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#### ****ANGELS UNAWARE, INC.****

**TITLE VI PLAN**

**ADOPTED: January 6, 2020**

# 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].*

Angels Unaware, 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.

Angels Unaware, 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.
   * Ross O’Banion is the designated Liaison
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against Angels Unaware, Inc.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency’s programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

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

Signature

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Ross O’Banion

Executive Director/Angels Unaware, Inc./January 6, 2020

## Title VI Plan Concurrence and Adoption

**Your Agency will submit the Title VI Plan to FDOT for concurrence every three (3) years or any time a major change in the Plan occurs.**

This Plan was approved and adopted by Angels Unaware, Inc. Board of Directors during a meeting held on January 6, 2020. A copy of the meeting minutes is included in **Appendix A** of this Plan.

# Title VI Notice to the Public

## 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.

## Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Angels Unaware, 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 Angels Unaware, Inc. office(s) including the reception desk and meeting rooms, and on the Angels Unaware, Inc. website at Angelsunaware.com. Additionally, Angels Unaware, 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. The public notice must be provided in any other language which meets the Safe Harbor threshold (See Appendix E).

# Title VI Procedures and Compliance

## Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Angels Unaware, Inc. may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form (see **Appendix C**). Angels Unaware, Inc. investigates complaints received no more than 180 days after the alleged incident. Angels Unaware, Inc. will process complaints that are complete.

Once the complaint is received, Angels Unaware, Inc. will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

Angels Unaware, Inc. has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Angels Unaware, Inc. may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, Angels Unaware, Inc. can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public Angels Unaware, Inc. website ([www.angelsunaware.com](http://www.angelsunaware.com)).

## Complaint Form

A copy of the complaint form in English and [other languages if necessary] is provided in the **Appendix C** and on Angels Unaware, Inc. website ([www.Angelsunaware.com](http://www.Angelsunaware.com)). The complaint form must be provided in any languages spoken by the LEP population which meet the Safe Harbor threshold (See **Appendix C**).

# Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Angels Unaware, 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 Angels Unaware, 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].

Angels Unaware, Inc. has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

**Table 1: Summary of Investigations, Lawsuits, and Complaints**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Date**  **(Month, Day, Year)** | **Summary**  **(include basis of complaint: race, color, or national origin)** | **Status** | **Action(s) Taken** |
| Investigations |  |  |  |  |
| 1. |  |  |  |  |
| 2. |  |  |  |  |
| Lawsuits |  |  |  |  |
| 1. |  |  |  |  |
| 2. |  |  |  |  |
| Complaints |  |  |  |  |
| 1. |  |  |  |  |
| 2. |  |  |  |  |

# Public Participation Plan

The Public Participation Plan (PPP) for Angels Unaware, Inc. was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Angels Unaware, Inc. The PPP is included in **Appendix D** to this Title VI Plan.

### Current Outreach Efforts

Angels Unaware, Inc. is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Angels Unaware, Inc. recent, current, and planned outreached activities.

* Annual public meeting is held at the Angels Unaware, Inc, Corporate Office to update public on current year and to receive input from those members of the public attending. Annual public meeting notices are sent by mail, posted in all Angels Unaware, Inc. locations and on the Angels Unaware, Inc. website at [www.angelsunaware.com](http://www.angelsunaware.com). (Last public meeting – March 2020)
* Daily contact is made at numerous public locations to obtain information from the public on Angels Unaware, Inc. processes to plan for improvements.

# Language Assistance Plan

Angels Unaware, Inc. operates a transit system within Hillsborough County Florida. The Language Assistance Plan (LAP) has been prepared to address Angels Unaware, 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 Angels Unaware, Inc. service area there are 335,593 residents or 27.5% who describe themselves as not able to communicate in English very well (Source: US Census). Angels Unaware, 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. Angels Unaware, Inc. has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as **Appendix E.**

Transit Planning and Advisory Bodies

Angels Unaware, Inc. has a planning board that consists of 6 members that applied to be on the board.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Body | Caucasian | Latino | African American | Asian American | Native American | Other |
| Service Area Population | 48.8% | 28.6% | 15.8% | 4.2% | .238% | 2.362% |
| Board | 100% | 0% | 0% | 0% | 0% | 0 |

Angels Unaware, Inc. will make efforts to encourage minority participation on the board. These efforts are made by distributing information about the particpation on the board at the annual public meeting, letters sent to all Angels Unaware, Inc. residents, staff, families, and public associations, posted on the Angels Unaware, Inc. website at [www.angelsunaware.com](http://www.angelsunaware.com), and throughout all Angels Unaware, Inc. properties. Angels Unaware, Inc. will utilize the minority population demographic maps included in Appendix G in order to focus on the areas in which the committee participation information is distributed.

# Title VI Equity Analysis

Angels Unaware, Inc. has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, Angels Unaware, Inc. does not have any Title VI Equity Analysis reports to submit with this Plan. Angels Unaware, Inc. will utilize the demographic maps included in Appendix I for future Title VI analysis.

# 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: Angels Unaware, Inc. SERVICE AREA

APPENDIX G DEMOGRAPHIC MAPS (COULD BE OPTIONAL)

**Appendix A**

**Title VI Plan Adoption Meeting Minutes**

Insert a copy of the Title VI Plan adoption meeting minutes.

**Appendix B**

**Title VI Sample Notice to Public**

**Notifying the Public of Rights Under Title VI**

**Angels Unaware, Inc.**

* Angels Unaware, 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 Angels Unaware, Inc.
* For more information on Angels Unaware, Inc. civil rights program, and the procedures to file a complaint, contact 813-961-1159, email [auiexdir@](mailto:auiexdir@)aol.com, or visit our administrative office at 4918 W. Linebaugh Avenue, Tampa Florida 33624. For more information, visit www.angelsunaware.com.
* If information is needed in another language, contact 813-961-1159.

**Appendix C**

**Title VI Complaint Form**

**Angels Unaware, 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):  [ ] Race [ ] Color [ ] National Origin [ ] Age  [ ] Disability [ ] Family or Religious Status [ ] 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?  [ ] Yes [ ] No  If yes, check all that apply:  [ ] Federal Agency:  [ ] Federal Court [ ] State Agency  [ ] State Court [ ] 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:

Ross O’Banion

4918 W. Linebaugh Avenue

Tampa, Florida 33624

**Appendix D**

**Public Participation Plan (PPP)**

Introduction

The Public Participation Plan (PPP) for Angels Unaware, Inc. was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Angels Unaware, Inc. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Angels Unaware, Inc. services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Angels Unaware, Inc. also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Angels Unaware, Inc. and its operations. The goals for this PPP include:

* **Inclusion and Diversity**: Angels Unaware, Inc. will proactively reach out and engage low-income, minority, and LEP populations for the Angels Unaware, Inc. service area so these groups will have an opportunity to participate as a resident of Angels Unaware, Inc..
* **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. Proposed adjustments to services will be described in language that is clear and easy to understand.
* **Responsive**: Angels Unaware, Inc. will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
* **Tailored**: Public participation methods will be tailored to match local and cultural preferences as much as possible.
* **Flexible**: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

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

Angels Unaware, Inc. will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

Public Meetings occurred:

March 2018

March 2019

March 2020

The public will be invited to provide feedback on the Angels Unaware. Inc. website ([www.angelsunaware.com](http://www.angelsunaware.com)) and all feedback on the site will be recorded and passed on to Angels Unaware, Inc. management. The public will also be able to call the Angels Unaware corporate office at 813-961-1159 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Angels Unaware, Inc. management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate. No feedback has been given on the company website.

Employee, parent and client surveys occurred:

January 2018

January 2019

January 2020

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

For community meetings and other important information, Angels Unaware, Inc. will use a variety of means to make riders and citizens aware, including some or all of the following methods:

* In-vehicle advertisement
* Posters or flyers in Angels Unaware, Inc, facilities
* Posting information on website
* Press releases and briefings to media outlets
* Multilingual flyer distribution to community based organizations, particularly those that target LEP population
* Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
* Communications to relevant elected officials
* Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

LCB Meetings

Angels Unaware, Inc. board meets once monthly. Public information, concerns and/or suggestions are brought forth for evaluation and discussion. Policies, procedures and practices are adjusted to meet service needs. Information is then published to all Angels Unaware, Inc. facilities, staff, residents, and available to the public; whle maintaining all HIPAA requirements.

**Appendix E**

**Language Assistance Plan (LAP)**

1. **Introduction**

Angels Unaware, Inc. operates a transit system within Hillsborough County Florida. The Language Assistance Plan (LAP) has been prepared to address Angels Unaware, 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 Angels Unaware, Inc. service area there are 115,863 residents or 9.5% who describe themselves as not able to communicate in English “very well” (Source: US Census). Angels Unaware, 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. Angels Unaware, 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 Angels Unaware, Inc. be able to communicate effectively with all of its riders. When Angels Unaware, 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. Angels Unaware, 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 Angels Unaware 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 Angels Unaware, Inc. staff to assist LEP customers
* Training: Providing training on LAP to responsible employees.

1. **Four Factor Analysis**

The analysis provided in this report has been developed to identify LEP population that may use Angels Unaware, 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 Angels Unaware, Inc. program, activity or service.

2. The frequency with which LEP persons come in contact with Angels Unaware, Inc. programs, activities or services.

3. The nature and importance of programs, activities or services provided by Angels Unaware, Inc. to the LEP population.

4. The resources available to Angels Unaware, Inc. and overall costs to provide LEP assistance

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

Of the 1,219,613 residents in the Angels Unaware, Inc. service area 115,863 residents describe themselves as speaking English less than “very well”. People of Spanish Creole descent are the primary LEP persons likely to utilize Angels Unaware, Inc. services. For the Angels Unaware, Inc. service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 90.5% speak English “very well”. For groups who speak English “less than very well”, .3% speak Vietnamese and 8% speak Spanish Creole.

**Appendix F** contains a table which lists the languages spoken at home by the ability to speak English for the population within the Angels Unaware, Inc. service area.

* 1. **Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Angels Unaware,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 their is a lack of a prominent LEP group. Phone inquiries and staff survey feedback indicated that Angels Unaware, Inc. dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke English. Over the past 47 years, Angels Unaware, Inc. has had 0 requests for translated documents.

* 1. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives**

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

A yearly survey is conducted to collect data on usage of and access to the Angels Unaware, Inc. services. According to the survey, the most common age among all the participants in the survey was 45 or older and all are disabled. This supports the fact that Angels Unaware, Inc. Transit can be considered a disability transit service as all of its patrons are disabled.

To further access personal mobility options, each respondent was asked how he or she would have made the surveyed trip had Angels Unaware, inc. Transit not been availbable. The most frequent response was “friend of family member” (100 percent). 100 percent indicated they would not have made the surveyed trip if the service was not available. This data indicates that the Angels Unaware, Inc. Transit Service is very important as a primary means of transportation for its customers.

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

Angels Unaware, 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: website translation, brochure translation, forms translations, survey translations, and use of interpreter. Angels Unaware, Inc. provides a reasonable degree of services for LEP populations in its service area.

1. **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.

* 1. **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.

Angels Unaware, Inc. has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 72.5% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish Creole (21%). Of those who primary spoken language is Spanish Creole, approximately 8% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish Creole and who identify themselves as speaking English less than “very well” account for 19.5% of the service area population.

Angels Unaware, 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. Having Census Bureau Language Identification Flashcards available at Angels Unaware, Inc. Meetings. This will assist Angels Unaware, Inc. in identifying language assistance needs for future events and meetings.
3. Vehicle operators and front-line staff (Directors, Home Manager, Office Administrators, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.
   1. **Element 2: Language Assistance Measures**

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

Angels Unaware, 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 transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Include statements clarifying that being bilingual is preferred on driver recruitment flyers.
4. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

Angels Unaware, Inc. 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.

* 1. **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 Angels Unaware, Inc., the most important staff training is for front line workers. SCurrent staff are bilingual in English and other Pacific Island Languages.

The following training will be provided to front line workers:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards when available
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint
   1. **Element 4: Providing Note to LEP Persons**

Angels Unaware, 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 Angels Unaware, Inc. office, on vans, and all facilities. 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.

* 1. **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 Angels Unaware, Inc. financial resources are sufficient to fund language assistance resources needed

Angels Unaware, Inc. 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. Angels Unaware, Inc. is open to suggestions from all sources, including customers, Angels Unaware, Inc. staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

1. **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.

Angels Unaware, Inc. service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in **Appendix F**, Angels Unaware, Inc. does not have LEP groups which speak English less than “very well” which exceed either 5.0% or 1,000 person.

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. Angels Unaware, 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.

**Appendix F**

**Operating Area Language Data:**

**Angels Unaware, Inc. Service Area**

|  |  |  |
| --- | --- | --- |
| **Hillsborough County, Florida** | | |
| Language | People | Percentage |
| **Total** | 1,219,613 | 100.0% |
| **Speak only English** | 884,020 | 72.5% |
| **Spanish or Spanish Creole** | 256,379 | 21.0% |
| Speak English “very well” | 159,418 | 13.1% |
| Speak English less than “very well” | 96,961 | 8.0% |
| **French (incl. Patois, Cajun)** | 5,297 | 0.4% |
| Speak English “very well” | 4,418 | 0.4% |
| Speak English less than “very well” | 879 | 0.1% |
| **French Creole** | 6,777 | 0.6% |
| Speak English “very well” | 4,337 | 0.4% |
| Speak English less than “very well” | 2,440 | 0.2% |
| **Italian** | 2,541 | 0.2% |
| Speak English “very well” | 2,265 | 0.2% |
| Speak English less than “very well” | 276 | 0.0% |
| Portuguese or Portuguese Creole | 2,942 | 0.2% |
| Speak English “very well” | 1,947 | 0.2% |
| Speak English less than “very well” | 995 | 0.1% |
| **German** | 3,941 | 0.3% |
| Speak English “very well” | 3,430 | 0.3% |
| Speak English less than “very well” | 511 | 0.0% |
| **Yiddish** | 29 | 0.0% |
| Speak English “very well” | 11 | 0.0% |
| Speak English less than “very well” | 18 | 0.0% |
| **Other West Germanic languages** | 750 | 0.1% |
| Speak English “very well” | 693 | 0.1% |
| Speak English less than “very well” | 57 | 0.0% |
| **Scandinavian languages** | 377 | 0.0% |
| Speak English “very well” | 318 | 0.0% |
| Speak English less than “very well” | 59 | 0.0% |
| **Greek** | 1,143 | 0.1% |
| Speak English “very well” | 1,017 | 0.1% |
| Speak English less than “very well” | 126 | 0.0% |
| **Russian** | 1,784 | 0.1% |
| Speak English “very well” | 1,177 | 0.1% |
| Speak English less than “very well” | 607 | 0.0% |
| **Polish** | 939 | 0.1% |
| Speak English “very well” | 706 | 0.1% |
| Speak English less than “very well” | 233 | 0.0% |
| **Serbo-Croatian** | 611 | 0.1% |
| Speak English “very well” | 446 | 0.0% |
| Speak English less than “very well” | 165 | 0.0% |
| **Other Slavic Languages** | 727 | 0.1% |
| Speak English “very well” | 561 | 0.0% |
| Speak English less than “very well” | 166 | 0.0% |
| **Armenian** | 59 | 0.0% |
| Speak English “very well” | 52 | 0.0% |
| Speak English less than “very well” | 7 | 0.0% |
| **Persian** | 1,079 | 0.1% |
| Speak English “very well” | 703 | 0.1% |
| Speak English less than “very well” | 376 | 0.0% |
| **Gujarati** | 2361 | 0.2% |
| Speak English “very well” | 1,843 | 0.2% |
| Speak English less than “very well” | 518 | 0.0% |
| **Hindi** | 3053 | 0.3% |
| Speak English “very well” | 2,704 | 0.2% |
| Speak English less than “very well” | 349 | 0.0% |
| **Urdu** | 1,442 | 0.1% |
| Speak English “very well” | 1,109 | 0.1% |
| Speak English less than “very well” | 333 | 0.0% |
| **Other Indic languages** | 2,587 | 0.2% |
| Speak English “very well” | 1,854 | 0.2% |
| Speak English less than “very well” | 733 | 0.1% |
| **Other Indo-European Languages** | 1,341 | 0.1% |
| Speak English “very well” | 1,081 | 0.1% |
| Speak English less than “very well” | 260 | 0.0% |
| **Chinese** | 4,619 | 0.4% |
| Speak English “very well” | 2,541 | 0.2% |
| Speak English less than “very well” | 2,078 | 0.2% |
| **Japanese** | 787 | 0.1% |
| Speak English “very well” | 431 | 0.0% |
| Speak English less than “very well” | 356 | 0.0% |
| **Korean** | 2,596 | 0.2% |
| Speak English “very well” | 1,671 | 0.1% |
| Speak English less than “very well” | 925 | 0.1% |
| **Mon-Khmer, Cambodian** | 415 | 0.0% |
| Speak English “very well” | 152 | 0.0% |
| Speak English less than “very well” | 263 | 0.0% |
| **Hmong** | 277 | 0.0% |
| Speak English “very well” | 205 | 0.0% |
| Speak English less than “very well” | 72 | 0.0% |
| **Thai** | 856 | 0.1% |
| Speak English “very well” | 369 | 0.0% |
| Speak English less than “very well” | 487 | 0.0% |
| **Laotian** | 157 | 0.0% |
| Speak English “very well” | 87 | 0.0% |
| Speak English less than “very well” | 70 | 0.0% |
| **Vietnamese** | 7,287 | 0.6% |
| Speak English “very well” | 3,109 | 0.3% |
| Speak English less than “very well” | 4,178 | 0.3% |
| **Other Asian languages** | 6,816 | 0.6% |
| Speak English “very well” | 5,286 | 0.4% |
| Speak English less than “very well” | 1,530 | 0.1% |
| **Tagalog** | 3,719 | 0.3% |
| Speak English “very well” | 2,882 | 0.2% |
| Speak English less than “very well” | 837 | 0.1% |
| **Other Pacific Island languages** | 844 | 0.1% |
| Speak English “very well” | 682 | 0.1% |
| Speak English less than “very well” | 162 | 0.0% |
| **Navajo** | 10 | 0.0% |
| Speak English “very well” | 10 | 0.0% |
| Speak English less than “very well” | 0 | 0.0% |
| **Other Native American languages** | 144 | 0.0% |
| Speak English “very well” | 116 | 0.0% |
| Speak English less than “very well” | 28 | 0.0% |
| **Hungarian** | 517 | 0.0% |
| Speak English “very well” | 378 | 0.0% |
| Speak English less than “very well” | 139 | 0.0% |
| **Arabic** | 7,368 | 0.6% |
| Speak English “very well” | 5,184 | 0.4% |
| Speak English less than “very well” | 2,184 | 0.2% |
| **Hebrew** | 634 | 0.1% |
| Speak English “very well” | 528 | 0.0% |
| Speak English less than “very well” | 106 | 0.0% |
| **African languages** | 2,277 | 0.2% |
| Speak English “very well” | 1,928 | 0.2% |
| Speak English less than “very well” | 349 | 0.0% |
| **Other and unspecified languages** | 111 | 0.0% |
| Speak English “very well” | 111 | 0.0% |
| Speak English less than “very well” | 0 | 0.0% |

**Appendix G**

**Demographic Maps**

Insert the demographic maps (separate file) for your county here