone inquiries and staff survey feedback indicated that Louise Graham Regeneration Center dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 12 years, Louise Graham Regeneration Center has had 0 requests for translated documents.

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.

An on-board passenger survey was conducted to collect data on usage of and access to the Louise Graham Regeneration Center. According to the survey, all participants have an intellectual or physical disability. This supports the fact that Louise Graham Regeneration Center can be considered a transit service for individuals with disabilities. Without use of the transit these individuals would have no other way to attend the program. This would affect his or her ability to gain employment and education.

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

LGRC does not operate a traditional transit system and is not a public transit provider. The center serves low income adults with developmental disabilities, all of whom have self-selected to attend the center. Only LGRC clients are provided transportation services. Due to their disabilities, many of those served have limited ability to read and write in English, or any other language. LGRC accepts clients with Limited English Proficiency. When required, a signer, interpreter or translator may be provided if a staff member is not available who speaks the necessary language. As needed, training is provided to employees on the agency's language assistance obligations.

III. 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.

a. 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.

Louise Graham Regeneration Center has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 86.3% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish or Spanish Creole (6.4%). Of those whose primary spoken language is Spanish or Spanish Creole, approximately 2.5% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish or Spanish Creole and who identify themselves as speaking English less than “very well” account for 3.8% of the service area population.

Louise Graham Regeneration Center 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. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Louise Graham Regeneration Center management to follow-up.
3. 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.

b. 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.

Louise Graham Regeneration Center has undertaken the following actions to improve access to information and services for LEP individuals:

1. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
2. Provide Language Identification Flashcards onboard transit vehicles and in the Louise Graham Regeneration Center offices.

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.

Your Community Transit will utilize the demographic maps provided in **Appendix G** in order to better provide the above efforts to the LEP persons within the service area.

c. 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 Louise Graham Regeneration Center, the most important staff training is for Customer Service Representatives and transit drivers. LGRC does not operate a traditional transit system and is not a public transit provider. The center serves low income adults with developmental disabilities, all of whom have self-selected to attend the center. Only LGRC clients are provided transportation services. Due to their disabilities, many of those served have limited ability to read and write in English, or any other language. LGRC accepts clients with Limited English Proficiency. When required, a signer, interpreter or translator may be provided if a staff member is not available who speaks the necessary language. As needed, training is provided to employees on the agency's language assistance obligations.

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

d. Element 4: Providing Note to LEP Persons

Louise Graham Regeneration Center will make Title VI information available in English Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Louise Graham Regeneration Center office lobby, on buses, and website. 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.

e. 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 Louise Graham Regeneration Center financial resources are sufficient to fund language assistance resources needed

Louise Graham Regeneration Center 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. Louise Graham Regeneration Center is open to suggestions from all sources, including customers, Louise Graham Regeneration Center staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. 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.

Louise Graham Regeneration Center service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in **Appendix F**, Spanish or Spanish Creole speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" is counted as 2.5% and 2262 persons.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Louise Graham Regeneration Center service may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix F

Operating Area Language Data:

Louise Graham Regeneration Center

Service Area

Pinellas County, Florida		
<u>Language</u>	<u>People</u>	<u>Percentage</u>
Total	889,154	100.0%
Speak only English	767,354	86.3%
Spanish or Spanish Creole	5,647	6.4%
Speak English "very well"	3,385	3.8%
Speak English less than "very well"	2,262	2.5%
French (incl. Patois, Cajun)	5,625	0.6%
Speak English "very well"	4,056	0.5%
Speak English less than "very well"	1,569	0.2%
French Creole	1,215	0.1%
Speak English "very well"	800	0.1%
Speak English less than "very well"	415	0.0%
Italian	2,486	0.3%
Speak English "very well"	1,803	0.2%
Speak English less than "very well"	683	0.1%
Portuguese or Portuguese Creole	2,428	0.3%
Speak English "very well"	1,611	0.2%
Speak English less than "very well"	817	0.1%
German	4,698	0.5%
Speak English "very well"	3,968	0.4%
Speak English less than "very well"	730	0.1%
Yiddish	18	0.0%
Speak English "very well"	6	0.0%
Speak English less than "very well"	12	0.0%
Other West Germanic languages	709	0.1%
Speak English "very well"	681	0.1%
Speak English less than "very well"	28	0.0%
Scandinavian languages	501	0.1%
Speak English "very well"	479	0.1%
Speak English less than "very well"	22	0.0%
Greek	5,055	0.6%
Speak English "very well"	3,610	0.4%
Speak English less than "very well"	1,445	0.2%
Russian	1,851	0.2%
Speak English "very well"	1,201	0.1%
Speak English less than "very well"	650	0.1%
Polish	2,971	0.3%
Speak English "very well"	1,727	0.2%
Speak English less than "very well"	1,244	0.1%
Serbo-Croatian	5,074	0.6%
Speak English "very well"	2,753	0.3%
Speak English less than "very well"	2,321	0.3%

Other Slavic Languages	2,410	0.3%
Speak English “very well”	1,353	0.2%
Speak English less than “very well”	1,057	0.1%
Armenian	92	0.0%
Speak English “very well”	50	0.0%
Speak English less than “very well”	42	0.0%
Persian	294	0.0%
Speak English “very well”	141	0.0%
Speak English less than “very well”	153	0.0%
Gujarati	1,390	0.2%
Speak English “very well”	997	0.1%
Speak English less than “very well”	393	0.0%
Hindi	916	0.1%
Speak English “very well”	735	0.1%
Speak English less than “very well”	181	0.0%
Urdu	220	0.0%
Speak English “very well”	210	0.0%
Speak English less than “very well”	10	0.0%
Other Indic languages	1,190	0.1%
Speak English “very well”	806	0.1%
Speak English less than “very well”	384	0.0%
Other Indo-European Languages	2,780	0.3%
Speak English “very well”	1,522	0.2%
Speak English less than “very well”	1,258	0.1%
Chinese	2,723	0.3%
Speak English “very well”	1,150	0.1%
Speak English less than “very well”	1,573	0.2%
Japanese	734	0.1%
Speak English “very well”	470	0.1%
Speak English less than “very well”	264	0.0%
Korean	600	0.1%
Speak English “very well”	341	0.0%
Speak English less than “very well”	259	0.0%
Mon-Khmer, Cambodian	1,110	0.1%
Speak English “very well”	459	0.1%
Speak English less than “very well”	651	0.1%
Hmong	231	0.0%
Speak English “very well”	142	0.0%
Speak English less than “very well”	89	0.0%
Thai	726	0.1%
Speak English “very well”	316	0.0%
Speak English less than “very well”	410	0.0%
Laotian	1,593	0.2%

Speak English "very well"	632	0.1%
Speak English less than "very well"	961	0.1%
Vietnamese	5,712	0.6%
Speak English "very well"	1,767	0.2%
Speak English less than "very well"	3,945	0.4%
Other Asian languages	1,681	0.2%
Speak English "very well"	1,262	0.1%
Speak English less than "very well"	419	0.0%
Tagalog	3,387	0.4%
Speak English "very well"	2,631	0.3%
Speak English less than "very well"	756	0.1%
Other Pacific Island languages	290	0.0%
Speak English "very well"	167	0.0%
Speak English less than "very well"	123	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	119	0.0%
Speak English "very well"	96	0.0%
Speak English less than "very well"	23	0.0%
Hungarian	813	0.1%
Speak English "very well"	663	0.1%
Speak English less than "very well"	150	0.0%
Arabic	2,653	0.3%
Speak English "very well"	1,650	0.2%
Speak English less than "very well"	1,003	0.1%
Hebrew	385	0.0%
Speak English "very well"	354	0.0%
Speak English less than "very well"	31	0.0%
African languages	546	0.1%
Speak English "very well"	343	0.0%
Speak English less than "very well"	203	0.0%
Other and unspecified languages	96	0.0%
Speak English "very well"	88	0.0%
Speak English less than "very well"	8	0.0%

Appendix G

Demographic Maps

