

Agency Name: Palm Beach Habilitation Center, Inc.



Title VI Program

3/01/2017



Title VI Program Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
03/01/2017	Adoption		
6/18/2018	FDOT Concurrence		
7/10/2018	Board Approval		
06/01/2021	Update Plan		

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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Program

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].

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

Palm Beach Habilitation Center, Inc. further agrees to the following responsibilities with respect to its programs and activities:

1. To 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. To 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 program into every contract subject to the Acts and the Regulations.
4. Complaint process instructions to attempt to resolve complaints of discrimination against Palm Beach Habilitation Center, Inc. is maintained by Palm Beach Habilitation Center and is posted and distributed to individuals served as well as all employees.
5. To 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, Palm Beach Habilitation will take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. To 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 program)

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.

Patty Isola, Interim Chief Executive Officer

Date

2.0 Introduction & Description of Services

Palm Beach Habilitation Center, Inc. submits this Title VI Program in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

Palm Beach Habilitation Center, Inc. is a recipient of FTA funds and provides service in Palm Beach County

Palm Beach Habilitation Center, Inc. is a not-for-profit organization providing programs for skills training, employment, community job placement, residential services, recreational and senior activities to adults with disabilities.

Our **Vision** is an inclusive community where individuals with disabilities can realize their full potential and contribute to the community in personally meaningful ways.

Our **Belief** is that we have the responsibility to provide the tools, opportunities, and support needed for each individual to make their own unique and valuable contributions to society.

Palm Beach Habilitation Center's Board of Directors provide oversight to the organization through the CEO who is responsible for implementing the organization's mission on a day to day basis.

Palm Beach Habilitation Center employees approximately 120 people, of which about 30 are paid client employees. Our operating hours for staff and administration are 8:00 am to 4:30 pm; 8:00 am to 2:30 pm for day training; and twenty-four/7 for our three group homes. We also provide supported employment and supported living at hours convenient for those served.

The organization has designated the Human Resource manager as the Title VI liaison. Her contact information is below

Title VI Liaison

Laura Lavelle
Human Resource Manager
Palm Beach Habilitation Center, Inc.
4522 S. Congress Ave Lake Worth FL 33461
561-965-8500 x 211
llavelle@pbhab.com

Alternate Title VI Contact

Melissa Engelberg
Director of Events and Grant Management
Palm Beach Habilitation Center, Inc.
4522 S. Congress Ave Lake Worth FL 33461
561-965-8500 X 231
mengelberg@pbhab.com

The superintendent of buildings and grounds is responsible for administration of transportation including maintenance of vehicles, and records of such maintenance. The organization's Controller is responsible for maintaining vehicle insurance. Trip records are completed by each driver and maintained in the

vehicle. The directors of each program are responsible for making sure that the trip records are periodically removed from the vehicle, reviewed and stored. No employees are strictly drivers. However, approximately 20 people have driving as part of their job description. Due to the size of the vehicles, only a Class E driver's license is required. All drivers are required to complete a driver training course and to have a DOT physical before driving vehicles. Each program director is responsible for assuring that staff driving vehicles obtain the required training. FDOT rule changes are conveyed to each director by the Title VI liaison. Directors are responsible for training the staff reporting to them.

Transportation is provided throughout Palm Beach County for the people served by Palm Beach Habilitation Center as needed for transport to work and community activities. No vehicles are on a fixed route. Transportation may be provided at any time (24/7) as required to accommodate client needs.

2.1 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be

FTA Circular 4702.1B, Chapter III, and 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.

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.

Palm Beach Habilitation Center, Inc. will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT. We do not have sub-recipients.

2.2 Title VI Program Concurrence and Adoption

This Title VI Program received FDOT concurrence on date 6/18/2018. The Program was approved and adopted by Palm Beach Habilitation Center, Inc.'s Board of Directors via a meeting held via email on 7/10/2018. A copy of the meeting minutes and FDOT concurrence letter is included in Appendix B of this document.

3.0 Title VI Notice to the Public

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

3.1 Notice to Public

Palm Beach Habilitation will notify the public of its rights under Title VI. The notice will 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

The following is Palm Beach Habilitation Center, Inc.'s Title VI notice to the public:

PUBLIC NOTICE

Palm Beach Habilitation Center, Inc. operates its transportation programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Palm Beach Habilitation Center, Inc.

For more information on the Palm Beach Habilitation Center, Inc.'s non-discrimination obligations, and the procedures to file a complaint about the transportation program, contact the Human Resources Manager at 561-965-8500 or Palm Beach Habilitation Center, INC. 4522 S. Congress Ave. Lake Worth FL 33461 or visit our website <http://www.pbhab.com/wp-content/uploads/2018/06/PB-Hab-Title-VI-Plan-.pdf>

A complainant may file a complaint directly with the Florida Department of Transportation by filing a complaint with the District Four Title VI Coordinator Sharon Singh Hagyan; 954-777-4389, sharon.singhhagyan@dot.state.fl.us

Additionally, Palm Beach Habilitation Center, Inc. assures to each applicant, employee or consumer an equal employment opportunity or entrance into services without regard to the person's age, race, color, gender, religious creed, national origin, ancestry, political opinions or affiliations, marital status, familial status, veteran status, sexual orientation, gender identity and expression, genetic information or disability, except when such requirement constitutes a bona fide occupational qualification necessary to perform tasks associated with the position.

The following is Palm Beach Habilitation’s Public Notice in Spanish:

NOTICIA PÚBLICA

Palm Beach Habilitation Center, Inc. opera sus programas y servicios de transporte sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido agraviada por cualquier discriminación ilegal La práctica bajo el Título VI puede presentar una queja antes de Palm Beach Habilitation Center, Inc.

Para obtener más información sobre las obligaciones de no discriminación del Palm Beach Habilitation Center, Inc. y los procedimientos para presentar una queja sobre el programa de transporte, comuníquese con el Gerente de Recursos Humanos al 561-965-8500 o al Palm Beach Habilitation Center, INC. 4522 S. Congress Ave. Lake Worth FL 33461 o visite nuestro sitio web en <http://www.pbhab.com/wp-content/uploads/2018/06/PB-Hab-Title-VI-Plan-.pdf>

Un denunciante puede presentar una queja directamente con el Departamento de Transporte de la Florida mediante la presentación de una queja con el Coordinador del Título VI del Distrito Cuarto, Sharon Singh Hagyan, 954-777-4389, sharon.singhhagyan@dot.state.fl.us

Además, Palm Beach Habilitation Center, Inc. asegura a cada solicitante, empleado o consumidor una oportunidad de empleo igual o la entrada en los servicios sin tener en cuenta la edad de la persona, raza, color, género, credo religioso, origen nacional, ancestros, opiniones políticas o afiliaciones , Estado civil, estado familiar, estado de veterano, orientación sexual, identidad y expresión de género, información genética o discapacidad, excepto cuando tal requisito constituya una cualificación profesional de buena fe necesaria para desempeñar tareas relacionadas con el puesto.

If information is needed in another language, LEP individuals will be directed to contact: Odet Rodriguez (Spanish) or Laura Lavelle or Melissa Engelberg for referral to assistance with other languages.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Palm Beach Habilitation Center, Inc. obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of Palm Beach Habilitation Center, Inc. office(s) and in all vehicles. Palm Beach Habilitation Center, Inc. notice to the public will be posted at the following locations:

Location Name	Address	City
Palm Beach Habilitation Center, Inc.	4522 S. Congress Ave (Multiple locations)	Lake Worth and Palm Springs FL 33461
Vehicle Tag # X9282B	2011 Ford Cutaway M/W	Lake Worth & Palm Springs, FL 33761

	VIN # 1FDFE4FS4BDA73620	
Vehicle Tag #X0134D	2018 Ford Turtle R/W Vin # 1FDFE4FS4HDC58887	
Vehicle Tag #X9278B	2011 Ford Cutaway G/W Vin #1FDFE4FS3BDA80350	
Vehicle Tag # X0135D	2018 Ford Turtle B/W Vin # 1FDFE4FSXHDC57579	
Vehicle Tag # X8919D	2009 Ford E-150 Green Vin # 1FBNE31L69DA00435	
Vehicle Tag # X3259E	2010 Ford Cutaway Blue Vin # 1FDFE4FS7ADA46300	
Vehicle Tag # X2869D	2013 Ford E-250 Gold Vin # 1FTNE2EL3DDB15633	
Vehicle Tag # X2868C	2013 Ford E-250 Red Vin # 1FTNE2EL1DDB15632	
Vehicle Tag # 114Q SX	2014 Ford Fusion Blue Vin # 3FA6P0G77ER359545	
Vehicle Tag # X5711C	2015 Chevy Equinox Silver Vin # 2GNALBEK3F1175574	
Vehicle Tag # X5710C	2015 Chevy Equinox Silver Vin # 2GNALBEK3F1175610	
Vehicle Tag # X5709C	2015 Chevy Equinox Silver Vin # 2GNALBEK1F1176237	

The Title VI notice and program information will also be provided on Palm Beach Habilitation Center, Inc.'s website at <http://www.pbhab.com/who-we-are/missionvisionandbeliefs>

4.0 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.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by Palm Beach Habilitation Center, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaints can also be submitted by Fax: 561-433-2073 or email at llavelle@pbhab.com or phone contact 561-965-8500 x 211. Palm Beach Habilitation Center, Inc. investigates complaints received no more than 180 days after the alleged incident. Palm Beach Habilitation Center, Inc. will only process complaints that are complete. To be considered complete, complainants must, at a minimum, include their name, contact information, date of alleged incident, and a description of the incident.

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

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

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

The complaint procedures and forms will be made available to the public on Palm Beach Habilitation Center, Inc.'s website <http://www.pbhab.com/wp-content/uploads/2018/06/PB-Hab-Title-VI-Plan-.pdf>

The forms are also available in other formats or languages upon request.

4.2 Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<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.				

Section IV				

Palm Beach Habilitation Center, Inc.
 Title VI Liaison
 4522 S. Congress Ave.
 Lake Worth FL 33461

Below is the complaint form in Spanish:

Formulario de Queja

Sección I:				
Nombre:				
Dirección:				
Teléfono(Casa):			Teléfono (Móvil):	
Correro Electrónico:				
Requisitos de formato accesibles?	Letra grande		Cinta de audio	
	TDD		Otro	
Sección II:				
Está presentando esta queja en su propio nombre?			Si*	No
* Si respondió afirmativamente a esta pregunta, vaya a la sección iii				
Si no es así, proporcione el nombre y la relación de la persona por la que se queja:				
Explique por qué ha presentado un tercero: _____				
Por favor, confirme que ha obtenido el permiso de la parte agraviada si está presentando una declaración en nombre de un tercero.			Si	No
Sección III:				
Creo que la discriminación que experimenté se basó en (marque todas las que apliquen):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> origen nacional <input type="checkbox"/> Edad <input type="checkbox"/> Discapacidad <input type="checkbox"/> credo religioso <input type="checkbox"/> Otro (explica) _____				
Fecha de 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 involucradas. Incluya el nombre y la información de contacto de la persona (s) que discriminó (si se conoce), así como nombres e información de contacto de cualquier testigo. Si necesita más espacio, utilice el reverso de este formulario				

Sección IV				

Ha presentado previamente una queja de Título VI con esta agencia?	Si	No
--	----	----

Sección V	
Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal? <input type="checkbox"/> Si <input type="checkbox"/> No En caso afirmativo, marque todas las que correspondan: <input type="checkbox"/> Agencia Federal: _____ <input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Agencia del Estado _____ <input type="checkbox"/> Corte Estatal _____ <input type="checkbox"/> Agencia Local _____	
Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección VI	
El nombre de la agencia en que la queja es en contra:	
Persona de Contacto:	
Título:	
Numero de Teléfono :	

Usted puede adjuntar cualquier material escrito u otra información que considere pertinente a su queja.
 Firma y fecha requerida abajo

_____ Firma _____ Fecha

Por favor envíe este formulario en persona a la dirección abajo, o envíe este formulario a:

Palm Beach Habilitation Center, INC.
Title VI Liaison
4522 S. Congress Ave.
Lake Worth FL, 33461

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three (3) years. Palm Beach Habilitation Center, Inc. will submit Title VI Programs to FDOT for concurrence as required or any time a major change in the Program occurs.

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

5.0 Title VI Investigations, Complaints, and Lawsuits

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

In accordance with 49 CFR 21.9(b), Palm Beach Habilitation Center, Inc. must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by Palm Beach Habilitation Center, Inc. in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Program when it is submitted to FDOT.

Palm Beach Habilitation Center, Inc. has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years.

Table 1: Summary of Investigations, Lawsuits, and Complaints

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

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Program 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 Program 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.

This section is not applicable to Palm Beach Habilitation Center, Inc. as we do not provide transportation to the public.

7.0 Language Assistance Plan

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

7.1 Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis used to identify LEP needs and assistance measures.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

Safe Harbor Provision, DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes **five percent (5%) or 1,000 persons**, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Palm Beach Habilitation Center, Inc. language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

7.2 Four Factor Analysis

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

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Palm Beach Habilitation Center, Inc.’s program, activity or service.
2. The frequency with which LEP persons come in contact with Palm Beach Habilitation Center, Inc.’s program, activity or service.
3. The nature and importance of programs, activities or services provided by Palm Beach Habilitation Center, Inc.’s program, activity or service to the LEP population.
4. The resources available to Palm Beach Habilitation Center, Inc.’s program, activity or service and overall cost to provide LEP assistance.

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

Palm Beach Habilitation Center, Inc. service area has one LEP population which qualifies for the Safe Harbor Provision. As shown in Appendix C, 104,839 speakers qualify for the Safe Harbor Provision as the number of person which speak English less than “very well” is counted as 8.02% and 104,839 persons. (See Appendix C, Palm Beach County Language Tables – US Census 2015 ACS 5 Year)

Of the 1,307,499 residents in the Palm Beach Habilitation Center service area, 137,916 residents describe themselves as speaking English less than “very well”. Spanish speakers are the primary LEP persons likely to utilize Palm Beach Habilitation Center services. For the Palm Beach Habilitation Center service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 82.53 speak English “very well”. For groups who speak English “less than very well”, 8.02% speak Spanish and 2.53% speak French Creole.

Appendix C contains a table which lists the languages spoken at home by the ability to speak English for the population within the **Palm Beach Habilitation Center** service area. The following is a summary of **Palm Beach Habilitation Center** Language Data Table:

Palm Beach, Florida	Estimate	Percentage
Total:	1,307,499	100.00%
Speak only English	919,626	70.33%

Spanish or Spanish Creole	229,085	17.52%
Speak English "very well"	124,246	9.50%
Speak English less than "very well".	104,839	8.02%
French Creole	68,379	5.23%
Speak English "very well"	35,302	2.70%
Speak English less than "very well".	33,077	2.53%

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.

Palm Beach Habilitation Center 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 and client survey. As discussed above, Census data indicates that Spanish or Spanish Creole are the only group who requires assistance under the Safe Harbor provision. Of the individuals served by the program (and therefore the only potential riders) approximately 45 speak Spanish as their primary language. At least 15 direct support staff are fluent Spanish/English speakers, who interact frequently with these individuals. Direct care staff also serve as drivers, and Spanish translation is readily available as needed.

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

Palm Beach Habilitation Center, Inc. provides transportation to adults with disabilities accessing at least one of our other services (work, training, community engagement, residential). Transportation is very important to them in meeting their goals and maintaining work, training, community integration, recreational activities, medical appointments and the like. We do not offer transportation to the public.

Factor 4: The Resources Available to the Recipient and Costs

Palm Beach Habilitation Center has at least four program management staff who are fluent in both Spanish and English, and are able to provide verbal and written translation services. In addition, many of our direct support staff speak Spanish as their first language and English as a second language and so are available to provide basic verbal translation as needed. In addition, Palm Beach Habilitation Center employs at least three staff who are fluent in French Creole, Haitian Creole, and one who is fluent Portuguese. Our CEO is fluent in ASL, and a number of other staff have more limited ASL fluency. As needed, Palm Beach Habilitation Center utilizes has an account with and utilizes the services of Cyacom Language Solutions, (www.cyacom.com) as needed for video remote foreign language interpretation. Palm Beach Habilitation Center, therefore, provides a reasonable degree of services for LEP populations in its service area.

Palm Beach Habilitation Center, Inc. has developed a Limited English Proficiency (LEP) Deaf and Hard of Hearing And Auxiliary Aids Plan. The analysis used in the plan includes the five elements FTA guidance recommends. This plan has been forwarded to FDOT for concurrence:

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.

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.

Palm Beach Habilitation Center, Inc. has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix C). As presented earlier, 70.33% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish or Spanish Creole (17.52%). Of those whose primary spoken language is Spanish or Spanish Creole, approximately 5.23% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish or Spanish Creole and who identify themselves as speaking English less than “very well” account for 4.76% of the service area population.

Palm Beach Habilitation Center, Inc. may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Vehicle operators and front-line staff (i.e. direct support staff, managers, directors etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LEP 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.

Palm Beach Habilitation Center, Inc. has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. When an interpreter is needed in person or on the telephone, staff will access language assistance from one of our designated employees, or services from a professional translation service or qualified community volunteers.

Palm Beach Habilitation Center does not currently have this map. Per discussion with FDOT (Marie Dorismond) we will submit the plan without the maps as we do not provide public transportation. We understand that we will be notified if this map is necessary and directed as to obtaining it.

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 Palm Beach Habilitation Center, Inc., the most important staff training is for direct support personnel, many of whom also act as drivers. At least 45 of these staff are Spanish/English speakers.

PBHC staff members shall receive the Florida DCF approved training Service Delivery for the Deaf or Hard-of-Hearing, and a general Civil Rights Training within 60 days of commencing employment. Staff members shall receive an annual refresher training on both, and be provided ongoing training as needed on how to use video relay services and how to access other resources as needed. Training documentation shall be maintained in each employee’s file

The training will include:

Information on Title VI Procedures and LEP responsibilities

Who to contact for assistance in providing help to LEP or Deaf/Hard of Hearing persons

Documentation of language assistance requests

How to handle a potential Title VI/LEP complaint

Element 4: Providing Notice to LEP Persons

Palm Beach Habilitation Center, Inc. will make Title VI information available in English and Spanish and on the on the Agency’s website. Key documents are written in English and Spanish. Notices are also posted in Palm Beach Habilitation’s office lobby, on vehicles, and other places visible to people served. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is

expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

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 Palm Beach Habilitation, Inc.'s financial resources are sufficient to fund language assistance resources needed

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

8.0 Transit Planning and Advisory Bodies

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

Palm Beach Habilitation, Inc. does not have a transit-related committee or board, therefore this requirement does not apply. Palm Beach Habilitation, Inc. exists to provide employment, skill training community job placement, residential services, recreational and senior activities to adults with disabilities. Transportation is provided to the people served, to assist them in accessing these activities. It is not provided to the general public. PBHC has Board of Directors, but no committee that oversees transportation.

9.0 Title VI Equity Analysis

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

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Palm Beach Habilitation Center, Inc. does not provide any transportation related facilities, nor does it use any FDOT funds for buildings. PBHC does not anticipate doing so in the foreseeable future. Future expansion would be in the area of training facilities on our present site, owned by Palm Beach Habilitation Center, Inc. Additionally, the organization owns three group homes located in integrated neighborhoods.

Palm Beach Habilitation [has not recently constructed any transportation related facilities nor does it currently have any facilities in the planning stage. Therefore, Palm Beach Habilitation Center, Inc. does not have any Title VI Equity Analysis reports to submit with this Program.

10.0 System-Wide Service Standards and Service Policies

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

Palm Beach Habilitation Center, Inc. is not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	TITLE VI PROGRAM ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER
APPENDIX C	OPERATING AREA LANGUAGE DATA: Palm Beach Habilitation Center, Inc.'s SERVICE AREA
APPENDIX D	DEMOGRAPHIC MAPS
APPENDIX E	TITLE VI EQUITY ANALYSIS

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

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

General Requirements

All recipients must submit:

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

- Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

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

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

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

Appendix B

Title VI Program Adoption Meeting Minutes and FDOT Concurrence Letter

Appendix C

Operating Area Language Data: Palm Beach Habilitation Center, Inc. Service Area

Palm Beach County Language Data Tables - US Census 2020 ACS 5 Year		
	Palm Beach County	Percent of Population
Total Population	1,307,499	100%
Speak only English	919,626	70.33%
Spanish or Spanish Creole:	229,085	17.52%
Speak English "very well"	124,246	9.50%
Speak English less than "very well"	104,839	8.02%
French (incl. Patois, Cajun):	11,463	0.88%
Speak English "very well"	8,286	0.63%
Speak English less than "very well"	3,177	0.24%
French Creole:	68,379	5.23%
Speak English "very well"	35,302	2.70%
Speak English less than "very well"	33,077	2.53%
Italian:	6,622	0.51%
Speak English "very well"	4,773	0.37%
Speak English less than "very well"	1,849	0.00%
Portuguese or Portuguese Creole:	11,813	0.90%
Speak English "very well"	7,019	0.54%
Speak English less than "very well"	4,794	0.37%
German:	5,261	.40%
Speak English "very well"	4,363	0.33%
Speak English less than "very well"	898	0.07%
Yiddish:	1,815	0.14%
Speak English "very well"	1,596	0.12%
Speak English less than "very well"	219	0.02%
Other West Germanic languages:	1,298	0.10%
Speak English "very well"	1,129	0.09%
Speak English less than "very well"	169	0.01%
Scandinavian languages:	1,443	0.11%
Speak English "very well"	1,243	0.10%
Speak English less than "very well"	200	.02%

Greek:	1,653	0.13%
Speak English "very well"	1,381	0.11%
Speak English less than "very well"	272	0.02%
Russian:	3,392	0.26%
Speak English "very well"	2,057	0.16%
Speak English less than "very well"	1,335	0.10%
Polish:	2,597	0.20%
Speak English "very well"	1,698	0.13%
Speak English less than "very well"	899	0.07%
Serbo-Croatian:	799	0.06%
Speak English "very well"	515	0.04%
Speak English less than "very well"	284	0.02%
Other Slavic languages:	1,049	0.08%
Speak English "very well"	657	0.05%
Speak English less than "very well"	392	0.03%
Armenian:	547	0.04%
Speak English "very well"	423	0.03%
Speak English less than "very well"	124	0.01%
Persian:	1,046	0.08%
Speak English "very well"	759	0.06%
Speak English less than "very well"	287	0.02%
Gujarati:	1,178	0.09%
Speak English "very well"	750	0.06%
Speak English less than "very well"	428	0.03%
Hindi:	1,492	0.11%
Speak English "very well"	1,266	0.10%
Speak English less than "very well"	226	0.02%
Urdu:	733	0.06%
Speak English "very well"	595	0.05%
Speak English less than "very well"	138	0.01%
Other Indic languages:	2,713	0.21%
Speak English "very well"	1,658	0.13%
Speak English less than "very well"	1,055	0.08%
Other Indo-European languages:	2,525	0.19%
Speak English "very well"	1,647	0.13%
Speak English less than "very well"	878	0.08%
Chinese:	5,262	0.40%
Speak English "very well"	2,077	0.16%
Speak English less than "very well"	3,185	0.24%
Japanese:	584	0.04%
Speak English "very well"	430	0.03%
Speak English less than "very well"	154	0.01%
Korean:	1,153	0.09%

Speak English "very well"	701	0.05%
Speak English less than "very well"	452	0.03%
Mon-Khmer, Cambodian:	77	0.01%
Speak English "very well"	77	0.01%
Speak English less than "very well"	0	0.00%
Hmong:	19	0.00%
Speak English "very well"	19	0.00%
Speak English less than "very well"	0	0.00%
Thai:	1,245	0.10%
Speak English "very well"	606	0.05%
Speak English less than "very well"	639	0.05%
Laotian:	194	0.01%
Speak English "very well"	143	0.01%
Speak English less than "very well"	51	0.00%
Vietnamese:	4,115	0.31%
Speak English "very well"	1,537	0.12%
Speak English less than "very well"	2,578	0.20%
Other Asian languages:	3,775	0.29%
Speak English "very well"	2,725	0.21%
Speak English less than "very well"	1,050	0.08%
Tagalog:	3,121	0.24%
Speak English "very well"	2,292	0.18%
Speak English less than "very well"	829	0.06%
Other Pacific Island languages:	510	0.04%
Speak English "very well"	352	0.03%
Speak English less than "very well"	158	0.01%
Navajo:	0	0.00%
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%
Other Native North American languages:	18	0.00%
Speak English "very well"	18	0.00%
Speak English less than "very well"	0	0.00%
Hungarian:	1,337	0.10%
Speak English "very well"	967	0.07%
Speak English less than "very well"	370	0.03%
Arabic:	4,307	0.33%
Speak English "very well"	3,575	0.27%
Speak English less than "very well"	732	0.03%
Hebrew:	2,471	0.19%
Speak English "very well"	2,014	0.03%
Speak English less than "very well"	457	0.03%
African languages:	230	0.02%

Speak English "very well"	178	0.01%
Speak English less than "very well"	52	0.00%
Other and unspecified languages:	2,552	0.20%
Speak English "very well"	1,268	0.10%
Speak English less than "very well"	1,284	0.10%

Appendix D

Demographic Maps

Palm Beach Habilitation Center does not currently have this map. Per discussion with FDOT (Marie Dorismond) we will submit the plan without the maps as we do not provide public transportation. We understand that we will be notified if this map is necessary and directed as to how to obtain it.

Appendix E

Title VI Equity Analysis

I am Palm Beach Habilitation Center has not recently constructed any transportation-related facilities, nor does it currently have any buildings in the planning stage. Therefore, Palm Beach Habilitation Center, Inc. does not have any Title VI Equity Analysis reports to submit with this Plan.

