

Vincent House Pinellas

TITLE VI PLAN

ADOPTED: 06/12/2023

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].

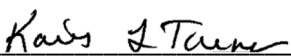
Vincent House Pinellas assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil 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.

Vincent House Pinellas 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 Vincent House Pinellas.
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.

Signature



Karis Turner

Executive Director, Vincent House Pinellas, Date: 05/01/2023

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 Vincent House Pinellas via an email vote on 06/12/2023. A copy of the vote 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 Vincent House Pinellas 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 Vincent House Pinellas office(s) including the reception desk and meeting rooms, and on the Vincent House Pinellas website at vincenthouse.org.

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 Vincent House Pinellas may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (see **Appendix C**). Vincent House Pinellas investigates complaints received no more than 180 days after the alleged incident. Vincent House Pinellas will process complaints that are complete.

Once the complaint is received, Vincent House Pinellas 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.

Vincent House Pinellas has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Vincent House Pinellas 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, Vincent House Pinellas 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 Vincent House Pinellas's website (<https://vincenthouse.org/>).

2.2 Complaint Form

A copy of the complaint form in English is provided in the **Appendix C** and on Vincent House Pinellas's website (<https://vincenthouse.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), Vincent House Pinellas 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 Vincent House Pinellas 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.

Vincent House Pinellas 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	N/A			
1.				
2.				
Lawsuits	N/A			
1.				
2.				
Complaints	N/A			
1.				
2.				

4.0 Public Participation Plan

The Public Participation Plan (PPP) for Vincent House Pinellas 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 Vincent House Pinellas. The PPP is included in **Appendix D** to this Title VI Plan.

Current Outreach Efforts

Vincent House Pinellas 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 Vincent House Pinellas recent, current, and planned outreach activities.

- Vincent House performs reach out daily. This is a process whereby members who have not attended in a day or more are phoned, texted, or emailed by either staff or another member. The members who are reached out to are checked on and invited to come back to Clubhouse. If transportation is a barrier, they are offered rides.

5.0 Language Assistance Plan

Vincent House Pinellas operates a transit system within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address Vincent House Pinellas’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write,

speaking or understanding English are LEP. In Vincent House Pinellas 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). Vincent House Pinellas 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. Vincent House Pinellas 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

Vincent House Pinellas does not have a transit-related committee or board; therefore, this requirement does not apply.

6.0 Title VI Equity Analysis

Vincent House Pinellas has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, Vincent House Pinellas does not have any Title VI Equity Analysis reports to submit with this Plan. Vincent House Pinellas 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: Vincent House Pinellas SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAPS

Appendix A
Title VI Plan Adoption Meeting Minutes



4801 78th Ave. North
Pinellas Park, FL 33781
(727) 541-0321
www.vincenthouse.org

A Recovery through Work Partnership

June 14, 2023

To Whom it May Concern:

In an email dated June 12, 2023, our board voted and so approved the motion:

“I move to approve the Pinellas FDOT Title VI Plan”

Motion made by Noreen Hodges. Motion seconded by Bill MIschler. The motion so carried.

Sincerely,

Karis Turner, Executive Director

Appendix B
Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Vincent House Pinellas

- Vincent House Pinellas 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 Vincent House Pinellas.
- For more information on Vincent House Pinellas civil rights program, and the procedures to file a complaint, contact 727-541-0321; email alexandra@vincenthouse.org; or visit our administrative office at 11145 Denton Ave., Hudson, FL 34667. For more information, visit vincenthouse.org.
- If information is needed in another language, contact 727-819-4477.
 - Si necesita información en otro idioma, comuníquese al 727-819-4477.
 - 如果需要其他语言的信息，请联系 727-819-4477。
 - Si des informations sont nécessaires dans une autre langue, contactez le 727-819-4477.
 - Εάν χρειάζεστε πληροφορίες σε άλλη γλώσσα, επικοινωνήστε με το 727-819-4477.
 - Jika informasi diperlukan dalam bahasa lain, hubungi 727-819-4477.
 - Jeśli potrzebujesz informacji w innym języku, zadzwoń pod numer 727-819-4477.
 - Ak sú potrebné informácie v inom jazyku, kontaktujte 727-819-4477.
 - إذا كانت المعلومات مطلوبة بلغة أخرى ، فاتصل بالرقم 727-819-4477

Appendix C
Title VI Complaint Form

Vincent House Pinellas

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:

Vincent House Pinellas Title VI Liaison
11145 Denton Ave
Hudson, FL 34667

Appendix D

Public Participation Plan (PPP)

Introduction

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

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

If Vincent House Pinellas holds a community meeting, it will conduct the 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 able to call the Vincent House Pinellas office at 727-541-0321 during its hours of operation to provide feedback. Feedback collected over the phone will be recorded and passed on to Vincent House Pinellas management.

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. 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, Vincent House Pinellas 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 in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based 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.

LCB Meetings

Vincent House is not a part of the LCB committee and therefore does not attend the meetings.

Appendix E
Language Assistance Plan (LAP)

I. Introduction

Vincent House Pinellas operates a transit system within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address Vincent House Pinellas' 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 Vincent House Pinellas 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). Vincent House Pinellas 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. Vincent House Pinellas 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 Vincent House Pinellas be able to communicate effectively with all of its riders. When Vincent House Pinellas 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. Vincent House Pinellas 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 Vincent House Pinellas 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 Vincent House Pinellas 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 Vincent House Pinellas 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 Vincent House Pinellas program, activity or service.
2. The frequency with which LEP persons come in contact with Vincent House Pinellas programs, activities or services.
3. The nature and importance of programs, activities or services provided by Vincent House Pinellas to the LEP population.
4. The resources available to Vincent House Pinellas and overall costs to provide LEP assistance

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

Of the 889,154 residents in the Vincent House Pinellas service area 26,544 residents describe themselves as speaking English less than “very well”. People of Vietnamese descent are the primary LEP persons likely to utilize Vincent House Pinellas services. For the Vincent House Pinellas service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 8% speak English “very well”. For groups who speak English “less than very well”, 0.40% speak Vietnamese and 0.30% speak Serbo-Croatian.

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the Vincent House Pinellas 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.

Vincent House Pinellas 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 there is not a prominent LEP group. Phone inquiries and staff survey feedback indicated that Vincent House Pinellas dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have

occurred with LEP persons who mainly spoke vietnamese. Over the past 3 years, Vincent House Pinellas 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.

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

Vincent House Pinellas periodically assesses its resources and needs for providing LEP F-4 assistance. This includes identifying staff and volunteer language interpreters that are readily available, the cost of a professional interpreter and translation service, and documents that need to be translated. It also involves identifying organizations Vincent House Pinellas can partner with for outreach and translation efforts, financial and in-kind sources available to provide assistance and determining staff training needs. Vincent House Pinellas has staff available for Spanish speaking LEP citizens as necessary. The agency also maintains contact information for language interpretation services and utilizes these for document translation. Community group resources are also maintained and utilized for outreach efforts. The Pinellas County Office of Human Rights is a reliable resource for the agency and can provide translation services.

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.

Vincent House Pinellas 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 Vietnamese (0.60%). Of those who primary spoken language is

Vietnamese, approximately 0.40% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Vietnamese and who identify themselves as speaking English less than “very well” account for 4.5% of the service area population.

Vincent House Pinellas 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 available at Vincent House Pinellas Meetings. This will assist Vincent House Pinellas in identifying language assistance needs for future events and meetings.
3. 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 Vincent House Pinellas management to follow-up.
4. 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.

Vincent House Pinellas has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings (if available).
2. Survey staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the Vincent House Pinellas offices.
4. 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.

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 Vincent House Pinellas, the most important staff training is for the Rehabilitation Specialists/drivers. Several specialists are bilingual in English and Spanish.

The following training will be provided to the Rehabilitation Specialists:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests

d. Element 4: Providing Note to LEP Persons

Information on language assistance services available to the public are noticed/posted in Vincent House Pinellas and on the website.

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 Vincent House Pinellas' financial resources are sufficient to fund language assistance resources needed

Vincent House Pinellas 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. Vincent House Pinellas is open to suggestions from all sources, including customers, Vincent House Pinellas 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.

Vincent House Pinellas service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in **Appendix F, Vietnamese, Serbo-Croatian, Spanish or Spanish Creole, Chinese, French, Greek, Other Indo-European Languages, Polish, Other Slavic Languages, and Arabic** speakers qualify for the Safe Harbor Provision as the number of person which speak English less than “very well” is counted as 4.2% of the total area population or 17,677 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. Vincent House Pinellas 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:

Vincent House Pinellas 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

Pinellas County Limited English Proficiency by Census Block Group

