



## TITLE VI AND LIMITED ENGLISH PROFICIENCY (LEP) PLAN

*Adopted by the TBARTA Governing Board on August 3, 2018*

*Minor edits made and revised on August 17, 2021*

For information on Title VI and LEP compliance contact,

**Brian Pessaro:**

By phone: (813) 282-8200 or (800) 998-RIDE (7433)

By mail: 5100 West Lemon Street, Suite 209, Tampa, FL 33607

By email: [Brian.Pessaro@tbarta.com](mailto:Brian.Pessaro@tbarta.com)

# TABLE OF CONTENTS

INTRODUCTION .....	3
DESCRIPTION OF TBARTA.....	3
GOVERNING BOARD.....	3
NON-ELECTED COMMITTEES .....	3
VANPOOL PROGRAM.....	5
TITLE VI POLICY AND OBJECTIVES .....	6
VANPOOL OUTREACH.....	6
TITLE VI PUBLIC NOTICE.....	7
TRANSPORTATION RELATED COMPLAINTS AND LAWSUITS .....	7
TITLE VI PROGRAM AND COMPLAINT PROCEDURE .....	8
HOW TO FILE A TITLE VI COMPLAINT WITH TBARTA .....	8
PUBLIC OUTREACH AND INVOLVEMENT PLAN .....	9
COMMITMENT TO PUBLIC INVOLVEMENT.....	9
REGIONAL PUBLIC PARTICIPATION PLAN .....	10
OUTREACH TOOLS AND ACTIVITIES .....	11
TRANSIT AGENCY COORDINATION/COOPERATION.....	12
CITIZENS ADVISORY COMMITTEE (CAC) .....	12
VANPOOL PROGRAM OUTREACH.....	12
LANGUAGE ASSISTANCE PLAN .....	13
LIMITED ENGLISH PROFICIENCY PROCEDURE .....	13
LEP SUPPORT FOR REGIONAL PUBLIC INVOLVEMENT .....	13
LEP SUPPORT FOR REGIONAL VANPOOL .....	14
FOUR FACTOR ANALYSIS.....	15
LEP APPLICATION .....	16
IDENTIFYING AN LEP PERSONS REQUIRING LANGUAGE ASSISTANCE.....	16
LANGUAGE ASSISTANCE MEASURES.....	16
STAFF TRAINING .....	17
BOARD APPROVAL OF THE TITLE VI PROGRAM .....	17
APPENDICES .....	18
APPENDIX A: TBARTA VANPOOL PROGRAM – ORGANIZATION AND OPERATION .....	18
SERVICES PROVIDED .....	18
APPENDIX B: ENTERPRISE ADA PROCEDURES.....	19

ENTERPRISE ADA POLICY .....	20
ADAPTIVE DRIVING DEVICES .....	20
REASONABLE MODIFICATIONS AND AUXILIARY AIDS AND SERVICES....	20
WHEELCHAIR ACCESSIBLE VEHICLES.....	20
INTERNAL PROCESS FOR HANDLING REQUEST FOR WHEELCHAIR ACCESSIBLE VEHICLE .....	21
APPENDIX C: TBARTA ORGANIZATIONAL CHART .....	22
APPENDIX D: TITLE VI COMPLAINT FORM .....	23
APPENDIX E: FOUR FACTOR ANALYSES - TRANSIT OPERATORS IN THE TBARTA VANPOOL SERVICE AREA .....	25
APPENDIX F: GOVERNING BOARD MEETING APPROVING TITLE VI PLAN .....	32

## Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Recipients of public transportation funding from the Federal Transit Administration (FTA), including the Tampa Bay Area Regional Transit Authority (TBARTA), are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory. This document details how TBARTA incorporates nondiscrimination policies and practices in providing services to the public.

## Description of TBARTA

The **Tampa Bay Area Regional Transit Authority (TBARTA)** was originally created by the Florida Legislature in July 2007 as a regional transportation authority. In 2017, the Legislature changed TBARTA from a transportation to a transit authority. TBARTA's purpose is to plan, implement, and operate mobility improvements and expansions of multimodal transportation options within Hernando, Hillsborough, Manatee, Pasco, and Pinellas Counties. The agency coordinates its efforts with the Florida Department of Transportation Districts 1 and 7, as well as MPOs and transit agencies in its service area to improve transportation in the Tampa Bay region and by statute has developed a Regional Transit Development Plan (RTDP) called Envision 2030 for its 5-county service area.

### TBARTA Governing Board

The TBARTA Governing Board is made up of elected officials and appointed members from around the region. Membership includes gubernatorial appointments, county commissioners, transit authority members, the mayors of Tampa and St. Petersburg, and FDOT advisory members.

### Non-Elected Committees

TBARTA has two directly appointed committees which provide recommendations to the Governing Board. The **Citizens Advisory Committee (CAC)** is made up of residents and business persons from around the region. CAC members are appointed by TBARTA Board members and volunteer their time to advise the Board on a range of issues that affect TBARTA and the region. Each appointee to the CAC serves at the pleasure of their appointing Board member or other appointing authority.

To ensure the CAC includes a cross-section of the region's population, criteria used by the Board for appointment may include, but not be limited to:

- Membership in business, civic, and environmental organizations
- Member of senior, low-income, minority, and/or disabled populations

- Demonstrated interest in transportation or other public policy advocacy
- Experience in working with local jurisdictions on regional issues
- Previous community service
- Professional expertise and qualifications

The **Transit Management Committee (TMC)** is made up of the region’s transit agency directors, who advise the Board in the review, development, and direction of regional transit projects and programs, considerations relating to transportation issues pursuant to state and federal legislation, and perform other duties as assigned by the Board or Chair. The mission of the Transit Management Committee is to:

- Serve as an advisory body to the Tampa Bay Area Regional Transit Authority
- Establish liaisons between the Authority Board and local transit agencies
- Provide technical assistance regarding the development and implementation of a multimodal transportation plan

The TMC meets quarterly while the CAC meets bimonthly. Meetings are noticed on the TBARTA website. The following table shows the ethnic makeup of the Transit Management Committee and the Citizens Advisory Committee.

COMMITTEE	AMERICAN INDIAN OR ALASKAN NATIVE	ASIAN	BLACK OR AFRICAN AMERICAN	HAWAIIAN/ PACIFIC ISLANDER	HISPANIC	WHITE/ CAUCASIAN	TWO OR MORE RACES	TOTAL
Transit Management Committee (TMC)*	0.00% 0	0.00% 0	0.00% 1	0.00% 0	20.00% 1	60.00% 3	0.00% 0	100% 5
Citizens Advisory Committee (CAC)	15.38% 2	0.00% 0	0.00% 0	0.00% 0	0.00% 0	84.62% 11	15.38% 2	100% 13

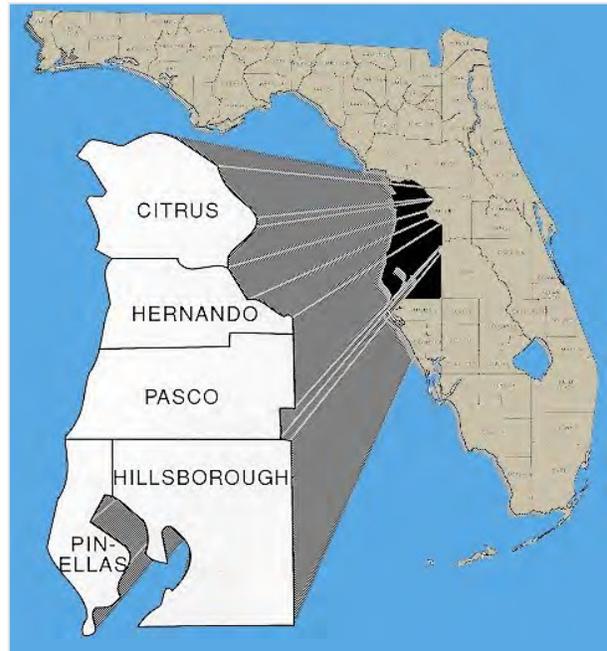
\*The TMC consists of nine total seats with five voting and four non-voting members.

Additionally, an active regional planning program is maintained through the **Metropolitan Planning Organizations Chairs Coordinating Committee (MPOs CCC)**. The Committee reviews projects deemed regionally significant, reviews regionally significant land use decisions, reviews all proposed regionally significant projects affecting more than one MPO and maintains a conflict resolution process throughout the West Central Florida region. Members include: the Hernando/Citrus MPO, Hillsborough MPO, Pasco MPO, Forward Pinellas, Polk Transportation Planning Organization (TPO), and the Sarasota-Manatee MPO. Through this process TBARTA works directly with the MPOs and other partner agencies to cooperatively further regional transportation priorities and can address issues affecting minorities and the mobility challenged throughout West Central Florida.

## Vanpool Program

TBARTA is the official Tampa Bay regional provider of the Florida Department of Transportation District 7 Commuter Assistance Program, covering the counties of Citrus, Hernando, Hillsborough, Pasco, and Pinellas. Commuter options offered under the Program include Carpool, Vanpool, Regional School Commute, Emergency Ride Home (ERH), Telework, Compressed Work Schedule, and Commuter Tax Benefits.

The **TBARTA Vanpool** program has been recognized as a successful public-private partnership between TBARTA, FDOT, and Enterprise. A vanpool is a group of 5 to 15 commuters who voluntarily participate in a ridesharing arrangement to and from work. TBARTA Regional Vanpool provides a variety of vehicles to choose from, ranging from 5 passenger Chevy Traverses to full-size 15 passenger vans. The program has operated since 1994 and is available to all commuters traveling to or from one of the five counties in FDOT District 7.



Each van has a Primary Driver, and a minimum of two Volunteer Alternate Drivers. Groups of typically 4 to 15 share the cost of the van lease and fuel, based on van style/size and commute miles. The Primary and Alternate Drivers are permitted to take the van home overnight, and vans can also park at Park and Rides throughout the Tampa Bay region. With Property Manager or Owner permission vans can be parked at places of worship and shopping centers. The TBARTA office can assist groups in securing parking if the vans are not parked overnight at their residence.

TBARTA provides an Emergency Ride Home (ERH) Program to help vanpoolers get home in the event of illness or family emergency while at work or having to work late unexpectedly. The ERH Program provides registered participants up to six (6) free taxi rides home from work per year.

TBARTA is also committed to providing a range of Adaptive Driving Devices through its provider to customers with disabilities. Adaptive Driving Devices include hand controls, left foot accelerators, spinner knobs, and pedal extenders. Such devices are available at no additional charge.

In FY 2019, the TBARTA Vanpool Program had 150 vanpools in service with 900 vanpool participants, reporting 293,714 Unlinked Passenger Trips (UPT) and 9,266,431 Passenger Miles Traveled (PMT). The average round trip commute was 57 miles.

Additional information about the organization and operation of the TBARTA Vanpool Program is contained in Appendix A.

## TITLE VI POLICY AND OBJECTIVES

TBARTA is committed to ensuring that no person shall, on the grounds of race, color, national origin, age, sex, religion, disability or family status, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Toward this end, TBARTA's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin, age, sex, religion, disability or family status;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

As described earlier, TBARTA does not operate any fixed route transit service, rather, TBARTA provides vanpool service throughout the area covered by the Florida Department of Transportation (FDOT) District 7 encompassing Hillsborough, Hernando, Pinellas, Pasco, and Citrus Counties.

The provider of vanpool services for TBARTA's program, Enterprise Leasing Company of Florida, has developed a detailed set of procedures that conform with requirements of the Americans with Disabilities Act (ADA), including the provision of adaptive driving devices and availability of surrogate drivers. Further details on these procedures can be found in Appendix B.

### Vanpool Outreach

Extensive outreach efforts are conducted in support of TBARTA's vanpool and rideshare programs. Staff frequently attend business meetings and community sponsored events to describe benefits of the program, and to provide information on obtaining transportation services within the region.

## TITLE VI PUBLIC NOTICE

TBARTA posts Title VI notices on the agency's website, in public areas of the agency, and on vanpool vehicles.

### Notifying the Public of Rights under Title VI

TBARTA operates its programs and services without regard to race, color and national origin, age, sex, religion, disability or family status in accordance with Title VI of the Civil Rights Act of 1964. If you believe you have been discriminated against on the basis of race, color or national origin by TBARTA you may file a Title VI complaint by completing, signing and submitting the agency's Title VI Complaint Form.

#### How to file a Title VI complaint with TBARTA:

1. Download a PDF of the Title VI Complaint Form from our website at <https://tbarta.com/media/1832/tbarta-title-vi-complaint-form.pdf>. Or, have a form mailed to you by contacting TBARTA at (813) 282-8200, (800) 998-RIDE (7433) or emailing **Brian Pessaro**
2. Complaints must be filed within 180 days of the alleged discriminatory act and should contain as much detailed information about the alleged discrimination as possible.
3. The form must be signed and include your contact information.

#### Please mail all complaints to:

##### **Brian Pessaro, Title VI Officer**

Brian.Pessaro@tbarta.com

Phone: (813) 282-8200 or (800) 998-RIDE (7433)

Tampa Bay Area Regional Transit Authority

5100 Lemon Street, Suite 209, Tampa, FL 33609

## Transportation Related Complaints and Lawsuits

TBARTA maintains a file regarding Title VI complaints and investigations of lawsuits. To date TBARTA has not received any Title VI complaints alleging discrimination on the basis of race, color, or national origin with respect to transportation services or other transportation-related programs.

## TITLE VI PROGRAM AND COMPLAINT PROCEDURE

### How to file a Title VI complaint with TBARTA

Any person who believes they have been discriminated against on the basis of race, color or national origin by TBARTA may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form to:

**Brian Pessaro**, Title VI Officer  
Tampa Bay Area Regional Transit Authority  
5100 Lemon Street, Suite 209  
Tampa, FL 33609

We encourage you to make your complaint in writing.

Complaint forms and information on how to file the complaint are available online at <https://tbarta.com/media/1832/tbarta-title-vi-complaint-form.pdf> in print in a publicly accessible area of TBARTA's office, and at all TBARTA meetings and events. You may also have a form mailed to you by contacting TBARTA at (813) 282-8200 or (800) 998-RIDE (7433). A copy of the complaint form can be found in Appendix D of this report.

#### ***Please include the following information:***

- Your name, address and how to contact you (phone number, email address, etc.).
- How, why, when and where you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- You must sign your letter of complaint.

Complaints may also be filed directly with the Federal Transit Administration, the Department of Fair Employment and Housing and the Equal Employment Opportunity Commission.

Verbal and non-written complaints received by TBARTA shall be resolved informally by the Title VI Officer. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant(s) request(s) to file a formal written complaint, the complainant shall be referred by the Title VI Officer to FDOT's District Seven Title VI Coordinator / District One Title VI Coordinator for processing in accordance with approved State procedures.

When appropriate, the Title VI Officer will conduct and complete a review of the verbal or non-written allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to the Governing Board.

Complaints must be filed within 180 days of the alleged discriminatory act and should contain as much detailed information about the alleged discrimination as possible.

TBARTA has 60 days to investigate the complaint. If more information is needed to resolve the complaint the Title VI Officer may contact the complainant. The complainant has ten business

days from the date of the letter to provide requested information. If the requested information is not received within that time frame the case will be closed.

After the Title VI Officer reviews the complaint, he/she will issue one of two letters to the complainant: a closure letter or letter of finding (LOF). A closure letter summarizes the allegations and states that there was no Title VI violation and that the case will be closed. An LOF summarizes the allegations and provides an explanation of the corrective action taken. If the complainant wishes to appeal the decision, they have 30 days after the date of the letter to do so.

The appeal should be submitted in writing stating the reason(s) for the appeal. The written appeal should be submitted to the Title VI Officer, **Brian Pessaro**, Tampa Bay Area Regional Transit Authority, 5100 Lemon Street, Suite 209, Tampa, FL 33609.

TBARTA's Executive Director, or designee, will promptly consider the appeal. Consideration of the appeal will be based on the written appeal and accompanying documentation and with the discretion of the Executive Director or designee may include a meeting with the appealing party.

## PUBLIC OUTREACH AND INVOLVEMENT PLAN

### Commitment to Public Involvement

The underlying goal in TBARTA's public participation efforts is to raise the awareness and importance of transportation in the regional conversation, and endeavor to "provide...useful, timely information to our constituency and policy leaders..." An active program is maintained by engaging all segments of the public during key points in the project development process. Events and meetings are noticed and published on its website, and staff consistently attends meetings of public, private and non-profit groups throughout the region. TBARTA recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan planning organizations, community-based organizations, major employers, patrons, and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

TBARTA maintains an active and inclusive regional public involvement process which allows all segments of the community to be involved in all phases of the public comment process by providing complete information, timely public notice, opportunities for making comments, and full access to decision making. All comments are ultimately shared with the Governing Board for consideration prior to making decisions.

TBARTA is committed to complying with Federal legislation requiring that public involvement process adheres to the requirements of the following acts and orders:

- **Americans With Disabilities Act (ADA):** Requires reasonable efforts be made to accommodate citizens with disabilities who wish to attend meetings.

- **Environmental Justice (EJ) – Executive Order 12898:** Requires Federal agencies to achieve environmental justice by identifying and addressing disproportionately high and adverse human health or environmental effects, including the interrelated social and economic effects of their programs, policies, and activities on minority populations and low-income populations in the United States.
- **Department of Transportation Order 5610.2(a):** Requires consideration of environmental justice principles in all programs, policies or activities, and sets forth steps to prevent disproportionately high and adverse effects to minority or low-income populations through Title VI analyses and environmental justice analyses conducted as part of federal transportation planning and National Environmental Protection Act (NEPA) provisions.

TBARTA also complies with State of Florida requirements for public participation, which are found in Florida Statutes (FS), Title XI, Chapter 163, Section 163.3181. This statute directs local planning agencies and local governmental units to adopt procedures that “...*provide for broad dissemination of the proposals and alternatives, opportunity for written comments, public hearings as provided herein, provisions for open discussion, communications programs, information services, and consideration of and response to public comments.*”

### Regional Public Participation Plan

Developed by TBARTA, the Regional Public Participation Plan calls for the five MPOs within TBARTA’s area, the Regional Public Participation Program Advisory Group, regional partners (including the Florida Department of Transportation), and others, to closely coordinate and schedule public outreach efforts across organizations. This cooperative public involvement program enables TBARTA to draw from the expertise and knowledge of its regional planning partners, particularly their efforts to engage minority communities in the transportation planning process, during project development, and in the delivery of regional vanpool services.

A major component of TBARTA’s regional public outreach program is a strong commitment to directly engage with community groups and associations of all sizes and demographic makeup. Staff frequently attend meetings, respond to speaking requests, and seek out opportunities to share information regarding its programs and available resources throughout the Tampa Bay region and West Central Florida.

Specific actions that support the regional public participation plan related to minority engagement and LEP include the following commitments by TBARTA and its partners:

- Conduct an active program for outreach to diverse populations throughout the region.
  - Include diverse socioeconomic groups early in the planning effort.
  - Examine the location and service area of transportation improvements to ensure the system adequately and appropriately benefits all groups of the region’s population.

- Provide direct notice of public meetings and public input periods to identified groups of stakeholders, as is practicable.
- Develop technical tools to clearly identify the location of diverse populations and associated demographics with particular attention given to Environmental Justice areas.
  - Census and mapping data will be used to identify areas with large concentrations of low income, minority and ethnic populations.
  - Using the technical evaluation, contact lists will be updated to ensure they are sufficiently broad to include identified diverse populations within the regional planning process.
- The Regional Public Participation Plan Advisory Group will ensure all information and related materials are easy to access.

Public information meetings will be held in facilities that are centrally located and accessible by persons with disabilities and by as many transportation modes as possible.

#### Outreach Tools and Activities

TBARTA’s website is the central repository of information regarding its vanpool program and regional planning efforts, and includes the following:

- All print marketing collateral, in a downloadable pdf format, including fact sheets, and previously developed brochures
- Calendar of TBARTA meetings, workshops, and public participation opportunities
- Links to social media
- Opportunity to sign up for TBARTA e-notices
- Project documents, maps, information

Social media also provides a platform for comments, questions, and awareness of TBARTA’s programs. Social media strategies use several permanent platforms (Facebook, Twitter, LinkedIn, and YouTube) to advance regional public participation. Other applications such as YouTube are also used to a lesser extent.

TBARTA’s website has built-in Spanish translation alternative pages, which include the majority of TBARTA information. Translation of print material into alternative languages will be considered upon request.

## Transit Agency Coordination/Cooperation

Each transit agency within TBARTA's vanpool service area (The Hernando TheBus, Hillsborough Area Regional Transit Authority, Pasco County Public Transportation, and the Pinellas Suncoast Transit Authority) has an extensive public involvement program. Through its committee structure, such as the Transit Management Committee, and other processes, TBARTA frequently engages with these agencies, supports their public involvement programs associated with planning and operations, and continues to provide assistance as requested.

TBARTA draws upon the technical support and other resources of these and other partners to identify underserved populations, including minorities, disabled persons and the elderly.

## Citizens Advisory Committee (CAC)

A major component of TBARTA's public involvement program is the Citizens Advisory Committee. Made up of residents and business persons from around the region, CAC members are appointed by TBARTA Board members and volunteer their time to advise the Board on a range of issues that affect TBARTA and the region. Each appointee to the CAC serves at the pleasure of their appointing Board member or other appointing authority.

The role of the CAC includes:

- Providing region-oriented advice to the Authority regarding the development and implementation of TBARTA's regional transit development plan and other TBARTA led studies
- Representing a wide range of stakeholder interests and community organizations
- Evaluating proposals and proposed solutions from a citizen's perspective
- Promoting public awareness and participation in the planning and implementation of the regional transit development plan and other TBARTA led studies to local citizen groups

Because the CAC was created to provide broad community engagement and because a key responsibility of CAC members is to assist with increasing public awareness and participation, it is preferred that members be leaders of a recognized group or organization. Members may not be transportation agency staff.

## Vanpool Program Outreach

TBARTA's outreach staff works closely with Enterprise to communicate vanpool program information to businesses and agencies throughout Tampa Bay. Staff assists employers with evaluating transportation options and employee origin locations, and conducts vanpool formation meetings with employees.

Forums and other public events include:

- University of South Florida – various outreach events (employee and student events)
- University of South Florida and the Center for Global Solutions
- MPO Citizen Advisory Committees
- Florida Commuter Transportation Summit meetings
- Tampa Bay Transportation Management Areas and Transportation Management

#### Organizations

- School Transportation Safety Committees
- Transportation Management Organizations Coordinating Group meeting
- Chambers of Commerce and Transportation Task Forces
- Downtown Partnership assistance and meetings
- Public and Private Entity Employee Orientations
- Commuter services meetings at area hospitals and health organizations
- Other community events such as Earth Day and Commuter Choices Day
- Commuter vanpool marketing collaboration meetings
- Sustainability Employee Fairs
- Regional events for the transportation disadvantaged
- Social marketing in transportation workshops
- Community group open houses
- Civic association meetings/events
- Hillsborough County and MacDill AFB rideshare/vanpool orientation for new-hires with foreign heritage
- Elderly Affairs – various events

TBARTA also maintains a large database of transportation organizations allowing commuters to speak directly to staff regarding available transportation options. This human interaction prevents having to navigate an automated system.

## LANGUAGE ASSISTANCE PLAN

### Limited English Proficiency Procedure

A Language Assistance Plan is included in the Title VI Program update to satisfy Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” to ensure that persons with limited English proficiency (LEP) are accorded equal treatment by agencies receiving federal funding. TBARTA works cooperatively with the region’s MPOs/TPO and transit providers to help identify the existence of limited English proficient populations, the size of any such populations, and determine what methods may be used to assist those populations and assign resources for the tasks involved.

### LEP Support for Regional Public Involvement

To support its regional public involvement program, TBARTA works with MPOs and FDOT to provide language assistance for LEP persons seeking meaningful access to programs, as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak

English as their primary language and who has a limited ability to read, speak, write, or understand English. Technical support is provided by the Florida Department of Transportation.

Both TBARTA and the MPOs Chairs Coordinating Committee (CCC) maintain a consolidated process which supports their LEP and Title VI Programs. As agencies that receive federal funds through their MPO/TPO member agencies, TBARTA and the MPOs CCC comply with Title VI requirements, including LEP and Americans with Disabilities Act (ADA), in their activities and interactions with the public. To comply, public hearings and other public events are held at ADA accessible locations, collateral materials are offered in English and Spanish, and translation services are available upon request. Public hearings and other public events are advertised with contact information to be used if special assistance or accommodations are needed.

Additionally, member MPOs/TPO LEP Plans include a demographic analysis using the most recent US Census Bureau's American Community Survey data to determine the LEP population. Written materials routinely provided by the MPOs CCC in English also are provided in regularly encountered languages other than English, and the CCC ensures that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity.

Persons are informed, in conformance with Title VI, that those requiring special accommodations under the Americans with Disabilities Act (ADA) or persons who require translation service (free of charge) should contact their local MPO/TPO. Complaints regarding denial of benefits or discrimination are also handled by a designated staff member. Persons are encouraged to make complaints in writing.

Through 2019, there have been no language related complaints received and no requests for translation services or assistance. For assistance requests and translation services, the public may contact the same individual five days prior to the meeting where support is required.

### LEP Support for Regional Vanpool

As described earlier in this report, TBARTA is a regional entity that can rely on an extensive network of partners directly involved with developing and providing materials to populations with limited English proficiency.

As with the Regional Public Involvement Program, TBARTA draws upon the resources of the region's transit operators to identify populations of persons with limited English and works with staffs from the appropriate agencies/operators to provide support when translation services for verbal or print materials are required.

The operators are:

- Citrus County Transit Services (Orange Line)
- The Hernando Express Bus (THEBus)
- Hillsborough Area Regional Transit Authority (HART)
- Manatee County Area Transit (MCAT)
- Pasco County Public Transportation (PCPT)
- Pinellas Suncoast Transit Authority (PSTA)

## Four Factor Analysis

TBARTA is also able to access and apply materials in the Four Factor Analysis prepared by each operator when meeting language needs of the region.

**Step 1** - The first step toward understanding the profile of individuals that could participate in programs and services is a review of datasets. The transit operators use the American Community Survey (ACS) data, as accepted in FTA C 4702.1B.

**Step 2** - The next step is to understand the frequency at which LEP persons come in contact with programs and services.

**Step 3** – The third factor looks at the importance of the service provided by the program. Transit operators must ensure that all segments of the population, including LEP persons, have an opportunity to be involved in all aspects of the service provided. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process in use of federal funds.

**Step 4** - The fourth factor consists of the resources available and overall cost, and follows the U.S. Department of Transportation's (DOT) Guidance regarding the need for language services, which states, "the more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed."

Analyses conducted by transit operators in TBARTA's service area can be used to identify LEP populations that may use TBARTA services and identify needs for language assistance. Due to the size and complexity of TBARTA's vanpool service area, TBARTA must rely upon the cooperative efforts of its transportation partners to fulfill this requirement.

Following is a general assessment of each of the four factors cited by the transit operators/counties.

**Factor 1** – Counties within the TBARTA service area have identified significant populations of Spanish speaking LEP persons using the American Community Survey (ACS). Other language populations have also been identified by geographic area. All operators are familiar with these populations

**Factor 2** – Likewise, all operators have developed plans to make materials available to LEP populations, specifically through techniques such as tracking callers requesting language assistance, having Spanish print materials available, and community outreach.

**Factor 3** – Operators have evaluated the need for communication and engagement with LEP persons and groups. In all cases, finding opportunities for the involvement of all stakeholders is actively considered with conducting operational and planning tasks.

**Factor 4** – Each county/operator has assessed resources that are available to LEP persons, community groups, and organizations. As identified by each transit operator, the needs are great and, in some cases, LEP populations are increasing.

When coupled with tight budgetary constraints, it is essential that expenditures to meet these needs are allocated in the most cost-effective manner possible.

This information is valuable to TBARTA when conducting operational and planning activities within these areas. As indicated previously, assistance from TBARTA's partners is available for the following:

- Knowledge of the LEP needs within specific geographic areas and communities.
- Lists of organizations that can assist or provide contacts to community groups.
- Resources to assist TBARTA when conducting operational and planning activities.
- Other informational and marketing materials in Spanish and other languages, as required.

Detailed summaries of the Four Factor Analyses conducted by transit operators within TBARTA's service area are included in Appendix E.

### LEP Application

Information on the means of accommodating LEP persons is of great value to TBARTA. The preceding analysis is an important resource for reaching out to specific LEP populations.

TBARTA will utilize this information whenever conducting/planning activities or responding to concerns from citizens, groups, or organizations within geographic areas cited by the analyses conducted by transit providers.

### Identifying LEP Persons Requiring Language Assistance

Records requests for language assistance from past meeting and events will be reviewed to anticipate the possible need to assistance at upcoming meetings.

Census Bureau's "I Speak Cards" will be available at workshop or conference sign-in tables. Although staff may not be able to provide translation assistance at a particular meeting, the cards can be an excellent tool to identify language needs for future meetings. Cards will also be available at the TBARTA office reception area.

A notice of available language assistance will be posted in reception area.

### Language Assistance Measures

When an interpreter is needed, in person or on the telephone, TBARTA will first determine what language is required. TBARTA staff can currently provide only informal verbal interpretation.

Staff may be able to assist with written communications and document translation requests from LEP persons.

### Staff Training

All TBARTA staff will be provided with the LEP Plan and trained on procedures and available services. This information will also be part of the staff orientation process for new hires. Training will include the following:

- Understanding the Title VI LEP responsibilities
- What language assistance services TBARTA offers
- Use of LEP “I Speak Cards”
- How to access a staff interpreter
- Documentation for language assistance requests
- How to handle a complaint

As a rule, Spanish speaking staff or a hired interpreter will be on hand at public meetings intended for gathering public input. Additionally, a Spanish speaking person can be contacted at appropriate agencies, particularly through the transit agencies.

**For information on Title VI or LEP compliance, persons are encouraged to contact:**

**Brian Pessaro, Title VI Officer**

Phone: (813) 282-8200 or (800) 998-RIDE (7433)

Mail: Tampa Bay Area Regional Transit Authority  
5100 Lemon Street, Suite 209, Tampa, FL 33609

Email: [Brian.Pessaro@tbarta.com](mailto:Brian.Pessaro@tbarta.com)

Additionally, complaint forms are available on TBARTA’s website at <https://tbarta.com/media/1832/tbarta-title-vi-complaint-form.pdf> or in print at TBARTA and MPO/TPO offices, and at all TBARTA and MPOs CCC public meetings and events.

### MONITORING COMPLIANCE WITH TITLE VI AND LEP

TBARTA will monitor and update this plan biannually, as needed. This will include:

- Reviewing our Title VI and LEP Plans with staff and adjusting as needed.
- Monitoring demographic changes, as documented in the Regional Transit Development Plan.
- Addressing any Title VI and LEP-related complaints.

### BOARD APPROVAL OF THE TITLE VI PROGRAM

TBARTA's Governing Board provided full approval of the Title VI Program at its meeting on **August 3, 2018**. The meeting minutes can be found in Appendix F.

## APPENDICES

### APPENDIX A

#### TBARTA Vanpool Program – Organization and Operation

##### **How It Works**

Each van has a Primary Driver, and a minimum of two Volunteer Alternate Drivers. Groups of typically 4 to 15 share the cost of the van lease and fuel, based on van style/size and commute miles. The Primary and Alternate Drivers are permitted to take the van home overnight, and vans can also park at Park and Rides throughout Tampa Bay. With Property Manager or Owner permission vans can be parked at places of worship and shopping centers. The TBARTA office can assist groups in securing parking if the vans are not parked overnight at their residence.

##### **Services Provided**

TBARTA works through Enterprise, its third-party provider of vanpool leasing services, to offer commuters that live or work in the FDOT District 7 service area an alternative to driving alone. Enterprise manages all aspects of vehicles in the program including routine maintenance, roadside assistance, fleet response, insurance, and registration.

TBARTA provides an Emergency Ride Home (ERH) Program to help vanpoolers get home in the event of illness or family emergency while at work or having to work late unexpectedly. The ERH Program provides registered participants up to six (6) free taxi rides home from work per year. Certain restrictions apply so please contact TBARTA at 1-800-998-RIDE to learn more about ERH.

TBARTA is also committed to providing a range of Adaptive Driving Devices through its provider to customers with disabilities. Adaptive Driving Devices include hand controls, left foot accelerators, spinner knobs, and pedal extenders. Such devices are available at no additional charge.

While TBARTA uses good faith efforts to satisfy requests for vehicles with hand controls, left foot accelerators, spinner knobs, or pedal extenders, as soon as reasonably practical, we may require up to two to three business days' notice for vehicles equipped with Adaptive Driving Devices depending on the location of the branch where such a vehicle is requested. However, at certain major airport locations, vehicles equipped with Adaptive Driving Devices may be available with as little as 8 or 24 hours' notice. The foregoing timeframes are subject to delays beyond TBARTA's reasonable control.

## APPENDIX B

### Enterprise ADA Procedures

#### VANPOOL CUSTOMERS WITH DISABILITIES PROTOCOL ADA REQUEST METHODOLOGY

Enterprise takes every ADA request seriously and will develop a plan on a case by case basis, assess the exact needs of the vanpool group, and provide reasonable accommodations for them based on those needs.

Enterprise can modify a vehicle to accommodate a passenger with disabilities. There is no additional cost to the monthly vanpool rental rate to perform modifications to meet the ADA requirements listed below;

- Removing the seat nearest the side door of the vehicle.
- Providing telescoping ramps so a wheelchair can be rolled into the vehicle.
- Installing tie-downs on the vehicle floor so the wheelchair can be secured safely and used by the passenger as a seating position.
- Adding hand-controlled accelerator and brakes, steering knobs, or pedal extensions.
- Adding grab bars for entering and exiting the vehicle.

More extensive modifications (e.g., wheelchair lifts) can also be made to a vehicle upon request. However, the additional costs would be passed on to public contract sponsors if a public contract sponsor contract is in place.

If a more extensive modification is required, Enterprise will provide the options to the public contract sponsor and the vanpool group. Cost allocations between Enterprise and the public contract sponsor will be agreed upon by both parties before the vehicle is put into service.

Once the needs are assessed and specific modifications are identified, Enterprise will either provide the modifications/conversions or rent/lease vehicles directly from ADA specific providers - such as in the case of a group requesting an extensive conversion such as wheelchair lifts or ramps. This relationship will provide ADA vehicles at an efficient price point and lease terms congruent with typical vanpool provision options. This will also increase options for vanpool groups and allow compliance with typical vehicle delivery timeline of 30 days from the execution of paperwork.

**For customer service inquiries relating to customers with disabilities, please call (866) 225-4284, e-mail us at [Mobility@erac.com](mailto:Mobility@erac.com), or TTY us at (866) 534-9270.**

#### ENTERPRISE ADA POLICY

This document sets forth Enterprise's internal policy for requests by individuals with disabilities for (i) Adaptive Driving Devices, (ii) modifications to normal policies, practices and procedures, and (iii) wheelchair accessible vehicles.

For purposes of this policy, the following definitions apply:

A “Public Vanpool” is one:

- (1) where participants receive public subsidies, OR
- (2) that is entirely funded by a governmental entity, usually through a contract.

#### ADAPTIVE DRIVING DEVICES

Rideshare will equip its vanpool vehicles with hand controls, left foot accelerators, spinner knobs, and pedal extenders (“Adaptive Driving Devices”) where needed by a driver with a disability, provided they can be safely installed in the vehicle in question. There is no additional charge for these devices.

#### REASONABLE MODIFICATIONS AND AUXILIARY AIDS AND SERVICES

Rideshare will make reasonable modifications to its normal policies, practices, and procedures to the extent necessary to ensure that individuals with disabilities have equal access to its goods and services, unless doing so fundamentally alters the goods and services it offers. In addition, Rideshare provides auxiliary aids and services where needed to ensure effective communication with individuals with disabilities in connection with the provision of its goods and services. Such auxiliary aids and services may include but are not limited to: (1) providing documents in alternative formats (e.g., reading aloud, braille, large print, or audio) for individuals who are blind or have low vision; and (2) exchanging notes and providing sign language interpreters for complicated communications with individuals who have hearing disabilities. If Rideshare receives a request for a reasonable modification or auxiliary aid or service, it will consider the request and provide a response. Rideshare also accepts phone calls made using relay services and treats them the same as other calls.

#### WHEELCHAIR ACCESSIBLE VEHICLES

Public Vanpools. Rideshare will provide a wheelchair accessible vehicle for a public vanpool if it is requested for or on behalf of a person with a disability who uses a wheelchair, scooter, or other mobility device that requires a wheelchair accessible vehicle. The cost of providing the wheelchair accessible vehicle or retrofitting a vehicle to be accessible is determined by the contract between Enterprise and the public entity in question, if there is a contract. If there is no contract provision allocating the cost of providing a wheelchair accessible vehicle to a public entity or third party, then Enterprise will pay for providing the accessible vehicle.

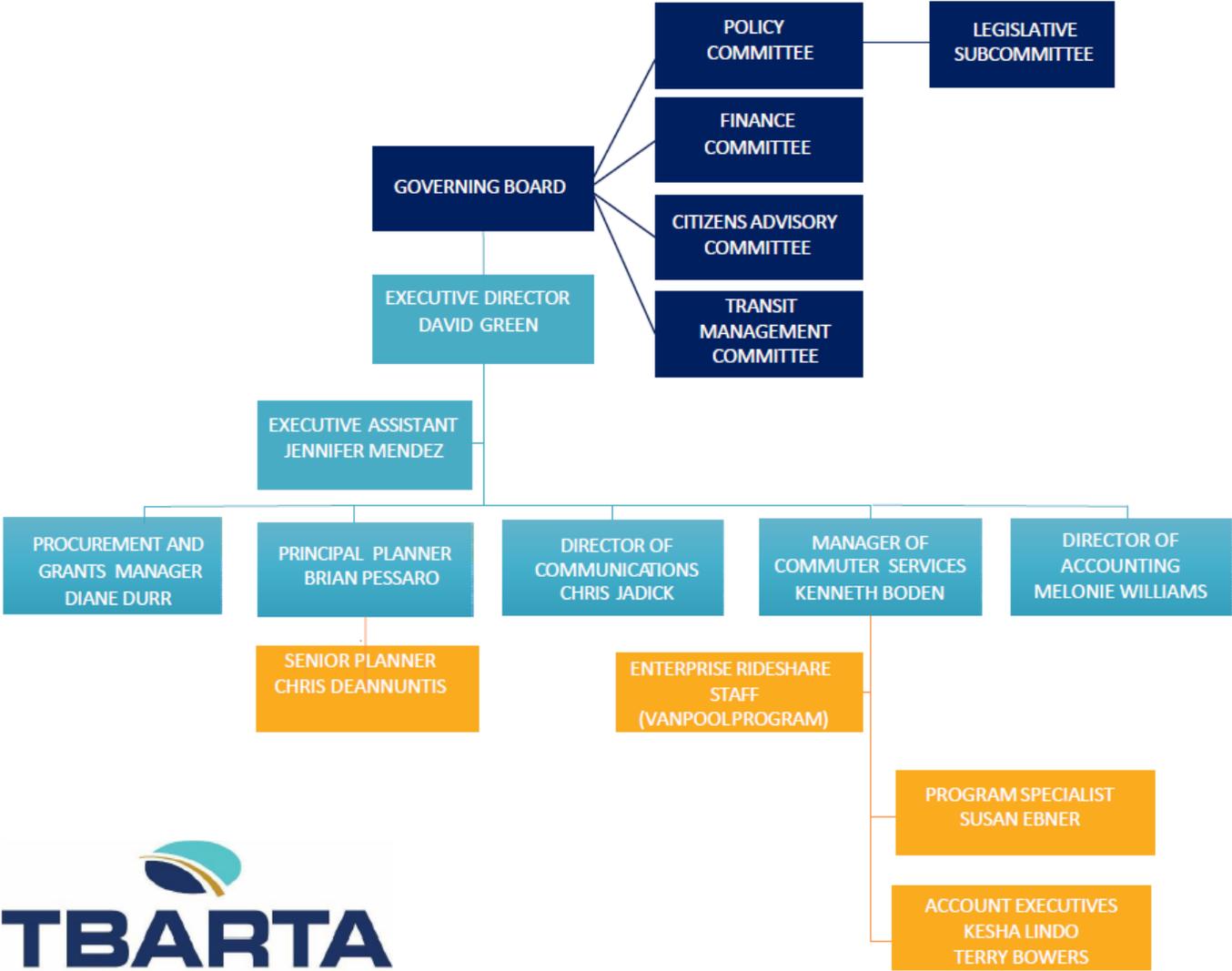
#### INTERNAL PROCESS FOR HANDLING REQUEST FOR WHEELCHAIR ACCESSIBLE VEHICLE

This document describes the process for handling a request for a wheelchair accessible vehicle made by or on behalf of a person with a disability.

1. Does the vanpool in question involve an agreement between Enterprise and a government/public entity (e.g., a local transportation agency)?

- a. If yes, Enterprise must provide a wheelchair accessible vehicle. Contact Risk Management to assist in determining who is responsible for the cost of providing wheelchair accessibility.
  - b. If no, proceed to question 2.
2. Is the request for a wheelchair accessible vehicle made by or on behalf of a person with a disability whose participation in the vanpool is subsidized by government/public funds?
- a. If yes, Enterprise must provide a wheelchair accessible vehicle. Contact Risk Management to assist in determining who is responsible for the cost of providing wheelchair accessibility.
  - b. If no, then there is no obligation to provide a wheelchair accessible vehicle. Contact Risk Management to discuss next steps.

APPENDIX C  
Agency Org Chart



## APPENDIX D

### Title VI Complaint Form

The **TBARTA** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the TBARTA office
- Available in appropriate languages for LEP populations, **meeting the Safe Harbor Threshold.**
- Other, \_\_\_\_\_

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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
<b>Section III:</b>				
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				
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.				
_____				
_____				



## APPENDIX E

### Four Factor Analyses - Transit Operators in the TBARTA Vanpool Service Area

COUNTY/ AGENCY	FOUR FACTOR ANALYSES
<b>FACTOR 1 - The number and proportion of LEP persons served or encountered in the eligible service population.</b>	
<b>Hillsborough Area Regional Transit Authority (HART)</b>	<p>Spanish is identified as the most prevalent language amongst the LEP population in the HART service area (9.7%). The 5% threshold is not met for any additional languages, however, there is a possibility that more than 1,000 LEP persons speak Creole, Chinese and/or Korean within the service area.</p> <p>Spanish meets and/or exceeds the 5% safe harbor threshold on 85% of the routes.</p> <p>HART staff members have also become familiar with LEP populations in Hillsborough County by working with community organizations that serve these populations. HART turns to these organizations for assistance in identifying language translation needs and in planning the best ways to inform and involve people with limited English proficiency.</p>
<b>Hernando Express Bus (THEBus)</b>	<p>Approximately 10.8% or 12,965 of the Hernando County population age 5 and older spoke a language other than English at home.</p> <p>Of these, 7.0% speak Spanish or Spanish Creole, 2.8% speak Other Indo-European languages, 0.6% speak Asian and Pacific Island languages, and 0.4% speak Other languages.</p> <p>Of the 7.0% of the persons that speak Spanish or Spanish Creole, approximately 25% or 1.8% speak English less than “very well.”</p>
<b>Pasco County Public Transportation (PCPT)</b>	<p>The number and proportion of LEP persons within the PCPT service area was assessed using the 2011–2015 American Community Survey (ACS) Five-Year Estimates to determine the number of people who speak English less than “very well” for Pasco County and for each Census block group within the PCPT service area.</p> <p>For ages 5 and over, approximately 4% of the total population (454,546) speak English less than “very well,” with approximately 64% of the LEP population speaking Spanish. The second most common language among LEP persons is Vietnamese, at 5.7%. Since Spanish and Vietnamese LEP</p>

language groups constitute at least 1,000 persons, PCPT is obligated to provide written translations of vital documents under the Safe Harbor Stipulation. Obligations under the Safe Harbor Stipulation are further discussed in the Language Assistance Plan.

Higher proportions of LEP populations reside in New Port Richey, Lutz, west of US 41, south of SR 54 in Wesley Chapel, and Dade City. The northeast corner of the county, along with parts of Dade City and north Zephyrhills, have the highest proportion of Spanish-speaking LEP populations. Wesley Chapel south of SR 54 has the highest proportion of Vietnamese-speaking LEP persons, and parts of New Port Richey have a moderate proportion Vietnamese-speaking LEP persons. Approximately 12% of transit riders ages 16 and older are LEP persons.

**Pinellas Suncoast  
Transit Authority  
(PSTA)**

5.36% of the total population above five years old within PSTA's service area is LEP, with 2.51 percent of the total population above five years old being Spanish LEP.

PSTA has identified community organizations that serve LEP persons within the service area. These organizations have the ability to confirm the statistical analysis completed using Census data and also provide information that may not have been collected by the U.S. Census Bureau. In addition to Census data and community organizations, an effort will continue to be made to gather statistics from Pinellas County Schools regarding the total number of students enrolled in English for Speakers of Other Languages (ESOL) classes. During the 2014-15 school year, 7.3% of Pinellas County students were considered LEP students.

**Manatee County  
Area Transit  
(MCAT)**

According to data from the 2018 American Community Survey (ACS), Manatee County has a total population of 345,508. The ACS estimates that 288,584 (93.4 percent) of those persons speak English "very well" while 22,171, or 6.4 percent, speak English "less than very well" with Spanish being the most predominant language spoken among those persons who speak English "less than very well."

Multiple languages are now tabulated under unique ACS categories. For example, all French, Haitian, and Cajun speaking persons are aggregated under one general category and this grouping of languages makes it difficult to determine which foreign languages to target for translation and thereby provide enhanced LEP access. The Title VI Safe Harbor provision stipulates that agencies provide written translation of vital documents for each LEP language group that constitutes 5% or 1,000 persons of the total population of persons eligible to be served. As a result, the Public Works/Transit Division targets Spanish speakers as the predominant LEP population for assistance, and the agency works to implement language assistance measures that meet the needs of Spanish-speaking persons in the community. Over time, Public Works/Transit Division staff will continue to monitor customer service requests for language assistance for languages other than Spanish and provide additional language services to passengers.

**FACTOR 2 – Frequency with which LEP persons come into contact with programs, activities, and services.**

**Hernando  
Express Bus  
(THEBus)**

The County assess the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying public meeting attendees. The County has recorded zero requests for an interpreter in any language and no requests for translated County documents.

The County will ensure that Spanish language brochures and transit schedules are available on the vehicles, at all County government offices; at transfer centers and other transit stops.

**Hillsborough  
Area Regional  
Transit Authority  
(HART)**

Even though the languages of Creole, Chinese, and Korean might meet the 1,000+ safe harbor provision for the HART Service Area, Spanish speakers are the largest representative of the LEP population and are very likely to come in contact with HART services. Over the past 4 years, HART has not had any requests for interpreters during public meetings or for any additional translated documents than those that are already Available.

Most callers that are LEP, speak Spanish, and several Spanish speaking representatives are available for these callers. The majority of interactions have occurred with Spanish speakers. Community Relations staff encounters with LEP persons have mainly been with Spanish speakers.

HART has taken the necessary steps to ensure that critical information is available in English and Spanish. Additional steps for translation and interpretation services will be available in other languages as needed.

**Pasco County  
Public  
Transportation  
(PCPT)**

Pasco County conducts regular board meetings and public hearings throughout the year. Community outreach and the County website are the main sources of potential contact between the PCPT and LEP persons. As a result, the frequency of contact is difficult to anticipate. Current contact with LEP individuals is relatively infrequent, but the commitment to serve the LEP group is a priority. In areas with more concentrated LEP populations, LEP individuals often ride PCPT buses with English-speaking family members. This is especially apparent along the East Pasco routes where there is a contingent of migrant workers located in the area.

**Pinellas  
Suncoast Transit  
Authority (PSTA)**

In order to understand the frequency with which LEP individuals come into contact with transit agency services, PSTA reviewed the number of surveys returned in Spanish during their last on-board survey in 2012. Of the 11,010 surveys returned, 340 surveys or 3.1% were returned in Spanish. This gives a rough idea of the number of LEP individuals using PSTA services, at least those who speak Spanish.

To augment this data, PSTA will re-institute its policy to track callers who need language assistance from the Customer Service Representatives. By tracking this figure, PSTA will have a better understanding of how many callers have requested language assistance and in what languages they needed assistance. PSTA currently employs several Customer Service and Marketing Staff to assist callers who need assistance in Spanish.

**Manatee County  
Area Transit  
(MCAT)**

The 2018 on-board survey of fixed-route ridership was distributed in both English and Spanish language versions and included an LEP related question. The results show that 25 of the 849 respondents requested a Spanish-language version of the on-board survey or a total of approximately 3 percent. An LEP-related survey question asked respondents what language, or languages, other than English were spoken at home. Twenty percent (approximately 170 of the 849 riders surveyed) of the onboard survey respondents spoke a language other than English while at home. Of the 170 respondents, 104 indicate that they speak Spanish, (i.e., the most common language other than English) spoken while at home.

**FACTOR 3 - Nature and importance of program, activity, or service provided by program to people's lives.**

**Hernando  
Express Bus  
(THEBus)**

The County will evaluate the need for formal outreach effort to identify County programs that would be of importance to Spanish-speaking LEP persons. The transit operator has translated its system route map and brochures and has the ability to translate any of its documents and brochures into Spanish as needed.

The County's transportation disadvantaged program was also identified as a potential provider of important services for Spanish-speaking LEP persons.

**Hillsborough  
Area Regional**

The third factor looks at the importance of the service provided by the program. HART services are voluntary, but important for LEP persons. Through communication with LEP persons, organizations that serve LEP

**Transit Authority  
(HART)**

persons, and through HART participation in community organizations and events, HART identifies its critical services to include HART fixed route service and HARTPlus paratransit service. If limited English is a barrier to using these services, then the consequences for the individual can be serious, including limited access to obtain healthcare, education, or employment.

All segments of the population, including LEP persons, have the opportunity to be involved in all aspects of the service provided. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process in use of federal funds in two major areas: the Transit Development Plan and the Annual Program of Projects. Inclusive public participation is a priority in other HART plans, studies and programs as well. The impacts of transportation improvements resulting from these activities do have an impact on all residents. Understanding and involvement are encouraged throughout the service process. HART is concerned with input from all stakeholders, and every effort is made to make the information process as inclusive as possible.

**Pasco County  
Public  
Transportation  
(PCPT)**

PCPT realizes that public transportation services can be very important to LEP individuals who may need these critical services to travel to jobs, go shopping for basic items such as food and clothing, or for getting to medical appointments. To assist LEP persons in accessing public transportation services, PCPT provides brochures, flyers, and schedules for the Spanish-speaking and Vietnamese-speaking populations of Pasco County, which are available upon request throughout the entire county. Flyers announcing workshops, route or schedule changes, closings, and other significant events are also provided in Spanish and Vietnamese. These are posted on buses for the most widespread notice to riders. Additionally, when a transportation planning activity calls for a non-board survey, it is distributed in English, Spanish, and Vietnamese. The Title VI Policy Statement, Title VI Complaint Procedures, and the Title VI Complaint Form are also provided in Spanish and Vietnamese and are available on the PCPT website. These documents also can be provided in large print formats if required. The Pasco County Personnel Department is compiling an extensive list of employees who speak languages other than English who can be available for translation services if needed at public meetings. At workshops or other events, a bilingual staff member attends and translates as needed.

PCPT ensures that all segments of the population, including LEP persons, have been or have had the opportunity to be involved in the public transportation planning process. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process for use of Federal funds in several major areas: 1) TDP, 2) Transportation Improvement Program, 3) Comprehensive Operational Analysis (COA), and 4) Long Range Transportation Plan (LRTP). Inclusive public participation is a priority in these plans, studies, and programs as well as the impacts of public transportation enhancements resulting from these planning activities impact all residents. Understanding and involvement are encouraged throughout the process, and every effort is made to make the planning process as inclusive as possible.

**Pinellas Suncoast  
Transit Authority  
(PSTA)**

PSTA recognizes the importance of providing public transportation to LEP persons and the consequences associated with language barriers. PSTA understands that barriers limiting a LEP person's ability to effectively use public transportation can limit his or her ability to obtain healthcare, education, or employment, and has determined that providing meaningful LEP services is crucial.

Of the 340 Spanish-language surveys submitted in the last on-board survey, 172 respondents (51%) indicated they live in a zero-vehicle household. For these individuals, transit services are a very important lifeline to activities such as employment, medical services, etc.

**Manatee County  
Area Transit  
(MCAT)**

The Manatee County Government/Transit Division is the only public transportation service provider available to residents in Manatee County. As demonstrated by the analysis of demographic and on-board survey data, there are a significant number of LEP persons in the community who use those public transit services. The Public Works/Transit Division employs bilingual staff (i.e. staff that are fluent in both English and Spanish), including Spanish speaking operators, supervisors, and customer service representatives, and experience consistently demonstrates that many bus riders require assistance from bilingual staff on a daily basis. The results of these bilingual interactions demonstrate the importance of the Public Works/Transit Division services to LEP populations. The bilingual staff members assist the agency in developing communication tools to better serve LEP populations, and in so doing, reduce barriers and improve access to persons who otherwise may not have other options for transportation.

**FACTOR 4 - Resources available to recipient for LEP outreach and costs associated with outreach.**

**Hernando  
Express Bus  
(THEBus)**

The County assessed its available resources that could be used for providing LEP assistance. These costs are related to Language Line Services for other than English and Spanish speaking individuals, website translation, and document reproduction in another language.

**Hillsborough  
Area Regional  
Transit Authority  
(HART)**

The fourth factor considered in the analysis is the resources available and overall cost. HART will follow DOT’s Guidance regarding the need for language services, which states, “the more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed.” Currently HART supplies numerous documents in Spanish. Pertinent information and materials in Spanish translation are available in the Route Schedule Book and public brochures, as well as on the HART website: [www.goHART.org](http://www.goHART.org). In some cases, it may be appropriate to translate the executive summary of a large document. Customer service, travel trainers, Community relations staff, dispatchers, road supervisors and drivers act as interpreters for phone calls and face-to-face inquiries from Spanish speaking persons. Other languages available for interpretation within HART staff include: Creole, Russian, French and German.

The HART EEO & Community Programs department regularly engages the community, analyzes the population segments and includes Spanish language outreach for the service area. The expenditures incurred in their efforts with regard to Spanish-speaking and LEP persons are included in the annual budget for that department.

**Pasco County  
Public  
Transportation  
(PCPT)**

Given the significant size of the LEP population in Pasco County as well as financial constraints, full translation of all transportation documents is not reasonable at this time. However, bus schedules, information brochures, and flyers announcing public involvement activities, route or schedule changes, closings, and other significant events as well as Title VI information are provided in Spanish and Vietnamese. Items are printed in-house or by external print agencies.

Continued growth of Pasco County and its Spanish- and Vietnamese-speaking populations make offering Spanish and Vietnamese translations in many areas a good community investment; therefore, the County continues to make efforts to partner with State and local agencies to provide language translation and interpretation services when practical within the scope of funding available. PCPT suggests that the public make requests seven business days in advance of public meetings to accommodate LEP assistance.

PCPT continues to monitor the need for additional language assistance, including the need for greater dissemination of information in the current languages provided and/or translation to new languages. If additional services are needed, PCPT will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

**Pinellas  
Suncoast  
Transit  
Authority  
(PSTA)**

Given PSTA's understanding of the importance of language assistance to those who need it, PSTA has undertaken several activities to assist LEP individuals. Due to the predominance of the LEP population being Spanish speaking, PSTA has put more resources into Spanish-language resources than other languages.

Language assistance measures identified through the application of the four- factor framework include

the following:

- Printed Materials: Due to dominance in the number of Spanish-speaking residents, the website, system maps, fare brochures, on-board surveys, and public notices are translated into Spanish.
- Google Translate: Currently, the PSTA website provides all direct website information in 80 different languages using the GoogleTranslator plugin.
- Customer Service Representatives: PSTA currently provides bilingual Customer Service (both call center and transit center booths) and front desk reception to accommodate the high number of Spanish LEP customers and residents in Pinellas County.
- Show Me Program: PSTA continues to participate in the "Show Me" program, which partners with organizations that cater to non-English speaking residents. The "Show Me" program coordinates a translator for residents needing a translator for less commonly spoken languages.
- Greenlight Pinellas Outreach: Recent large-scale outreach efforts associated with PSTA's Greenlight Pinellas Plan have provided the opportunity to leverage public outreach strategies in reaching out to a much larger LEP audience that educates the public on PSTA's programs, activities, and services. Over 200 of these events were done by bilingual staff, and all events were presented with the opportunity to be offered Spanish if requested.

PSTA cannot precisely calculate the cost of these activities due to the integrated nature of these services. Because of the demand for Spanish language services, PSTA does not outsource them, but rather meets the demand with in-house staff. PSTA has made efforts to ensure that it has bilingual staff in order to serve the needs of its customers.

**Manatee County  
Area Transit (MCAT)**

Over the last several years, the Manatee County Government Public Works/Transit Division continue to dedicate budget and resources with the intent to enhance access to services for LEP persons within the community. These resources include the hiring of bilingual staff, translation of various communications materials including website pages and program applications, and preparation of dedicated Spanish language materials used in the development of the agency's 2018 10-Year Transit Development Plan (TDP) Update. Currently, the Transit Division has a consultant Work Assignment issued under a General

Planning Services Contract that includes translation services for a variety of media and communications material. This is consistent with past efforts to transition various outreach materials into Spanish language materials. The agency estimates that over \$7,000 was allocated to LEP outreach in the past year (that total does not reflect staff time devoted to in-person communications and document translation).

Based on available financial and staff resources available, the Public Works/Transit Division is currently delivering competent and accurate language services for LEP populations within the service area. Public Works/Transit Division staff continue to monitor the need for additional language assistance, including the need for greater dissemination of information in the existing languages provided and/or translation to new languages. If additional services are needed, the Public Works/Transit Division staff will determine which additional language assistance measures are most cost-effective and feasible for implementation based upon demonstrated need and current and projected financial resources

## APPENDIX F

### Governing Board Meeting Minutes Approving the Title VI Plan

- **TBARTA Title VI Program, Hugh Pascoe, Pascoe Planning Services, LLC**
  - Hugh Pascoe gave a presentation on the TBARTA Title VI Program. The program is a requirement by the Federal Transit Administration (FTA) for Direct Recipient status as well as for any organization that uses FTA funds. This presentation is available online at:  
[http://www.tbarta.com/images/Calendar/TBARTA/Board/2018\\_08-03%20Title%20VI%20Presentation%20TBARTA%20Board\\_080318.pdf](http://www.tbarta.com/images/Calendar/TBARTA/Board/2018_08-03%20Title%20VI%20Presentation%20TBARTA%20Board_080318.pdf)
  - Commissioner Kemp questioned whether the TBARTA Title VI Plan addresses Title VI concerns regionally. She expressed that the Title VI programs require federal funds and suggested that the Board move to have the MPO Study report a comparison between all three counties and possibly propose a merger.
  - ❖ **Cliff Manuel moved to move forward with the updated MPO Study report reflecting the comparisons of all three counties to the next Board meeting for review of the Board. Commissioner Long seconded. PASSED 11-0.**
  - ❖ **Cliff Manuel moved to approve the TBARTA Title VI Plan for submission to FTA. Mayor Kriseman seconded. PASSED 11-0.**