



Mental Health Care, Inc.
d.b.a. Gracepoint

TITLE VI PLAN

Adopted: July 1, 2023

**Prepared by
Brice Wolford
Facilities and Purchasing Manager**

Gracepoint Title VI Plan

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

Mental Health Care, Inc. d.b.a. Gracepoint (Gracepoint) 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.

Gracepoint 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. Develop a complaint process and attempt to resolve complaints of discrimination against Gracepoint.
4. Participate in training offered on the Title VI and other nondiscrimination requirements.
5. 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.
6. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
7. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

Gracepoint will submit the Title VI Plan to FDOT for concurrence every three (3) years or any time a major change in the Plan occurs.

Gracepoint Title VI 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

Roaya Tyson
Chief Executive Officer
Gracepoint
Date: June 27, 2023



Gracepoint Title VI Plan

Title VI Plan Concurrence and Adoption

This Plan was approved and adopted by Gracepoint's Board of Directors during a meeting held on June 27, 2023. A copy of the meeting minutes is included in **Appendix A** of this Plan.

Gracepoint Title VI Plan

1. Title VI Notice to the Public

A. Notice to the Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. Gracepoint's notice includes:

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

Gracepoint's notice is included in the Appendix B of this Plan.

B. Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of Gracepoint's 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 Gracepoint's office(s) including lobby and reception and on the Gracepoint's website at gracepointwellness.org. Additionally, Gracepoint may also post the notice in transit vehicles.

A sample version of this notice is included in Appendix B of this Plan along with any translated versions of the notice, as necessary. The public notice must be provided in any other language which meets the Safe Harbor threshold (See Appendix E).

Gracepoint Title VI Plan

2. Complaint Procedure

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

Once the complaint is received, Gracepoint 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.

Gracepoint has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, Gracepoint 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, Gracepoint 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 Gracepoint's website (www.gracepointwellness.org).

A. Complaint Form

A copy of the complaint form in English and Spanish is provided in the Appendix C and on Gracepoint's website gracepointwellness.org. The complaint form must be provided in any languages spoken by the LEP population which meet the Safe Harbor threshold (See Appendix C).

Gracepoint Title VI Plan

3. Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), Gracepoint 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 Gracepoint in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to [FDOT].

Gracepoint 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.

Gracepoint Title VI Plan

4. Public Participation Plan

The Public Participation Plan (PPP) for Gracepoint 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 Gracepoint. The PPP is included in **Appendix D** to this Title VI Plan.

A. Current Outreach Efforts

Gracepoint 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 Gracepoint's recent, current, and planned outreached activities.

- We participate in community events such as wellness fairs, back to school events, homeless outreach and faith based events Providing brochures, program information as well as someone to answer questions.
- We do presentations at businesses, schools, university's, faith organizations, non-profits and neighborhood associations.
- We have information on our website, as well as online chat and on social media platforms.

Gracepoint Title VI Plan

5. Language Assistance Program

Gracepoint operates a transit system within [service area]. The Language Assistance Plan (LAP) has been prepared to address Gracepoint’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 Gracepoint service area there are 119,833 residents or 9.83% who describe themselves as not able to communicate in English very well (Source: US Census). Gracepoint 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. Gracepoint 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 E.

A. Transit Planning and Advisory Bodies

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

Gracepoint Title VI Plan

6. Title VI Equity Analysis

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

Gracepoint Title VI Plan

Appendix A: Meeting Plan Adoption Minutes

**MEETING OF THE BOARD OF DIRECTORS
BEHAVIORAL HEALTH CENTER**

June 27, 2023

Board Meeting – 12:00pm

AGENDA

- 1) Chairman of the Board: Doug Arthur
 - A. Confirmation of quorum and Invocation
- 2) Request Approval of the May 2023 meeting minutes
- 3) Consent Agenda
 - A. FDOT Title VI Plan update (Brice)
 - B. Resolution update re: Legal Signing Authority for contracts for Roaya and Joe L (Roaya)
 - C. Financials and KPI's for May 2023 (Kim O'Brien)
 - D. Review Human Resources' Stats and Request approval of May 2023 Reports (April T)
 - E. Summary of Litigations (April T)
 - F. Approve Credentialing (April T)
- 4) Gracepoint CMHC: Roaya Tyson
 - A. Reports and Updates (Roaya)
- 5) Foundation Update
- 6) New Business
- 7) EXECUTIVE SESSION: Board Members Only
 - Board Officer Elections
 - Board Member Re-election

BOARD OF DIRECTORS' MEETING MINUTES

Behavioral Health


Tuesday, June 27, 2023

BOARD MEMBERS PRESENT: Doug Arthur (Chair), Amandia Craig, Kim Jenkins, David Schlaifer, Kim O'Brien (Secretary/ Treasurer), Carolyn Rostetter, Dr. Michael Longley, Martha Monfried, John Grandoff, Chuck Melendi (Vice-Chair), Jackie Toledo, Gary White, John Byczek, David Tarabocchia, Arnita McKinnie

BOARD MEMBERS ABSENT: Ray Sikorski, Joe Lallanilla (COO)

STAFF PRESENT: Roaya Tyson (CEO), Steve Welch (CFO), April Teamer (Director of HR), Lenny Moore (CIO)

Doug Arthur called the meeting to order at 12:00pm

Agenda Item	Attachments	Action
<p>1 Invocation and Confirmation of Quorum (Doug Arthur, Board Chair)</p> <ul style="list-style-type: none"> Doug Arthur (Board Chair) confirmed a quorum. <p>2 Request Approval of May 2023 meeting minutes Approval of Minutes for May 2023 (Doug Arthur Board Chair) Board Members reviewed May 2023 meeting minutes. There were no changes.</p> <p>3 Consent Agenda:</p> <p>A. FDOT Title VI Plan Update (Brice Wolford) A. Brice presented to the board that every three years, the Florida Department of Transportation who provides 9 of our 23 vehicles via grant requires us to update our title six plan, which is nondiscrimination for age, race, religion, national origin, those kinds of things. We have updated the plan. We submit that to the Florida Department of Transportation. The only change from the plan that was approved three years ago is our new CEO. We are also required to report any investigations or reports on discrimination, and we have none. Other than that there's no other changes other than signature for approval by the board.</p> <ul style="list-style-type: none"> Doug Arthur asked the question, how many employees does this typically affect? Brice replied that this is a part of transportation plan. We transport clients to our programs. Brice also explained that we 30 drivers, but this is more about having policies 	<p align="center">  Gracepoint Title VI Plan 230627.pdf </p>	<p>No action required.</p> <p>2. Chuck Melendi made a motion to approve the minutes as presented. Gary White seconded the motion and the board unanimously approved.</p> <p>3. A. Amandia Craig made a motion to approve the FDOT Title VI Plan Update as presented by Brice Wolford. Jackie Toledo seconded the motion and the board unanimously approved.</p>

and procedures and methods of reporting discrimination. Brice proceeded to tell the board that we have 10 to 12 drivers that are consistent and the rest of the drivers are casual drivers.

- Doug Arthur then asked if the casual drivers were on our payroll or do they tend to have other duties as well? Brice explained that we may need a tech to transport a patient.
- Brice also explained that none of the drivers have CDL's, these are all passenger vans. When we receive the grants, we do not want to get into the need for a CDL.
- Jackie Toledo asked Brice if we acquire the vehicles or are they provided by the DOT? Brice stated that the DOT provides us the grant and we buy the vehicles at 10% of the cost of the vehicle, 20% is provided by the state and federal. These are DOT vehicles that are granted to us, usually between 7 to 10 years and during this time they are FDOT vehicles, but after the end of their useful life for the DOT, they become our vehicles.
- Jackie then asked if the vehicles are titled in our name or are they a leased vehicle that we can turn in if we want to? Brice stated that these vehicles are owned by the DOT. Doug stated that is kind of like our real estate is owned but once we pay, we are handed the title. Jackie then said to Brice that she would like to talk more about this with him as she stated while she was serving in the house, she learned of another company that uses these types of vehicles and can get more money and we want to capitalize on that.

B. Resolution update re: Legal Signing Authority for contracts for Roaya and Joe L

- a. We will be renewing the resolution so that Roaya and Joe can have the authority to operate certain parts of the business without having to go before the board each time. This will be signed by the board chairman.

Gracepoint Title VI Plan

Appendix B: Sample Notice to the Public

Your Rights Under Title VI

Gracepoint

- Gracepoint 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 Gracepoint.
- For more information on Gracepoint's civil rights program, and the procedures to file a complaint, contact 813-239-8446, email ateamer@gracepointwellness.org, or visit our administrative office at 5707 N 22nd St, Tampa, FL. For more information, visit gracepointwellness.org.

If information is needed in another language, contact 813-239-8446.

Sus Derechos Bajo el Título VI

Gracepoint

- Gracepoint opera sus programas y servicios sin importar 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 ella o él ha sido perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante Gracepoint
- Para obtener más información sobre el programa de derechos civiles de Gracepoint, y los procedimientos para presentar una queja, comuníquese con 813-239-8446, envíe un correo electrónico a ateamer@gracepointwellness.org; o visite nuestra oficina administrativa en 5707 N 22^{md} St, Tampa, FL 33610. Para obtener más información, visite gracepointwellness.org.

Si se necesita información en otro idioma, comuníquese con el 813-239-8446.

Gracepoint Title VI Plan

Appendix C: TITLE VI 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 _____			
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			
Have you previously filed a Title VI complaint with this agency?		Yes	No

Gracepoint Title VI Plan

Sección I:		
Nombre:		
Dirección:		
Teléfono (Casa):		Teléfono (Trabajo):
Dirección de correo electrónico:		
Requisitos de formato accesible?	<u>Impresión grande</u>	Cinta de audio
	dispositivo de telecomunicaciones para sordos	Otro
Section II:		
¿Está presentando esta queja en su propio nombre?	Sí *	No
* Si respondiste "sí" a esta pregunta, ve a la Sección III.		
Si no es así, proporcione el nombre y la relación de la persona por la que se queja:		
Por favor, explique por qué ha presentado una solicitud para un tercero:		
Confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero.	Sí	No
Section III:		
Cree que la discriminación que experimento se basó en (marque todo lo que corresponda):		
<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 _____		
Fecha de supuesta discriminación (mes, día, año): _____		
Explica lo más claramente posible lo que sucedió y por qué crees que fuiste discriminado. Describe a todas las personas que participaron. Incluya el nombre y la información de contacto de la(s) persona(s) que le discriminaron (si se conocen), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario.		

Section IV		
¿Ha presentado previamente una queja del Título VI ante esta agencia?	Sí	No

Gracepoint Title VI Plan

Sección V	
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante algún tribunal federal o estatal?	
[] Sí [] No	
En caso afirmativo, marque todas las que correspondan:	
[] Agencia Federal: _____	
[] Tribunal Federal _____	[] Agencia Estatal _____
[] Tribunal del Estado _____	[] 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 queja de la agencia está en 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

Por favor envíe este formulario en persona a la siguiente dirección, o envíe lo presente por correo a:

Gracepoint – Recursos Humanos
April Teamer
5707 N 22nd St
Tampa, FL 33610

Gracepoint Title VI Plan

Appendix D: Public Participation Plan

Introduction

The Public Participation Plan (PPP) for Gracepoint 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 Gracepoint.

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 Gracepoint services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Gracepoint 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 Gracepoint and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** Gracepoint will proactively reach out and engage low-income, minority, and LEP populations for the Gracepoint 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.
- **Responsive:** Gracepoint 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.

Gracepoint Title VI Plan

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 Gracepoint. Gracepoint intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

Gracepoint has established a Patient Advisory Council to provide input, guidance, assistance and make recommendations to the CEO and Senior Management of Gracepoint on matters important to patients. The CEO will present recommendations to the Board of Directors of Gracepoint when appropriate. To assist Gracepoint in ensuring patients are receiving the best services possible in a respectful and effective manner as well as provide feedback on new services and programs as needed.

The Patient Advisory Council (CAC) looks at ways to improve services provided to patients of mental health. The Committee reviews specific areas for improvement and makes recommendations for change.

Typical responsibilities for a patient advisory council are:

- Reviewing organizational publications, brochures,
- Organizing special activities to promote patients
- Advising the Board of Directors on how best to meet patient needs
- Provide Input on New Program Design or Implementation
- Provide feedback on ease and use of facilities and accessing services

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, Gracepoint will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posting information on website
- Other methods required by local or state laws or agreements

The public will also be invited to provide feedback on the Gracepoint website (gracepointwellness.org) and all feedback on the site will be recorded and passed on to Gracepoint management. The public will also be able to call the Gracepoint office at 813-239-8121 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Gracepoint management.



Gracepoint Title VI Plan

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.

Gracepoint Title VI Plan

Appendix E: Language Assistance Program

A. Introduction

Gracepoint operates a transit system within Hillsborough County, Florida. The Language Assistance Plan (LAP) has been prepared to address Gracepoint’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 Gracepoint service area there are 119,833 residents or 9.83% of residents who describe themselves as not able to communicate in English “very well” (Source: US Census). Gracepoint 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. Gracepoint 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 Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for Gracepoint be able to communicate effectively with all of its riders. When Gracepoint 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. Gracepoint is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency’s services in accordance with Title VI.

Gracepoint Title VI Plan

This plan will demonstrate the efforts that Gracepoint 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 Gracepoint staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

B. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Gracepoint 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 Gracepoint program, activity or service.
 2. The frequency with which LEP persons come in contact with Gracepoint programs, activities or services.
 3. The nature and importance of programs, activities or services provided by Gracepoint to the LEP population.
 4. The resources available to Gracepoint 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 1,219,613 residents in the Gracepoint service area 119,833 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Gracepoint services. For the Gracepoint service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 90.3% speak English “very well”. For groups who speak English “less than very well”, 21% speak Spanish and 0.6% speak Arabic.

Gracepoint Title VI Plan

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the Gracepoint 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.

Gracepoint 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 a majority of the individuals we will encounter speak Spanish. Staff survey feedback indicated that Gracepoint dispatchers and drivers interact infrequently with LEP persons. The majority of interactions that have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Gracepoint has had no 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.

Gracepoint serves a wide variety of participants ranging in age from 5 to over 65. The services we provide include critical behavioral health, social rehabilitation, forensic, co-occurring disorders, homeless services and other services to these individuals. We provide access to education, treatment, and referrals and transportation to a variety of complimentary services in our community including federal, state and local government services.

We know from experience that the passengers in our vehicles would not

Gracepoint Title VI Plan

utilizes the services we provide and otherwise have access to the services to which we refer.

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

Gracepoint assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. We provide on demand access to a language translation service. This service is provide free of charge to the the LEP population.

C. 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.

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.

Gracepoint has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 72.5% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (21%). Of those who primary spoken language is Spanish, approximately 37.8% 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 2% of the service area population.

Gracepoint provides 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.

Gracepoint Title VI Plan

2. Vehicle operators and front-line staff 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 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.

When an interpreter is needed in person or on the telephone, staff will attempt to access a contract language assistance services from a professional translation service or qualified community volunteers.

Gracepoint will utilize the demographic maps provided in Appendix G in order to better provide the above efforts to the LEP persons within the service area.

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 Gracepoint, 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. Documentation of language assistance requests and how to access services and staff to assist with resolving the language assistance request
3. How to handle a potential Title VI/LEP complaint

Element 4: Providing Note to LEP Persons

Gracepoint 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 Gracepoint office lobby and our vehicles. Additionally, when staff prepares a

Gracepoint Title VI Plan

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.

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 Gracepoint's financial resources are sufficient to fund language assistance resources needed

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

D. 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.

Gracepoint service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix F, 327,349 speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" is counted as 9.83% and 119,833 persons.

Gracepoint Title VI Plan

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. Gracepoint 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.

Gracepoint Title VI Plan

Appendix F: Operating Language Data: Gracepoint Service Area

Hillsborough County, Florida		
Language	People	Percentage
Total	1,219,613	100.0%
Speak only English	884,020	72.5%
Spanish or Spanish Creole	256,379	21.0%
Speak English "very well"	159,418	13.1%
Speak English less than "very well"	96,961	8.0%
French (incl. Patois, Cajun)	5,297	0.4%
Speak English "very well"	4,418	0.4%
Speak English less than "very well"	879	0.1%
French Creole	6,777	0.6%
Speak English "very well"	4,337	0.4%
Speak English less than "very well"	2,440	0.2%
Italian	2,541	0.2%
Speak English "very well"	2,265	0.2%
Speak English less than "very well"	276	0.0%
Portuguese or Portuguese Creole	2,942	0.2%
Speak English "very well"	1,947	0.2%
Speak English less than "very well"	995	0.1%
German	3,941	0.3%
Speak English "very well"	3,430	0.3%
Speak English less than "very well"	511	0.0%
Yiddish	29	0.0%
Speak English "very well"	11	0.0%
Speak English less than "very well"	18	0.0%
Other West Germanic languages	750	0.1%
Speak English "very well"	693	0.1%
Speak English less than "very well"	57	0.0%
Scandinavian languages	377	0.0%
Speak English "very well"	318	0.0%
Speak English less than "very well"	59	0.0%
Greek	1,143	0.1%
Speak English "very well"	1,017	0.1%
Speak English less than "very well"	126	0.0%
Russian	1,784	0.1%
Speak English "very well"	1,177	0.1%
Speak English less than "very well"	607	0.0%
Polish	939	0.1%
Speak English "very well"	706	0.1%

Gracepoint Title VI Plan

Speak English less than “very well”	233	0.0%
Serbo-Croatian	611	0.1%
Speak English “very well”	446	0.0%
Speak English less than “very well”	165	0.0%
Other Slavic Languages	727	0.1%
Speak English “very well”	561	0.0%
Speak English less than “very well”	166	0.0%
Armenian	59	0.0%
Speak English “very well”	52	0.0%
Speak English less than “very well”	7	0.0%
Persian	1,079	0.1%
Speak English “very well”	703	0.1%
Speak English less than “very well”	376	0.0%
Gujarati	2361	0.2%
Speak English “very well”	1,843	0.2%
Speak English less than “very well”	518	0.0%
Hindi	3053	0.3%
Speak English “very well”	2,704	0.2%
Speak English less than “very well”	349	0.0%
Urdu	1,442	0.1%
Speak English “very well”	1,109	0.1%
Speak English less than “very well”	333	0.0%
Other Indic languages	2,587	0.2%
Speak English “very well”	1,854	0.2%
Speak English less than “very well”	733	0.1%
Other Indo-European Languages	1,341	0.1%
Speak English “very well”	1,081	0.1%
Speak English less than “very well”	260	0.0%
Chinese	4,619	0.4%
Speak English “very well”	2,541	0.2%
Speak English less than “very well”	2,078	0.2%
Japanese	787	0.1%
Speak English “very well”	431	0.0%
Speak English less than “very well”	356	0.0%
Korean	2,596	0.2%
Speak English “very well”	1,671	0.1%
Speak English less than “very well”	925	0.1%
Mon-Khmer, Cambodian	415	0.0%
Speak English “very well”	152	0.0%
Speak English less than “very well”	263	0.0%
Hmong	277	0.0%
Speak English “very well”	205	0.0%

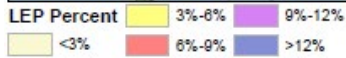
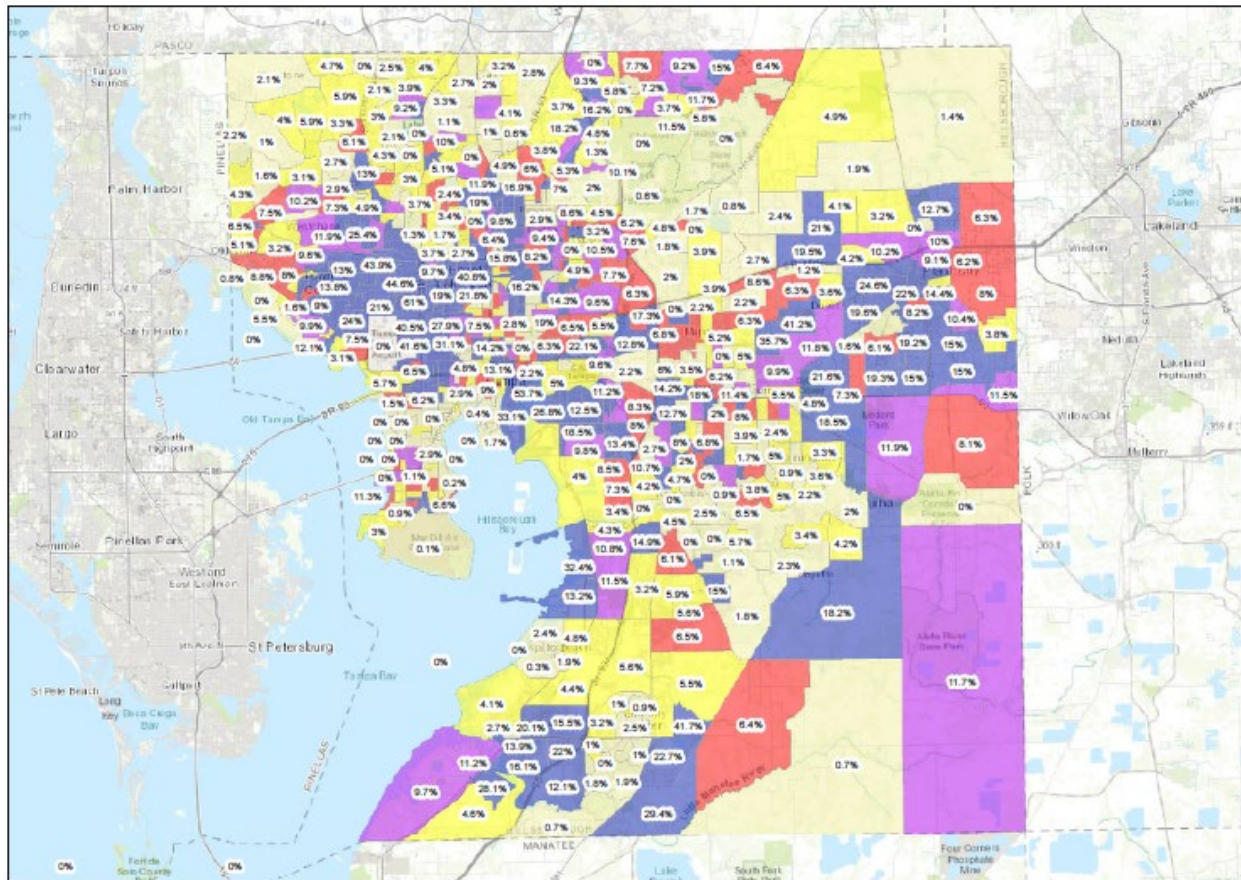
Gracepoint Title VI Plan

Speak English less than “very well”	72	0.0%
Thai	856	0.1%
Speak English “very well”	369	0.0%
Speak English less than “very well”	487	0.0%
Laotian	157	0.0%
Speak English “very well”	87	0.0%
Speak English less than “very well”	70	0.0%
Vietnamese	7,287	0.6%
Speak English “very well”	3,109	0.3%
Speak English less than “very well”	4,178	0.3%
Other Asian languages	6,816	0.6%
Speak English “very well”	5,286	0.4%
Speak English less than “very well”	1,530	0.1%
Tagalog	3,719	0.3%
Speak English “very well”	2,882	0.2%
Speak English less than “very well”	837	0.1%
Other Pacific Island languages	844	0.1%
Speak English “very well”	682	0.1%
Speak English less than “very well”	162	0.0%
Navajo	10	0.0%
Speak English “very well”	10	0.0%
Speak English less than “very well”	0	0.0%
Other Native American languages	144	0.0%
Speak English “very well”	116	0.0%
Speak English less than “very well”	28	0.0%
Hungarian	517	0.0%
Speak English “very well”	378	0.0%
Speak English less than “very well”	139	0.0%
Arabic	7,368	0.6%
Speak English “very well”	5,184	0.4%
Speak English less than “very well”	2,184	0.2%
Hebrew	634	0.1%
Speak English “very well”	528	0.0%
Speak English less than “very well”	106	0.0%
African languages	2,277	0.2%
Speak English “very well”	1,928	0.2%
Speak English less than “very well”	349	0.0%
Other and unspecified languages	111	0.0%
Speak English “very well”	111	0.0%
Speak English less than “very well”	0	0.0%

Gracepoint Title VI Plan

Appendix G: Demographic Map

Hillsborough County
Limited English Proficiency
by Census Block Group



Source: 2013-2017 American Community Survey, ESRI

