

All MPO sponsored meetings or workshops are conducted in ADA accessible locations and are easily accessible by transit. Availability of language assistance stated in English and Spanish is included in each meeting and workshop notice.

- **Public Hearings:** The MPO conducts formal public hearings to provide opportunities for citizen input on MPO programs and transportation planning activities. Public hearings are conducted annually for TD Program review and the adoption of the Transportation Improvement Program. Public hearings are also conducted for updated editions of the Long Range Transportation Plan. Public hearing notices are placed in the local newspapers, mailed and emailed to the MPO's mailing list, and posted in the MPO office and on the website. Information on language assistance in English and Spanish is included in each notice.
- **Surveys:** MPO staff utilizes survey instruments on its website, distributed through email and at various workshops to collect public input. Surveys are also used for the Long Range Transportation Plan updates. They are often tailored to garner information from targeted populations such as transit riders, the elderly and minority persons. Staff considers the needs of those who cannot read or write and will verbally read the survey and record the respondent's comments. Surveys have also been made available in alternative formats such as in large type, Braille and Spanish.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSON AND LANGUAGE ASSISTANCE PLAN

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

EXECUTIVE ORDER 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of

1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities and subrecipients.

LEP INTRODUCTION AND LANGUAGE ASSISTANCE PLAN

The Pinellas County Metropolitan Planning Organization (MPO) has developed this LEP to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future plan updates.

In developing the plan while determining the MPO's extent of obligation to provide LEP services, the MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the county to be served or likely to encounter an MPO program, activity or service; 2) the frequency with which LEP individuals come in contact with an MPO program; 3) the nature and importance of the program, activity or service provided by the MPO to the LEP population; and 4) the resources available to the MPO and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

FOUR FACTOR ANALYSIS AND RESULTS:

1. The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity or service.

The MPO examined the US Census Bureau's 2010-2014 American Community Survey data and was able to determine that approximately 13.4%, or 118,290, of the Pinellas County population age 5 and older spoke a language other than English at home and 5.3%, or 47,108, reported that they speak English "less than very well". The most spoken language besides English in Pinellas County is Spanish, with 6.2% of the population speaking Spanish at home.

Table 1, on the next page, shows languages spoken at home in Pinellas County. Additional

tables on pages 13-14 provide information and analysis on the general population characteristics, population by race and economic characteristics.

Table 1. 2014 Pinellas County Population, 2010-2014 Languages Spoken At Home

| 2010-2014 LANGUAGES SPOKEN AT HOME | | |
|---|----------------|-------|
| Pinellas County Population 5 years and over | 882,636 | |
| Speak English only | 764,346 | 86.6% |
| Language other than English spoken at home | 118,290 | 13.4% |
| Speak English less than "very well"* | 47,108 | 6.2% |
| Spanish | | |
| Persons 5 years and over who speak Spanish at home | 54,322 | 6.2% |
| Speak English less than "very well"* | 22,808 | 2.6% |
| Indo-European | | |
| Persons 5 years and over who speak Indo-European language at home | 41,776 | 4.7% |
| Speak English less than "very well"* | 13,537 | 1.5% |
| Asian and Pacific Islander languages | | |
| Persons 5 years and over who speak Asian and Pacific Islander languages at home | 17,864 | 2.0% |
| Speak English less than "very well"* | 9,339 | 1.1% |
| Other Languages | | |
| Persons 5 years and over who speak other languages at home | 4,328 | 0.5% |
| Speak English less than "very well"* | 1,424 | 0.2% |

Source: US Census Bureau 2010-2014 American Community Survey

*Of total population

LEP persons may interact with the MPO at public meetings or events the MPO is participating in. Public meetings held by the MPO, including Board meetings, offer the opportunity for translation, as described in this Plan and the Public Participation Plan. The MPO, through its public participation efforts, attends community meetings and participates in events throughout the County. The MPO has certain materials translated into Spanish, as described in this Plan, and evaluates new materials as they are produced, to determine format and language for production and distribution. For example, the MPO conducted a trail survey in 2014. This survey was available in English and Spanish. English and Spanish speaking staff were available to assist those not comfortable with the written versions of the survey. The MPO works with local community groups to assist in outreach to LEP persons.

The U.S. Department of Transportation 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 populations. For groups that constitute five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be

served or likely to be affected or encountered, than this action will be considered to be strong evidence of compliance of the MPO's written translation obligations. If there are fewer than 50 persons in a language group that reaches the five percent trigger, the this provision does not require translation of 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.

Based on census data, Spanish language translation falls under the "safe harbor" provision. As such, the LRTP and other vital written materials, shall be translated into Spanish. Based on the information in Table 1, several other language groups could require translation. The MPO is prepared to translate vital documents into languages as groups that fall under "safe harbor" are known, and to provide verbal translation or translation through another means, to those who request it.

When engaging with LEP populations, the MPO assesses to determine the best method for engagement. This may include written or verbal translation, depending on the situation, potential literacy skills, and the identified language barrier.

2. The frequency with which LEP individuals come in contact with an MPO program, activity or service.

The MPO assesses the frequency at which staff has or could possibly have contact with LEP persons. Key areas in which LEP individuals interact with the MPO are inquiries for language assistance are at public meetings.

The MPO documents requests via phone inquiries and surveying public meeting attendees. From January 1, 2006 to December 31, 2016, the MPO recorded 14 requests for language assistance: two for informal Spanish speaking interpretation, one for informal Spanish translation of an MPO document, two requests for American Sign Language, one for Braille translation of an MPO document and eight requests for staff to read a document because the persons were unable to read. All requests received were fulfilled.

LEP populations may also come into contact with the MPO and its programs at public outreach events. The MPO, as described in Four Factor Analysis Area 1, prepares for this through the development of materials in Spanish, and by providing staff translations when attending events in which LEP persons may be in contact with MPO programs.

3. The nature and importance of the program, activity or service provided by the MPO to LEP community.

Since there is a large geographic concentration of Hispanics in Clearwater, the MPO contacted the YWCA Hispanic Outreach Operation (Centro de Apoyo Hispano de YWCA) in Clearwater, for

help in identifying which MPO programs would be of importance to a Hispanic LEP person. This includes long-range transportation planning and also work with the Transportation Disadvantaged (TD) Program. The Hispanic Outreach Operation identified transportation as a major concern for their clients stating many do not drive and rely on public transit, walking or biking. To help accommodate the Hispanic population, the county's transit operator, the Pinellas Suncoast Transit Authority (PSTA), has translated its system route map and many brochures and the MPO has also translated several bicycle and pedestrian safety brochures into Spanish.

Many Hispanic Outreach Operation clients are economically disadvantaged and are eligible to receive low cost transportation services through the MPO's TD Program. PSTA, as the TD Program's management entity, and its taxi cab and wheelchair provider subcontractors, have Spanish speaking staff readily available to provide language assistance.

In the Long Range Transportation Plan update process, the MPO utilizes the above resources, and others as they becomes available, to ensure that the LEP community is engaged in the MPO's planning processes. The MPO works to reach out to LEP communities and to populations in areas identified through Environmental Justice analysis through a number of methods, including working with community groups and organizations, such as the High Point Neighborhood Family Center, Union Academy Family Center/Citizens Alliance for Progress, and the Lealman and Asian Neighborhood Family Center.

4. The resources available to the MPO and overall costs.

The MPO assessed its available resources that could be used for providing LEP assistance. This assessment included identifying what staff and volunteer language interpreters are readily available, how much a professional interpreter and translation service would cost, and which documents should be translated. It also involved taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts, examining which financial and in-kind sources could be used to provide assistance and determining what level of staff training is needed.

MPO staff translation is readily available. The MPO maintains contact information for language interpretations services available and utilizes these for document translation. Community group resources are also maintained and utilized for outreach efforts. The Pinellas County Office of Human Rights is a resource for the MPO and can provide translation services.

After analyzing the four factors the MPO developed the plan outlined in the following section for assisting persons of Limited English Proficiency.

LANGUAGE ASSISTANCE PLAN: ASSISTANCE SERVICES, MONITORING AND EVALUATION

1. How to Identify an LEP Person who Needs Language Assistance

Below are procedures for identifying persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When MPO sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the MPO office reception area; and
- Post a notice of available language assistance at MPO reception area.

2. Language Assistance Measures

When an interpreter is needed, in person or on the telephone, the MPO shall first determine what language is required. Staff can provide Spanish, French and German informal verbal interpretation. Spanish V/TDD service is available through the Pinellas County Office of Human Rights. The phone number is 727-464-4062 (V/TDD).

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

Following safe harbor provisions, vital documents, including the 2040 Long Range Transportation Plan Summary Report and the Title VI complaint form, are available in Spanish. The Transportation Disadvantaged Program application is also available in Spanish. Trail surveys were provided in English and Spanish during the last trail survey and were verbally communicated to those needing assistance.

3. MPO Staff Training

All MPO staff is provided with the LEP and LAP Plan and educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP and LAP responsibilities;
- What language assistance services the MPO offers;

- Use of LEP “I Speak Cards”;
- How to access a staff interpreter;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on the MPO’s LEP program responsibilities and their obligation to provide language assistance.

4. Providing Notice of Available Language Service to LEP Persons

Available language assistance services are available to the public and noticed/posted in public places, on the MPO’s website and in the MPO’s offices. This information is also included with agendas and in legal advertisements.

5. Outreach Techniques

The following are potential outreach techniques to assist with reaching and providing language assistance for LEP populations.

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements and agendas will be printed in an alternative language, such as Spanish.
- When placing a general public meeting notice, staff will insert “**Un traductor del idioma español estará disponible**” This means “A Spanish translator will be available”. Or if not sure of the need, staff should insert, “**Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la** (insert staff name) **al teléfono (727) 464-8200, cuando menos 48 horas antes de la junta**” which asks persons who need Spanish language assistance to make arrangements with the MPO within two days of the publication notice.
- Spanish speaking staff or a hired interpreter should be on hand at public meetings intended for gathering public input.

6. Monitoring and Updating the LEP Plan

At a minimum, the MPO will follow the Title VI Program update schedule for the LEP Plan. A Title VI Program update must be forwarded to the FTA every three years. The questions listed below will be considered in updating the LEP Plan.

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Pinellas County?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified MPO programs and are there other programs that should be included?
- Have the MPO's available resources, such as technology, staff and financial costs changed?
- Has the MPO fulfilled the goals of the LEP Plan?
- Were any complaints received?

7. Dissemination of the MPO Limited English Proficiency Plan

The MPO posts the LEP Plan on its website at www.pinellascounty.org/mpo.

Any person, including social service, non-profit and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, all Pinellas County libraries offer free internet access. Copies of the LEP Plan are provided to the Pinellas County Office of Human Rights, the Florida Department of Transportation, Federal Highway Administration, the Federal Transit Administration and any person or agency requesting a copy. Each MPO subrecipient is provided a copy and informed of the importance of providing language assistance. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding LEP should be directed to MPO staff at 727-464-8250 or mpo@pinellascounty.org.

PINELLAS COUNTY SELECT POPULATION CHARACTERISTICS

Table 2. 2010 Pinellas County Population, General Characteristics

| General Characteristics | Estimate | Percent |
|--|-----------------|----------------|
| Total Pinellas County Population | 916,542 | |
| Male | 440,009 | 48.0 |
| Female | 476,533 | 52.0 |
| Median age (years) | 46.3 | (X) |
| Under 5 years | 42,349 | 4.6 |
| 18 years and over | 753,654 | 82.2 |
| 65 years and over | 194,099 | 21.2 |
| <i>One race</i> | <i>896,526</i> | <i>97.8</i> |
| White | 752,892 | 82.1 |
| Black or African American | 94,745 | 10.3 |
| Hispanic or Latino (of any race) | 73,241 | 8.0 |
| American Indian and Alaska Native | 2,892 | 0.3 |
| Asian | 27,229 | 3.0 |
| Native Hawaiian and Other Pacific Islander | 810 | 0.1 |
| Some other race | 18,039 | 2.0 |
| <i>Two or more races</i> | <i>20,016</i> | <i>2.2</i> |

Source: US Census Bureau 2010 Census

An '(X)' means that the estimate is not applicable or not available from the US Census Bureau

The general population characteristics have experienced slight changes from 2010 Census. According to the 2010-2014 American Community Survey, the total Pinellas County population is 925,030, 47.9% male and 52.1% female. 4.6% of the population is under five years old, 82.6% is 18 years and over, and 22.1% is 65 years and over. Below is a table from the 2010-2014 American Community Survey displaying the Pinellas County population by race.

Table 3. 2010-2014 Pinellas County Population, by Race

| | Estimate | Percent |
|--|-----------------|----------------|
| White | 767,248 | 82.9 |
| Black or African American | 95,649 | 10.3 |
| American Indian and Alaska Native | 2,423 | 0.3 |
| Asian | 28,733 | 3.1 |
| Native Hawaiian and Other Pacific Islander | 765 | 0.1 |
| Two or more Races | 21,151 | 2.3 |
| <i>Hispanic or Latino (of any race)</i> | <i>78,298</i> | <i>8.5</i> |

Source: US Census Bureau 2010-2014 American Community Survey

Table 4. 2014 Pinellas County Population, Economic Characteristics

| Economic Characteristics | Estimate | Percent |
|---|-----------------|----------------|
| In labor force (population 16 years and over) | 462,056 | 59.0 |
| Mean travel time to work in minutes (workers 16 years and over) | 23 | (X) |
| Median household income (in 2014 inflation-adjusted dollars) | 45,574 | (X) |
| Median family income (in 2014 inflation-adjusted dollars) | 60,514 | (X) |
| Per capita income (in 2014 inflation-adjusted dollars) | 29,617 | (X) |
| Families below poverty level | (X) | 9.7 |
| Individuals below poverty level | (X) | 14.3 |

Source: US Census Bureau 2010-2014 American Community Survey

An '(X)' means that the estimate is not applicable or not available from the US Census Bureau

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

The MPO continues to strive to ensure that its advisory committees reflect the demographic composition of Pinellas County. To compensate for or supplement the membership of the advisory committees, the MPO has conducted targeted outreach to minority and low income populations. For example, the MPO has reached out to Pinellas County’s Hispanic Outreach Center, the City of Clearwater’s YWCA Hispanic Outreach Operation (Centro de Apoyo Hispano de YWCA), the Clearwater Police Department’s Hispanic outreach officer, the Tampa Bay Black Business Investment Corporation, the Hispanic Business Initiative Fund of Florida (HBIF) and the Ridgecrest Community in southwest Largo. The CAC has one Hispanic member and the remaining members are white, non-Hispanic. Previously, the CAC membership included black or African American members. The MPO is conducting outreach to promote greater diversity in its membership. There are currently two vacancies on the CAC. Exactly half of the CAC is female and half is male.

Tables depicting the membership of non-elected committees are included as Appendix F.

PROVIDING ASSISTANCE TO SUBRECIPIENTS

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports