

OPERATION PAR INC.

TITLE VI PLAN

ADOPTED: August 4, 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].

Operation PAR, 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.

Operation PAR, 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. Develop a complaint process and attempt to resolve complaints of discrimination against Operation PAR, Inc.
4. Participate in training offered on the Title VI and other nondiscrimination requirements.
5. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
6. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
7. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

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

Signature *Dianne L. Clark, PhD*

Printed Name Dianne Clark, PhD, Chief Executive Officer

Executive Director/Signatory Authority, Your Community Transit, Date:

Title VI Plan Concurrence and Adoption

This Plan was approved and adopted by Operation PAR, Inc. Board of Directors during a meeting held on 8/4/2023 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 Operation PAR, Inc. 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 Operation PAR, Inc. office(s) including the reception desk, and on the Operation PAR, Inc. website at www.operationpar.org . Additionally, Operation PAR, Inc. may also post the notice on transit vehicles.

A sample version of this notice is included in **Appendix B** of this Plan along with any translated versions of the notice, as necessary.

2.0 Title VI Procedures and Compliance



2.1 Complaint Procedure



POLICY and PROCEDURE

Policy Name Client Grievance (English)

POLICY:

To provide clients the opportunity to file a grievance when they experience dissatisfaction with any aspect of program services. To examine client grievances in an expeditious and thorough manner.

PURPOSE:

To promote open lines of communication through which problems may be fully explored and resolved in the best interest of all concerned.

DEFINITIONS:

Client is a consumer, guardian, or parent of a minor of any program services of this company.

Client Advocate is an individual assigned to assist clients navigate the client grievance process.

Companion is an individual legally authorized or otherwise to participate in treatment communication and decisions of deaf or hard of hearing clients.

Grievance is a written complaint regarding a system which directly affects client care, services

or rights that has not been addressed satisfactorily through any other means.

Working Days are Monday thru Friday excluding legal holidays.

PROCEDURE:

1. Instructions for accessing the process shall be posted at each facility.
2. At the time of admission or thereafter if conditions warrant, employees will review and discuss the client grievance procedure with the client. Clients are encouraged to comment without fear of reprisal on any aspect of service operations, procedures and any perceived violations of local, state or federal regulations.
3. Clients/Parents/Companions may file a grievance at any time, but are encouraged to discuss their concerns with staff to help resolve the concern as quickly as possible.
4. Clients/Parents/Companions may contact the Patient Advocate 727-456-3201 at any time to assist in obtaining a grievance form and/or navigating the grievance process.
 - a. The Patient Advocate does not become involved in issues of program rules, policy, or treatment decisions, but may try to expedite resolution by gathering and

relaying information to the program administrator.

5. A grievance is initiated by completing Section 1 of the Grievance Report Form. These forms shall be readily available to clients/parents/companions in each facility.

a. Section 1 must be completed in full including the client's/parent's/companion's signature, actions taken to resolve the concern and recommendations for resolution. The client/parent/companion is also signing a statement indicating that he/she understands that if they do not respond to proposed resolutions within three (3) working days, the grievance is considered resolved.

b. If a client/parent/companion needs assistance completing the grievance form, any employee can assist the client/parent/companion. This includes clients/ parents and or companions who are deaf or hard of hearing, physical limitations/ disability or present with a language barrier.

6. Once the client/parent/companion has written and signed the grievance, receiving staff

will sign the form and make a copy of the signed form for the client/parent/companion.

7. Receiving staff will immediately fax or email a copy of the grievance to the Risk Management and Safety Director, and forward the original to the administrator or designee of the service.

8. The administrator or the designee will investigate the circumstances of the grievance and

complete Section 2 of the Grievance Report Form with their proposed resolution.

9. **Within three (3) working days**, the administrator or designee will meet with the client/parent/companion. This applies to active clients as well as discharged clients. All attempts to contact the client/parent/companion will be documented. If the client/parent/companion is unavailable to meet in person, the administrator or designee will notify the Risk Management and Safety Director of the delay and request permission to send the written response by mail.

a. If the reply is being sent by mail, it will be sent certified mail with return receipt requested. All mail receipts and a copy of the grievance form and proposed resolution will be forwarded to the Risk Management and Safety Director.

b. The client/parent/companion has **three (3) working days** from meeting or receipt of mailed response to review, respond, and sign off on the proposed response.

The form will then be forwarded to the Risk Management and Safety Director **within 24 hours** of obtaining the client's/parent's/companion's signature.

c. If the client/parent/companion does not respond to the grievance within the three working days' time frame, the grievance is considered resolved.

d. If the mailed grievance is returned undelivered to the program, the administrator or designee is to forward the unopened envelope to the Risk Management and Safety Director.

10. If the problem is not resolved to the client's/parent's/companion's satisfaction, the grievance will be sent to the Vice President in charge of the program or designee.

a. The Vice President or designee will review the concern and present a response to the client/parent/companion within **three (3) working days** from the day the Vice President or designee receives the grievance.

b. The Vice President or designee's proposed response will be recorded in Section 3 of the Grievance Report Form.

c. If the reply is being sent by mail, it will be sent certified mail with return receipt requested.

d. If the Vice President or designee is not able to contact the client/parent/companion within three (3) days, he/she will document the reason for the delay on the grievance form and contact the Risk Management and Safety Director explaining the delay.

e. The client/parent/companion has **three (3) working days** to review, respond, and sign off on the proposed response. The form will then be forwarded to the Risk Management and Safety Director **within 24 hours** of obtaining the client's/parent's/companion's signature.

f. If the client/parent/companion does not respond to the grievance within the 3 working days' time frame, the grievance is considered resolved.

11. If the problem is not resolved to the client's/parent's/companion's satisfaction, the grievance will be sent to the Chief Operating Officer or designee.

a. The Chief Operating Officer or designee will review the concern and present a response to the client/parent/companion within **three (3) working days** from the day the Chief Operating Officer or designee receives the grievance.

b. The Chief Operating Officer or designee's proposed response will be recorded in Section 4 of the Grievance Report Form.

c. If the reply is being sent by mail, it will be sent certified mail with return receipt requested.

d. If the Chief Operating Officer or designee is not able to contact the client/parent/companion within three (3) days, he/she will document the reason for the delay on the grievance form and contact the Risk Management and Safety Director explaining the delay.

e. The client/parent/companion has **three (3) working days** to review, respond, and sign off on the proposed response. The form will then be forwarded to the Risk Management and Safety Director **within 24 hours** of obtaining the client's/parent's/companion's signature.

f. If the client/parent/companion does not respond to the grievance within the 3 working days' time frame, the grievance is considered resolved.

12. If the client/parent/companion remains unsatisfied with the proposed resolution, the grievance will be sent to the Chief Executive Officer (CEO).

a. The CEO will review the grievance and the attempted resolutions and present a response to the client/parent/companion within **fourteen (14) working days** of the CEO receiving the grievance.

b. The CEO's resolution will be recorded in Section 5 of the Grievance Report Form. A copy of the form sent to the client/parent/companion with the proposed resolution should be sent to the Risk Management and Safety Director **within 24 hours**.

c. If the reply is being sent by mail, it will be sent certified mail with return receipt requested.

d. The client/parent/companion has **three (3) working days** to review, respond and sign off on the proposed response. The form will then be forwarded to the Risk Management and Safety Director **within 24 hours** of obtaining the client's/parent's/companion's signature.

e. If the client/parent/companion does not respond to the grievance within the three working days time frame, the grievance is considered resolved.

13. If the decision of the CEO is not satisfactory to the client/parent/companion, the client/

parent/companion may submit a written appeal to the CEO's office within three (3) working days of receipt of the CEO's response requesting that the appeal be submitted to

PAR's Board of Directors for review.

a. The Board of Directors will send a written response to the client/parent/ companion within thirty (30) working days after the Board receives the grievance.

b. Copies will also be sent to the CEO and the Risk Management and Safety Director.

c. The decision of the Board of Directors will be final.

14. If at any time during the grievance process the client/parent/companion wishes to take

his/her grievance to an external agency or if the client/parent/companion does not feel that the grievance has been resolved satisfactorily or fairly, he/she will be advised of the right to file a complaint with the District Alcohol, Drug Abuse and Mental Health Program Office (ADM).

a. Any complaint that cannot be resolved by the Florida Department of Children & Families ADM Program Office can be referred in writing, by telephone or in person to the District Administrator of the local district.

15. If a client/parent/companion who is funded by Central Florida Behavioral Health Network

(CFBHN) does not feel that the grievance has been resolved satisfactorily or fairly, he/she will be advised of the right to file a complaint with Central Florida Behavioral Health Network (CFBHN).

16. Submitted grievances will be maintained confidentially for a period of three (3) years by

the Risk Management Department.

17. The Civil Rights Division is the primary institution within the federal government responsible for enforcing federal statutes prohibiting discrimination on the basis of race, disability, religion, and national origin.

Customers, potential customers, and companions who believe they have been the victim of discrimination by any reason of a disability in the provision of the benefits or services may file a written complaint of discrimination within 180 days of the alleged discriminatory act(s) with departments of civil rights at DCF, HHS, the United States Department of (USDOJ), and USDOJ Disability Rights Section.

a. The Civil Rights Division:

202-514-4609 (voice); 202-514-0716 (TDD)

b. Americans with Disabilities Act:
 800-514-0301 (VOICE); 800-514-0383 (TTY) (also in Spanish)

c. Section 508:
 202-305-8304 (voice); 202-353-8944 (TTY)

d. HHS:
 webmaster@oig_hhs.gov
 1-800-447-8477 (1-800-HHS-TIPS) (voice); 1-800-377-4950 (TTY)

Revised 4/28/19

2.2 Complaint Form

A copy of the complaint form is provided in the **Appendix C** (See **Appendix C**).

3.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Operation PAR, 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 Operation PAR, 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].

Operation PAR, Inc. has had [no] investigations, complaints, or lawsuits involving allegations of discrimination in its transportation program 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

Not Applicable: Operation PAR, Inc. does not provide transportation to the general public. Transport in Operation PAR vehicles is limited to current clients only.

5.0 Language Assistance Plan

Operation PAR Inc. provides limited transportation to clients within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address Operation PAR Inc. 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 Operation PAR, Inc's. service area there are 121,800 residents or 13.7% who describe themselves as not able to communicate in English very well (Source: US Census). Operation PAR, 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. The LAP is included in this Title VI Plan as **Appendix E**.

Transit Planning and Advisory Bodies

[Operation PAR Inc. does not have a transit-related committee or board; therefore, this requirement does not apply.]

Title VI Equity Analysis

[Operation PAR Inc. has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Operation PAR Inc. does not have any Title VI Equity Analysis reports to submit with this Plan.]

6.0 Appendices

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

Appendix A
Title VI Plan Adoption Meeting Minutes

**Operation PAR, Inc.
Board of Directors
Finance Committee Meeting
Date: August 4, 2023
11:30 a.m.**

Board Members	Staff/Guests
<input checked="" type="checkbox"/> Joseph Saunders	<input checked="" type="checkbox"/> Dianne Clarke
<input checked="" type="checkbox"/> David Pilkington	<input checked="" type="checkbox"/> Amy Scholz
<input checked="" type="checkbox"/> John Waechter	<input checked="" type="checkbox"/> Jim Miller
<input checked="" type="checkbox"/> Tina Gilmore-Johnson	<input checked="" type="checkbox"/> Craig Douglas
<input type="checkbox"/> Le Anne Lake	

Agenda Item – Review FDOT Title VI Plan

Dianne reported on the non-discrimination transportation plan (FDOT Title VI) with the current census numbers for the Board to approve.

A motion was made by Joseph Saunders and seconded by Tina Gilmore-Johnson to accept the FDOT Title VI Plan as presented. All were in favor. Motion carried.

Dianne L. Clarke, PLD

Appendix B

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

Operation PAR, Inc.

- Operation PAR, 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 Operation PAR, Inc.
- For more information on Operation PAR, Inc. civil rights program, and the procedures to file a grievance, contact 727-456-3201 (TTY 800-752-6096); www.operationpar.org or visit our administrative office at 6655 66th Street North, Pinellas Park FL 33781. For more information, visit www.operationpar.org.
- If information is needed in another language, contact 888-727- 6398.
- Si se necesita información en otro idioma, comuníquese con 888-727- 6398.

Appendix C
Title VI Complaint Form

Operation PAR 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:

Juan A. DeLeon, JD CHC
 Compliance Officer
 Operation PAR
 6655 66th Street North
 Pinellas Park, FL 33781

Appendix D

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Operation PAR Inc. was developed to ensure that all clients of the program, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Operation PAR 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 Our clients with effective access to information about Operation PAR Inc. services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Operation PAR Inc

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all clients we provide services, including, but not limited to, low-income, minority and LEP groups to comment on Operation PAR Inc. and its operations. The goals for this PPP include:

Inclusion and Diversity: Operation PAR Inc. will proactively reach out and engage low-income, minority, and LEP populations for the Operation PAR Inc. service area so these groups will have an opportunity to participate.

Accessibility: All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.

Clarity and Relevance: Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Clients of Operation PAR Inc. will be made aware that, as a client there are no fares or charges for transportation services.

Responsive: Operation PAR Inc. will strive to respond to and incorporate, when possible, appropriate comments into transportation decisions.

Tailored: Public participation methods will be tailored to match local and cultural preferences as much as possible.

Flexible: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

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

Operation PAR Inc. will open up for discussion transportation needs and concerns in monthly community Council meetings at our residential programs.

Operation PAR Inc. will conduct survey on transportation related services every quarter at our residential programs to help generate feedback for improvements.

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.

Appendix E
Language Assistance Plan (LAP)

I. individuals from Introduction

Operation PAR Inc. operates a transit system within [Pinellas County]. The Language Assistance Plan (LAP) has been prepared to address Operation PAR Inc. 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. Operation PAR Inc. service area there are 121,800 residents or 13.7% who describe themselves as not able to communicate in English “very well” (Source: US Census). Operation PAR 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. Operation PAR 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).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Operation PAR Inc. be able to communicate effectively with all of its riders. When Operation PAR Inc. is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Operation PAR Inc. is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency’s services in accordance with Title VI.

This plan will demonstrate the efforts that Operation PAR Inc. undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas

- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Operation PAR Inc. staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

Operation PAR Inc. does not provide Public transportation. We provide transport to any residential Client needing transportation services. This four factor Analysis is based on Operation PAR Inc. Annual Census.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that Operation PAR 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 Operation PAR Inc. program, activity or service.
2. The frequency with which LEP persons come in contact with Operation PAR Inc. programs, activities or services.
3. The nature and importance of programs, activities or services provided by Operation PAR Inc. to the LEP population.
4. The resources available to Operation PAR 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 4,497 residential clients Operation PAR Inc. serviced 24 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Operation PAR Inc. services. For the Operation PAR Inc. service area, the Annual Census shows that among the Clients Sevcided 99.4% speak English “very well”. For groups who speak English “less than very well”, 0.38%% speak Spanish and 0.07% 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 Operation PAR 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 different language groups. The more frequent the

contact with a particular LEP language group, the more likely enhanced services will be needed.

Operation PAR 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 Spanish speaking is the largest population encountered that speak English "Less than Very Well" Phone inquiries and staff survey feedback indicated that Operation PAR Inc. dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Operation PAR 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

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

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

Operation PAR Inc assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: Access to translator when necessary, and translated documentation to provide to LEP clients. Operation PAR Inc provides a reasonable degree of services for LEP populations in its service area.

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.

Operation PAR Inc has identified the number and proportion of LEP individuals within its service area using Residential Census data As presented earlier, 99.4% of the service area population speaks English only. The largest non-English spoken language in the service area is [Spanish] (0.37%). Of those who primary spoken language is [Spanish] approximately 0.38% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or [Spanish] and who identify themselves as speaking English less than “very well” account for 0.16% of the service area population.

Operation PAR Inc may identify language assistance need for an LEP group by:

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

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 Operation PAR Inc has undertaken the following actions to improve access to information and services for LEP individuals:

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

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

c. Element 3: Training Staff

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

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing

staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Operation PAR Inc, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and [other language].

The following training will be provided to Customer Service Representative:

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

d. Element 4: Providing Note to LEP Persons

Operation PAR Inc will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Operation PAR office lobby, and on vans. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

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

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

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

IV. Safe Harbor Provision

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

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

Operation PAR Inc service area [does not] have LEP populations which qualify for the Safe Harbor Provision.

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

Section V

POLICY and PROCEDURE

Policy Name: Interpreters

POLICY: To make every reasonable effort to establish various methods of communications which can be easily understood by service participants.

PURPOSE: To assist clients with various levels of functioning/abilities to actively participate in services.

PROCEDURE:

1. Staff will screen participants and/or companions prior to assessment to determine if assistive technology is needed for effective communication. If there is a communication need, the "Customer or Companion Waiver for Free Interpreter Service" and "Communication Assessment and Auxiliary Aid and Service Record" forms (located on shared/forms/ada) are completed for each session. The forms are then forwarded to the Single Point of Contact for communication assistance within 24 hours of the service or event.

2. Assistive technology may include, but is not limited to, reading forms to clients, use of TDD system, obtaining interpreters/translators, videos, and use of flash cards to assist with the assessment process. Other needs will be determined on an individual basis.

3. To accommodate the needs of hearing and/or speech impaired individuals, there is a statewide toll free number, which can be called for assistance (Florida Telephone Relay System). The program answering the toll free number will provide all assistance needed to communicate with or to a hearing/speech impaired person by telephone. The toll free number for individuals with a TDD (to relay to voice) is 1-800-955-8771 or voice (to relay to TDD) is 1-800-955-8770 or for either TDD or voice is 711. For individuals with video capabilities, a toll-free number is available at 1-866-327-8877 (Sorenson VRS).

4. Staff should forward information regarding needs for specific assistive technology to the program supervisor for assessment of reasonable accommodations and procurement of

appropriate materials:

a. The Florida Telecommunications Relay, Inc. can assist in providing hearing aid equipment and assistive technology for free for County residents.

i. Bradenton 941-758-2539 ii. Fort Myers 941-461-0334 iii. Pinellas Park 727-541-4488 iv. Port Richey 727-816-1314 or 1-800-940-3323 v. Sarasota 941-921-5447 vi. Tampa 813-933-4858

5. Attempts will be made, using interpreters, to assist individuals who are unable to communicate in English.

a. The Human Resources Department maintains a list of available staff for use in interpreter services. The list is updated at least annually and can be located at [shared/forms/ada](#).

b. In addition, contracted or local community resources for interpreters can be accessed by contacting the Single Point of Contact. Releases should be obtained for interpreters not contracted with Operation PAR.

c. For urgent situations where a resource is not available through a or b above, staff may obtain supervisor approval to contact Language Line Solutions as follows:

i. Dial 1-888-808-9008 ii. Provide Operation PAR's PIN: 84782740 iii. Indicate the desired language needed for translation. (If unsure what language is needed, there is "Language Identification Desktop Display Poster" available in [shared/forms/ada](#) which can be shown to client to select their language.) iv. When prompted if you would like assistance in dialing a third party, say "NO" v. At the conclusion of the call, a progress note should be entered in Avatar indicating that Language Line Solutions interpreter services were used.

6. For each case that the participant or companion requests an interpreter service the "Customer/Companion Communication Assessment and Auxiliary Aid/Service Record"

and "DCF Customer/Companion Feedback" forms (located on [shared/forms/ada](#)) are completed at each event. The forms are the

Appendix F

Operating Area Language Data: Operation PAR, Inc. Service Area

Not Applicable: Operation PAR, Inc. does not provide transportation to the general public. Transport in Operation PAR vehicles is limited to current clients only

Annual Client Census Data Operation PAR Inc. 7/01/2020 – 6/30/2023

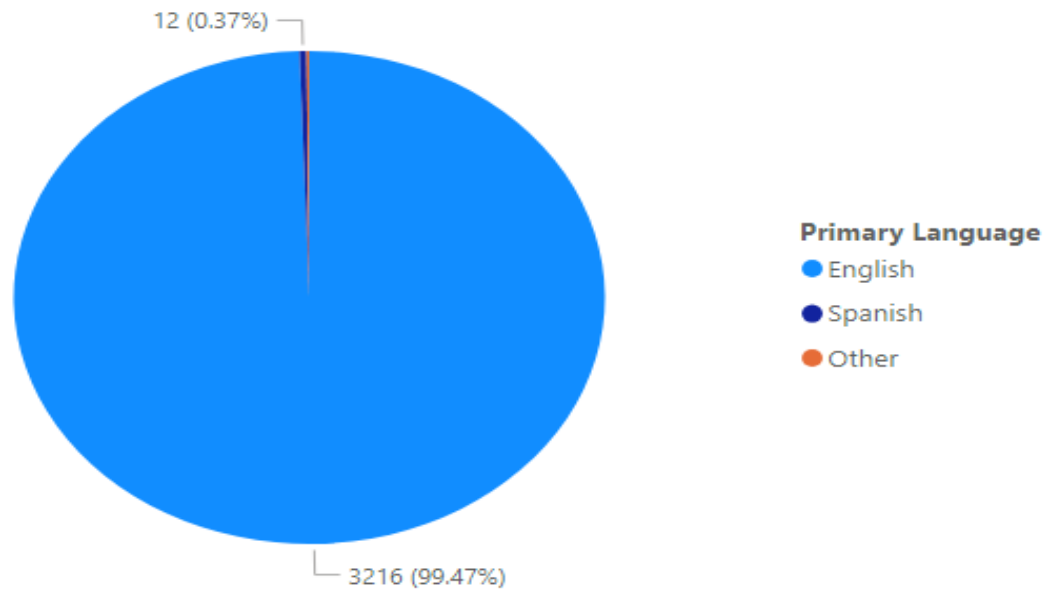
Row Labels	Count of PATID	Count of PATID2
English	3216	99.47%
Other	5	0.16%
Spanish	12	0.37%
Grand Total	3233	100.00%

Census

Data as of 7/28/23, 3:09 PM

Admissions

BY PRIMARY LANGUAGE



Appendix G

Demographic Maps

Pinellas County Limited English Proficiency by Census Block Group

