

A.F.I.R.E. OF PASCO COUNTY, INC.

TITLE VI PLAN

ADOPTED: NOVEMBER 12, 2019

UPDATED: Appendix D Public

Participation Plan (PPP)

December 7, 2021

UPDATED: New Website

September 12, 2023

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

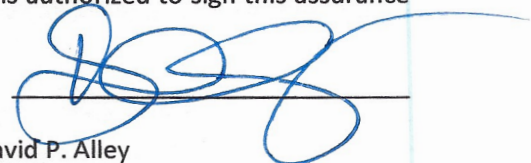
49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

A.F.I.R.E. OF PASCO COUNTY, INC 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.

A.F.I.R.E. OF PASCO COUNTY, INC 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 A.F.I.R.E. OF PASCO COUNTY, INC 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.



David P. Alley

Director of Operations, A.F.I.R.E. of Pasco County, Inc, 9/12/2023

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

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A.F.I.R.E. OF PASCO COUNTY, INC 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.

A.F.I.R.E. OF PASCO COUNTY, INC 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 *A.F.I.R.E. OF PASCO COUNTY, INC* 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.

David P. Alley
Director of Operations, A.F.I.R.E. of Pasco County, Inc, 9/12/2023

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 *A.F.I.R.E. OF PASCO COUNTY, INC's* Board of Directors during a meeting held on November 8, 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 *A.F.I.R.E. OF PASCO COUNTY, INC'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 *A.F.I.R.E. OF PASCO COUNTY, INC's* office(s) including the reception desk and meeting rooms, and on the *A.F.I.R.E. OF PASCO COUNTY, INC's* website at www.afirepasco.com. Additionally, *A.F.I.R.E. OF PASCO COUNTY, INC* may also post the notice on transit vehicles.

If your agency does not have a website, contact Mr. Dave Newell, District 7 – Tampa Florida
Dave.Newell@dot.state.fl.us
813/975-6195

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 *A.F.I.R.E. OF PASCO COUNTY, INC* may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (see **Appendix C**). *A.F.I.R.E. OF PASCO COUNTY, INC* investigates complaints received no more than 180 days after the alleged incident. *A.F.I.R.E. OF PASCO COUNTY, INC* will process complaints that are complete.

Once the complaint is received, *A.F.I.R.E. OF PASCO COUNTY, INC* 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.

A.F.I.R.E. OF PASCO COUNTY, INC has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, *A.F.I.R.E. OF PASCO COUNTY, INC* 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, *A.F.I.R.E. OF PASCO COUNTY, INC* 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 *A.F.I.R.E. OF PASCO COUNTY, INC*'s website (www.afireofpascocounty.com).

2.2 Complaint Form

A copy of the complaint form in English and [other languages if necessary] is provided in the **Appendix C** and on *A.F.I.R.E. OF PASCO COUNTY, INC*'s website (www.afireofpascocounty.com). 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), *A.F.I.R.E. OF PASCO COUNTY, INC* 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 *A.F.I.R.E. OF PASCO COUNTY, INC* 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].

A.F.I.R.E. OF PASCO COUNTY, INC 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 *A.F.I.R.E. of Pasco County, Inc.* was developed to ensure that all members of the Developmentally Disabled (DD) community, including minorities and Limited English Proficient (LEP) with DD, are encouraged to participate in the decision making process for *A.F.I.R.E. of Pasco County, Inc.* The PPP is included in Appendix D to this Title VI Plan.

Current Outreach Efforts

A.F.I.R.E. of Pasco County, Inc. serves a population that is traditionally under served. 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 *A.F.I.R.E. of Pasco County, Inc.*:

- * Provides opportunity for clients to provide feedback on agency services.
- * Engages in outreach to enroll clients by periodically informing APD-funded Waiver Support Coordinators about *A.F.I.R.E.*'s Adult Day Training services. This outreach is primarily done via email and personal contact.
- * Periodically, surveys are conducted with clients and supports about the services being rendered.

5.0 Language Assistance Plan

A.F.I.R.E. OF PASCO COUNTY, INC operates a transit system within West Pasco County. The Language Assistance Plan (LAP) has been prepared to address *A.F.I.R.E. OF PASCO COUNTY, INC*'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 *A.F.I.R.E. OF PASCO COUNTY, INC* service area there are 12,914 residents or 2.8% who describe themselves as not able to communicate in English very well (Source: US Census). *A.F.I.R.E. OF PASCO COUNTY, INC* 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. *A.F.I.R.E. OF PASCO COUNTY, INC* 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

A.F.I.R.E. OF PASCO COUNTY, INC does not have a transit-related committee or board; therefore, this requirement does not apply.

6.0 Title VI Equity Analysis

A.F.I.R.E. OF PASCO COUNTY, INC 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 B	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: <i>A.F.I.R.E. OF PASCO COUNTY, INC</i> SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAPS (COULD BE OPTIONAL)
APPENDIX H	2023 TITLE VI LETTER OF CONCURRENCE

Appendix A
Title VI Plan Adoption Meeting Minutes

A.F.I.R.E. OF PASCO COUNTY, INC.
SPECIAL BOARD OF DIRECTOR MEETING MINUTES

DATE: Tuesday, September 12, 2023
PLACE: AFIRE Campus @ 7540 Ridge Rd. Port Richey, FL 34668
ATTENDEES: President Richard Rabideau, Secretary Julia Alley, Board
Members Denise Haystrand, David Alley, Lora Rabideau

NOT IN ATTENDANCE:

Special Meeting was called to order by President of the Board, Richard Rabideau at 3:30 pm.

This Special Board Meeting was called to discuss the New Title VI Plan that needed to be developed. Board Members discussed the new plan that Administrator, Denise M. Haystrand and Director of Operations, Dave Alley had worked on. A motion was made to accept by Board Member, Lora Rabideau. Secretary, Julia Alley seconded the motion. All Board Members were in favor.

Meeting adjourned at 4:00 pm.

Appendix B
Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

A.F.I.R.E. OF PASCO COUNTY, INC

- *A.F.I.R.E. OF PASCO COUNTY, INC* 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 *A.F.I.R.E. OF PASCO COUNTY, INC*.
- For more information on *A.F.I.R.E. OF PASCO COUNTY, INC* 's civil rights program, and the procedures to file a complaint, contact 727-849-8982; email afireofpasco@verizon.net; or visit our administrative office at 7540 Ridge Rd., Port Richey, FL 34668. For more information, visit afireofpascocounty.com.
- If information is needed in another language, contact 727-849-8982.

Appendix C
Title VI Complaint Form

A.F.I.R.E. OF PASCO COUNTY, INC

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:

A.F.I.R.E. OF PASCO COUNTY, INC
 ATTN: DAVE ALLEY
 P.O. BOX 933
 ELFERS, FL 34680

Appendix D

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for A.F.I.R.E. of Pasco County, Inc. was developed to ensure that all members of the Developmentally Disabled (DD) community, including minorities and Limited English Proficient (LEP) with DD, are encouraged to participate in the decision making process for A.F.I.R.E. of Pasco County, Inc. 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 A.F.I.R.E. of Pasco County, Inc. and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. A.F.I.R.E. of Pasco County, Inc. 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 A.F.I.R.E. of Pasco County, Inc. and its operations. The goals for this PPP include:

- * **Inclusion and Diversity:** A.F.I.R.E. of Pasco County, Inc. will proactively reach out and engage low-income, minority and LEP populations for the A.F.I.R.E. of Pasco County, Inc. service area so these groups 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, temporarily, linguistically and culturally.

- * **Responsive:** A.F.I.R.E. of Pasco County, Inc. will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.

- * **Tailored:** Public Transportation 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 A.F.I.R.E. of Pasco County, Inc. A.F.I.R.E. of Pasco County, Inc. intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

A.F.I.R.E. of Pasco County, Inc. 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 A.F.I.R.E. of Pasco County, Inc. website (www.afireofpascocounty.com) and all feedback on the site will be recorded and passed on to A.F.I.R.E. of Pasco County, Inc. management. The public will also be able to call the A.F.I.R.E. of Pasco County, Inc. office at 727-849-8982 during its hours of operation. Feedback collected over the phone will be recorded and passed on to A.F.I.R.E. of Pasco County, Inc. 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 at A.F.I.R.E. of Pasco County, Inc. at 7540 Ridge Rd. Port Richey, FL 34668.

For community meetings and other important information, A.F.I.R.E. of Pasco County, Inc. will use a variety of means to make riders aware, including some or all of the following methods:

- * Posters or flyers sent home to all clients.
- * Posting information on website.
- * Communication to relevant officials if needed.
- * 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, when needed.

Appendix E

Language Assistance Plan (LAP)

I. Introduction

A.F.I.R.E. OF PASCO COUNTY, INC operates a transit system within West Pasco County. The Language Assistance Plan (LAP) has been prepared to address *A.F.I.R.E. OF PASCO COUNTY, INC*'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 *A.F.I.R.E. OF PASCO COUNTY, INC* service area there are 12,914 residents or 2.8% who describe themselves as not able to communicate in English "very well" (Source: US Census). *A.F.I.R.E. OF PASCO COUNTY, INC* 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. *A.F.I.R.E. OF PASCO COUNTY, INC* 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).

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use *A.F.I.R.E. OF PASCO COUNTY, INC* 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 *A.F.I.R.E. OF PASCO COUNTY, INC* program, activity or service.
2. The frequency with which LEP persons come in contact with *A.F.I.R.E. OF PASCO COUNTY, INC* programs, activities or services.

3. The nature and importance of programs, activities or services provided by *A.F.I.R.E. OF PASCO COUNTY, INC* to the LEP population.
4. The resources available to *A.F.I.R.E. OF PASCO COUNTY, INC* 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 454,546 residents in the *A.F.I.R.E. OF PASCO COUNTY, INC* service area 12,914 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 *A.F.I.R.E. OF PASCO COUNTY, INC* services. For the *A.F.I.R.E. OF PASCO COUNTY, INC* service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 97.2% speak English “very well”. For groups who speak English “less than very well”, 2.8% speak Spanish or Spanish Creole and .5% speak French.

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the *A.F.I.R.E. OF PASCO COUNTY, INC* 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.

A.F.I.R.E. OF PASCO COUNTY, INC 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 *A.F.I.R.E. OF PASCO COUNTY, INC* has a lack of prominent LEP groups. Phone inquiries and staff survey feedback indicated that *A.F.I.R.E. OF PASCO COUNTY, INC* dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke English. Over the past 30 years, *A.F.I.R.E. OF PASCO COUNTY, INC* 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**

A.F.I.R.E. OF PASCO COUNTY, INC is a private, non-profit Day Training Program for Developmentally Disabled Adults that provides transportation to and from their homes. We are an Agency that is affiliated with APD (Agency for Persons with Disabilities). If any of our consumers need LEP assistance, APD will provide this for the consumer.

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

A.F.I.R.E. OF PASCO COUNTY, INC is a private, non-profit Day Training Program for Developmentally Disabled Adults that provides transportation to and from their homes. We are an Agency that is affiliated with APD (Agency for Persons with Disabilities). If any of our consumers need LEP assistance, APD will provide this for the consumer.

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.

A.F.I.R.E. OF PASCO COUNTY, INC has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 85.6% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish or Spanish Creole 9.1%. Of those who primary spoken language is Spanish or Spanish Creole, approximately 2.8% 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 1.6% of the service area population.

A.F.I.R.E. OF PASCO COUNTY, INC will assist APD with attaining any LEP persons’ needs.

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.

A.F.I.R.E. OF PASCO COUNTY, INC will assist APD with attaining any LEP persons’ needs.

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.

A.F.I.R.E. OF PASCO COUNTY, INC will assist APD with attaining any LEP persons' needs.

d. Element 4: Providing Note to LEP Persons

A.F.I.R.E. OF PASCO COUNTY, INC will make Title VI information available in English on the Agency's website. Key documents are written in English. If information is needed in another language, *A.F.I.R.E. OF PASCO COUNTY, INC* will assist APD with attaining any LEP persons' needs.

e. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. *A.F.I.R.E. OF PASCO COUNTY, INC* will assist APD with attaining any LEP persons' needs.

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.

A.F.I.R.E. OF PASCO COUNTY, INC's service area does not have LEP populations which qualify for the Safe Harbor Provision. [As shown in **Appendix F**, *A.F.I.R.E. OF PASCO COUNTY, INC* does not have LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person.]

Appendix F

Operating Area Language Data:

A.F.I.R.E. OF PASCO COUNTY, INC

Service Area

Pasco County, Florida		
<u>Language</u>	<u>People</u>	<u>Percentage</u>
Total	454,546	100.0%
Speak only English	389,082	85.6%
Spanish or Spanish Creole	41,385	9.1%
Speak English “very well”	28,471	6.3%
Speak English less than “very well”	12,914	2.8%
French (incl. Patois, Cajun)	2,076	0.5%
Speak English “very well”	1,774	0.4%
Speak English less than “very well”	302	0.1%
French Creole	675	0.1%
Speak English “very well”	445	0.1%
Speak English less than “very well”	230	0.1%
Italian	1,532	0.3%
Speak English “very well”	1,316	0.3%
Speak English less than “very well”	216	0.0%
Portuguese or Portuguese Creole	1,121	0.2%
Speak English “very well”	795	0.2%
Speak English less than “very well”	326	0.1%
German	1,888	0.4%
Speak English “very well”	1,602	0.4%
Speak English less than “very well”	286	0.1%
Yiddish	34	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	34	0.0%
Other West Germanic languages	312	0.1%
Speak English “very well”	256	0.1%
Speak English less than “very well”	56	0.0%
Scandinavian languages	180	0.0%
Speak English “very well”	110	0.0%
Speak English less than “very well”	70	0.0%
Greek	2,273	0.5%
Speak English “very well”	1,574	0.3%
Speak English less than “very well”	699	0.2%
Russian	518	0.1%
Speak English “very well”	323	0.1%
Speak English less than “very well”	195	0.0%
Polish	886	0.2%
Speak English “very well”	588	0.1%
Speak English less than “very well”	298	0.1%
Serbo-Croatian	760	0.2%
Speak English “very well”	406	0.1%
Speak English less than “very well”	354	0.1%

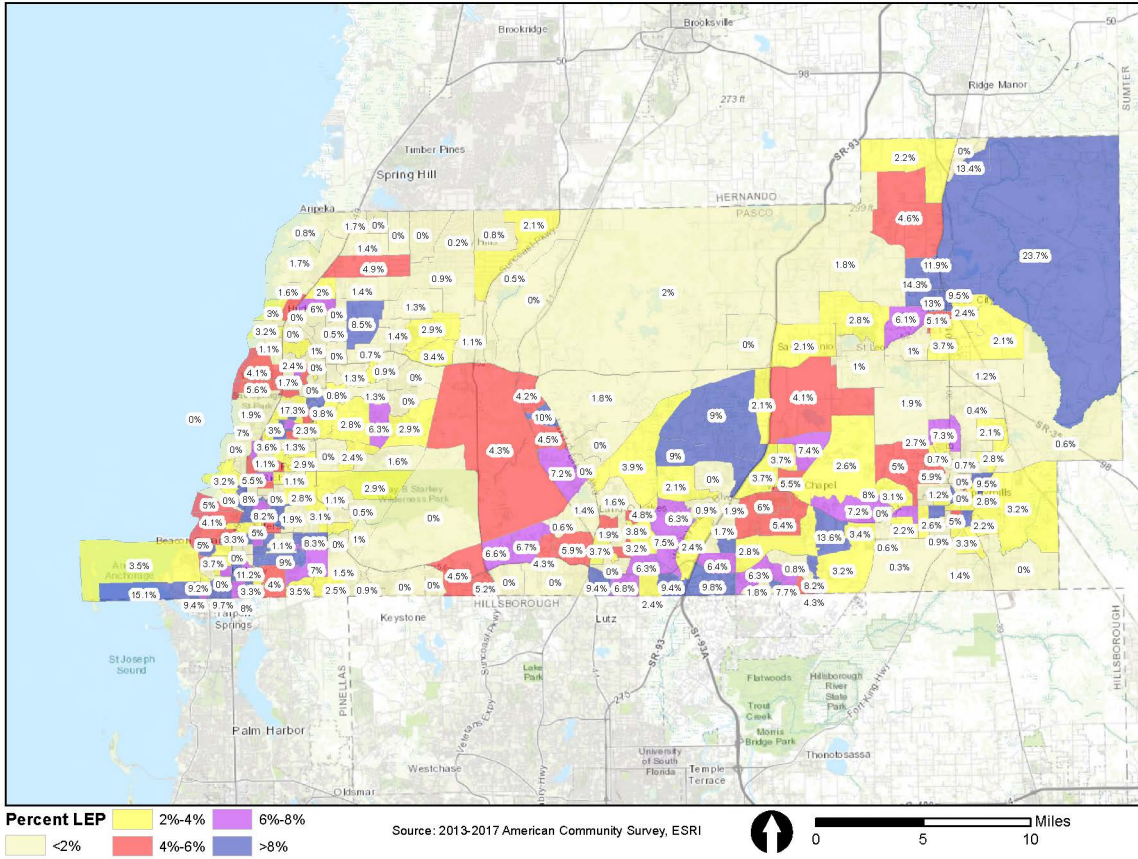
Other Slavic Languages	526	0.1%
Speak English “very well”	328	0.1%
Speak English less than “very well”	198	0.0%
Armenian	30	0.0%
Speak English “very well”	16	0.0%
Speak English less than “very well”	14	0.0%
Persian	112	0.0%
Speak English “very well”	79	0.0%
Speak English less than “very well”	33	0.0%
Gujarati	757	0.2%
Speak English “very well”	504	0.1%
Speak English less than “very well”	253	0.1%
Hindi	304	0.1%
Speak English “very well”	275	0.1%
Speak English less than “very well”	29	0.0%
Urdu	39	0.0%
Speak English “very well”	33	0.0%
Speak English less than “very well”	6	0.0%
Other Indic languages	481	0.1%
Speak English “very well”	420	0.1%
Speak English less than “very well”	61	0.0%
Other Indo-European Languages	569	0.1%
Speak English “very well”	383	0.1%
Speak English less than “very well”	186	0.0%
Chinese	930	0.2%
Speak English “very well”	469	0.1%
Speak English less than “very well”	461	0.1%
Japanese	201	0.0%
Speak English “very well”	122	0.0%
Speak English less than “very well”	79	0.0%
Korean	592	0.1%
Speak English “very well”	359	0.1%
Speak English less than “very well”	233	0.1%
Mon-Khmer, Cambodian	8	0.0%
Speak English “very well”	4	0.0%
Speak English less than “very well”	4	0.0%
Hmong	0	0.0%
Speak English “very well”	0	0.0%
Speak English less than “very well”	0	0.0%
Thai	233	0.1%
Speak English “very well”	153	0.0%
Speak English less than “very well”	80	0.0%
Laotian	58	0.0%

Speak English “very well”	32	0.0%
Speak English less than “very well”	26	0.0%
Vietnamese	2,039	0.4%
Speak English “very well”	889	0.2%
Speak English less than “very well”	1,150	0.3%
Other Asian languages	828	0.2%
Speak English “very well”	598	0.1%
Speak English less than “very well”	230	0.1%
Tagalog	1,186	0.3%
Speak English “very well”	1,005	0.2%
Speak English less than “very well”	181	0.0%
Other Pacific Island languages	282	0.1%
Speak English “very well”	115	0.0%
Speak English less than “very well”	167	0.0%
Navajo	1	0.0%
Speak English “very well”	1	0.0%
Speak English less than “very well”	0	0.0%
Other Native American languages	140	0.0%
Speak English “very well”	49	0.0%
Speak English less than “very well”	91	0.0%
Hungarian	330	0.1%
Speak English “very well”	156	0.0%
Speak English less than “very well”	174	0.0%
Arabic	1,440	0.3%
Speak English “very well”	1,066	0.2%
Speak English less than “very well”	374	0.1%
Hebrew	193	0.0%
Speak English “very well”	147	0.0%
Speak English less than “very well”	46	0.0%
African languages	508	0.1%
Speak English “very well”	406	0.1%
Speak English less than “very well”	102	0.0%
Other and unspecified languages	37	0.0%
Speak English “very well”	25	0.0%
Speak English less than “very well”	12	0.0%

Appendix G

Demographic Maps

Pasco County Limited English Proficiency by Census Block Group



Appendix H
2023 Title VI Letter of Concurrence



Florida Department of Transportation

RON DESANTIS
GOVERNOR

11201 North McKinley Drive
Tampa, FL 33612

JARED W. PERDUE, P.E.
SECRETARY

June 30, 2023

Denise Haystrand
AFIRE of Pasco County
7540 Ridno Rd
Port Richey, Florida, 34668

Subject: 2023 Title VI Letter of Concurrence

Dear Mike:

The Department has completed a review of AFIRE of Pasco County Title VI Program dated September 12, 2023. We find the Title VI Plan in compliance with Section 49 Code of Federal Regulations, Part 21 and Federal Transit Agency (FTA) Circular 4702.1B, as well as the Department's Title VI Program Guidance. Therefore, the Department is in concurrence with AFIRE. If your agency has a website, please post the grievance procedure and the Title VI Program on the website so that it is accessible to the public. If you do not have a website, please inform us and we will post it on our state website.

We appreciate the opportunity to review the document and ensure compliance with the federal and state requirements. Please include a copy of this Letter of Concurrence in the appendices of your agency's Title VI Program as outlined in the Title VI Program requirements. The Department also recommends proper documentation of the receipt of concurrence letter in the program's activity log.

Please note that the Title VI Program must be reviewed, updated, and submitted to the Department every three years.

Sincerely,

DocuSigned by:

Tracy Noyes

CE23DF3045C342E...
Tracy Noyes

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