



**FORWARD
PINELLAS**
Integrating Land Use & Transportation

**The Metropolitan Planning Organization and
Planning Council for Pinellas County**

**Title VI Program
Related to Transportation Planning Activities**

March 13, 2019

www.forwardpinellas.org

TABLE OF CONTENTS

Title VI Resolution	iii
Nondiscriminatory Policy Statement	iv
1. Introduction.....	1
2. Objectives	2
3. General Requirements	3
3.1 Title VI Assurances	3
3.2 Preparation and Submission Title VI Program	3
3.3 Protected Beneficiaries of Title VI	3
3.4 Title VI Complaint Procedures and Form	3
3.5 Title VI Investigations, Complaints and Lawsuits.....	4
3.6 Public Participation	4
3.7 Limited English Proficiency (LEP) Language Assistance Plan	5
3.8 Executive Order 13166.....	5
3.9 Minority Representation on Planning and Advisory Bodies.....	6
3.10 Subrecipient Assistance	6
3.11 Subrecipient Monitoring.....	7
3.12 Location of Facilities	8
3.13 Information Requests	9
4. Requirements Specific to Metropolitan Planning Organizations.....	9
4.1 Title VI Compliance	9
4.2 Demographic Profile of the Metropolitan Area.....	9
4.3 Mobility Needs of Minority Populations.....	10
4.4 Environmental Justice Communities - Impact and Allocation of Federal and State Funds	11
4.5 Pass-Through of FTA Financial Assistance	17
4.6 Potential Subrecipient Assistance.....	17
4.7 Program Administration	18

APPENDICES

Appendix A – Title VI Contract Clauses

Appendix B – Title VI Notice to the Public

Appendix C – Title VI Complaint Procedure and Forms

Appendix D – Title VI Investigations, Complaints, and Lawsuits

Appendix E – Public Participation Plan

Appendix F – Limited English Proficiency (LEP) Language Assistance Plan

Resolution #19 - 1

A RESOLUTION OF FORWARD PINELLAS, AS THE PINELLAS COUNTY METROPOLITAN PLANNING ORGANIZATION, AUTHORIZING THE SIGNING AND SUBMISSION OF THE 2019 TITLE VI PROGRAM AND SUPPORTING DOCUMENTATION TO THE FEDERAL TRANSIT ADMINISTRATION.

WHEREAS, the Federal Transit Administration requires that all direct and primary recipients document their compliance with Title VI requirements by submitting a Title VI Program once every three years, and

WHEREAS, Forward Pinellas, as the Pinellas County Metropolitan Planning Organization (MPO), must approve the Title VI Program prior to submission to the Federal Transit Administration.

NOW, THEREFORE, BE IT RESOLVED, by Forward Pinellas, as the Pinellas County MPO, as follows:

1. Forward Pinellas, as the Pinellas County MPO, has the authority to submit the 2019 Title VI Program.
2. The Chair, or his designee, is hereby authorized to sign the Title VI Program transmittal letter.
3. Forward Pinellas, as the Pinellas County MPO, authorizes the Executive Director to sign any and all assurances, warranties, certification and other documents which may be required in connection with the 2019 Title VI Program.

In a regular meeting of Forward Pinellas County duly assembled on this 13th day of March, 2019, Commissioner Long offered the foregoing Resolution and moved its adoption, which was seconded by CM Rice, and the final vote was as follows:

AYES: Mayor Bujalski, Commissioner Soter, Commissioner Smith, Mayor Kennedy, Commissioner Eggers, Commissioner Welch, Councilmember Rice, Councilmember Grabber, Commissioner Seel, Commissioner Long

NAYS: ∅

Absent and not voting:

Councilmember David Allbritton
Mayor Sandra Bradbury

By: Dave Eggers
Dave Eggers, Chair
Forward Pinellas, as the Pinellas County
Metropolitan Planning Organization

APPROVED AS TO FORM

By: Christen Howard
Office of the County Attorney

Nondiscriminatory Policy Statement

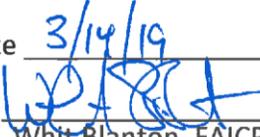
As the metropolitan planning organization (MPO) for Pinellas County, Forward Pinellas assures the U.S. Department of Transportation and Florida Department of Transportation that no person shall on the basis of race, color, national origin, sex, age, disability, family or religious status, as provided by the Title VI of the 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. In addition, Forward Pinellas assures the Florida Department of Transportation that no person shall be discriminated on the basis of sexual orientation, in accordance with Pinellas County Code Chapter 70, as amended.

Forward Pinellas 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 Executive Director;
2. Issue a policy statement signed by the Executive Director, which expresses a commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public;
3. Such information shall be published where appropriate in languages other than English;
4. Insert Title VI nondiscrimination clauses , as appropriate, in every contract subject to the Acts and the Regulations;
5. Develop a complaint process and attempt to resolve complaints of discrimination against subrecipients. Complaints against the Recipient shall immediately be forwarded to FDOT District 7 or the Federal Transit Administration, as appropriate;
6. Participate in training offered on Title VI and other nondiscrimination requirements;
7. If reviewed by FDOT or USDOT, take affirmative action to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) calendar days; and
8. Have a process to collect racial and ethnic data on persons impacted by your agency's programs.

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 Recipient.

Date 3/14/19

By 
Whit Blanton, FAICP, Executive Director, Forward Pinellas

1. Introduction

Forward Pinellas serves as the Pinellas County Metropolitan Planning Organization (MPO) and Pinellas Planning Council. As the Planning Council, Forward Pinellas, serves as a countywide land use planning agency responsible for the administration and implementation of the Countywide Plan, which coordinates future land use planning among the county's 25 local governments. As the MPO, Forward Pinellas is part of the Tampa Bay Transportation Management Area (TMA), which includes the urbanized areas of Pasco and Hillsborough counties.

As a recipient of federal funds, Forward Pinellas' transportation planning program is required to comply with Title VI of the 1964 Civil Rights Act, related nondiscrimination statutes, executive orders, and federal regulations. Forward Pinellas is also a direct recipient of Federal Transit Administration (FTA) funds that are currently being allocated to subrecipients. As the designated MPO for Pinellas County, Forward Pinellas coordinates transportation planning countywide and is responsible for the following:

- Development and adoption of an annual Unified Planning Work Program (UPWP), which identifies transportation planning activities, major regional planning and operational studies, transit-system planning tasks, and interagency coordination between Forward Pinellas and state and local jurisdictions in the implementation of the MPO's core responsibilities;
- Development and maintenance of the Long Range Transportation Plan (LRTP), a 20-year plan addressing the area's transportation needs;
- Development and maintenance of the Transportation Improvement Program (TIP), a five-year schedule of federally funded projects;
- Development and maintenance of the Congestion Management Process (CMP), which identifies areas in the county with safety and traffic issues and identifies strategies to address them; and
- Providing opportunities for public involvement in the transportation planning and decision-making process following the adopted guidelines in the Forward Pinellas Public Participation Plan (PPP).

Forward Pinellas is governed by a 13-member board of elected officials representing the county's local governments and transit authority. The organization of Forward Pinellas includes seven advisory committees: 1) Technical Coordinating Committee (TCC), 2) Planners Advisory Committee (PAC), 3) Citizens Advisory Committee (CAC), and 4) Bicycle Pedestrian Advisory Committee, 5) Local Coordinating Board (LCB), 6) School Transportation Committee (STSC), and

7) Pinellas Trail Security Task Force. Forward Pinellas also participates on and supports the TMA Leadership group, which advises the Tampa Bay MPOs on regional matters.

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. To address these federal requirements, Forward Pinellas has developed a Title VI Plan, a Limited English Proficiency (LEP) and Language Assistance Plan and an Environmental Justice Plan. The following sections provide a description of the agency's activities relating to those requirements.

2. Objectives

Forward Pinellas is committed to preventing discrimination and as well as fostering a just and equitable society and recognizes the key role that transportation services provide to the community. Forward Pinellas seeks to accomplish the following objectives in implementing this Title VI Program;

- Make transportation decisions that strive to meet the needs of all segments of the population throughout Pinellas County;
- Enhance the public involvement process to reach all segments of the population and ensure that all groups have the opportunity to have a voice in the transportation planning process regardless of race, color, national origin, gender, age, disability, and income status;
- Provide the community with opportunities to learn about and improve the quality and usefulness of transportation in their lives;
- Conduct data collection, monitoring, and analysis efforts to assess the needs and analyze the potential impacts of transportation plans and programs on Title VI protected populations;
- Avoid disproportionately high and adverse impacts on Title VI protected populations; and
- Comply with the requirements of Title VI and related nondiscrimination statutes, regulations, and federal directives.

As a direct recipient of Federal Transit Administration (FTA) funds and as an agency receiving Federal Highway Administration (FHWA) funds, Forward Pinellas, as the Pinellas County Metropolitan Planning Organization (MPO), is required to submit a Title VI compliance report to

the FTA Region 4 office every three years. This document highlights the Forward Pinellas' efforts with regards to Title VI compliance.

3. General Requirements

As part of its Title VI Program, Forward Pinellas maintains certain reporting requirements and provides the Florida Department of Transportation (FDOT), Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) the information described below regarding these general reporting requirements. These requirements apply to all recipients of federal aid. Metropolitan planning organizations must respond to additional requirements related to planning of federally funded transportation projects, and program administration that are addressed at the end of this section.

3.1 Title VI Assurances

Applications for financial assistance from FTA, FHWA or FDOT will be accompanied by an assurance that Forward Pinellas will carry out the program in compliance with Title VI regulations. The agency will include this Title VI Assurance with its Certifications and Assurances submission to FDOT, FHWA and FTA. Forward Pinellas will also collect Title VI Assurances from subrecipients prior to passing through FTA funds.

3.2 Preparation and Submission Title VI Program

Forward Pinellas will prepare and submit its Title VI Program to FTA every three years and to FHWA and FDOT on an annual basis to ensure compliance with Title VI.

3.3 Protected Beneficiaries of Title VI

Forward Pinellas will notify citizens that interact with its planning program of the protections afforded them by Title VI through its website, public meeting notices, planning documents such as the Long Range Transportation Plan, Unified Planning Work Program and Transportation Improvement Program, publications, MPO-related contracts, Board agendas and bid advertisements. Title VI materials are also provided to citizens, subrecipients, contractors and others upon request.

3.4 Title VI Complaint Procedures and Form

Forward Pinellas has developed procedures and a form for Title VI complaints that may be filed against the agency in its role as the MPO and for making these procedures available to members of the public upon request. Subrecipients are required to have these procedures and shall be encouraged to adopt the Forward Pinellas complaint procedures.

A copy of the Title VI Complaint Procedures utilized by Forward Pinellas, including the complaint form, is included in Appendix C.

3.5 Title VI Investigations, Complaints and Lawsuits

In compliance with 49 CFR Section 21.9(b), Forward Pinellas (and any subrecipient) shall record and report all Title VI investigations. This includes preparing and maintaining a list of any active investigations conducted by entities other than the FTA or FHWA, lawsuits, or complaints naming the agency (or subrecipient) alleging discrimination on the basis of race, color, national origin, sex, creed, disability or income status. This list shall include the date the investigation, lawsuit, or complaint was filed and received by Forward Pinellas, a summary of the allegation(s), the status of the investigation, lawsuit or complaint, and actions taken by the agency (or subrecipient) in response to the investigation, lawsuit, or complaint.

Forward Pinellas has never received a Title VI complaint or been the subject of a lawsuit or investigation. If Forward Pinellas does receive a complaint or is subject to a lawsuit or investigation the agency will record the information on the table shown in Appendix D and maintain an accompanying file.

3.6 Public Participation

Public involvement is central to the activities of Forward Pinellas as prescribed in the agency's Public Participation Plan (PPP). The PPP seeks and considers viewpoints of low-income, minority, elderly, disabled, LEP, ethnic and religious groups in the course of conducting public outreach activities related to transportation planning. One of the objectives of the PPP is to involve the traditionally underserved in transportation planning issues. Activities associated with the PPP, which is included in Appendix E, are described below.

- **Website and Publications:** Forward Pinellas has developed a website that includes a host of information on MPO planning activities including the Title VI and LEP programs. The Title VI complaint procedure and complaint forms are accessible on the website. Forward Pinellas board meetings are broadcast live and are video archived on the website. Forward Pinellas can supply most documents, upon request, in a variety of alternative formats. Documents that have a wide distribution such as the Long Range Transportation Plan brochure have been translated to Spanish. When conducting public meetings and workshops, staff tries to anticipate the targeted audience and have translators and suitable materials in alternative formats available.
- **Public Meetings/Workshops:** Major MPO projects and studies may include a public workshop to provide opportunities for citizens to learn about various plans or programs and to provide comment. Workshops are held in public buildings located on

roads that are served by PSTA buses. They are typically advertised through press releases, direct mailings, posters, webpage announcements and/or the *Tampa Bay Times*. Times, locations and methods for distributing information about the event are based on the location of the affected area and availability of individuals, businesses and other interested parties. All Forward Pinellas sponsored meetings or workshops are conducted in Americans with Disabilities Act (ADA) accessible locations and are accessible by transit. Availability of language assistance stated in English and Spanish is included in each meeting and workshop notice.

- **Public Hearings:** Forward Pinellas conducts formal public hearings to provide opportunities for citizen input on the adoption and amendment of the Long Range Transportation Plan (LRTP), Transportation Improvement Program (TIP), and Public Participation Plan. Public hearing notices are mailed and emailed to mailing list recipients, and posted on the Forward Pinellas website and social media platforms. Information on language assistance in English and Spanish is included in each notice.
- **Surveys:** Forward Pinellas staff utilizes survey instruments on its website, distributed through email and at various workshops to collect public input. Surveys are also used for Long Range Transportation Plan input. 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 as necessary. Surveys have also been made available in alternative formats such as in large type, Braille and Spanish.

3.7 Limited English Proficiency (LEP) Language Assistance Plan

Forward Pinellas is committed to providing meaningful access to limited English proficiency (LEP) people, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations, as necessary to participate in its transportation planning process. This includes ensuring that the LEP community has access to MPO plan and program information in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations.

3.8 Executive Order 13166

Forward Pinellas also complies with Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), which applies to all programs and operations of entities that receive funding from the federal government. Pursuant to this Executive Order, Forward Pinellas publishes guidance to its recipients clarifying that obligation. This guidance is consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance (65 FR 50123, August 16, 2000), "Enforcement of Title VI of the Civil

Rights Act of 1964--National Origin Discrimination Against Persons with Limited English Proficiency.” The Forward Pinellas LEP and Language Assistance Plan is provided in Appendix E.

3.9 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.” Forward Pinellas advisory committees play a key role in reviewing proposed plans and programs and making recommendations on them to the Forward Pinellas Board. There are three advisory committees that address public transportation issues and that include citizen representatives among their members. These include the Citizens Advisory Committee (CAC), Bicycle Pedestrian Advisory Committee (BPAC) and Transportation Disadvantaged (TD) Program Local Coordinating Board (LCB).

Forward Pinellas continues to strive for greater diversity in the membership of its advisory committees that have citizen representatives, particularly the CAC, which is the primary conduit for public input and discussion on MPO plans and programs. In 2016, Forward Pinellas revised its CAC member application process, including a bylaw amendment making the prioritization of minority representation its foremost consideration in the selection of new committee members. To bolster its outreach efforts toward minority and underserved communities, Forward Pinellas conducts targeted outreach to communities and organizations that serve these population groups. For example, the agency 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 to assist in the development of the Long Range Transportation Plan. The CAC has three Hispanic members and one black/African American. The remaining members are white, non-Hispanic.

There is one Hispanic representative on the BPAC and one black/African American individual on the LCB. The remaining members of the two committees are white, non-Hispanic. In classifying race, Forward Pinellas follows the definitions utilized by the US Census Bureau, which adheres to the Office of Management and Budget standards on race and ethnicity.

3.10 Subrecipient Assistance

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 to the primary recipient as may be necessary to enable the primary recipient to

carry out its obligations under this part.” Primary recipients should assist their subrecipients in complying with DOT’s Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient. Forward Pinellas currently has two subrecipients receiving Federal Transportation Administration grant funds. These include the City of St. Petersburg for a bus rapid transit corridor enhancement project and Pinellas County for replacement of pier/dock at Fort DeSoto Park. Forward Pinellas provides the information listed below to these subrecipients.

- Sample notices to the public informing beneficiaries of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint, and the recipient’s Title VI complaint form
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient
- Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance
- Any other recipient-generated or obtained data, such as demographic information, travel patterns, surveys, etc., that will assist subrecipients in complying with Title VI
- Forward Pinellas Title VI plan documents or weblink
- FTA circulars associated with Title VI

3.11 Subrecipient Monitoring

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. If a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance. In order to ensure the primary and subrecipient are in compliance with Title VI requirements, the primary recipient shall undertake the following activities:

- Document the process for ensuring that all subrecipients are complying with the general reporting requirements of this circular, as well as other requirements that apply to the subrecipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider;

- Collect Title VI program documents from subrecipients and review them for compliance. These document may be collected electronically at the option of the primary recipient;
- At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by the primary recipient, the primary recipient shall request that subrecipients providing transportation services verify that FTA C 4702.1B Chap. III-11 service is provided on an equitable basis. Subrecipients that are fixed route transit providers are responsible for reporting as outlined in Chapter IV of this Circular;
- Ensure that each Forward Pinellas subrecipient/subgrantee contract or agreement includes the Civil Rights clauses (see Appendix A) and the internet link to the Forward Pinellas Title VI Plan;
- Ensure that subgrantees annually certify that their organization has not had any Title VI complaints or active lawsuits with respect to service or other transit benefits; and
- Ensure Title VI requirements are included with the subrecipient/subgrantee's third party contracts.

When a subrecipient is also a direct recipient of FTA funds (i.e., applies for funds directly from FTA in addition to receiving funds from a primary recipient) the organization reports directly to FTA. In this situation, Forward Pinellas is not responsible for monitoring compliance of that subrecipient. The supplemental agreement signed by both entities in their roles as designated recipient and direct recipient relieves the primary recipient/designated recipient of this oversight responsibility.

3.12 Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, "in determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) stipulates that "the location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

Per FTA Circular 4702.1B, "facilities" are defined narrowly to exclude bus shelters, which are transit amenities, or larger projects such as bus stations or guideways subject to the National Environmental Policy Act (NEPA) process. Rather they include, but aren't limited to, storage facilities, maintenance facilities, operations centers, etc.

Forward Pinellas acknowledges its responsibility to complete a Title VI equity analysis 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. This process would include outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis would compare the equity impacts of various siting alternatives, and occur before the selection of the preferred site.

3.13 Information Requests

Forward Pinellas will provide information other than that required by Circular 4702.1B to FTA upon request, should it be necessary to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

1. Requirements Specific to Metropolitan Planning Organizations

4.1 Title VI Compliance

Forward Pinellas recognizes that all MPO related transportation planning activities must comply with 49 U.S.C. Section 5303, Metropolitan Transportation Planning, as well as subpart C of 23 CFR part 450, Metropolitan Transportation Planning and Programming. This section addresses requirements specific to MPO planning activities. These are in addition to the requirements identified in Section 3.

4.2 Demographic Profile of the Metropolitan Area

Pinellas County has the highest population density of any county in the state, with approximately 3,100 people per square mile. Population growth in Pinellas County decreased slightly from 2000 to 2010, but as shown in Table 1, which compares five year US Census estimates from 2010 - 2014 to 2013 - 2017, it has increased nearly 6 percent since then. The median age of residents has also increased slightly to 47.9, exceeding the median age of the state (41.8) and the U.S. (38). The average household size in the county is 2.16 compared to 2.5 for the state and 2.6 for the U.S. In addition, 67.4% of households are owner-occupied in the county, the same percentage as the state and slightly higher than the national rate of 64 percent.

Of the total population, 23.7% percent is comprised of minority groups, an increase of over 7.5 percent since 2000 and 2 percent since 2010 - 2014. While growth in the black or African American population has been relatively flat, the Hispanic population has continued a steady growth. The 1.7 percent Hispanic growth from 2010 – 2014 to 2013 - 2017 was preceded by a near doubling of the population from 2000 to 2010.

Table 1. Pinellas County Demographic Trends

Population Groups	2010 - 2014		2013 - 2017		%age change
	Estimate	Percent	Estimate	Percent	
Total Pinellas County Population	916,542		970,637		+5.9
Male	440,009	48.0	465,906	48.0	0
Female	476,533	52.0	504,731	52.0	0
Median age (years)	46.3	n/a	47.9	n/a	n/a
Under 5 years	42,349	4.6	42,708	4.4	-0.2
5 – 18 years	120,984	13.2	160,155	16.5	+3.3
18 – 64 years	559,555	61	532,880	54.9	-6.1
65 years and over	194,099	21.2	234,894	24.2	+3
White	752,892	82.1	777,713	80.1	-2
Black or African American	94,745	10.3	97,162	10	-0.3
Hispanic or Latino (of any race)	73,241	8.0	94,152	9.7	+1.7
American Indian and Alaska Native	27,496	0.3	38,825	0.4	+0.1
Asian	27,229	3.0	34,943	3.6	+0.6
Native Hawaiian and Other Pacific Islander	9,165	0.1	9,706	0.1	0
Two or more races	20,016	2.2	21,354	2.2	0

Source: US Census Bureau, American Community Survey

4.3 Mobility Needs of Minority Populations

As stated in its Public Participation Plan, Forward Pinellas “engages the County’s underserved through its participation in community events, meetings and workshops that serve their neighborhoods.” Objective 5 of the Public Participation Plan is to “involve traditionally under-served persons, including minority, low-income and elderly citizens or those addressed by the Americans with Disabilities Act (ADA) in the development and review of transportation plans.”

Forward Pinellas has developed a Census-based Environmental Justice (EJ) profile of the county identifying the locations of EJ population groups and conducts targeted public outreach in those areas. Forward Pinellas also utilizes this information to ensure traditionally underserved citizens have ample opportunities to participate in the transportation planning process. Pursuant to its Public Participation Plan, Forward Pinellas continues to strive to ensure that its advisory committees reflect the demographic composition of Pinellas County.

Forward Pinellas gauges the level of involvement by low-income and minority citizens in the number of meaningful responses they provide to staff at public events and meetings

within their neighborhoods. Having staff interact with these groups when such events or meetings are held within their neighborhoods has proven to be the best method of ensuring their participation in the public involvement process. Another strategy that has proven effective has been to coordinate with social service organizations that work with underserved citizens to meet their sustenance needs through the Transportation Disadvantaged (TD) Program. Forward Pinellas is the designated official planning agency for the program pursuant to Chapter 427, F.S. In this role, Forward Pinellas helps to link these agencies with technical and funding resources to meet the transportation needs of the people they serve.

4.4 Environmental Justice Communities - Impact and Allocation of Federal and State Funds

As a part of the development of the Long Range Transportation Plan (LRTP), Forward Pinellas utilizes US Census data to identify concentrations of low income and minority populations. Combined, these population groups comprise the county's environmental justice (EJ) areas as shown in Figure 1. Figures 2 through 4 illustrate the level of investment in terms of LRTP capital improvements in the EJ areas. Figures 2 and 3 demonstrate substantial transit, trail and bicycle facility investment in the EJ areas whereas Figure 4 shows limited road improvements in them. This reflects that the greater need in the EJ areas in terms of roadway investments is maintenance as opposed to infrastructure expansion. As these maps were prepared for the 2040 LRTP, which was adopted in 2014, the minority percentage does not reflect the more recent Census data displayed in Table 1.

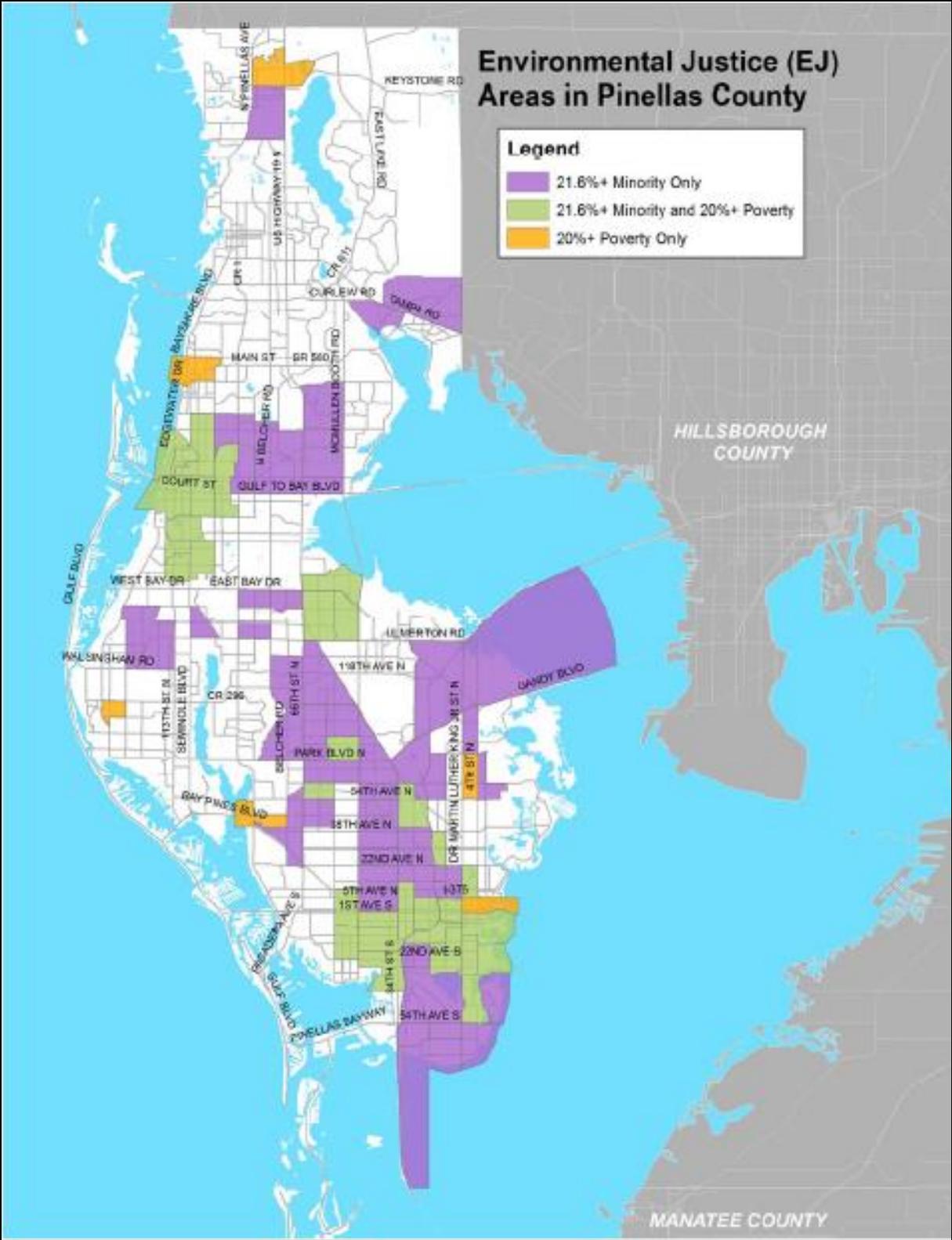


Figure 1

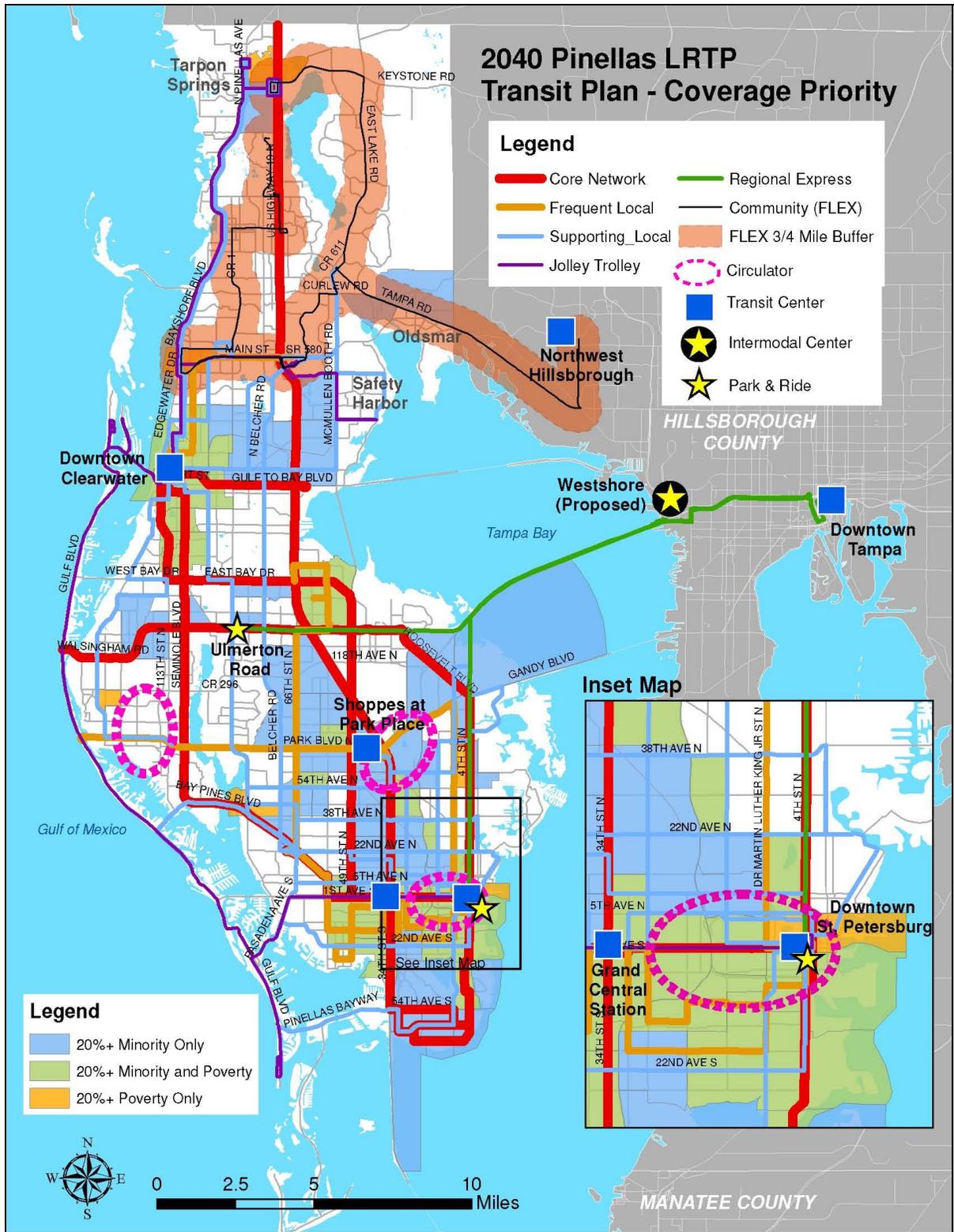


Figure 2

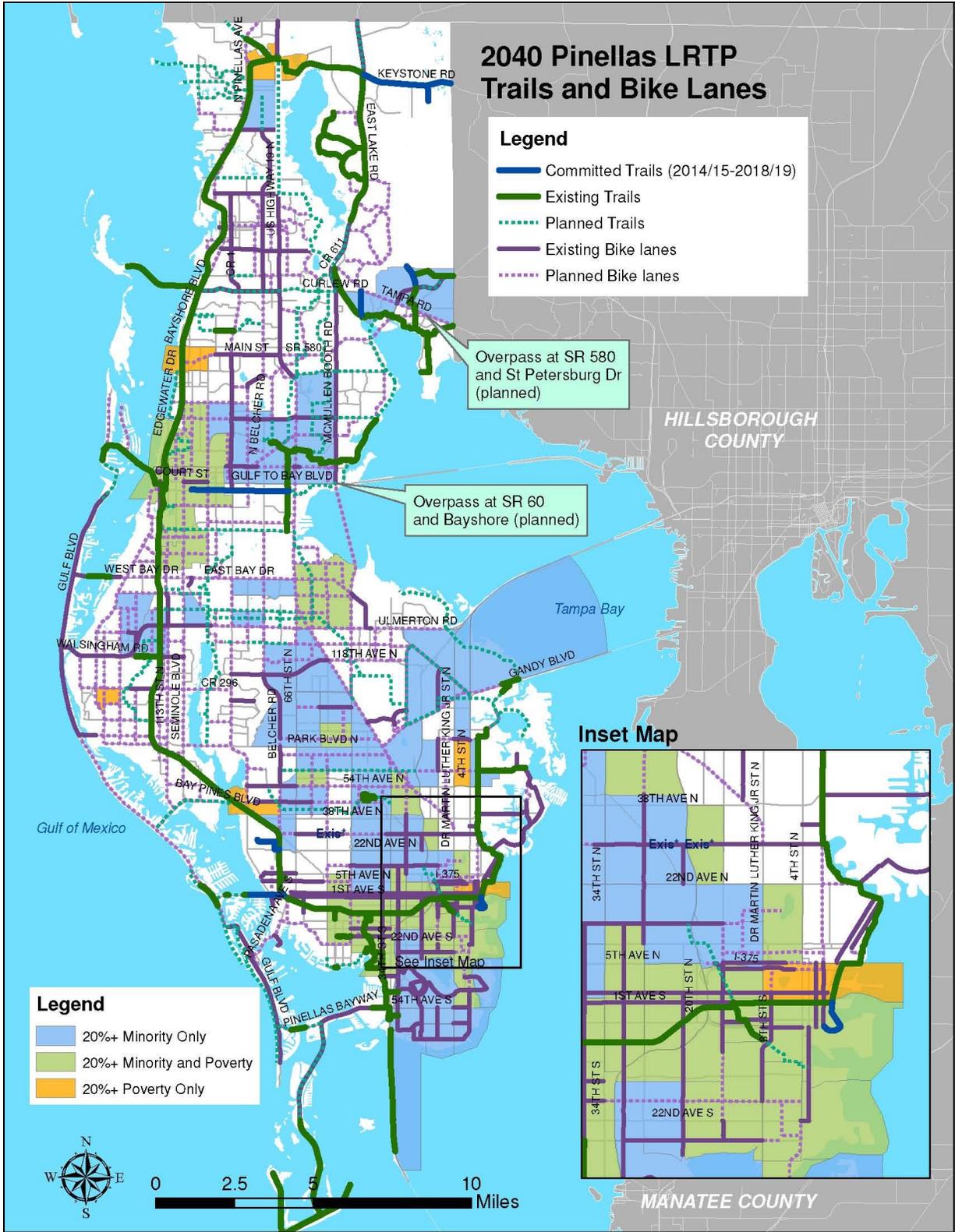


Figure 3

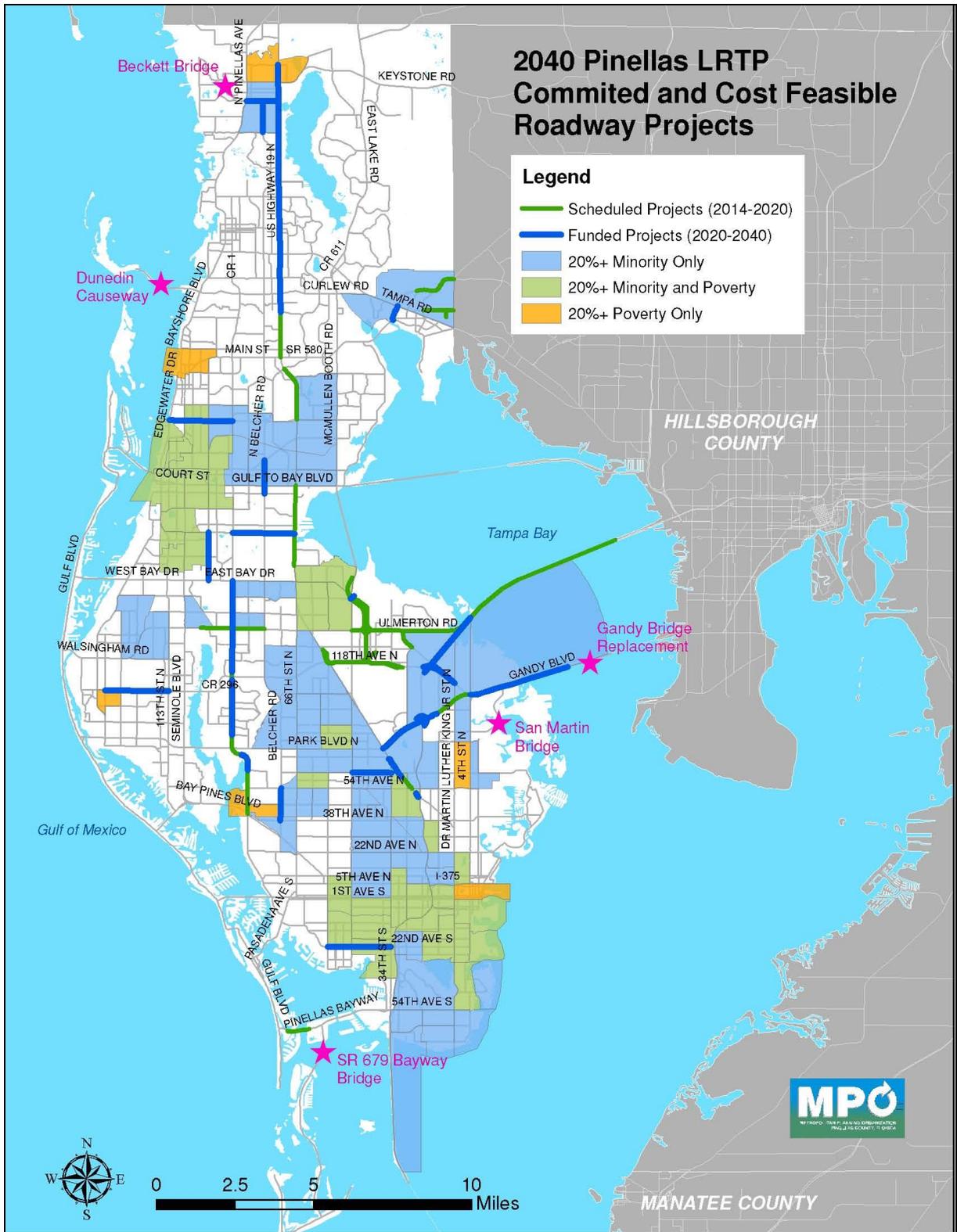


Figure 4

Table 2 presents the allocation of transportation investments, as identified in the 2040 LRTP, on roadway, transit, pedestrian and bicycle facility projects in EJ areas as compared to the remainder of the county. Regarding future spending on highways, it's important to note that most of projects identified in the LRTP for road improvements are enhancements (i.e., curb, gutter, bike lanes and sidewalks) as opposed to capacity expansion (e.g., adding through lanes), which has a far greater impact on the surrounding land area. As evidenced by the per capita spending and the percentage of total funding, the EJ areas are receiving an equitable allocation of transportation funding. The one exception to this is the trail projects. However, when considering the location of the existing trail network in combination with the planned improvements as shown on Figure 3, the facilities available to EJ populations are comparable to the other areas of the county.

Table 2. LRTP Transportation Investment

	EJ Areas	Non-EJ Areas	Total
Population	370,328	546,214	916,542
Percent of Population	40.4	59.6	
Committed Highways (2015-2019)	\$615,670,000	\$709,900,000	\$1,325,570,000
Per Capita	\$1,662	\$1,300	\$1,446
Mileage	12.7	23.2	35.9
Cost Feasible Highways (2020-2040)	\$966,250,668	\$614,695,962	\$1,580,946,630
Per Capita	\$2,609	\$1,125	\$1,725
Mileage	24.6	12.3	36.9
Cost Feasible "Core" Transit Plan (2020-2040)	\$969,449,785	\$1,370,089,747	\$2,339,539,532
Per Capita	\$2,618	\$2,508	\$2,553
Mileage	196	277	473
Cost Feasible "Coverage" Transit Plan (2020-2040)	\$1,029,232,056	\$1,310,307,476	\$2,339,539,532
Per Capita	\$2,779	\$2,399	\$2,553
Mileage	249	317	566

	EJ Areas	Non-EJ Areas	Total
Cost Feasible Trails (2020-2040)	\$23,091,642	\$49,871,538	\$72,161,381
Per Capita	\$62.35	\$89.84	\$78.73
Mileage	39.8	98.9	138.7
Cost Feasible Bike Lanes (2020-2040)	158.3	188.4	346.7
Total Funding	\$3,603,694,151	\$4,054,864,723	\$7,657,757,075
Percentage	47	53	100

4.5 Pass-Through of FTA Financial Assistance

Forward Pinellas currently serves as a pass-through entity of FTA funds for the City of St. Petersburg and Pinellas County. In this role, Forward Pinellas coordinates with the subrecipients to ensure the use of the funds comply with Title VI requirements. Forward Pinellas worked with several subrecipient agencies from 2009 to 2015 when administering Job Access Reverse Commute (JARC) and New Freedom funds. Applications for these grant programs were evaluated through a competitive selection process by a committee consisting of a member from each of the three Tampa Bay TMA MPOs (Pinellas, Hillsborough and Pasco), FDOT District 7 and the Tampa Bay Regional Planning Council (TBRPC). To be considered for funding, the applications had to address mobility needs identified in the Tri-County Access Plan, which was adopted jointly by the TMA MPOs. Although the JARC and New Freedom programs no longer exist, the process used for selecting and evaluating these applications serves as a model for competitive grant programs serving the needs of disadvantaged or EJ communities that Forward Pinellas might manage in the future.

4.6 Potential Subrecipient Assistance

To provide assistance to potential subrecipients on how to provide programs and services in a non-discriminatory manner, Forward Pinellas uses the following procedures:

- Provide each applicant with public notice informing them of their rights under Title VI;
- Provide each applicant with the Forward Pinellas procedures on how to file a Title VI complaint;
- Provide technical assistance to applicants with regards to any Title VI question;

- Reply to questions of the application process in a manner that does not give any applicant an “edge” over any other applicant; and
- Provide relevant Title VI demographic information to applicants.

4.7 Program Administration

Forward Pinellas reviews its Title VI Program on a regular basis prior to signing its annual certification agreement with FDOT. Regarding its subrecipient agencies, Forward Pinellas ensures FTA funds allocated to them are utilized in a manner that is compliant with Title VI and assures that minority populations are not being denied the benefits of or excluded from participation in FTA funded programs. The agency will provide the following information upon request:

- A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding:
- A description of how Forward Pinellas develops its competitive selection process is submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present; and
- A description of Forward Pinellas’ criteria for selecting entities to participate in an FTA grant program.

APPENDIX A

Required Consultant and Subgrantee Title VI Contract Clauses

As a policy, the following civil rights clauses regarding non-discrimination are included in all Forward Pinellas contracts and subgrantee agreements related to the agency's role as the MPO:

1. CIVIL RIGHTS - The following requirements apply to this AGREEMENT:

Nondiscrimination - In accordance with Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d, section 303 of the Age Discrimination Act of 1975, as amended, 42 U.S.C. § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and federal transit law at 49 U.S.C. § 5332:

"The CONSULTANT or SUBGRANTEE shall not discriminate on the basis of race, age, creed, disability, marital status, color, national origin, or sex in the performance of this contract. The CONSULTANT or SUBGRANTEE shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of DOT assisted contracts. Failure by the CONSULTANT or SUBGRANTEE to carry out these requirements is a material breach of this AGREEMENT, which may result in the termination of this AGREEMENT or such other remedy, as Forward Pinellas deems appropriate."

Each subcontract the CONSULTANT or SUBGRANTEE signs in regards to this federal aid PROJECT must include the assurance in this paragraph (see 49 CFR 26.13(b)). The CONSULTANT or SUBGRANTEE agrees to comply with applicable federal implementing regulations and other implementing requirements FTA may issue. In addition to the above assurance, the CONSULTANT or SUBGRANTEE shall not discriminate on the basis of sexual orientation, in accordance with Pinellas County Code Chapter 70 as amended.

Equal Employment Opportunity - The following equal employment opportunity requirements apply to this AGREEMENT:

(1). Race, Color, Creed, National Origin, Sex - In accordance with Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, and federal transit laws at 49 U.S.C. § 5332, the CONSULTANT or SUBGRANTEE agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of Labor (U.S. DOL) regulations, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor," 41 C.F.R. Parts 60 et seq., (which implement Executive Order No. 11246, "Equal Employment Opportunity," as amended by Executive Order No. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," 42 U.S.C. § 2000e note), and with any applicable federal statutes, executive orders, regulations, and federal policies that may in the future affect construction activities undertaken in the course of the PROJECT. The CONSULTANT or SUBGRANTEE agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, creed,

national origin, sex, or age. Such action shall include, but not be limited to, the following: Employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, the CONSULTANT or SUBGRANTEE agrees to comply with any implementing requirements FTA may issue.

(2). Age – In accordance with Section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 621 through 634 and federal transit law at 49 U.S.C. § 5332, the CONSULTANT or SUBGRANTEE agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, the CONSULTANT or SUBGRANTEE agrees to comply with any implementing requirements FTA may issue.

(3). Disabilities – In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 U.S.C. § 12112, the CONSULTANT or SUBGRANTEE agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 C.F.R. Part 1630, pertaining to employment of persons with disabilities. In addition, the CONSULTANT or SUBGRANTEE agrees to comply with any implementing requirements FTA may issue.

(4). Access to Services for Persons with Limited English Proficiency – To the extent applicable and except to the extent that FTA determines otherwise in writing, the CONSULTANT or SUBGRANTEE agrees to comply with the policies of Executive Order No. 13166, "Improving Access to Services for Persons with Limited English Proficiency," 42 U.S.C. § 2000d-1 note, and with the provisions of U.S. DOT Notice, "DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries," 66 Fed. Reg. 6733 et seq., January 22, 2001. The LEP Plan is available at the Forward Pinellas office or may be viewed on-line at: <http://forwardpinellas.org/wp-content/uploads/2017/02/Limited-English-Proficiency-and-Language-Assistance-Plan-from-Title-VI-Plan.pdf>.

(5). Environmental Justice – The CONSULTANT or SUBGRANTEE agrees to comply with the policies of Executive Order No. 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," 42 U.S.C. § 4321 note, except to the extent that the Federal Government determines otherwise in writing.

(6). Drug or Alcohol Abuse-Confidentiality and Other Civil Rights Protections – To the extent applicable, the CONSULTANT or SUBGRANTEE agrees to comply with the confidentiality and other civil rights protections of the Drug Abuse Office and Treatment Act of 1972, as amended, 21 U.S.C. §§ 1101 et seq., with the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970, as amended, 42 U.S.C. §§ 4541 et seq., and with the Public Health Service Act of 1912, as amended, 42 U.S.C. §§ 201 et seq., and any amendments to these laws.

(7). Other Nondiscrimination Laws – The CONSULTANT or SUBGRANTEE agrees to comply with all applicable provisions of other federal laws, regulations, and directives pertaining to and prohibiting discrimination, except to the extent the Federal Government determines otherwise in writing. The CONSULTANT or SUBGRANTEE also agrees to include these requirements in each subcontract financed in whole or in part with federal assistance provided by FTA, modified only if necessary to identify the affected parties.

APPENDIX B

Public Notification Regarding Rights under Title VI

Forward Pinellas does not discriminate on the basis of race, color or national origin in administration of its programs, activities or services. Any person who believes she or he has been aggrieved by an MPO program or activity resulting from an unlawful discriminatory practice under Title VI may file a complaint with Forward Pinellas. Listed below are the procedures for filing a complaint.

1. Fill out a complaint form shown on page C-3 (Spanish version) and C-4.
2. Submit the completed form and mail to Al Bartolotta, Title VI Specialist, Forward Pinellas, 310 Court Street, Clearwater, Florida 33756; or email to info@forwardpinellas.org; or fax to 727-464-8212. The complaint must be submitted within 180 days of the alleged incident. Verbal complaints may also be submitted by phone to 727-464-8250 or in person at the above address.
3. Within ten calendar days, the agency's Title VI Specialist will acknowledge receipt of the allegation(s), inform the Complainant of action taken or proposed action to process the allegation(s), and advise the Complainant of other avenues of redress available, such as the FDOT Equal Opportunity Office (EOO). If the complaint is related to state or federal funding, the Complainant shall be referred to the FDOT District Seven Title VI Coordinator and/or FTA, as appropriate, for processing in accordance with approved state procedures.
4. The Title VI Specialist will advise the FDOT District Seven Title VI Coordinator within five calendar days of receipt of the allegation(s).
5. Forward Pinellas will conduct a preliminary inquiry into the complaint to determine whether an investigation is warranted. Should Forward Pinellas staff determine that the evidence presented is not sufficient to proceed, the complainant will be notified in writing of the decision within 15 calendar days. The notification shall specifically state the reason(s) for the decision.
6. Should Forward Pinellas staff determine that a full investigation is necessary, the complainant will be notified that an investigation will take place and additional information will be requested, if necessary.
7. Within 60 calendar days, the Title VI Specialist will conduct and complete a review of the allegation(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the Forward Pinellas Executive Director.
8. Within 90 calendar days of receiving the complaint, the Executive Director will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the FDOT EOO, if they are dissatisfied with the final decision rendered by Forward Pinellas.

For more information on the Forward Pinellas Title VI Program and the procedures to file a complaint, contact **Al Bartolotta, Title VI Specialist** at 727-464-8250; email info@forwardpinellas.org; or visit our office at 310 Court Street, Clearwater, Florida. For more information, visit the link below.

<http://forwardpinellas.org/get-involved/nondiscrimination-information>

A complainant may file a complaint directly with the Federal Transit Administration through the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. If information is needed in another language, the Complainant may contact (727) 464-4062. Si se necesita información en otro idioma, llame (727) 464-4062.

APPENDIX C

FORWARD PINELLAS DISCRIMINATION COMPLAINT PROCEDURE

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color and national origin in programs and activities receiving federal financial assistance. As a subrecipient of the Florida Department of Transportation, Forward Pinellas, in its role as the Pinellas County Metropolitan Planning Organization (MPO), has in place a Title VI complaint procedure.

Forward Pinellas investigates complaints received no more than 180 days after the alleged incident.

1. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, by any MPO programs or activities, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint completing one of the forms provided on page C-3 or C-4 and sending it to the address below. (Note: If you believe you have been discriminated against by another branch of the Pinellas County Government, please contact the Pinellas County Office of Human Rights at 727.464.4880). Complaints may also be submitted by email to info@forwardpinellas.org, by phone (727-464-8250), or in person.

Forward Pinellas
310 Court Street
Clearwater, FL 33756

2. Within ten calendar days, the Forward Pinellas Title VI Specialist will acknowledge receipt of the allegation(s), inform the Complainant of action taken or proposed action to process the allegation(s), and advise the Complainant of other avenues of redress available, such as the FDOT Equal Opportunity Office (EOO). If the complaint is related to state or federal funding, the Complainant shall be referred to the FDOT District Seven Title VI Coordinator and/or FTA, as appropriate, for processing in accordance with approved state procedures.
3. The Title VI Specialist will advise the FDOT's District Seven Title VI Coordinator within five calendar days of receipt of the allegations. The following information will be included in every notification to the FDOT's District Seven Title VI Coordinator:
 - Name, address, and phone number of the Complainant.
 - Name (s) and address(es) of the Respondent.
 - Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation).
 - Date of alleged discriminatory act(s).
 - Date complaint received by Forward Pinellas.

- A statement of the complaint.
 - Other agencies (state, local or federal) where the complaint has been filed.
 - An explanation of the actions Forward Pinellas has taken or proposed to resolve the allegation(s) raised in the complaint.
4. Forward Pinellas will conduct a preliminary inquiry into the complaint to determine whether an investigation is warranted. Should Forward Pinellas staff determine that the evidence presented is not sufficient to proceed, the complainant will be notified in writing of the decision within 15 calendar days. The notification shall specifically state the reason(s) for the decision.
 5. Should Forward Pinellas staff determine that a full investigation is necessary, the complainant will be notified that an investigation will take place and additional information will be requested, if necessary.
 6. Within 60 calendar days, the Title VI Specialist will conduct and complete a review of the allegation(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the Forward Pinellas Executive Director.
 7. Within 90 calendar days of receiving the complaint, the Executive Director will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the FDOT EEO, if they are dissatisfied with the final decision rendered by Forward Pinellas.
 8. The Title VI Specialist will maintain a log of all verbal and nonwritten complaints received by the agency. The log will include the following information:
 - Name of Complainant.
 - Name of Respondent.
 - Basis of Complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation).
 - Date verbal or non-written complaint was received by Forward Pinellas.
 - Date Forward Pinellas notified the FDOT's District Seven Title VI Coordinator of the verbal or non-written complaint.
 - Explanation of the actions Forward Pinellas has taken or proposed to resolve the issue raised in the complaint.

FORMULARIO DE QUEJA
(Condado de Pinellas)

Nombre de la persona discriminada		Número de teléfono (Residencia)	Número de teléfono (Trabajo)
Dirección de residencia (Número y calle, número de departamento)		Ciudad, estado, y código postal de residencia	
Nombre de la persona que discriminó contra usted, y nombre de la dependencia (si los sabe)			
Dirección de la persona o dependencia que discriminó contra usted		Ciudad, estado y código postal de la persona o dependencia que discriminó contra usted	
Fecha del incidente discriminatorio.			
Causa de la discriminación:			
<input type="checkbox"/> Raza	<input type="checkbox"/> Retaliación	<input type="checkbox"/> Sexo	<input type="checkbox"/> Estado Civil
<input type="checkbox"/> Color de Piel	<input type="checkbox"/> Nacionalidad (Idioma)	<input type="checkbox"/> Edad	<input type="checkbox"/> Impedimento Físico o Impedimento Mental
			<input type="checkbox"/> Religión
			<input type="checkbox"/> Otro
<p>Explique claramente como sucedió la discriminación y quienes participaron en ella. Incluya en su explicación cualquier conocimiento que tenga de tratamiento diferente a otras personas. Adjunte cualquier otro escrito relacionado con su caso.</p>			
Firma		Fecha	

APPENDIX D

List of Title VI Investigations, Complaints, and Lawsuits

Forward Pinellas maintains a file for Title VI complaints, investigations and lawsuits. To date, there have been no Title VI complaints, investigations, or lawsuits filed against the agency.

	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.				

APPENDIX E

Public Participation Plan

The Public Participation Plan was last adopted by the Forward Pinellas Board on February 10, 2016 and is available at the link below.

<http://forwardpinellas.org/wp-content/uploads/2016/07/PPP.pdf>

APPENDIX F

LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE ASSISTANCE PLAN

1. Introduction

Forward Pinellas has developed this Limited English Proficiency (LEP) Language Assistance Plan 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 extent of Forward Pinellas' obligation to provide LEP services, the agency 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 Forward Pinellas to the LEP population; and 4) the resources available to Forward Pinellas and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

2. Four Factor Analysis and Results

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

According to the US Census Bureau, the 2013 – 2017 total population estimate of Pinellas County citizens five years of age and older was 907,232. Based on a review of American Community Survey data for this period, it was determined that approximately 126,579 people in Pinellas County, 14 percent, spoke a language other than English at home and 46,416 people, 5.1 percent of the population spoke English less than “very well.” Aside from English, the language spoken by most people in Pinellas County, 58,647 (6.5 percent), during this period was Spanish.

**Table 2. Pinellas County Population Five Years of Age and Older 2013-2017
Languages Spoken At Home**

Population Group	Pop.	%age of Total Pop.
Speak English only	780,653	86%
Language other than English spoken at home	126,579	14%
Speak English less than "very well"	46,416	5.1%
Spanish		
Persons who speak Spanish at home	58,647	6.5%
Speak English less than "very well"*	22,383	2.5%
Indo-European		
Persons who speak European languages at home	42,068	4.6%
Speak English less than "very well"*	12,891	1.4%
Asian and Pacific Islander languages		
Persons who speak Asian and Pacific Islander languages at home	20,812	2.3%
Speak English less than "very well"*	9,740	1.1%
Other Languages		
Persons who speak other languages at home	5,052	0.6%
Speak English less than "very well"	1,402	0.2%

Source: US Census Bureau 2013-2017 American Community Survey

Language translation services for LEP individuals are available at Forward Pinellas meetings and events. Forward Pinellas also 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 agency conducted a trail survey in 2014. This survey was available in English and Spanish. Spanish speaking staff were available to assist those not comfortable with the written versions of the survey. Forward Pinellas works with local community groups to assist in outreach to LEP persons.

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

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

Listed below are the LEP requests received and fulfilled by Forward Pinellas from January 1, 2006 to December 31, 2018. None have been received since 2016.

- 2 - Spanish speaking interpretation

- 1 - Spanish translation of a Forward Pinellas document
- 2 - American Sign Language requests
- 1 - Braille translation of a Forward Pinellas document
- 8 - Reading assistance

LEP populations may also interact with Forward Pinellas at various public outreach events. As described in Four Factor Analysis Area 1, Forward Pinellas provides materials in Spanish and staff translations for LEP individuals attending events the agency sponsors.

2.3 The nature and importance of the program, activity or service provided by Forward Pinellas to the LEP community.

Since there is a large concentration of Hispanics in Clearwater, Forward Pinellas has contacted the YWCA Hispanic Outreach Operation (Centro de Apoyo Hispano de YWCA) in Clearwater for help in identifying MPO programs that would be of importance to a Hispanic LEP person. This included 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 since many of them do not drive and rely on public transit, walking or bicycling. To help these individuals and other Spanish citizens in the county facing similar circumstances, the county's transit operator, the Pinellas Suncoast Transit Authority (PSTA), translated its system route map and several brochures to Spanish. Forward Pinellas has also translated several bicycle and pedestrian safety brochures to Spanish.

Many Hispanic Outreach Operation clients are economically disadvantaged and are eligible to receive low cost transportation services through the Pinellas County Transportation Disadvantaged (TD) Program. As the TD Program's community transportation coordinator (CTC), PSTA and its taxi cab and wheelchair providers have Spanish speaking staff readily available to provide language assistance.

In the development of a new LRTP, which takes place every five years, Forward Pinellas utilizes Spanish outreach materials and related staff assistance to ensure that the LEP community is engaged in the Forward Pinellas public involvement process. Forward Pinellas also reaches out to social service and other non-profit agencies serving LEP communities identified through Environmental Justice analysis to provide their clients with opportunities to participate in LRTP public involvement activity. These agencies have included the High Point Neighborhood Family Center, Union Academy Family Center/Citizens Alliance for Progress, and the Lealman and Asian Neighborhood Family Center.

2.4 The resources available to Forward Pinellas and overall costs.

Forward Pinellas periodically assesses its resources and needs for providing LEP

assistance. This includes identifying staff and volunteer language interpreters that are readily available, the cost of a professional interpreter and translation service, and documents that need to be translated. It also involves identifying organizations Forward Pinellas can partner with for outreach and translation efforts, financial and in-kind sources available to provide assistance and determining staff training needs.

Forward Pinellas has staff available for Spanish speaking LEP citizens as necessary. The agency also maintains contact information for language interpretation services 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 reliable resource for the agency and can provide translation services.

Based on the four factor analysis considerations described above, procedures for the Forward Pinellas LEP Language Assistance Plan were developed. These procedures are presented in the following section.

3. Assistance Services, Monitoring and Evaluation

3.1 How to Identify an LEP Person who Needs Language Assistance

- Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- When Forward Pinellas sponsored workshops or conferences are held, set up a sign-in sheet table where a staff member will greet each attendee. To informally gage the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.
- Provide a Census Bureau "I Speak Card" at the workshop or conference sign-in table to attendees requiring language assistance. While staff may not be able to provide translation assistance at this meeting, the cards are an effective way to identify language needs for future meetings.

3.2 Language Assistance Measures

When an interpreter is needed in person or on the telephone, Forward Pinellas shall first determine which language is required. Staff can provide Spanish and French 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.

3.3 Staff Training

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

- Understanding Title VI LEP and Language Assistance Plan responsibilities
- Language assistance services provided by Forward Pinellas
- Use of LEP “I Speak Cards”
- How to access a staff interpreter
- Documentation of language assistance requests
- How to handle a Title VI complaint
- The importance of educating subrecipients on LEP program responsibilities and their obligation to provide language assistance.

3.4 Providing Notice of Available Language Service to LEP Persons

Information on language assistance services available to the public are noticed/posted in public buildings, on the Forward Pinellas website and in the agency’s office location. This information is also included with agendas and in legal advertisements.

3.5 Outreach Techniques

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

- If Forward Pinellas is presenting a topic that could be of potential importance to an LEP person or if the agency is hosting a meeting or workshop proximate to an LEP community, meeting notices, fliers, advertisements and agendas will be printed in an alternative language, such as Spanish.
- When advertising a public meeting notice, staff will insert “**Un traductor del idioma español estará disponible**” in the copy. This means “A Spanish translator will be available.” If the need for translation is not known, the copy should include, “**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.**” This asks individuals needing Spanish language assistance to make the necessary arrangements with Forward Pinellas 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.

3.6 Monitoring and Updating the LEP Language Assistance Plan

A Title VI Program update must be forwarded to the FTA every three years. Forward Pinellas will follow the same schedule for the update of the LEP Language Assistance Plan. The questions listed below will be considered in updating the 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 Forward Pinellas programs and are there other programs that should be included?
- Have Forward Pinellas' available resources, such as technology, staff and financial costs changed?
- Has Forward Pinellas fulfilled the goals of the LEP Language Assistance Plan?
- Were any complaints received?

3.7 Dissemination of the Forward Pinellas Limited English Proficiency and Language Assistance Plan

The LEP Language Assistance Plan is posted on the Forward Pinellas website at the link below. For those without personal internet service, all Pinellas County libraries offer free internet access. Copies of the LEP Language Assistance Plan are provided to the Pinellas County Office of Human Rights, the Florida Department of Transportation, Federal Highway Administration, Federal Transit Administration and to citizens upon request. Each Forward Pinellas subrecipient is provided a copy and informed of the importance of providing language assistance. LEP persons may obtain translations of the plan upon request. Any questions or comments regarding the LEP Language Assistance Plan should be directed to Forward Pinellas staff at 727-464-8250 or info@forwardpinellas.org.

<http://forwardpinellas.org/wp-content/uploads/2017/02/Limited-English-Proficiency-and-Language-Assistance-Plan-from-Title-VI-Plan.pdf>