



Levy County Board of County  
Commissioners/Levy County Transit

# Title VI Plan

August 22, 2023



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**Title VI Document Activity Log**

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
<b>12/02/2014</b>	Adoption of Plan	<i>Cennie Conley</i>	Board Minutes Unavailable
<b>12/12/2019</b>	Review	<i>Cennie Conley</i>	
<b>12/01/2022</b>	Revisions	<i>Cennie Conley</i>	
<b>12/13/2022</b> <b>12/20/2022</b> <b>12/21/2022</b>	Updates and revisions to Title VI Levy BOCC agenda/approval Uploaded document into TransCIP	<i>Cennie Conley</i>	Board minutes unavailable
<b>08/16/2023</b>	Updated Title VI plan into new template, made revisions and updates as needed.	<i>Cennie Conley</i>	
<b>08/22/2023</b>	Approved by Board of County Commissioners		

## Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

*49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].*

Levy County Board of County Commissioners/Levy County Transit assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family, or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

Levy County Board of County Commissioners/Levy County Transit, further agrees to the following responsibilities with respect to its programs and activities:

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

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

Signature

\_\_\_\_\_

Matthew Brooks

Board Chairman/Levy County Board of County Commissioners/August 22, 2023



## Introduction & Description of Services

Levy County Board of County Commissioners/Levy County Transit submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA

This is a section of the plan which covers general information about the transit agency.

Circular 4702.1B, published October 1, 2012.

Levy County Board of County Commissioners/Levy County Transit is a Sub-recipient of FTA funds and provides service in Levy County. A description of the current Levy County Board of County Commissioners/Levy County Transit system is included in Appendix B.

### Title VI Liaison

Connie Conley  
Director  
352-486-3485  
970 E. Hathaway Avenue, Bronson, FL 32621

### Alternate Title VI Contact

Jacqueline Martin  
Human Resources Manager  
352-486-5218 ext. 3  
310 School Street, Bronson, FL 32621

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

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

## First Time Applicant Requirements

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

Levy County Board of County Commissioners/Levy County Transit is not a first-time applicant for FTA/FDOT funding. The following is a summary of Levy County Board of County Commissioners/Levy County Transit's current and pending federal and state funding.

### Current and Pending FTA Funding

1. None

### Current and Pending FDOT Funding

1. 5311 Operating, 4/2020, \$774,558.00, Current
2. 5311 Operating, 2022, \$775,000.00, Pending
3. 5311 Operating, 2023, \$150,000.00, Pending
4. 5311 Operating, 2024, \$700,000.00, Pending
5. 5311 Capital, 2024, \$1,329,703.00, Pending
7. 5311 Capital, 2024, \$165,178.00 Pending
8. 5339 Capital, 2024, \$128,370.00, Pending
9. 5339 Capital, 2024, \$ 126,000.00, Pending

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

1. None

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

1. TD-Trip & Equipment, 2023/2024, \$360,642.00, Current
2. RCAP, 2023/2024, \$160,000.00, Pending

During the previous three years, Florida Department of Transportation did not complete a Title VI compliance review of Levy County Board of County Commissioners/Levy County Transit. Levy County Board of County Commissioners/Levy County Transit has not been found to be in noncompliance with any civil rights requirements.

## Annual Certifications and Assurances

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

Levy County Board of County Commissioners/Levy County Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by Florida Department of Transportation.

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

## Title VI Plan Adoption

The Plan was approved and adopted by Levy County Board of County Commissioners during a meeting held on \_\_\_\_\_. A copy of the meeting minutes is included in Appendix C of this Plan.



## Title VI Notice to the Public

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

### Notice to the Public

Recipients must notify members of the public of their rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color, and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

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

### Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Levy County Board of County Commissioners/Levy County Transit obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Levy County Transit office(s) including the reception desk and meeting rooms, and on Levy County website at [www.levycounty.org](http://www.levycounty.org). Additionally, Levy County Transit will post the notice at stations, stops, and on transit vehicles.

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## Title VI Procedures and Compliance

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

### Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by Levy County Board of County Commissioners/Levy County Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). Levy County Board of County Commissioners/Levy County Transit investigates complaints received no more than 180 days after the alleged incident. Levy County Board of County Commissioners/Levy County Transit will process complaints that are complete.

Once the complaint is received, Levy County Board of County Commissioners/Levy County Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

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

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

The complaint procedure will be made available to the public on Levy County's website:

[www.levycounty.org](http://www.levycounty.org).

### Complaint Form

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

### Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. Levy County Board of County Commissioners/Levy County Transit will submit their Title VI Plan to FDOT and the Florida Commission for the Transportation Disadvantaged for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

### Sub-recipient Assistance and Monitoring

Levy County Board of County Commissioners/Levy County Transit does not have any sub-recipients to provide monitoring and assistance. As a Sub-recipient to FDOT, Levy County Board of County Commissioners/Levy County Transit utilizes the Sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if Levy County Board of County Commissioners/Levy County Transit has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

### Contractors and Subcontractors

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

### Nondiscrimination Clauses

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the U.S. Department of Transportation (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion, or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurement of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurement of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion, or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Florida Department of Transportation, the Federal Highway Administration, Federal Transit

Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Levy County Board of County Commissioners/Levy County Transit shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination, or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs 1 through 6 in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Levy County Board of County Commissioners/Levy County Transit Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

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

As a part of the Public Transportation Grant Agreement (PTGA) with FDOT, Levy County Board of County Commissioners/Levy County Transit and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Levy County Board of County Commissioners/Levy County Transit and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of FDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

### **E-Verify**

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

Title VI Investigations, Complaints, and Lawsuits

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

In accordance with 49 CFR 21.9(b), Levy County Board of County Commissioners/Levy County Transit must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Levy County Board of County Commissioners/Levy County Transit in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to Florida Department of Transportation.

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

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

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race color or origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## Public Participation Plan

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

The Public Participation Plan (PPP) for Levy County Board of County Commissioners/Levy County Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Levy County Board of County Commissioners/Levy County Transit. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Levy County Board of County Commissioners/Levy County Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Plan.

### **Current Outreach Efforts**

Levy County Board of County Commissioners/Levy County Transit is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Levy County Board of County Commissioners/Levy County Transit's recent, current, and planned outreached activities.

- Health Fairs, includes those at local churches, senior centers and local medical center's, past, current and future.
- Hurricane Awareness fair for county residents, past, present and future.
- Haven Hospice board meetings, past, present and future.
- Job fairs throughout the county, past, present and future.
- Application/Riders guides are put at medical facilities, past, present and future.
- Public notices in local papers, past, current and future.



## Language Assistance Plan

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

Levy County Board of County Commissioners/Levy County Transit operates a transit system within Levy County. The Language Assistance Plan (LAP) has been prepared to address Levy County Board of County Commissioners/Levy County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak, or understand English are LEP. In Levy County Board of County Commissioners/Levy County Transit service area there are 1,292 residents or 3.2% who describe themselves as not able to communicate in English very well (Source: US Census). Levy County Board of County Commissioners/Levy County Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for individuals who are LEP. Levy County Board of County Commissioners/Levy County Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

### Transit Planning and Advisory Bodies

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

The Levy County Local Coordinating Board consists of 15 members. These members are selected by the agencies represented, (which are dictated by the state statute and rule) that make up the Local Coordinating Board. The individual that is selected must then be presented to the Levy County Board of County Commissioners for approval.

**Table 2 | Transit Planning and Advisory Boards**

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Service Area Population	76.6%	9.5%	8.4%	0.7%	0.3%	4.5%
LCB						
[Committee 2]						
[Committee 3]						

Levy County Board of County Commissioners/Levy County Transit will make efforts to encourage minority participation on the committee. These efforts are made by distributing information about the participation on the committee at public meetings and throughout the transit system. Levy County Board of County Commissioners/Levy County Transit will utilize the minority population demographic maps included in Appendix I in order to focus on the areas in which the committee participation information is distributed.

Levy County Transit will make efforts to encourage minority participation on the committee by disseminating information to each of the agencies represented.

## Title VI Equity Analysis

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

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

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

Levy County Board of County Commissioners/Levy County Transit has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, Levy County Board of County Commissioners/Levy County Transit does not have any Title VI Equity Analysis reports to submit with this Plan. Levy County Board of County Commissioners/Levy County Transit will utilize the demographic maps included in Appendix I for future Title VI analysis.]

## System-Wide Service Standards and Service Policies

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

Levy County Board of County Commissioners/Levy County Transit is not a fixed route service provider.

## Appendices

- Appendix A** FTA Circular 4702.1b Reporting Requirements for Transit Providers
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**Appendix A FTA Circular 4702.1b Reporting Requirements for Transit Providers**



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

## **General Requirements**

*All recipients must submit:*

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

## **Requirements of Transit Providers**

*All Fixed Route Transit Providers must submit:*

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

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

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

**Appendix B Current System Description**

## Current System Description

1. An overview of the organization including its mission, program goals, and objectives.  
Levy County Transit's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. The goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents. Levy County Transit will continue to strive daily to meet or exceed the expectations of those who depend on this vital service to reach their desired destinations. The continued efforts to bring awareness and educate the public on the services that we bring to this county, are an ongoing process. The opportunities this service has and continues to bring the citizens has been immeasurable to this county. With the projection of increased population for the age 65+, trips are expected to increase dramatically over the next five years for this county.
2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.  
Levy County Board of County Commissioners/Levy County Transit is a local government organization. Our organization is made up of 11 full-time employees, 0 part-time employees, and 0 volunteers. Our Director is responsible for all of the day-to-day operations of our organization and reports directly to our Board of County Commissioners (BCC). Our BCC is committed to this program and has, therefore, incorporated our service within the county's Public Transportation Program. Transportation services are provided in accordance with the BCC's approved Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our updated System Safety Program Plan (page 5-7). We will continue to operate at previous year (2022) service hours averaging 43 total fleet service hours per day or approximately 10,874 annual service hours (assuming 258 operating days).
3. Indicate if your agency is a government authority or a private non-profit agency.  
Levy County Board of County Commissioners/Levy County operates as a government agency with a CTC agreement between the BCC and The Florida Commission for the Transportation Disadvantaged. We have an executed CTC agreement dated 07/01/2020 to 06/30/2025.
4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?  
Levy County Transit's director is responsible for training and management of our transportation program. All safety sensitive employees are required to complete FDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheelchair lifts and securement devices. The Levy County BCC is responsible for annual renewal of all liability insurance for both FDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Director's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.
5. Who provides vehicle maintenance and record keeping?  
Maintenance on all agency vehicles is performed by Levy County Transit's full time mechanic. Levy County Transit employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the state Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 970 E Hathaway Avenue, Bronson, FL 32621 and

are maintained by the mechanic. All records are maintained and retained for a minimum of five (5) years.

6. Number of current transportation related employees.

Our transportation department has a total of 11 employees that include: 6 full-time drivers, 0 part-time drivers, 1 administrators, and 4 support staff.

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

Only Levy County Transit employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. Our drivers are not required to carry a Commercial Driver's License with passenger endorsement, however there are 3 of our office staff and one driver that currently hold a CDL with passenger endorsement. All drivers and staff that drive when needed, must have a current DOT physical, and First Aid/CPR certification. Currently three (3) of our office staff are qualified with all needed endorsements to provide trips, in the event of unforeseen events that would keep current drivers from attending work or providing trips. These office staff help to provide the transportation to the private Christian school, which requires a vehicle that the driver must have a CDL with passenger endorsement.

8. Transportation services provided are available to all county residents and open to the general public.

Service provided is a door to door, non-emergency, para-transit service. A wide range of trip purposes include: medical, nutrition, shopping, social, training, employment, and recreational. Approximately 70% of the medical trips provided are to medical facilities outside of the county; therefore, out of county services are directed to the nearby highway corridors that surround this community for optimum efficiency of trip duration and the most convenient route. These out of county trips are mainly into Gainesville, so the SR 26, Hwy 24 and SR 121 are the main corridors used to access the Gainesville area. Vehicles used are primarily cutaways to provide passenger trips. The fleet includes ten (10) cutaway buses, one (1) transit bus and two (2) larger buses, one with 20 seat capacity and the other with 24 seat capacity. Of all the vehicles, twelve (12) are equipped for wheelchair securement. We prioritize grouping trips and multi-loading for efficiency with keeping in mind the two (2) hour window for pickup and drop off, as stated in the TDSP.

**Appendix C Title VI Plan Adoption Meeting Minutes**



Board minutes are unavailable.

**Appendix D Title VI Sample Notice to Public**

Notifying the Public of Rights Under Title VI

## Levy County Board of County Commissioners/Levy County Transit

- Levy County Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Levy County Transit.
- For more information on Levy County Transit's civil rights program, and the procedures to file a complaint, contact 352-486-3485, (TTY 1-800-955-8771); [conley-connie@levycounty.org](mailto:conley-connie@levycounty.org) or [www.levycounty.org](http://www.levycounty.org); or visit our administrative office at 970 E. Hathaway Avenue, Bronson, FL 32621. For more information, visit [levycounty.org](http://levycounty.org).
- If information is needed in another language, contact 352-486-3485.
- Si necesita información en otro idioma, comuníquese con 352-486-3485.

Notificación al público de los derechos en virtud del Título VI

## Tránsito del condado de Levy

1. Transporte del condado de Levy opera sus programas y servicios sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante Transporte del condado de Levy.
2. Para obtener más información sobre el programa de derechos civiles Transporte del condado de Levy y los procedimientos para presentar una queja, comuníquese con 352-486-3485, (TTY 1-800-955-8771); envíe un correo electrónico [www.levycounty.org](http://www.levycounty.org); o visite nuestra oficina administrativa en 970 E. Hathaway Avenue, Bronson, Florida 32621. Para obtener más información, visite [agencyname.gov](http://agencyname.gov).
3. Si necesita información en otro idioma, póngase en contacto con 352-486-3485.

**Appendix E Complaint Form**

**Levy County Transit**  
Title VI Complaint Form

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age
<input type="checkbox"/> Disability	<input type="checkbox"/> Family or Religious Status	<input type="checkbox"/> Other (explain) _____	
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.  _____  _____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No

<b>Section V</b>	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____	
<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____	
Please provide information about a contact person at the agency/court where the complaint was filed.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Section VI</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature Date

Please submit this form in person at the address below, or mail this form to:

Levy County Transit  
Connie Conley, Director  
970 E. Hathaway Avenue  
Bronson, FL 32621

Tránsito del condado de Levy  
Formulario de reclamación del Título VI (Spanish)

<b>Sección I:</b>			
<b>Nombre:</b>			
<b>Dirección:</b>			
<b>Teléfono (Inicio):</b>		<b>Teléfono (Trabajo):</b>	
Dirección de correo electrónico:			
<b>¿Requisitos de formato accesible?</b>	Letra grande		<b>Cinta de audio</b>
	TDD		<b>Otro</b>
<b>Sección II:</b>			
<b>¿Está presentando esta queja en su propio nombre?</b>		Sí*	No
*Si respondió "sí" a esta pregunta, vaya a la Sección III.			
De lo contrario, proporcione el nombre y la relación de la persona por la que se queja:			
Por favor, explique por qué ha solicitado a un tercero: _____			
Confirme que ha obtenido el permiso de la parte agraviada si está presentando una solicitud en nombre de un tercero.		Sí	No
<b>Sección III:</b>			
Creo que la discriminación que experimenté se basó en (verifique todo lo que se aplica):			
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Edad <input type="checkbox"/> Discapacidad <input type="checkbox"/> Estado familiar o religioso <input type="checkbox"/> Otro (explicar) _____			
Fecha de la presunta discriminación (mes, día, año): _____			
Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario.  _____ _____			
<b>Sección IV</b>			
<b>¿Ha presentado previamente una queja del Título VI ante esta agencia?</b>		Sí	No

<b>Sección V</b>
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Agencia Federal: _____ <input type="checkbox"/> Tribunal Federal <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Tribunal Estatal <input type="checkbox"/> Agencia Local _____
Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.
<b>Nombre:</b>
<b>Título:</b>
<b>Agencia:</b>
<b>Dirección:</b>
<b>Teléfono:</b>
<b>Sección VI</b>
El nombre de la queja de la agencia es contra:
Persona de contacto:
Título:
Número de teléfono:

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma y fecha requeridas a continuación

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Envíe este formulario en persona a la dirección que aparece a continuación, o envíelo por correo a:

Tránsito del condado de Levy  
Connie Conley, Directora  
970 E. Hathaway Avenue  
Bronson, FL 32621



**Appendix F Public Participation Plan**

## Introduction

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

## Public Participation Goals

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

- **Inclusion and Diversity:** Levy County Transit will proactively reach out and engage low-income, minority, and LEP populations for the Levy County Transit service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically, and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Levy County Transit will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

## Public Participation Methods

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

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

The public will be invited to provide feedback on the Levy County Transit website ([www.levycounty.org](http://www.levycounty.org)) and all feedback on the site will be recorded and passed on to Levy County Transit management. The public will also be able to call the Levy County Transit office at 352-486-3485 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Levy County Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

For community meetings and other important information, Levy County Transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

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

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

### Public Hearing

Levy County Transit is not required to hold public meetings.

### LCB Meetings

The Local Coordinating Board must have at least one meeting per Quarter per Fiscal Year. All meetings are held on the third Thursday of the month and are open to the public. The first meeting of the year is held in January. Prior to this regular meeting is a Public Hearing and Transportation Disadvantaged Program Overview. The remaining meetings are held in April, August and November. All meetings begin at 10:00 a.m. and are held at the Levy County Court House, in the Boardroom, located at 355 S. Court Street, Bronson, FL.

For information as to the actual dates of upcoming Levy County Local Coordinating Board meetings, contact Connie Conley, Director at Levy County Transit at 352-486-3485.

Transportation is available for members or county residents that would like to attend meetings but are unable to otherwise get to the meetings. To arrange for transportation to LCB meetings, call at least 72 hours in advance of meeting date, to Levy County Transit at 352-486-3485.

**Appendix G Language Assistance Plan**

## I. Introduction

Levy County Transit operates a transit system within Levy County. The Language Assistance Plan (LAP) has been prepared to address Levy County Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak, or understand English are LEP. In Levy County Transit service area there are 1,134 residents or 2.91% who describe themselves as not able to communicate in English "very well" (Source: US Census). Levy County Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Levy County Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007)" (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000, states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally, recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Section III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Levy County Transit be able to communicate effectively with all of its riders. When Levy County Transit is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Levy County Transit is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Levy County Transit undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying Levy County Transit staff to assist LEP customers
- Training: Providing training on LAP to responsible employees

## II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Levy County Transit services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Levy County Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Levy County Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Levy County Transit to the LEP population.
4. The resources available to Levy County Transit and overall costs to provide LEP assistance:

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

Of the 38,927 residents in the Levy County Transit service area 1,134 residents describe themselves as speaking English less than “very well.” People of Spanish descent are the primary LEP persons likely to utilize Levy County Transit services. For the Levy County Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 4.58% speak English “very well.” For groups who speak English “less than very well,” 2.31% speak Spanish and 0.22% speak Chinese.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the Levy County Transit service area.

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

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

Levy County Transit has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that 92.50% (36,009) of the population ages 5 and over speak English only. Of the remaining 2,288 people, 1,134 speak English less than “very well”. Of these residents, 898 speak Spanish, 26 speak French, 16 speak Russian, 25 speak Other Indo-European languages, 86 speak Chinese, 27 speak Vietnamese, 44 speak Tagalog (incl. Filipino), and 12 speak other Asian/Pacific Island languages. Phone inquiries and staff survey feedback indicated that Levy County Transit dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP



persons who mainly spoke Spanish. Over the past 21 years, Levy County Transit has had less than a dozen requests for translated documents.

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

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

Of the rider's that would fall into the LEP population, that have been transported in the past and those that are currently using Levy County Transit for transportation, have no other means or resources of getting to medical, shopping or other desired destinations. Their dependency is due to lack of family/friends or their inability to drive, whether due to not having a vehicle, no driver's license and or age and health issues.

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

Levy County Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: Rider's guides and applications are available in Spanish. Levy County Transit provides a reasonable degree of services for LEP populations in its service area.

### **III. Language Assistance Plan**

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

**a. Element 1: Identifying LEP Individuals Who Need Language Assistance**

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Levy County Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 92.50% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (6.06%). Of those who primary spoken language is Spanish approximately 2.31% identify themselves as speaking less than "very well." Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than "very well" account for 0.60% of the service area population.

Levy County Transit may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Levy County Transit Meetings. This will assist Levy County Transit in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to Levy County Transit management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

**b. Element 2: Language Assistance Measures**

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

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

Levy County Transit has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide information such as rider's guides and applications at community events, possibly providing bilingual individual at ebents and Local Coordinating Board meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Levy County Transit has several bi-lingual driver's. Every effort is made to schedule trips for rider's that speak only Spanish with these driver's.
4. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance from one of the transit driver's or arrangements are made with the County HR office to provide one of numerous county employees that are bi-lingual.

Levy County Transit will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

**c. Element 3: Training Staff**

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of Levy County Transit, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and Spanish.

The following training will be provided to Customer Service Representative:

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

**d. Element 4: Providing Note to LEP Persons**

Levy County Transit will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in Levy County Transit office lobby, on buses, and in the rider's guide. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

**e. Element 5: Monitoring and Updating the Plan**

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether Levy County Transit's financial resources are sufficient to fund language assistance resources needed

Levy County Transit understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. Levy County Transit is open to suggestions from all sources, including customers, Levy County Transit staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

### **IV. Safe Harbor Provision**

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes less than two percent (2.31%) or 898 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Levy County Transit service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Levy County Transit does not have LEP groups which speak English less than “very well” which exceed either 5.0% or 1,000 person. Based on current Census, Levy County has approximately 2.91% of the total population that speaks English, less than “very well”.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Levy County Transit may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

### **Appendix H Operating Area Language Data:**

#### **Levy County Transit Service Area**

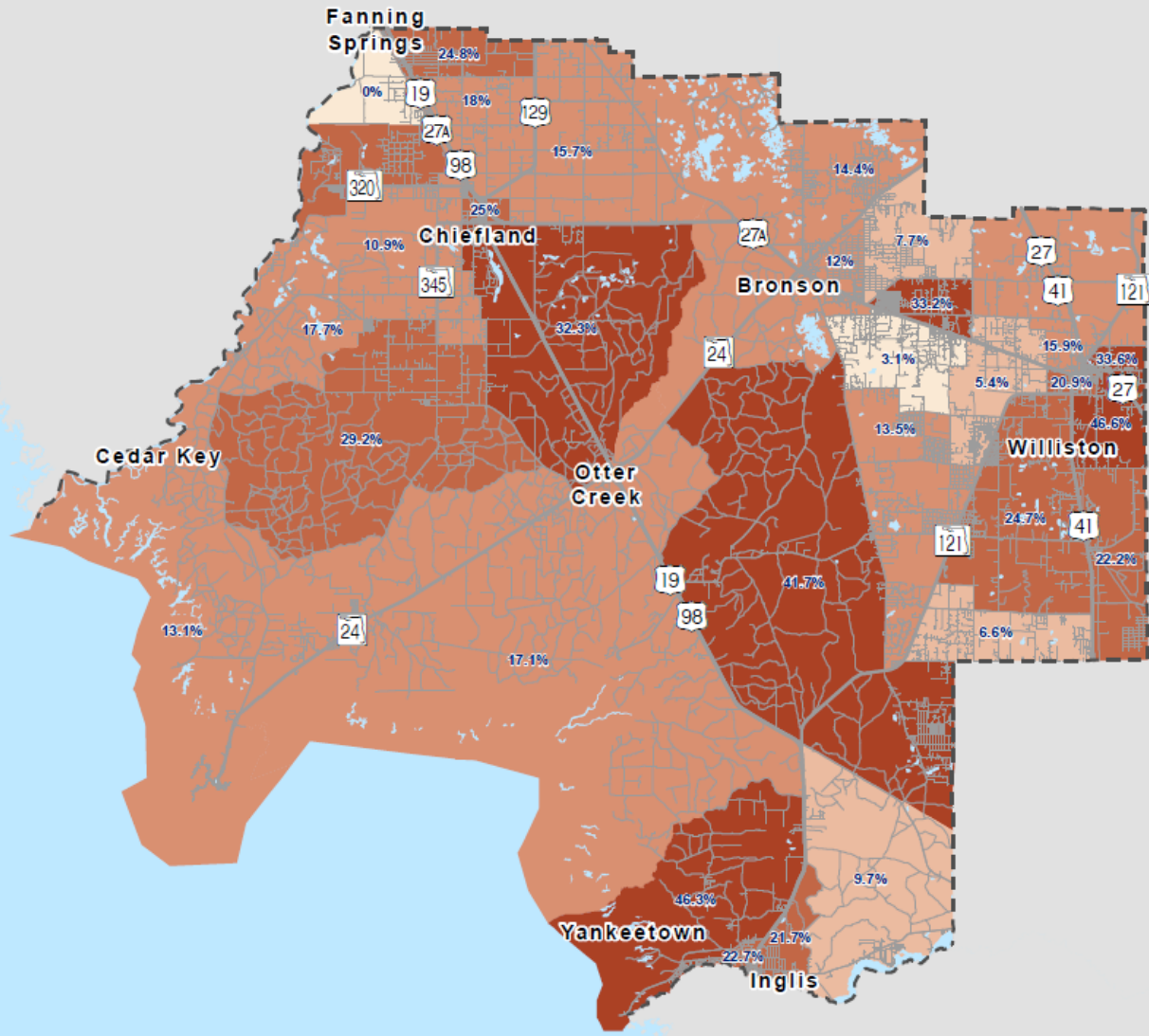
Levy County

	Levy County	Percent of Population
<b>Total Population</b>	<b>38,927</b>	<b>100.00%</b>
<b>Speak only English</b>	<b>36,009</b>	<b>92.50%</b>
<b>Spanish</b>	2,358	6.06%
<b>Speak English “very well”</b>	1,460	3.75%
<b>Speak English less than “very well”</b>	898	2.31%
<b>French, Haitian, or Cajun</b>	38	0.10%
<b>Speak English “very well”</b>	12	0.03%
<b>Speak English less than “very well”</b>	26	0.07%
<b>German or other West Germanic languages</b>	87	0.22%
<b>Speak English “very well”</b>	87	0.22%
<b>Speak English less than “very well”</b>	0	0.00%
<b>Russian, Polish, or other Slavic languages</b>	51	0.13%
<b>Speak English “very well”</b>	35	0.09%
<b>Speak English less than “very well”</b>	16	0.04%
<b>Other Indo-European languages</b>	32	0.08%
<b>Speak English “very well”</b>	7	0.02%
<b>Speak English less than “very well”</b>	25	0.06%
<b>Korean</b>	0	0.00%
<b>Speak English “very well”</b>	0	0.00%
<b>Speak English less than “very well”</b>	0	0.00%
<b>Chinese (incl. Mandarin, Cantonese)</b>	164	0.42%
<b>Speak English “very well”</b>	78	0.20%
<b>Speak English less than “very well”</b>	86	0.22%
<b>Vietnamese</b>	42	0.11%
<b>Speak English “very well”</b>	15	0.04%
<b>Speak English less than “very well”</b>	27	0.07%
<b>Tagalong (incl. Filipino)</b>	68	0.17%
<b>Speak English “very well”</b>	24	0.06%
<b>Speak English less than “very well”</b>	44	0.11%
<b>Other Asian and Pacific Island languages</b>	62	0.16%
<b>Speak English “very well”</b>	50	0.13%
<b>Speak English less than “very well”</b>	12	0.03%
<b>Arabic</b>	0	0.00%
<b>Speak English “very well”</b>	0	0.00%
<b>Speak English less than “very well”</b>	0	0.00%
<b>Other/Unspecified languages</b>	16	0.04%
<b>Speak English “very well”</b>	16	0.04%
<b>Speak English less than “very well”</b>	0	0.00%



**Appendix I Demographic Maps**





0% - 5%  
5.1% - 10%  
10.1% - 20%

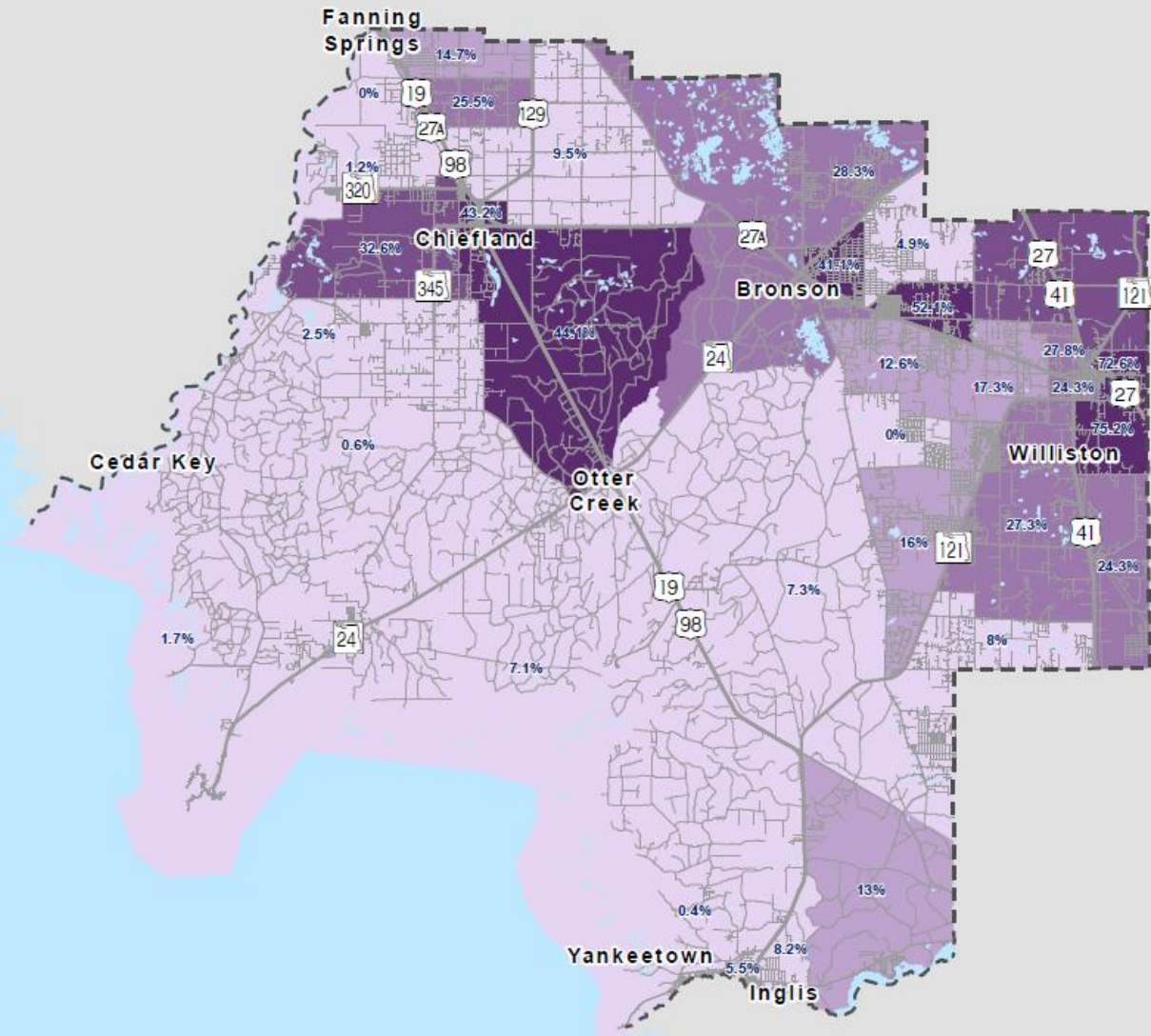
20.1% - 30%  
> 30%

Source: US Census ACS 2020



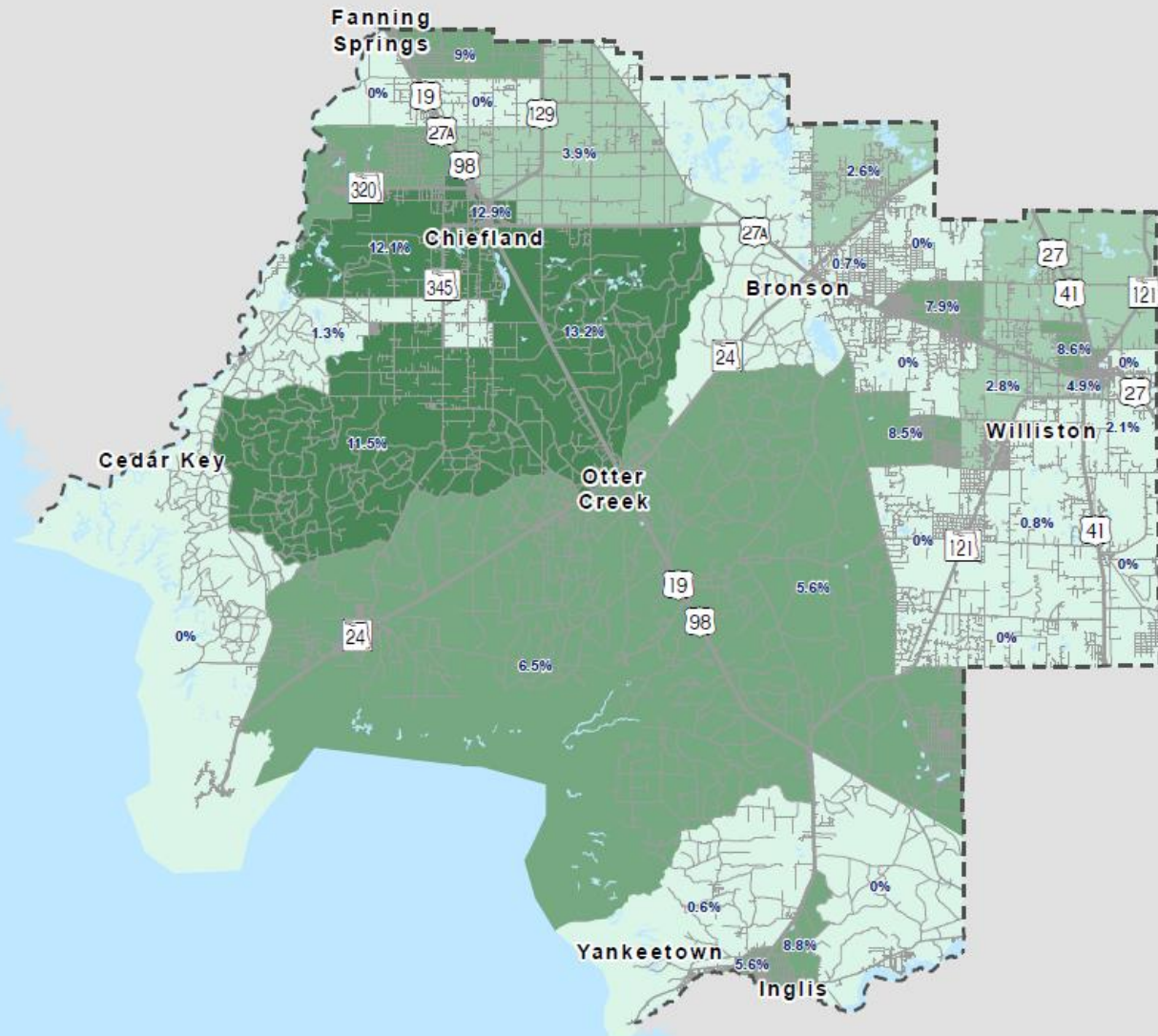
Title VI/Nondiscrimination Program  
Levy County  
Percentage of Population below Poverty Level

FDOT District T



Title VI/Nondiscrimination Program  
 Levy County  
 Percentage of Minority Population

FDOT District 1



0% - 2.5%  
2.6% - 5%  
5.1% - 10%

10.1% - 20%  
> 20%

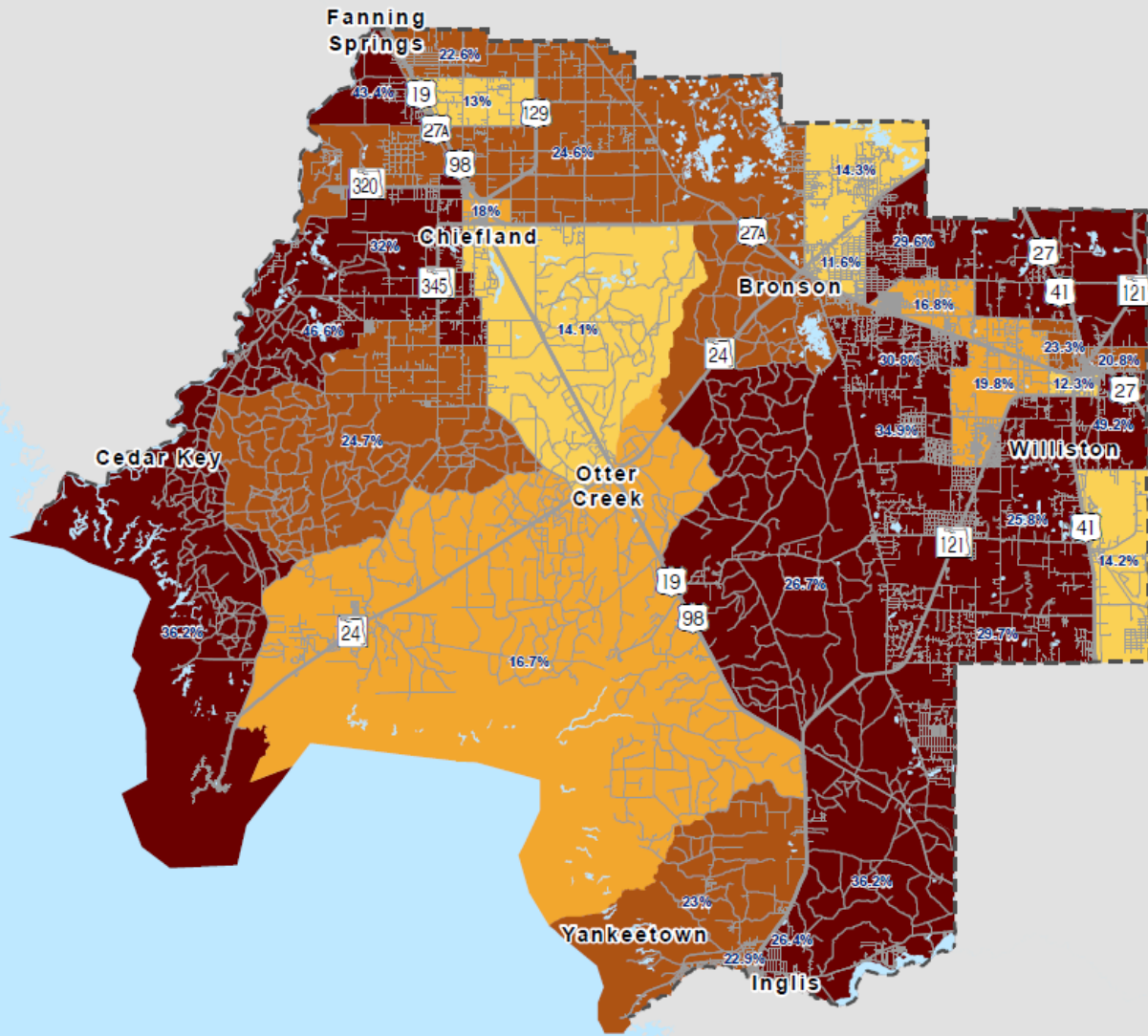
Source: US Census ACS 2020



Title VI/Nondiscrimination Program  
Levy County  
Percentage of Zero-Vehicle Households

FDOT District





0% - 10%  
10.1% - 15%  
15.1% - 20%

20.1% - 25%  
> 25%

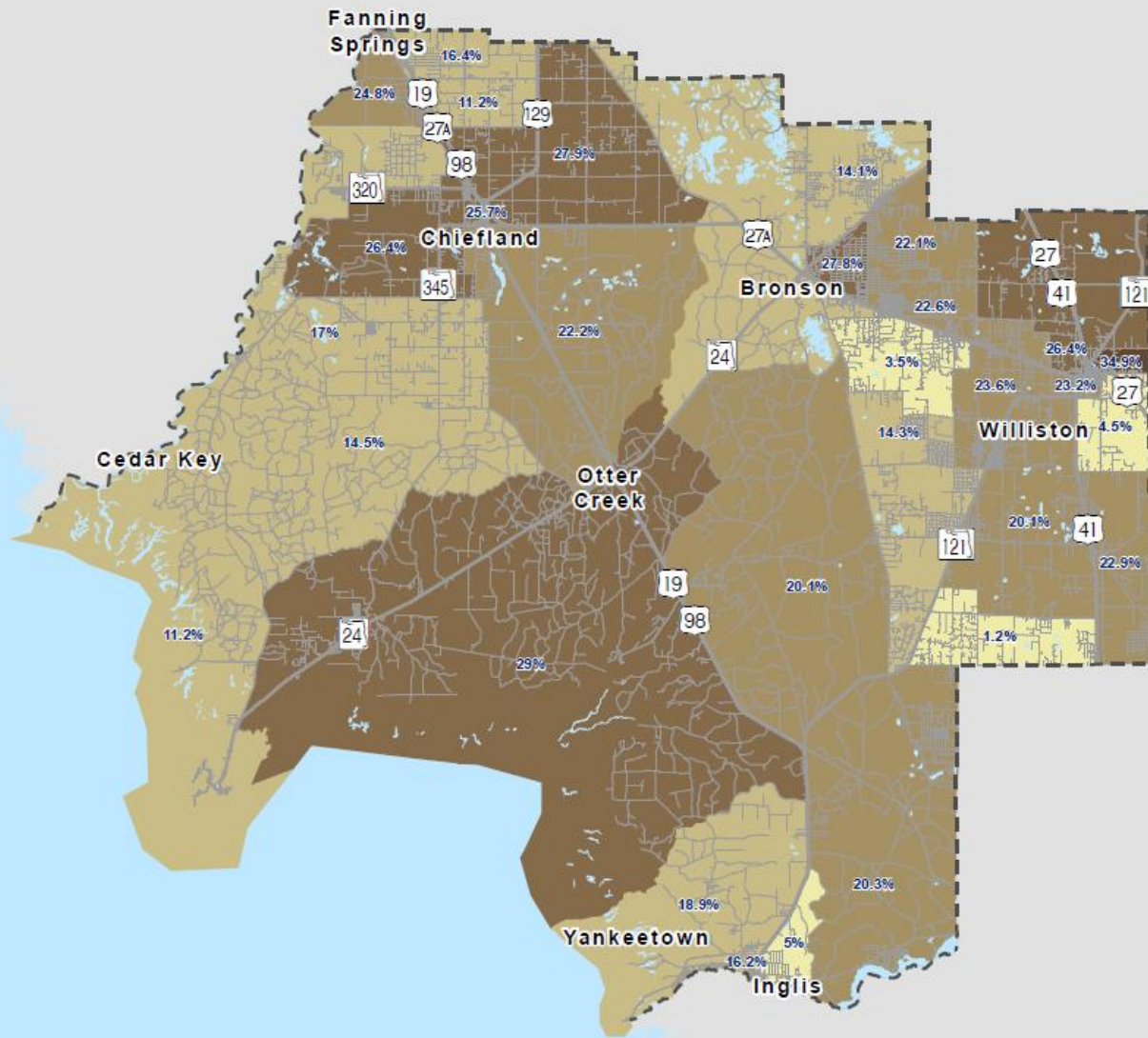
Source: US Census ACS 2020



Title VI/Nondiscrimination Program  
Levy County  
Percentage of Population Age 65 or above

FDOT District T





0% - 10%  
10.1% - 20%  
20.1% - 25%

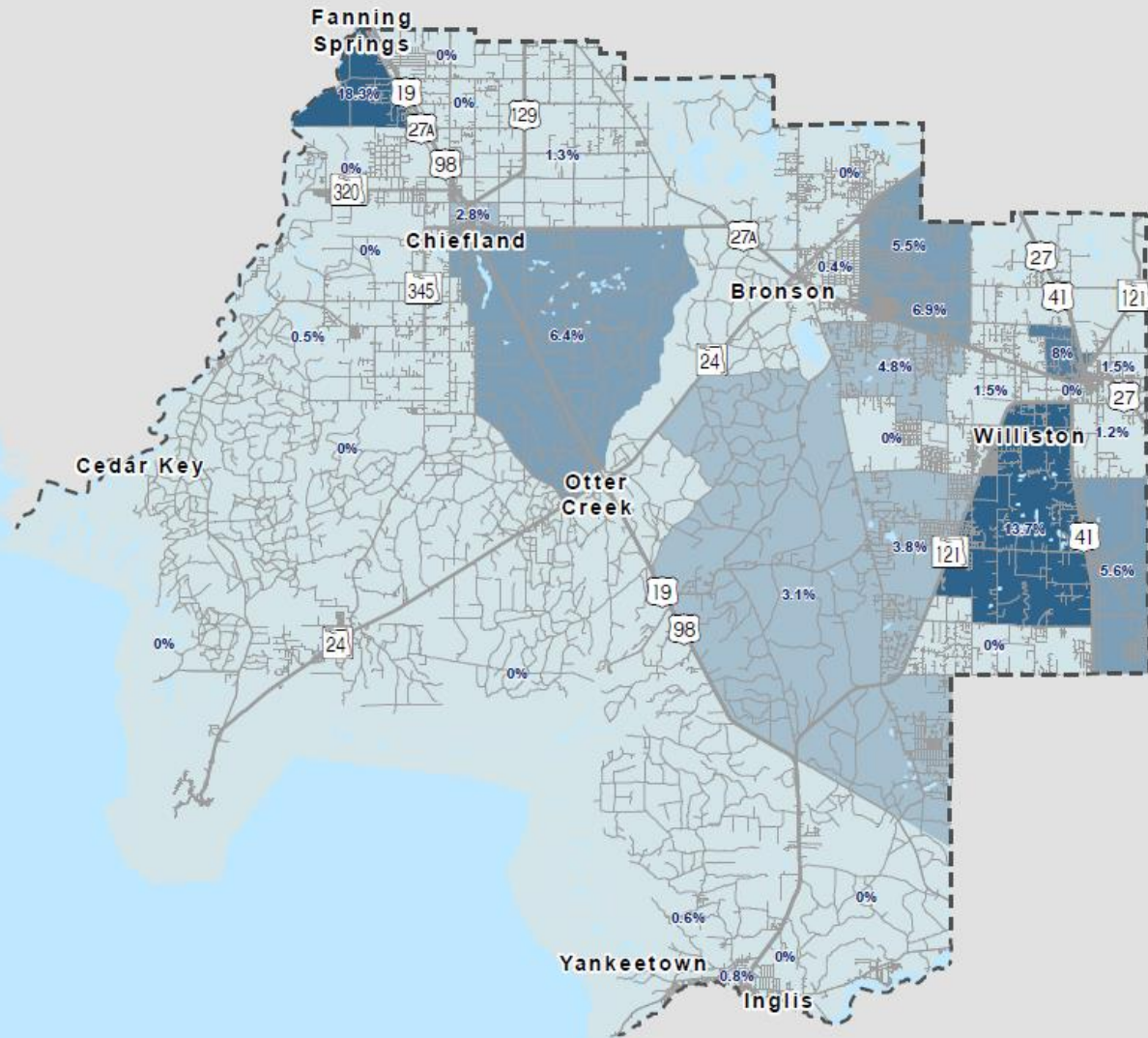
25.1% - 30%  
> 30%

Source: US Census ACS 2020



Title VI/Nondiscrimination Program  
Levy County  
Percentage of Population Age 18 or older

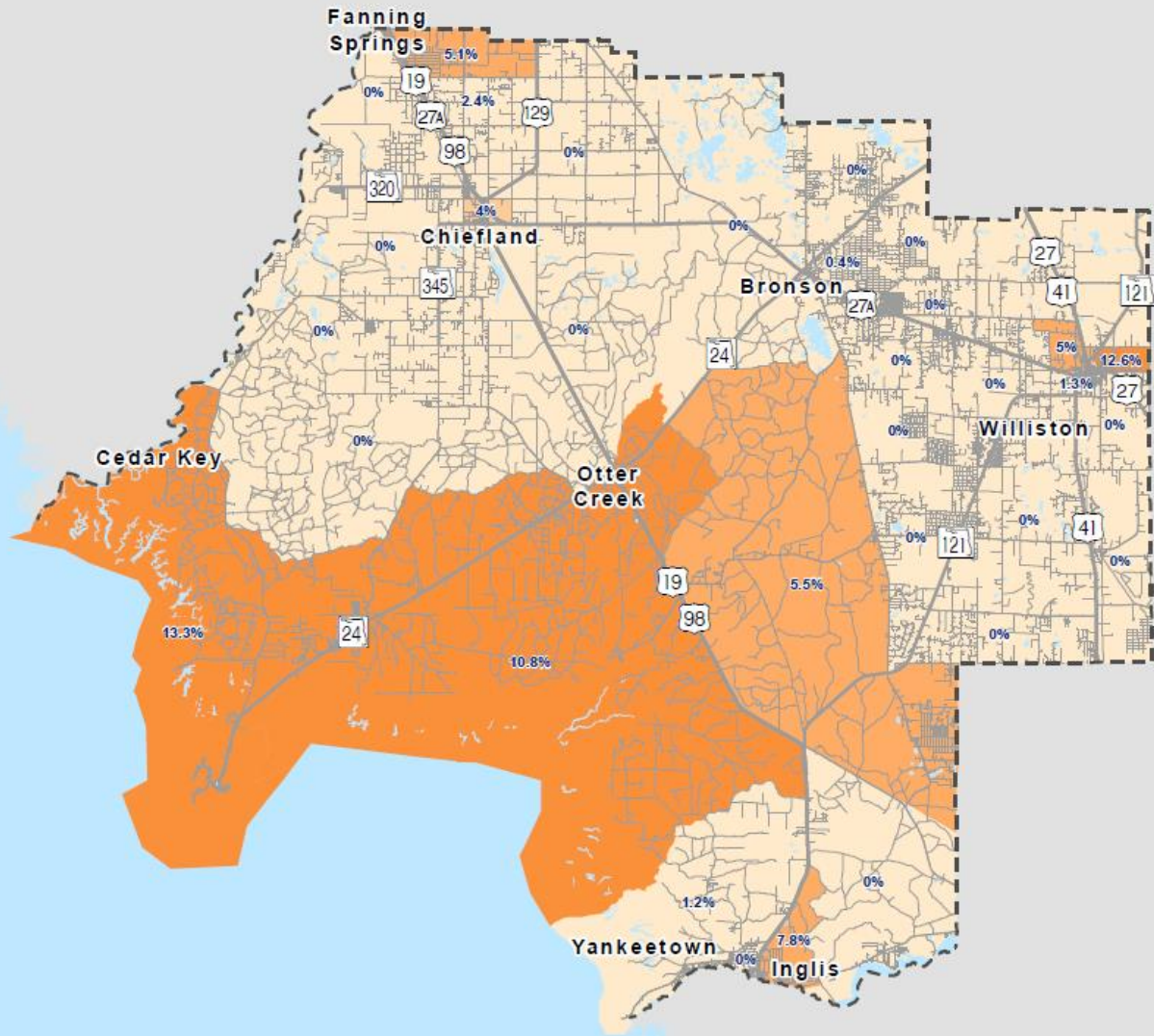
FDOT District 1



Title VI/Nondiscrimination Program  
 Levy County  
 Percentage of Households with Limited English Proficiency

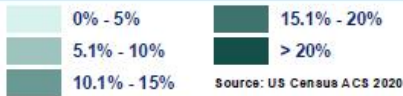
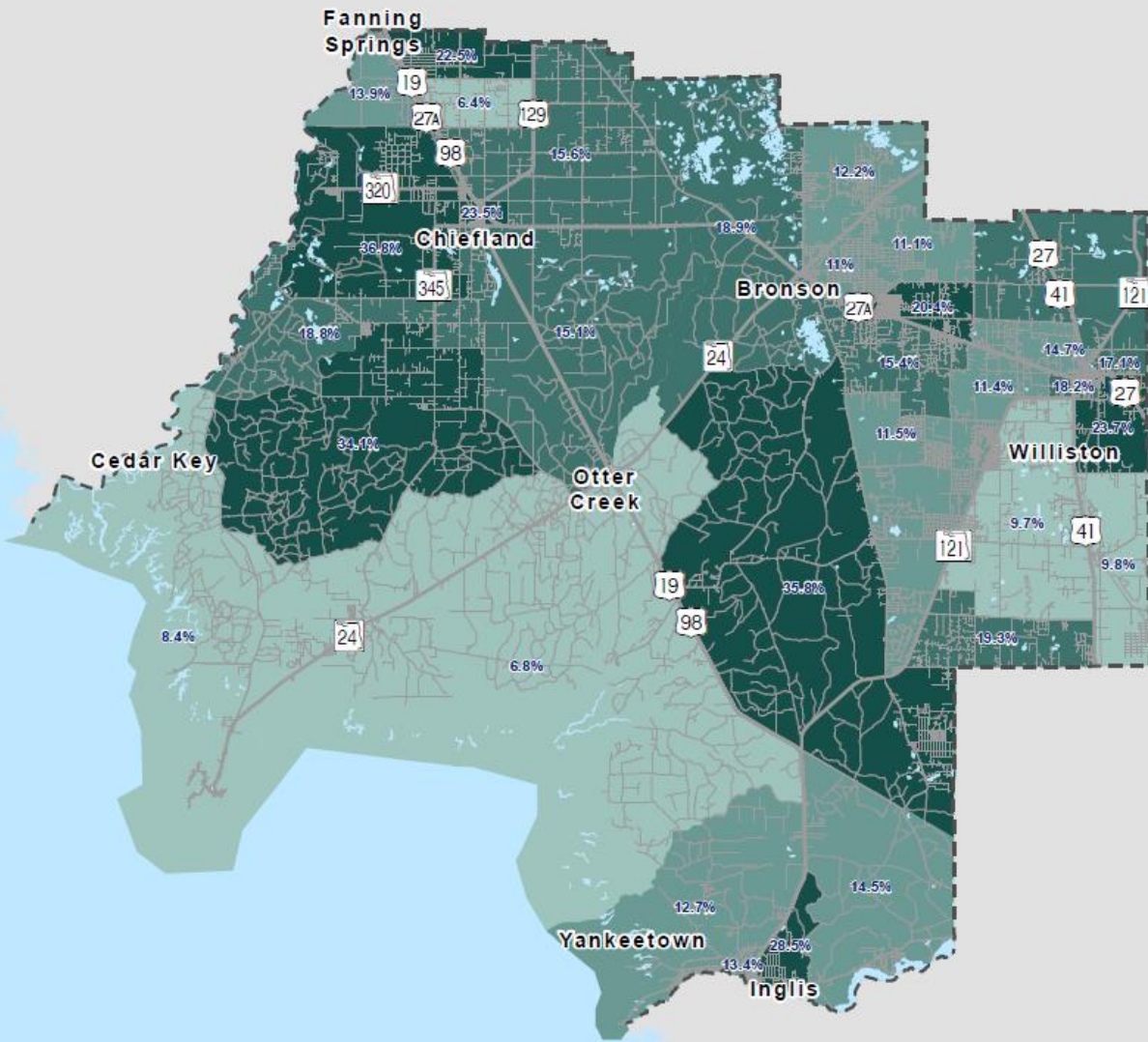
FDOT District T





Title VI/Nondiscrimination Program  
 Levy County  
 Percentage of Population Relying on Public Transport to Work

FDOT District TW



Title VI/Nondiscrimination Program  
 Levy County  
 Percentage of Population 20 to 64 Years with Disabilities

FDOT District T

**Appendix J Title VI Equity Analysis**

Levy County Transit has not performed Title VI Equity Analysis.





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