

Updates:

12/12/17 page 1 changed district two to district one

# Meals on Wheels PLUS of Manatee, Inc.



## **Title VI Plan**

*Date Adopted: 05/28/2019*



### Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
4/17/15	Adoption	Melissa Wilson	
4/28/19	New Review for Adoption	Melissa Wilson	5/28/19

Title VI Plan Activity Log  
(Continued)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

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## 1.0 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].*

Meals on Wheels PLUS of Manatee, 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.

MOWP 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 (CEO) or authorized representative.
2. Issue a policy statement signed by the Chief Executive Officer 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 MOWP.
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  


Maribeth Phillips, CEO

Meals on Wheels PLUS of Manatee, Inc.

Date: 5/28/2019

## 2.0 Introduction & Description of Services

MOWP submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

MOWP is a sub-recipient of FTA funds and provides service in Manatee County. A description of the current MOWP system is included in Appendix B.

### Title VI Liaison

Joe Stoddard  
Vice President of Operations  
941-747-4655 ext. 1233  
811 23<sup>rd</sup> Avenue East  
Bradenton, FL. 34208

### Alternate Title VI Contact

Melissa Wilson  
Transportation Manager  
941-747-4655 ext. 1224  
811 23<sup>rd</sup> Avenue East  
Bradenton, FL. 34208

MOWP must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

## 2.1 First Time Applicant Requirements

*FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.*

MOWP is not a first time applicant for FTA/FDOT funding. The following is a summary of MOWP current and pending federal and state funding.

### Current and Pending FTA Funding

N/A

### Current and Pending FDOT

*FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.*

N/A

### Current and Pending Federal Funding (non-FTA)

N/A

### Current and Pending State Funding (non-FDOT)

N/A

During the previous three years, FDOT did complete a Title VI compliance review of MOWP.

MOWP was found in noncompliance with one requirement of our Title VI, which was the incorrect District listed, was corrected immediately.

## 2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

MOWP will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT.

### **2.3 Title VI Plan Concurrence and Adoption**

This Title VI Plan received FDOT concurrence on March 6, 2015. The Plan was approved and adopted by MOWP Board of Directors during a meeting held on May 28, 2017. A copy of the meeting minutes and FDOT concurrence letter is included in Appendix C of this Plan.

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### 3.0 Title VI Notice to the Public

*FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.*

#### 3.1 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 in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

Customize the sample notice, as necessary. A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

#### 3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of MOWP 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 MOWP office(s) including the reception desk and meeting rooms, and on the MOWP website at [www.mealsonwheelsplus.org](http://www.mealsonwheelsplus.org). Additionally, MOWP will post the notice in our member's policies and procedures as well at the transit vehicles.

A sample version of this notice is included in Appendix D of this Plan along with a Spanish translated versions of the notice.

The public notice must be provided in any other language which meets the Safe Harbor threshold (See Appendix G).

*FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.*

## 4.0 Title VI Procedures and Compliance

### 4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color, national origin, age, disability, family or religious status, sexual orientation or any other discriminatory actions by MOWP may file a discrimination complaint by completing and submitting the agency's Discrimination Complaint Form (refer to Appendix E). MOWP investigates complaints received no more than 180 days after the alleged incident. MOWP will process complaints that are complete.

Once the complaint is received, MOWP 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.

MOWP has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, MOWP 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, MOWP can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

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

The complaint procedure will be made available to the public on MOWP website: [www.mealsonwheelsplus.org](http://www.mealsonwheelsplus.org)

### 4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on MOWP website: [www.mealsonwheelsplus.org](http://www.mealsonwheelsplus.org)

The complaint form must be provided in any languages spoken by the LEP population which meet the Safe Harbor threshold (See Appendix G).

### 4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. MOWP will submit Title VI Plans to FDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

If your agency receives funding from more than one primary recipient, this paragraph should be modified to note that the Title VI Plan will be submitted to all primary recipients, as needed. Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

### 4.4 Sub-recipient Assistance and Monitoring

MOWP does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, MOWP utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if MWOP has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B. ]

### 4.5 Contractors and Subcontractors

MOWP is responsible for ensuring that contractors follow Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. MOWP contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

#### Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion family status or sexual orientation in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination

prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, MOWP shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the MOWP, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

#### **Disadvantaged Business Enterprise (DBE) Policy**

As a part of the Joint Participation Agreement (JPA) with FDOT, MOWP and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. MOWP and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, sex, age, disability, family or religious status, or sexual orientation in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of FDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract,

which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

**E-Verify**

As a part of the JPA with FDOT, vendors and contractors of MOWP shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with MOWP. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for MOWP shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for MOWP.

## 5.0 Title VI Investigations, Complaints, and Lawsuits

*FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.*

In accordance with 49 CFR 21.9(b), MOWP 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 MOWP 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.

MOWP has had no investigations, complaints, or lawsuits involving allegations of discrimination 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.	N/A			
2.				
Lawsuits				
1.	N/A			
2.				
Complaints				
1.	N/A			
2.				

## 6.0 Public Participation Plan

*FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.*

The Public Participation Plan (PPP) for MOWP 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 MOWP. 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 MOWP services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.



## 7.0 Language Assistance Plan

*FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).*

MOWP operates a transit system within Manatee County. The Language Assistance Plan (LAP) has been prepared to address MOWP 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 MOWP service area there are 22,418 residents or 6.8% who describe themselves as not able to communicate in English very well (Source: US Census 2015 5 Year Estimates). MOWP 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. MOWP 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 G.

## 8.0 Transit Planning and Advisory Bodies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.*

MOWP does not have a transit-related committee or board, therefore this requirement does not apply.



## 9.0 Title VI Equity Analysis

*FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.*

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, MOWP will ensure the following:

1. MOWP will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. MOWP will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities MOWP will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If MOWP determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, MOWP may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. MOWP must demonstrate and document how both tests are met. MOWP will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

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

## 10.0 System-Wide Service Standards and Service Policies

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

MOWP transportation is a non-fixed route service provider.

## 11.0 Appendices

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# **Appendix A**

## **FTA Circular 4702.1B Reporting Requirements for Transit Providers**

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

**General Requirements**

*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
- 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 sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- 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 DOTs, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

**Requirements of Transit Providers**

*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

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:*

- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

# **Appendix B**

## **Current System Description**

### Current System Description

1. An overview of the organization including its mission, program goals and objectives.  
The mission of Meals on Wheels PLUS of Manatee, Inc. is to assist individuals to live independently by providing nutrition and caring supportive services.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.  
MOWP is a non-profit 501(c)(3) organization. Our organization is made up of 5 full-time employees, 0 part-time employees, and 0 volunteers. Our Manager is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the County's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2019 Transit Development Plan (page 201) and 2019 Operations Handbook (page 34). We will continue to operate at previous year (2019) service hours averaging 8 total fleet service hours per day.
3. Indicate if your agency is a government authority or a private non-profit agency.  
MOWP operates as a non-profit 501(c)(3) with a CTC agreement with the BCC. We have an executed CTC agreement dated 11/27/18
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
MOWP transportation manager is responsible for training and management of our transportation program. All safety sensitive employees are required to complete FDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 40 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The COO is responsible for annual renewal of all liability insurance for both FDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?  
Maintenance on all agency vehicles is provided by Shepherd's Tires, & Dodge. Shepherd's Tires and Dodge employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 811 23<sup>rd</sup> Avenue East, Bradenton, FL. 34208 and are maintained by the manager. All records are maintained and retained for a minimum of four (4) years.
6. Number of current transportation related employees  
Our transportation department has a total of 7 employees that include: 6 full-time drivers, 0 part-time drivers, 1 administrator and 0 support staff.



7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

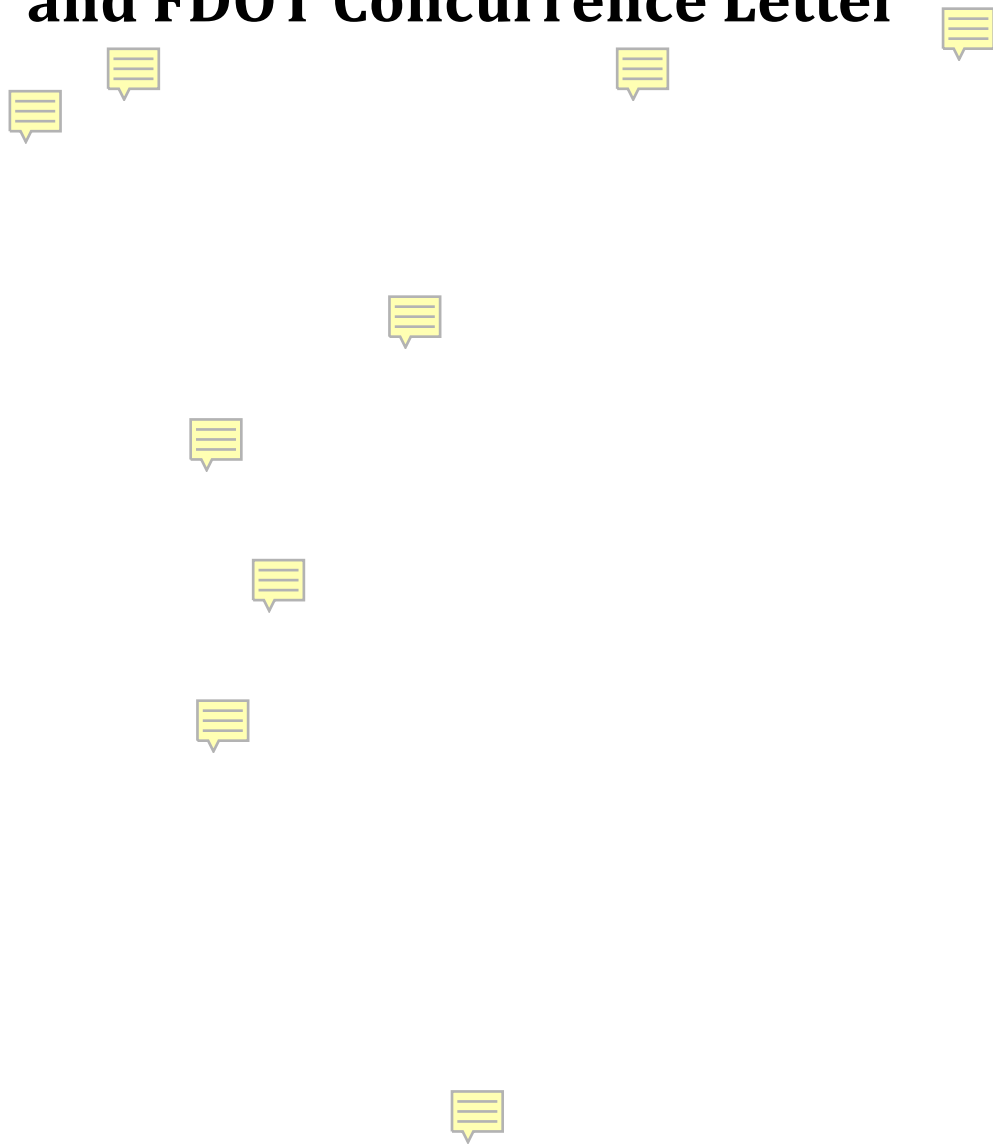
Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All our drivers are required to carry a Standard Driver's License. This allows coverage of all of the MOWP vehicles.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to clients/members. Our service incorporates MOWP Congregate Transportation and Daybreak Transportation. We provide a wide range of trip purposes that include: nutrition, social service, social and recreation. MOWP only services Manatee County. Currently, we use a variety of vehicles to provide passenger services. Our fleet includes vans, modified vans, and buses. 8 of our vehicles are equipped for wheelchair service.

# Appendix C

## Title VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter





# **Appendix D**

## **Title VI Sample Notice to Public**

**Notifying the Public of Rights  
Meals on Wheels PLUS of Manatee**

Meals on Wheels Plus of Manatee operates programs and services without regard to race, sex, color, national origin, disability, religion, age, sexual orientation, or status as a parent. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with Meals on Wheels PLUS of Manatee.

For more information on the Meals on Wheels LUS of Manatee civil rights program, and the procedures to file a complaint, contact Joe Stoddard, (941) 747-4655 or you may visit Meals on Wheels PLUS of Manatee located at 811 23<sup>rd</sup> Ave. East, Bradenton, FL 34208

**Notificación al Público de los Derechos  
Meals on Wheels PLUS of Manatee**

Meals on Wheels Plus de Manatee opera programas y servicios sin distinción de raza, sexo, color, nacionalidad, discapacidad, religión, edad, orientación sexual o condición de padre. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal puede presentar una queja ante Meals on Wheels PLUS of Manatee.

Para obtener más información sobre el programa de derechos civiles Meals on Wheels LUS of Manatee y los procedimientos para presentar una queja, comuníquese con Joe Stoddard al (941) 747-4655 o puede visitar Meals on Wheels PLUS de Manatee ubicado en 811 23<sup>rd</sup> Ave. Este, Bradenton, FL 34208

# **Appendix E**

## **Discrimination Complaint Form**

## Meals on Wheels PLUS of Manatee, Inc.

### Discrimination Complaint Form

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age
<input type="checkbox"/> Disability	<input type="checkbox"/> Family or Religious Status	<input type="checkbox"/> Other (explain) _____	
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.  _____  _____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No

<b>Section V</b>
------------------

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:	
<b>Section VI</b>	
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:

Joe Stoddard  
 Vice President of Operations  
 Meals on Wheels PLUS of Manatee, Inc.  
 811 23<sup>rd</sup> Avenue East  
 Bradenton, FL. 34208

or

The Federal Transit Administration  
 Office of Civil Rights  
 1200 New Jersey Ave., SE  
 Washington, D.C.



## Meals on Wheels PLUS of Manatee

### Título VI denuncia forma

<b>Sección I:</b>			
Nombre:			
Dirección:			
Teléfono (casa):		Teléfono (trabajo):	
Dirección de correo electrónico:			
¿Requisitos de formato accesible?	Impresión de gran tamaño		Cinta de audio
	TDD		Otros
<b>Sección II:</b>			
¿Usted está presentando esta queja en su nombre?		Sí *	No
* Si usted respondió "Sí" a esta pregunta, ir a la sección III.			
Si no, por favor suministrar el nombre y la relación de la persona a quien usted se queja:			
Explique por qué ha presentado por un tercero: _____			
Por favor confirme que ha obtenido el permiso de la parte agraviada si radicara en nombre de un tercero.		Sí	No
<b>Sección III:</b>			
Creo que he experimentado la discriminación se basaba en (marque todas las que apliquen): Carrera <input type="checkbox"/> <input type="checkbox"/> Color <input type="checkbox"/> origen nacional <input type="checkbox"/> edad <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Discapacidad familia o estado religioso <input type="checkbox"/> otro (explique) ____ Fecha de la supuesta discriminación (mes, día, año): _____ Explicar lo más claramente posible lo que pasó y por qué usted cree que fueron discriminados. Describir a todas las personas que estuvieron involucradas. Incluir el nombre e información de contacto de la persona que discriminó (si lo conoce) así como nombres e información de contacto de testigos. Si se necesita más espacio, utilice el dorso de este formulario. _____			
<b>Sección IV</b>			
¿Anteriormente ha presentado una queja del título VI con esta agencia?		Sí	No

<b>Sección V</b>
------------------

¿Ha presentado esta queja con cualquier otro Federal, estatal o agencia local, o con cualquier Tribunal Federal o estatal?

Sí  No

Si es así, compruebe todas las que apliquen:

Agencia Federal para el : \_\_\_\_\_

Tribunal Federal   la agencia estatal \_\_\_\_\_

Estado de corte Agencia Local] \_\_\_\_\_

Sírvanse proporcionar información sobre una persona de contacto en la Agencia/corte donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

**Sección VI**

Nombre de denuncia de la agencia es contra:

Persona de contacto:

Título:

Número de teléfono:

Usted puede conectar cualquier material escrito u otra información que crees que es pertinente a su queja.

Firma y fecha especificadas a continuación

\_\_\_\_\_

Firma fecha

Por favor, envíe este formulario en persona en la siguiente dirección, o envíe por correo este formulario para:

Joe Stoddard  
 Vicepresidente de operaciones  
 Comidas sobre ruedas además de Manatí, Inc.  
 811 23rd Avene East  
 Bradenton, FL 34208

o La Administración Federal de Tránsito  
 Oficina de Derechos Civiles  
 1200 New Jersey Ave., SE  
 Washington, D.C.

# Appendix F

## Public Participation Plan (PPP)

## Introduction

The Public Participation Plan (PPP) for Meals on Wheels PLUS of Manatee, 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 Manatee County. 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 MOWP services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services.

## 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 MOWP and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** MOWP will proactively reach out and engage low-income, minority, and LEP populations for the MOWP 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. Proposed adjustments to fares/pledges agreements or services will be described in language that is clear and easy to understand.
- **Responsive:** MOWP 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 MOWP. MOWP intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The public will be invited to provide feedback on the MOWP website [www. mealsonwheelsplus.org](http://www.mealsonwheelsplus.org) and all feedback on the site will be recorded and passed on to MOWP management. The public will also be able to call the MOWP office at 941-747-4655 ext. 1224 during its hours of operation. Feedback collected over the phone will be recorded and passed on to MOWP management. Formal customer surveys to measure performance will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

For all public meetings, the venue will be 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, MOWP will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posting information on website
- 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 Spanish that meets the “safe harbor” criteria.

#### Public Hearing

This agency is not required to perform public hearings.

# Appendix G

## Language Assistance Plan (LAP)

## I. Introduction

MOWP operates a transit system within Manatee County. The Language Assistance Plan (LAP) has been prepared to address MOWP's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In MOWP service area there are 325, 951 residents and 6.8% of them who describe themselves as not able to communicate in English "very well" (Source: US Census 2015 5 Year Estimates). MOWP 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. MOWP has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

Calculate the number and percentage of people who do not speak English very well by using Appendix H.

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 MOWP be able to communicate effectively with all of its riders. When MOWP 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. MOWP 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 MOWP 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 MOWP staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

## II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use MOWP 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 MOWP program, activity or service.
2. The frequency with which LEP persons come in contact with MOWP programs, activities or services.
3. The nature and importance of programs, activities or services provided by MOWP to the LEP population.
4. The resources available to MOWP 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 325,951 residents in the MOWP service area 22,418 residents describe themselves as speaking English less than “very well”. People of Hispanic or Latino descent are the primary LEP persons likely to utilize MOWP services. For the MOWP service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 303,533 speak English “very well”. For groups who speak English “less than very well”, 17,522 speak Spanish and 4,896 speak other languages.

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

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

MOWP 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 MOWP currently serves 3 clients under the LEP. Phone inquiries



and staff survey feedback indicated that MOWP dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke English or Spanish. Over the past 12 years, MOWP 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**

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 Responsibilities 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.

We are here to help all our members get to those important appointments and activities in the local community. A trained transportation driver will meet members of the Senior Wheels program at the door. Our drivers will be able to assure door-to-door service as well as safety and reliability.

MOWP also provided transportation to multiple MOWP locations throughout Manatee County to assist individuals by providing nutrition and caring supportive services.

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

MOWP assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. We have limited interaction with that population, but you have translated several key documents (non-discrimination policy, complaint form) and will translate others upon request. MOWP has 2 bi-lingual staff along with providing several translated document, translation services, outreach.

**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.

**e. 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.

MOWP has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 272,717 of the service area population speaks English only. The largest non-English spoken language in the service area is Hispanic or Latino. Of those whose primary spoken language is Spanish, approximately 17,522 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 4,896 of the service area population.

MOWP may identify language assistance needs 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.

**f. 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.

MOWP has undertaken the following actions to improve access to information and services for LEP individuals:

1. 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.

**g. 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 MOWP, the most important staff training is for Customer Service Representatives and transit drivers. One representative is bilingual in English and Spanish.

**Element 4: Providing Note to LEP Persons** The following training will be provided to Customer Service Representative.

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

**h.**

MOWP 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 MOWP office lobby, on buses, and in policies & procedures. Additionally, when staff prepares a key 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.

**i. 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 MOWP financial resources are sufficient to fund language assistance resources needed

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

### **III. 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.

MOWP service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, 17,522 speakers qualify for the Safe Harbor Provision as the number of Spanish speaking individuals in the service area is 17,522 or 5.4%.

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. MOWP 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 H

## Operating Area Language Data: MOWP Service Area



**American Community Survey 2015 5 Year Estimates**

Language Spoken At Home Manatee County	Estimate	% of Total
Total:	325,951	100%
Speak only English	272,717	83.7%
Spanish or Spanish Creole	38,237	11.7%
Speak English "very well"	20,715	6.4%
Speak English less than	17,522	5.4%
French (incl. Patois, Cajun):	1,932	0.6%
Speak English "very well"	1,286	0.4%
Speak English less than	646	0.2%
French Creole:	1,387	0.4%
Speak English "very well"	636	0.2%
Speak English less than	751	0.2%
Italian:	788	0.2%
Speak English "very well"	588	0.2%
Speak English less than	200	0.1%
Portuguese or Portuguese	372	0.1%
Speak English "very well"	200	0.1%
Speak English less than	172	0.1%
German:	2,041	0.6%
Speak English "very well"	1,706	0.5%
Speak English less than	335	0.1%
Yiddish:	-	0.0%
Speak English "very well"	-	0.0%
Speak English less than	-	0.0%
Other West Germanic	148	0.0%
Speak English "very well"	148	0.0%
Speak English less than	-	0.0%
Scandinavian languages:	292	0.1%
Speak English "very well"	253	0.1%
Speak English less than	39	0.0%
Greek:	198	0.1%
Speak English "very well"	189	0.1%
Speak English less than	4	0.0%
Russian:	579	0.2%
Speak English "very well"	454	0.1%
Speak English less than	125	0.0%
Polish:	440	0.1%
Speak English "very well"	273	0.1%
Speak English less than	167	0.1%
Serbo-Croatian:	137	0.0%
Speak English "very well"	59	0.0%
Speak English less than	78	0.0%





# Appendix I

## Demographic Maps



**Not Applicable**



**Appendix J**  
**Title VI Equity Analysis**

MOWP has not performed Title VI Equity Analysis.



Ms. Dale Hanson , Transit Projects Coordinator

Florida Department of Transportation,

Modal Development Office / Public Transit

801 North Broadway Avenue

MS 1-39

Bartow, Florida 33830

863-519-2321

Dale.Hanson@dot.state.fl.us

