



COUNCIL ON AGING OF ST. LUCIE, INC.

1505 ORANGE AVENUE • FT. PIERCE, FL 34950 • PHONE (772) 465-5220 • (772) 465-3929
2501 SW BAYSHORE BLVD. • PORT ST. LUCIE, FL 34984 • OFFICE: 772-336-8608 • FAX: 772-336-3314

COUNCIL ON AGING OF ST. LUCIE, INC. COMMUNITY TRANSIT

TITLE VI PLAN

2020

Updated March 2020

Revised and Updated October 2020

Revised and Updated March 2021

TITLE VI CHECKLIST

General Requirements (Chapter III)

All recipients must submit:

- ✓ Title VI Notice to the Public, including a list of locations where the notice is posted
- ✓ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ✓ Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits NA
- ✓ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ✓ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ✓ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions NA
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc. NA
- ✓ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ✓ Concurrence letter from FDOT.
- ✓ Complaint Procedure and forms samples.

Requirements of Transit Providers (Chapter IV)

All Fixed Route Transit Providers must submit:

- ✓ All requirements set out in Chapter III (General Requirements)
- ✓ Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- ✓ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode



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GENERAL REPORTING REQUIREMENTS

Title VI of the Civil Rights Act of 1964 (Title VI), states the following: "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 subjected to discrimination under any program or activity receiving Federal financial assistance."

The Department of Justice and the Department of Transportation regulations implementing Title VI, require Federal agencies to collect data and other information to enforce Title VI. In this regard, Council on Aging of St. Lucie, Inc. (COASL) as an applicant, and/or recipient, or sub recipient receiving Federal funding, hereby provides to FTA the following information:

- A. There are NO active lawsuits, investigations or complaints naming COASL which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- B. COASL annually applies for Federal financial assistance for service programs funded through the Older Americans Act. Applications for Sections 5310, 5311, 5309 and 5307 are submitted as well. COASL does not extend federal financial assistance to a subrecipient.
- C. COASL to date has not been subject to any civil rights compliance review activities.
- D. A signed FTA Certification and Assurances that all of the records and other information required under circular 4702.1B have been or will be compiled, as appropriate, is hereby submitted to FTA and maintained by the COASL.
- E. COASL has not constructed a facility with federal funds requiring Title VI Equity Analysis since the last Title VI Program submission.

Submitted by: David Rodriguez
Transit Director, VP/CTO

Approved by: 
Darrell J. Drummond
President/CEO



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A **RESOLUTION** of the Board of Directors of the Council on Aging of St. Lucie, Inc. authorizing the signing and submission of the Title VI Plan and assurances to the Federal Transit Administration.

WHEREAS, the Council on Aging of St. Lucie, Inc./Community Transit has reviewed and accepted the Title VI plan to be submitted to the Federal Transit Administration as authorized by Title VI of the Civil Rights Act of 1964, as amended;

NOW, THEREFORE, BE IT RESOLVED BY THE Board of Directors of the Council on Aging of St. Lucie, Inc., Fort Pierce, FLORIDA:

1. This resolution applies to the review and approval of the Title VI Plan to be submitted to the Federal Transit Administration.
2. The submission of the Title VI Plan and assurances to the Federal Transit Administration is approved.
3. Darrell J. Drummond, President/Chief Executive Officer is authorized to sign and submit the Title VI Plan.

DULY PASSED AND ADOPTED THIS 29th day of October, 2020.

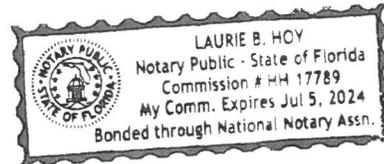
By Andre Hawkins
Andre Hawkins
Chairman of the Board

STATE OF FLORIDA

COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 29th day of October, 2020 by Andre Hawkins as Chairman of the Board of Directors for Council on Aging of St. Lucie, Inc.

Laurie B. Hoy



Personally Known Or Produced
Identification _____

Type of Identification Produced _____



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DULY PASSED AND ADOPTED THIS 31st day of March, 2021.

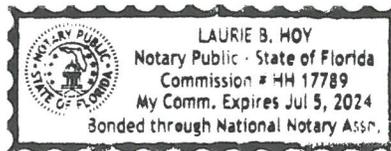
By: Andre Hawkins
Andre Hawkins
Chairman of the Board

STATE OF FLORIDA

COUNTY OF ST. LUCIE

The foregoing instrument was acknowledged before me this 6th day of April, 2021 by Andre Hawkins as Chairman of the Board of Directors for Council on Aging of St. Lucie, Inc.

Laurie B. Hoy



Personally Known ✓ Or Produced Identification _____

Type of Identification Produced _____

FEDERAL FISCAL YEAR 2020 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Council on Aging of St. Lucie, Inc.

The Applicant certifies to the applicable provisions of categories 01-20. XX

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	_____
02 Public Transportation Agency Safety Plans	_____
03 Tax Liability and Felony Convictions	_____
04 Lobbying	_____
05 Private Sector Protections	_____
06 Transit Asset Management Plan	_____
07 Rolling Stock Buy America Reviews and Bus Testing	_____
08 Urbanized Area Formula Grants Program	_____
09 Formula Grants for Rural Areas	_____
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	_____

Certifications and Assurances

Fiscal Year 2020

- 12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs
- 13 State of Good Repair Grants
- 14 Infrastructure Finance Programs
- 15 Alcohol and Controlled Substances Testing
- 16 Rail Safety Training and Oversight
- 17 Demand Responsive Service
- 18 Interest and Financing Costs
- 19 Construction Hiring Preferences
- 20 Cybersecurity Certification for Rail Rolling Stock and Operations

FEDERAL FISCAL YEAR 2020 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE

PAGE

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2020)

AFFIRMATION OF APPLICANT

Name of the Applicant: Council on Aging of St. Lucie, Inc.

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2020, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2020.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

Certifications and Assurances

Fiscal Year 2020

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature [Handwritten Signature] Date: 3/9/2020

Name Darrell J. Drummond/President/CEO Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Council on Aging of St. Lucie, Inc.

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award

Signature [Handwritten Signature] Date: 3/11/2020
Name Padrick A. Pinkney Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

The following notices have been placed:

On all transit buses
At the Administration Facility
At the Intermodal Facility
In the brochures
On the Website.

ADVIERTA AL PUBLICO

Es aconsejado por favor que el Concilio en el Envejecimiento de St. Lucie, S.a.
División de Tránsito opera según el

La Regulación de título VI, 49CFR, Parte 21,
que indica:

**“NO PERSONAS NI EL GRUPO DE PERSONAS IR SON
DISCRIMINADOS EN CONTRA CON RESPECTO AL DIRIGIR,
PLANIFICAR NI CALIDAD DE SERVICIO DE TRANSPORTE POR
CARRERA, EL COLOR NI ORIGEN NACIONAL.”**

Si usted se siente que usted ha sido discriminado en contra con respecto al arriba y querría
registrar una queja,

llama por favor:
772-345-8229

NOTICE TO THE PUBLIC

Please be advised that the Council on Aging of St. Lucie, Inc.'s

Transit Division operates according to the

Title VI Regulation, 49CFR, Part 21,

which states:

**"NO PERSON OR GROUP OF PERSONS SHALL BE DISCRIMINATED
AGAINST WITH REGARD TO THE ROUTING, SCHEDULING OR
QUALITY OF SERVICE OF TRANSPORTATION ON THE BASIS OF
RACE, COLOR OR NATIONAL ORIGIN."**

If you feel you have been discriminated
against in reference to the above and would like
to register a complaint, please call:

772-345-8229

**COUNCIL ON AGING OF ST. LUCIE, INC.
COMMUNITY TRANSIT
TITLE VI COMPLAINT PROCEDURES**

This section outlines the Title VI complaint procedures related to providing programs or services administered by Council on Aging of St. Lucie, Inc./Community Transit (CT). However, it does not deny the complainant the right to file formal complaints with the Federal Transit Administration, or seek counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Council on Aging of St. Lucie, Inc./Community Transit's (CT) Title VI Program Coordinator, 1505 Orange Avenue, Fort Pierce, FL 34984. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Program Coordinator may be utilized for resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Program Coordinator will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination when the Complainant became aware of the alleged act of discrimination or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI Program Coordinator will determine its jurisdiction, acceptability, need for additional information, as well as assign the complaint to investigate the merit of the complaint.
3. The Complainant will be provided with a written acknowledgement that CT has either accepted or rejected the complaint.

4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin.
 - c. The allegation must involve a CT program or service that receives Federal financial assistance.
5. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once the complaint is accepted for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will then be logged in a database identifying: Complainant's name, basis, alleged harm, race, color and national origin of the Complainant.
7. Within 90 calendar days of the acceptance of the complaint, the Title VI Program Coordinator will prepare an investigative report for review by the President. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The investigative report and its findings will be reviewed by the President and in some cases the investigative report and findings will be reviewed by CT's Legal Counsel. The report will be modified as needed.
9. The President/Legal Counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event CT is in noncompliance with Title VI regulations remedial actions will be listed.
10. Notice of the President's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. CT will reconsider this determination, if new facts, come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by CT, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, Attention: Director, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

11. A copy of the complaint and CT's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

RECORD KEEPING REQUIREMENT

The Title VI Coordinator will ensure that all records relating to Title VI Complaint Process are maintained with department records. Records will be available for compliance review audits.



U.S. Department of Transportation
Federal Transit Administration

Civil Rights Complaint Form

The Federal Transit Administration Office of Civil Rights is responsible for ensuring that providers of public transit properly implement several civil rights laws and programs, including Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990 (ADA), the Disadvantaged Business Enterprise (DBE) program, and the External Equal Employment Opportunity (EEO) program.

In the FTA complaint investigation process, we analyze the complainant's allegations for possible deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe.

Please mail your completed form to:

**Director, FTA Office of Civil Rights
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590**

If you have questions about how to prepare a complaint, you may contact our toll-free FTA Assistance Line at 1-888-446-4511. More information about transit-related civil rights requirements may be found on the FTA's website at www.fta.dot.gov.

Note: Apart from the form, *on separate pages*, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint, including any related correspondence from your transit provider.

Important: We cannot accept your complaint without a signature, so please sign on the last page of the form after printing out.

Section I

I believe that I have been (or someone else has been) discriminated against on the basis of:

- Race / Color / National Origin
- Disability
- Not Applicable
- Other (specify)

I believe that a public transit provider has failed to comply with the following program requirements:

- Disadvantaged Business Enterprise
- External Equal Employment Opportunity
- Not Applicable
- Other (specify)

Section II

Name:

Street Address:

City: State:

Zip Code:

Telephone Numbers:

Home:

Cell:

E-Mail Address:

Accessible format requirements:

Large Print

Not Applicable

Other

Section III

Are you filing this complaint on your own behalf?

Yes No

[If you answered "yes" to this question, go to Section IV.]

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 IV

Have you previously filed a civil rights complaint with FTA? Yes No

If yes, what was your FTA Complaint Number?

Have you filed this complaint with any of the following agencies?

Transit Provider

Department of Transportation

Department of Justice

Equal Employment Opportunity Commission

Other

If yes, please attach a copy of any response you received to your previous complaint.

Have you filed a lawsuit regarding this complaint?

Yes No

If yes, please provide the case number and attach any related material.

Note: FTA encourages, but does not require, riders to first file complaints with their local transit agencies to give them an opportunity to resolve the issue.

Section V

Name of public transit provider complaint is against:

Contact person

Title

Telephone number

Section VI

May we release your identity and a copy of your complaint to the transit provider?

Yes

No

Note: We may be unable to investigate your allegations without permission to release your identity and complaint.

Please sign here: _____

Date:

Note: We cannot accept your complaint without a signature.

COMMUNITY TRANSIT
COMPLAINT FORM

Name of person taking complaint: _____

Employee Signature Date

Transit Road Operations Director Signature Date

Transit Director / VP CTO Signature Date

Resolved ()

Forwarded to the President / CEO ()

Public Participation Plan

Purpose of the Public Participation Plan

In accordance with Title VI of the Civil Rights Act 1964, Executive Order 13166 and related authority, the DOT Order on Limited English Proficiency and Federal Transit Administration (FTA) Circular 4702.1B, the Council on Aging of St. Lucie, Inc./Community Transit (CT) has developed this Public Participation Plan (PPP) to guide public involvement efforts and improve access to CT's transit's decision making process by low-income, minority and Limited English Proficiency (LEP) populations.

The PPP describes the methods that CT will use to reach out to low-income, minority and LEP populations through means other than written communication. The PPP is not a static document. CT will continue to modify its public participation activities over time based on feedback and direction provided by community members and by evaluating specific performance measurements for public participation.

All major transit plans such as Transportation Disadvantaged Service Plan and the Transit Development Plan will follow the Transportation Planning Organization's Public Involvement Plan. These plans are developed by Consultants requiring major public participation from all groups including low income and minority groups.

All significant service or fare changes or just to disseminate information to the public will follow the following public involvement process:

Public Involvement Process Objectives:

1. Comply with the Federal and State regulations.
2. Provide opportunities for local citizens and citizen-based organizations to provide input on plans, projects or policies of CT.
3. Inform, educate and receive input from citizens and other interested parties about ongoing CT's planning activities.

Notice to Public:

All CT buses will have posted in plain sight a Notice to Public in both Spanish and English indicating the Title VI Regulation and how to register a complaint.

Community-Based Organizations:

CT will continue to establish contact with community-based organizations that represent the population of St. Lucie County. Information will be provided to contacts of the organization or a presentation will be made, if requested. Should a presentation be made to a specific organization, ample time will be made for questions and answers as well as receiving feedback from the group.

Public Meetings:

A Public Meeting is a great venue to disseminate information and proposed changes of the transit system and receive public input. One of the greatest challenges in conducting Public Meetings is lack of attendance.

The following notification methods will be pursued to inform individuals/organizations of St. Lucie County of upcoming public meetings. The notifications will be available in different formats upon request.

- Meeting information will be sent to community-based organizations.
- At various transit related committee meetings, announcements will be made of the upcoming public meeting.
- Signs, in plain sight, will be posted on all CT's buses.
- A request will be made of local government TV stations to post the public meeting notice.
- Post the Public Meeting Notice on CT's website.
- Posting of the Meeting in the local newspaper.
- Public Service Announcements
- Continuation to explore new/alternative ways to reach the residents of the community.

Meetings will be held at ADA accessible locations. At least two meetings will be held, one in Port St. Lucie and one in Fort Pierce. These meetings will be held during transit's service hours to assure transportation disadvantaged individuals have transportation. Upon request, materials and/or a translator will be available at the meeting in the language requested.

Information will be disseminated via a power point or some visual aid. The information will be clear and understandable. The information will indicate why the change is necessary, if applicable, what the change is and ample time for discussion and to receive comments from the audience. Should an individual be unable to make the public meeting, a comment card will be provided and time will be allowed to receive the cards via mail or email (approximately two full weeks.) The comment cards will be given to each participant for convenience if they do not wish to speak.

On new services a public meeting will be held at the affected City's Board Meeting and the Transportation Planning Organization. These meetings are televised, therefore, reaching more community residents.

All comments, both verbally and written, will be reviewed and considered in the implementation of the final project.

Surveys:

Transit surveys the fixed route monthly to determine demographics and to receive public comment on improvements of its service. When conducting these surveys a transit representative is on the bus to assist individuals with filling out the surveys.

Events:

Council on Aging of St. Lucie, Inc. participates through its marketing department and represents transit at all special events. Information about the transit system is disbursed along with contact information.

Performance Measures:

Some measurable performance objectives CT will consider include:

- Number of participants attending public meetings.
- Percent of the participants from a specific geographic area
- Number and percent of participants providing feedback in languages other than English.
- Number and percent of responses received to a survey
- Number and percent of responses received from the comment card.
- Increased number of community-based organizations contact information.
- Number and percent of participants expressing satisfaction regarding the process or results of a participation activity.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

COUNCIL ON AGING OF ST. LUCIE, INC. COMMUNITY TRANSIT

INTRODUCTION

This Limited English Proficiency (LEP) Plan has been prepared to address Council on Aging of St. Lucie, Inc/Community Transit's responsibilities as a recipient of federal assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 11, 2012, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

PLAN SUMMARY

Community Transit has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency, who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Community Transit prepared the U.S. Department of Transportation four factor LEP analysis as follows:

FOUR FACTOR ANALYSIS:

(1) The number and proportion of LEP persons served or encountered in the eligible service population:

Council on Aging annually reviews the ability of St. Lucie County's population to speak English through the U.S. Census Bureau – 2013-2017 American Community Survey Selected Social Characteristics in the US - Language Spoken at Home for the Population 5 Years and Over attached. The analysis for St. Lucie County is as follows:

		<u>Percentage</u>
<i>Population – 5 years and over</i>	283,022	100%
<i>Speaks only English</i>	220,580	77.9%
<i>Speaks English "Less than Well"</i>		
Spanish	17,868	6.3%
Europe	5,868	2.1%
Asian	1,169	*
Other	468	*

*Less than 1%

(2) The frequency with which LEP individuals come into contact with the program, activity, or service:

Council on Aging provides a public transit service for visitors and residents of St. Lucie County. In evaluating call data LEP persons are predominantly using the fixed route system. Transit receives an average of approximately 1 phone call per week requesting Spanish from 250 phone calls per week, less than 1% per week. The demand response system creates an average of approximately 400 calls daily and of these calls, Spanish is requested approximately 5 times a day, approximately 1%. Therefore, there is a need for Spanish literature and bilingual staff to satisfy the needs of our LEP customers.

(3) The nature and importance of the program activity or service provided by the program:

Besides the evaluation of phone data, Council on Aging surveys riders. One of the questions on the survey is the rider's ethnicity. It has been determined that approximately 18% of fixed route riders are Hispanic. Of that 18%, the survey suggests that they are using predominantly route schedules and maps to access the service.

Based upon the above data, Council on Aging recognizes the importance of providing brochures and signs in Spanish for our Hispanic LEP riders.

(4) The resources available to the recipient and costs:

According to the analysis of the data (service population – 6.3% LEP Spanish population, call data – 1% of demand response callers require Spanish and on-board surveys 18% of riders are Hispanic predominantly using route schedules and maps to access service), Council on Aging provides Spanish rider guides including fixed route and demand response service. In addition Council on Aging has office staff that speak fluent Spanish, as well as drivers who are bilingual in Spanish or Creole. All signs posted on bus, i.e. Title VI Regulation Notice to Public are provided in Spanish. Treasure Coast Connector’s website www.treasurecoastconnector.com also has a category Espanol which provides the whole website information in Spanish.

Council on Aging uses Translations USA to translate brochures and signs into Spanish. Translations USA charges twelve (12) cents per word.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to public transit programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. Community Transit will determine when interpretation and/or translation are needed and are reasonable. How Community Transit staff may identify a LEP person who needs language assistance:

- Examine 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.
- Periodically survey staff on their experience concerning any contacts with LEP persons.
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on Community Transit’s programs and services.
- Placement of statements in notices and publications that translation service is available.

STAFF TRAINING

The following training will be provided to staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

OUTREACH TECHNIQUES

- Staff will continue to provide notices on buses in both Spanish and English.
- Should a customer request to speak with a Spanish or Creole speaking person, staff will refer the individual to the interpreter.
- Staff will continue to document requests for language assistance.
- Brochures will continue to be printed in Spanish.

MONITORING, EVALUATING AND UPDATING LEP PLAN

It is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics of the County and the transit system. Community Transit will update the LEP Plan annually as census information may be obtained or when a higher concentration of LEP individuals are present in the transit service area.

Community Transit will assess its plan as follows:

- Determine how the needs of LEP person have been addressed.
- Determine the current LEP population in the service area and whether the need for translation services has changed.
- Determine whether the goals of the LEP Plan have been obtained.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

DISSEMINATION OF THE LEP PLAN

- Continue to educate human service organizations and staff of the LEP Plan and its availability.
- Provide the plan upon request by telephone, fax, mail or in person.

Questions or comments regarding the LEP Plan may be submitted as follows:

David Rodriguez, Transit Director, VP/CTO
Community Transit
1505 Orange Avenue
Fort Pierce, FL 34950
Phone (772) 464-7433
Fax (772) 465-1682

MEMBERSHIP TABLE

TABLE DEPICTING COUNCIL ON AGING OF ST. LUCIE, INC.'S MEMBERSHIP BROKEN DOWN BY RACE.

	CAUCASIAN	AFRICAN AMERICAN	HISPANIC
POPULATION of Board	50%	50%	
POPULATION of Management Team	37%	37%	26%
POPULATION of Staff	27%	55%	18%

Process the Agency uses to Encourage Board Participation of Minorities

Council on Aging of St. Lucie, Inc. (COASL) is a small board consisting of eight members. This Board makes policy and planning decisions for COASL. Three of the members on the board are elected officials assigned to the COASL Board by their Councils. The rest of the membership consists of non-elected members. COASL relies mostly on their membership through referrals. Members are recruited based on their area of expertise allowing for maximum strength in the decision making process. Although, COASL does not recruit members on a race conscious basis, minority participation is strong on the Board.

TITLE VI Plan Concurrence and Adoption

This TITLE VI Plan received FDOT concurrence on _____.

The Plan was approved and adopted by Council on Aging of St. Lucie, Inc.'s Board of Directors during a meeting held on _____. A copy of the meeting minutes and FDOT Concurrence letter is included in this plan.

APPENDIX