

WestCare Gulf Coast Florida, Inc.



Title VI Plan

June 15, 2023



Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
1/10/22	1.0 updated		
1/10/22	2.0 updated		
1/10/22	2.1 updated		
1/10/22	6.0 added		
1/10/22	Appendix C updated		
1/10/22	Appendix D updated		
6/15/23	Plan Reviewed and Updated		
6/20/23	Plan Signed		

Table of Contents

APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS

APPENDIX B CURRENT SYSTEM DESCRIPTION

APPENDIX C TITLE VI PLAN ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER

APPENDIX D TITLE VI SAMPLE NOTICE TO PUBLIC

APPENDIX E TITLE VI COMPLAINT FORM

APPENDIX F PUBLIC PARTICIPATION PLAN

APPENDIX G LANGUAGE ASSISTANCE PLAN

APPENDIX H OPERATING AREA LANGUAGE DATA: PINELLAS COUNTY SERVICE AREA

APPENDIX I DEMOGRAPHIC MAPS

APPENDIX J TITLE VI EQUITY ANALYSIS

1.0 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, on assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to {49 CFR Part 21}.

WestCare Gulf Coast Florida, Inc. (WC-GC) 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.

WC-GC further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate In language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against WC-GC. 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.I B to the primary recipients (refer to Appendix A of this plan).

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

Steve Blank

Signature

Steve Blank

Printed Name

June 20, 2023

Date

2.0 Introduction & Description of Services

WC-GC submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

WC-GC is a sub-recipient of FTA funds and provides service in Pinellas, County. A description of the current WC-GC system is included in Appendix B.

Title VI Liaison

WC-GC Liaison Name:

Steve Blank, Regional Vice President WC-GC

Administration: 1735 Dr. MLK Jr. Street South

St. Petersburg, FL. 33705

Mailing Address:

1735 Dr. MLK Jr. Street South

St. Pete FL 33705

PH 727-502-0188/ FX 727-502-9380

WC-GC has designated a liaison for Title VI issues and complaints within the organization. The liaison will be the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison will include:

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

2.1 First Time Applicant Requirements

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

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

WC-GC is **not** a first time applicant for FTA/FDOT funding. The following is a summary WC-GC'S as of July 2021 pending federal and state funding.

Date Applied	Amount	Source	Type of Funding (Fundraising or Contracts/Grants)	If Grant Application Date Submitted	Result
7/2022	\$100,000	City of St Petersburg Opioid Funding	Contracts/Grants		Awarded
4/13/22	\$8,000	SAAB – Ice Machines for DB	Contracts/Grants		Awarded
3/3/23	\$50,000	Pinellas County ESG	Contracts/Grants	3/23/23	Pending
3/8/22	\$221,067	City of St Petersburg ESG & CDBG utilities, lighting, ceiling tiles, insulation, flooring	Contracts/Grants		Awarded
3/15/23	\$25,000	City of Clearwater	Contracts/Grants	3/15/23	Pending
2/10/23	\$30,000	City of Largo	Contracts /Grants	2/10/23	Pending
4/13/22	\$50,000	Pinellas County Justice Assistance Grant	Contracts /Grants	4/13/22	Pending

5/9/22	Approx \$733,600/yr	Pinellas County Drug Court Residential beds and OP Div N & Z	Contracts/Grants		5 Year Award
6/3/23	\$4,621,058	FL DOC Secure Beds (Focus)	Contracts/Grants		Awarded
11/6/20	\$282,772/yr	Pinellas County Shelter Beds	Contracts /Grants		Awarded \$70,693/year for 5 years
6/1/22	\$2,310,000	CFBHN – Intervention, Recovery Support, SA, MH, Prevention, MAT	Contracts/Grants		3 Year extension
3/20/20	\$18,000/yr	Moyer Foundation – Camp Mariposa	Contracts /Grants		5 Year Award
6/16/23	\$150,000	Pinellas County Social Action Funding	Contracts /Grants	6/16/23	Pending
2/18/22	\$238,134	Pinellas County CDBG – generator, windows, bathroom remodel for TP	Contracts/Grants		Awarded
2/4/20	\$348,960/yr for 5 years	SAMHSA CSAT Drug Court Treatment Pasco	Contracts/Grants		Awarded
1/26/23	\$242,437	DOT – Vehicles	Contracts/Grants	1/26/23	Pending
6/1/20	\$500,000/yr for 5 years	SAMHSA Workforce Support	Contracts/Grants		Awarded
4/21/21	\$525,000/yr for 5 years	SAMHSA – MAT	Contracts/Grants		Awarded
5/14/20	\$500,000/for 36 months	BJA Veterans – Neuro Trauma	Contracts/Grants		Awarded
10/5/22	\$540,000	DOC MH Overlay at Residential program	Contracts/Grants		Pending
3/5/21	\$703,093/yr for 3 years	FL Reinvestment with Pinellas County	Contracts/Grants		Awarded
3/20/23	\$75,000	Emergency Food and Shelter Program EFSP Phase 40	Contracts/Grants	3/20/23	Awarded \$20,145
5/1/23	\$1,202,703	FL DCF Comprehensive Needs of Fathers	Contracts/Grants		Pending
3/21/23	\$2,500,000 over 5 years	SAMHSA GBHI Grants for the Benefit of Homeless Individuals	Contracts/Grants		Pending
5/5/23	\$2,500,000 over 5 years	SAMHSA Treatment for individuals experiencing homelessness	Contracts/Grants		Pending
3/10/23	\$102,000	City of St Petersburg ESG/CDBG	Contracts/Grants		pending

2.2 Annual Certifications and Assurances

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

WC-GC will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT.

2.3 Title VI Plan Concurrence and Adoption

N/A – WestCare Gulf Coast is a private 501c3 non-profit - providing 5310 transportation services only to our elderly and/or disabled clients.

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

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. The notice must include:

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

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

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of WC-GC 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 WC-GC main office(s) including the reception desk and meeting rooms, and on WC-GC website at www.westcare.com. Additionally, WC-GC will post the notice at stations, stops and on transit vehicles.

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 WC-GC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). WC-GC investigates complaints received no more than 180 days after the alleged incident will WC-GC process complaints that are complete.

Once the complaint is received, WC-GC 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.

WC-GC has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, WC-GC 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 WC-GC 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 at www.westcare.com.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on WC-GC at www.westcare.com.

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. WC-GC will submit Title VI Plans to FDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

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

4.4 Sub-recipient Assistance and Monitoring

WC-GC does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, WC-GC utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if WC-GC has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.]

4.5 Contractors and Subcontractors

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

Nondiscrimination Clauses

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
1. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
2. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
3. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
4. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, WC-GC shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
5. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the

Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the WC-GC Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

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

E-Verify

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

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), WC-GC 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 WC-GC 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. WC-GC has had zero (0) investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	0			
1.				
2.				
Lawsuits	0			
1.				
2.				
Complaints	0			
1.				
2.				

6.0 Public Participation Plan

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

Introduction

The Public Participation Plan (PPP) for WC-GC was developed to ensure that all members of these residential communities, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for WC-GC. Clients' sentiment and opinions are taken into consideration when designing policy and service delivery by outreach to the Westcare community, the stakeholders and families. This is done through emails and discussion with stakeholders, posters and flyers and client meetings. WC-GC provides transportation services to residential clients from Davis Bradley, which is the Residential program, Mustard Seed, which is Transitional Housing and Turning Point, which is a homeless shelter/non- medical detox.

Public Participation Goals:

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

- Inclusion and Diversity: All WC-GC residents will have the opportunity to participate in comments and concerns.
- Accessibility: All legal requirements for accessibility will be met for all residents.
- Clarity and Relevance: Any issues of concerns/complaints by residents will be addressed by the Administration in Management meetings
- Responsive: WC-GC Management will strive to respond to appropriate resident comments and concerns in community meetings.
- Tailored: Public/resident participation methods will be tailored to match local and cultural preferences as much as possible.
- Flexible: The PPP will accommodate participation in a variety of ways through annual surveys, administrative response to resident and grievance

Public Participation Methods:

The methods of public/resident transportation included in the PPP was developed based on best practices in conjunction with the needs WC-GC. WC-GC intends to achieve meaningful public/resident participation by methods with respect to service and any change to service. WC-GC will continue to have community meetings and listening sessions with residents to gather input, and distribute information about service quality, proposed change or new service options.

The public/residents will be invited to provide feedback through inhouse meetings, feedback cards, grievances, surveys, discussion with counselor or other staff. All information obtained will be evaluated and considered by the administrative department of WC-GC.

Meetings will be held to ask questions, share information, seek input from the public/residents and help to achieve consensus on a specific recommendation. The meetings will take place in a common area and signs will be posted as to date and time. Minutes will be taken to ensure fidelity of meeting and outcomes.

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).

WC-GC operates a transit system within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address WC-GC'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 WC-GC service area there are 886,900 residents or 3% (23,971) who describe themselves as not able to communicate in English very well (Source: US Census). WC-GC 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. WC-GC has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

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.

N/A

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. In order to comply with the regulations, WC-GC will ensure the following:

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

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

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.

N/A - WC-GC not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: PINELLAS SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	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

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.

Founded in 1973, the mission of WestCare is to empower everyone with whom the organization comes into contact with and to engage in a process of healing, growth and change, benefiting themselves, their families, coworkers and communities.

2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

WestCare GulfCoast-Florida, Inc. (WC-GC Florida) is part of the WestCare family of 501c3 tax-exempt nonprofit organizations that provides a wide spectrum of health and human services in both residential and outpatient environments in sixteen (16) states throughout the United States, and two off-shore territories of Guam and the Virgin Islands.

The WestCare Foundation has a national Board of Directors consisting of volunteer leaders throughout the nation from the public and private business, educational, government, human service, legal and finance sectors. The Board has eastern and western division members who meet regularly to review the operations and financial procedures of the organization, advising the national Board at its regular meetings. Locally, affiliated agencies may have their own additional advisory committees comprised of local leaders and volunteers to assist the Board and inform them on local needs.

In Florida, WestCare (WC-GC Florida) operates programs on the Gulf Coast in St. Petersburg, Florida and the surrounding area such as The Village in Miami-Dade County; and in the Florida Keys in Marathon (the middle Keys) and Key West - the Guidance Care Center. WC-GC employs 112 employees to ensure it reaches and serves all of our clients through client focused and centered services. Currently, we have eight (8) vehicles providing transportation to elderly and/or disabled clients in Pinellas County.

Since 2001, WestCare has developed a presence within Pinellas County as a provider of comprehensive behavioral health services for specialized populations including homeless men and women, youth, individuals transitioning into the community from jail/prison, individuals with co-occurring mental health and substance abuse issues and individuals living with HIV/AIDS.

3. Indicate if your agency is a government authority or a private non-profit agency.

WC-GC is a 501c3 non-profit providing transportation services only to our elderly and/or disabled clients.

4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

The WC-GC management team includes the Chief Operating Officer of Florida, Frank Rabbito, Robert Neri, Senior Vice President, and Chief Clinical Officer Dr. Frank Scafidi. Dr. Scafidi is responsible for designing, overseeing and maintaining the clinical operations of WestCare's substance abuse treatment services in West Central Florida and across all WestCare areas in the United States. The day to day administration, acquiring vehicle insurance, training of drivers, and management of the WC-GC Florida's transportation program is the responsibility of Steve Blank, Regional Vice President WC-CC.

Who provides vehicle maintenance and record keeping?

A Vehicle Safety Committee composed of a representative from each state where WestCare provides services was created to ensure operating policies and procedures are in place for the safety of our clients and employees. WC-GC Florida's internal safety committee is composed of Tom Heid, our vehicle maintenance technicians and a representative from each program. Vehicle maintenance is outsourced to a local auto services vendor. An on-line vehicle maintenance system is utilized to track individual vehicle mileage, all

maintenance activity and vehicle records. All maintenance and repairs are coordinated through Tom Heid and the vendor.

5. Number of current transportation related employees

Our transportation department has a total of three (3) employees that include: 3 full-time drivers.

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

Currently, we do not have vehicles requiring a CDL certification, however, staff that are selected to drive a vehicle requiring a CDL, will be trained to obtain the required certification. All employees who drive WC-GC Florida clients are required to complete our on-line Driver Safety training course. We have 6 staff providing transportation to our clients who all have valid Florida drivers' licenses.

Appendix C
Title VI Plan Adoption Meeting Minutes and FDOT
Concurrence Letter

*The Public Participation Plan is related to Westcare Gulfcoast residents/clients only and subsequent Transit Board approval does not apply to WC-GC as we only provide transportation for our own clients who are 5310 eligible – elderly and/or disabled. We do not publically advertise for ridership or have a separate Transit Board. WestCare does not require Board approval for state level plans.

Appendix D
Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI

WestCare Gulf Coast Florida, Inc. (WC-GC)

- WC-GC 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 WC-GC.
- For more information on WC-GC's civil rights program, and the procedures to file a complaint, contact, (727-502-0188); email steve.blank@westcare.com; or visit our administrative office at Davis Bradley: 1735 Dr. MLK St. South, St. Petersburg, FL. 33705. For more information, visit www.westcare.com.
- If information is needed in another language, contact 727-490-6767

The above sentence must also be provided in any language(s) spoken by the LEP population that meet the Safe Harbor threshold.

Appendix E
Title VI Complaint Form

WestCare Gulf Coast Florida, Inc.

Title VI Complaint Form

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Electronic Mail Address:					
Accessible Requirements?	Format	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	[]	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					
Have you previously filed a Title VI complaint with this agency?			Yes	No	

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

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

Signature and date required below

Signature Date

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

to: Steve Blank, Regional Vice President WC-GC

1735 DR. MLK Jr. St. South

St. Petersburg, FL. 33705

PH 727-502-0188 FX 727-502-9380

Appendix G
Language Assistance Plan (LAP)

I. Introduction

WC-GC operates a transit system within Pinellas County. The Language Assistance Plan (LAP) has been prepared to address WC-GC'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 WC-GC service area there is a total population of 886,900 with 23,971 residents or 3% (Spanish) who describe themselves as not able to communicate in English "very well" (Source: US Census). WC-GC 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. WC-GC 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 WC-GC be able to communicate effectively with all of its riders. When WC-GC 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. WC-GC is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

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

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use WC-GC 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 program, activity or service.
2. The frequency with which LEP persons come in contact with WC-GC programs, activities or services.
3. The nature and importance of programs, activities or services provided by WC-GC to the LEP population.
4. The resources available to WC-GC 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 889,154 residents in the WC-GC service area 18,922 residents describe themselves as speaking English less than “very well”. People of Spanish or Spanish Creole descent are the primary LEP persons likely to utilize WC-GC services. For the WC-GC service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 97% speak English “very well”. For groups who speak English “less than very well”, 9.1% speak Spanish.

Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the WC-GC 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.

WC-GC 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 of the 889,154 residents in the WC-GC service area 18,922 residents describe themselves as speaking English less than “very well”. People of Spanish or Spanish Creole descent are the primary LEP persons likely to utilize WC-GC services. Phone inquiries and staff survey feedback indicated that WC-GC dispatchers and drivers interact [infrequently] with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish.

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. WC-GC transports clients throughout the community daily. We strive to empower each client to be as independent as possible and employ a system for distributing free bus tokens to clients who opt to use public transportation. To alleviate the strain on the public transportation system, clients are also transported by WC-GC Florida vehicles. The average one way

trip is 9-10 miles from a facility. The common and frequent uses for transportation are to (1) medical appointments; (2) community-based support and 12-step groups; (3) to and from their homes or current transitional housing;(4) community outings or events; (5) legal appointments ; and (6) community-based social services for referral services including employment, housing and life skills development training.

WC-GC Florida provides transportation of up to 948 clients annually. Our clients are a diverse population of males and females of all ages. One hundred (100%) of our clients are defined as “disabled” due to their severe substance abuse and mental health disorders. More than 53% of our clients experience co-occurring mental health and substance abuse disorder. About 20% of the client population is over 55 years of age and may also be homeless or under-housed and most are extremely low to very low income and cannot afford private transportation. They also may lack a valid driver’s license.

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

WC-GC assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: Spanish to English translation services via written and spoken assistance. WC-GC provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

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

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

The five elements are addressed below.

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

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

WC-GC has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 97% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (9.1%). Of those whose primary spoken language is English, approximately 3% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for 0% (statistically insignificant) of the service area population.

WC-GC may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.

2. Having Census Bureau Language Identification Flashcards available at WC-GC Meetings. This will assist WC-GC in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to WC-GC management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

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

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

WC-GC 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. Provide Language Identification Flashcards onboard transit vehicles and in the WC-GC offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

WC-GC will utilize the demographic maps provided in Appendix I in order to better provide the above efforts to the LEP persons within the service area.

c. Element 3: Training Staff

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

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

In the case of WC-GC, the most important staff training is for staff and transit drivers. Several representatives are bilingual in English and Spanish.

The following training will be provided to drivers and staff:

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

d. Element 4: Providing Note to LEP Persons

WC-GC 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 WC-GC office lobby, and on buses. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

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

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

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

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 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.

WC-GC service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, WC-GC does not have over 5% of LEP groups which speak English less than "very well" which exceed either 5.0% or 1,000 person.] or [As shown in Appendix H, the number of person which speak English less than "very well" is counted as 18,922 persons.

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. WC-GC may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

Appendix H
Operating Area Language Data:
WC-GC Service Area

<u>Language</u>	<u>Pinellas County</u>	<u>Percent of Population</u>
Total	886,900	100%
Speak only English	772,759	87%
Spanish or Spanish Creole	55,730	6%
Speak English “very well”	31,759	4%
Speak English less than “very well”	23,971	3%
French (incl. Patois, Cajun)	5,401	1%
Speak English “very well”	4,253	0%
Speak English less than “very well”	1,148	0%
French Creole	1,359	0%
Speak English “very well”	927	0%
Speak English less than “very well”	432	0%
Italian	1,979	0%
Speak English “very well”	1,092	0%
Speak English less than “very well”	887	0%
Portuguese or Portuguese Creole	2,963	0%
Speak English “very well”	2,320	0%
Speak English less than “very well”	643	0%
German	3,213	0%
Speak English “very well”	2,806	0%
Speak English less than “very well”	407	0%
Yiddish	9	0%
Speak English “very well”	9	0%

Language	Pinellas County	Percent of Population
Speak English less than "very well"	0	0%
Other West Germanic languages	644	0%
Speak English "very well"	644	0%
Speak English less than "very well"	0	0%
Scandinavian languages	882	0%
Speak English "very well"	836	0%
Speak English less than "very well"	46	0%
Greek	5,909	1%
Speak English "very well"	4,043	0%
Speak English less than "very well"	1,866	0%
Russian	2,308	0%
Speak English "very well"	1,556	0%
Speak English less than "very well"	752	0%
Polish	2,414	0%
Speak English "very well"	945	0%
Speak English less than "very well"	1,469	0%
Serbo-Croatian	3,531	0%
Speak English "very well"	2,058	0%
Speak English less than "very well"	1,473	0%
Other Slavic Languages	1,670	0%
Speak English "very well"	1,079	0%
Speak English less than "very well"	591	0%
Armenian	26	0%

Language	Pinellas County	Percent of Population
Speak English "very well"	26	0%
Speak English less than "very well"	0	0%
Persian	297	0%
Speak English "very well"	297	0%
Speak English less than "very well"	0	0%
Gujarati	1,655	0%
Speak English "very well"	1,034	0%
Speak English less than "very well"	621	0%
Hindi	566	0%
Speak English "very well"	566	0%
Speak English less than "very well"	0	0%
Urdu	44	0%
Speak English "very well"	0	0%
Speak English less than "very well"	44	0%
Other Indic languages	1,571	0%
Speak English "very well"	988	0%
Speak English less than "very well"	583	0%
Other Indo-European Languages	1,756	0%
Speak English "very well"	659	0%
Speak English less than "very well"	1,097	0%
Chinese	2,900	0%
Speak English "very well"	1,592	0%
Speak English less than "very well"	1,308	0%

<u>Language</u>	<u>Pinellas County</u>	<u>Percent of Population</u>
Japanese	549	0%
Speak English “very well”	378	0%
Speak English less than “very well”	171	0%
Korean	600	0%
Speak English “very well”	157	0%
Speak English less than “very well”	443	0%
Mon-Khmer, Cambodian	311	0%
Speak English “very well”	92	0%
Speak English less than “very well”	219	0%
Hmong	0	0%
Speak English “very well”	0	0%
Speak English less than “very well”	0	0%
Thai	638	0%
Speak English “very well”	282	0%
Speak English less than “very well”	356	0%
Laotian	2,452	0%
Speak English “very well”	711	0%
Speak English less than “very well”	1,741	0%
Vietnamese	4,044	0%
Speak English “very well”	1,586	0%
Speak English less than “very well”	2,458	0%
Other Asian languages	1,375	0%
Speak English “very well”	1,046	0%

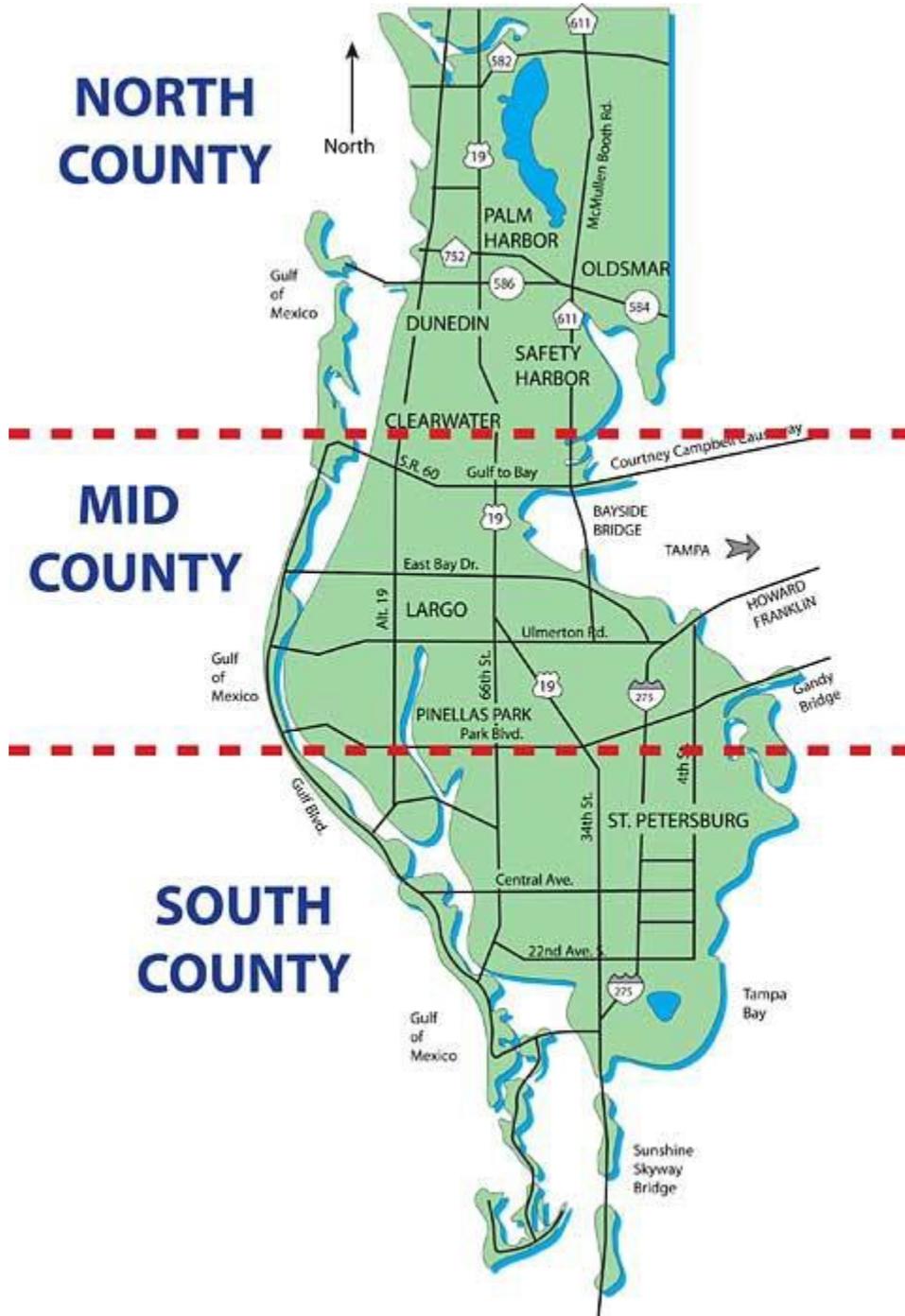
Language	Pinellas County	Percent of Population
Speak English less than "very well"	329	0%
Tagalog	4,080	0%
Speak English "very well"	3,185	0%
Speak English less than "very well"	895	0%
Other Pacific Island languages	472	0%
Speak English "very well"	197	0%
Speak English less than "very well"	275	0%
Navajo	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Other Native American languages	0	0%
Speak English "very well"	0	0%
Speak English less than "very well"	0	0%
Hungarian	456	0%
Speak English "very well"	211	0%
Speak English less than "very well"	245	0%
Arabic	1,923	0%
Speak English "very well"	1,612	0%
Speak English less than "very well"	311	0%
Hebrew	146	0%
Speak English "very well"	113	0%
Speak English less than "very well"	33	0%
African languages	214	0%

<u>Language</u>	<u>Pinellas County</u>	<u>Percent of Population</u>
Speak English "very well"	214	0%
Speak English less than "very well"	0	0%
Other and unspecified languages	54	0%
Speak English "very well"	54	0%
Speak English less than "very well"	0	0%

Appendix I

Demographic Maps

The majority of our clients using 5310 vehicles reside in Southern Pinellas County but are transported throughout the county.



Appendix J
Title VI Equity Analysis

WC-GC has not performed Title VI Equity Analysis due to no new facility being considered at this time

---END---



RESOLUTION WCGC 2023-02

RESOLUTION OF WESTCARE GULFCOAST-FLORIDA, INC. (“CORPORATION”) BOARD OF DIRECTORS AUTHORIZING THE SUBMISSION OF THE FOLLOWING 2023-2024 GRANT APPLICATIONS AND CONTRACTS AND THE DESIGNATING OF AUTHORIZED REPRESENTATIVES OF THE CORPORATION.

WHEREAS, the Corporation desires to submit and execute the following listed Funding Contracts (as defined below), including all supporting documentation and assurances, to the designed funding agencies under the specific Funding Contract;

WHEREAS, certain Funding Contracts require that the Board of Directors of the Corporation approve the submission and execution of each Funding Contract and further require that the Corporation designate named authorized representatives of the Corporation to act on behalf of the Corporation.

WHEREAS, pursuant to *Section 6.1 of The Amended and Restate Bylaws of WestCare GulfCoast-Florida, Inc.*, dated October 12, 2019, the Board may authorize, by resolution, certain officers to enter into any contract or instrument on behalf of the Corporation;

THEREFORE, BE IT RESOLVED that the Board of Directors of the Corporation, subject to the Corporation’s own contract review process and grant review structure and policies, hereby approves the submission of the following listed Funding Contracts, including all supporting documentation and assurances required under each application by the issuing funding body, by the Corporation:

- US Department of Commerce
 - US Economic Development Administration
- Substance Abuse and Mental Health Services Administration
 - Center for Substance Abuse Treatment
 - Center for Substance Abuse Prevention
 - Center for Mental Health Services
- US Department of Justice
 - Office of Juvenile Justice and Delinquency Prevention
- US Department of Veterans Affairs
- US Department of Housing and Urban Development
- US Department of Health and Human Services
 - Administration for Children and Families

- Health Resources and Services Administration
- US Center for Disease Control
- US Department of Education
- US Office of Juvenile Justice and Delinquency Prevention
- US Department of Labor
- United States Courts Probation and Pretrial Services
- Center for Substance Abuse Treatment (CSAT)
- Center for Substance Abuse Prevention (CSAP)
- Center for Mental Health Services (CMHS)
- US Center for Disease Control and Prevention
- Office of National Drug Control Policy
- US Department of Probation
- US Department of Natural Resources
- US Department of Transportation
- US Department of Agriculture
- US Department of the Interior
- The Federal Emergency Management Agency
- State of Florida Department of Children & Families
- State of Florida Department of Health
- State of Florida Department of Juvenile Justice
- State of Florida Department of Transportation
- State of Florida Department of Corrections
- Federal Department of Veterans Administration
- Broward Behavioral Health Coalition
- South Florida Behavioral Health Network
- Central Florida Behavioral Health Network
- City of St. Petersburg
- City of Largo
- Pinellas County
- Pinellas County Sheriff's Office
- Pinellas County Drug Court
- Pinellas County Health Services
- Pinellas County Justice Coordination
- The Able Trust
- Fraternal Order of Eagles
- HUD
- City of Clearwater
- FEMA
- Hillsborough County Health and Human Services
- FDOT 5310
- Paxen
- Sheriff's Department
- Florida Department of Children and Families
- Substance Abuse Advisory Board

- National Institute of Health
- Center for Disease Control and Prevention
- Health Resources and Services Administration
- Office of Violence Against Women
- Administration for Children and Families
- Bureau of Justice Assistance
- Center for Mental Health Services (CMHS)
- Urban League
- Pinellas County Health Department
- St. Peters Ex Offender Coalition (PerC)
- Directions for Living
- Pasco County Drug Court
- Career Source Pinellas County
- FADAA
- Hillsborough County
- Foundation for a Healthy St. Petersburg
- Pinellas Community Foundation
- Community Foundation of Tampa Bay
- Eluna Foundation
- Pasco County Sheriff's Office
- Pasco County
- Pasco County Continuum of Care
- Pinellas County Continuum of Care
- Pinellas County Homeless Leadership Alliance
- Wells Fargo
- Beal Bank USA
- CLMG Corp
- LNV Corporation

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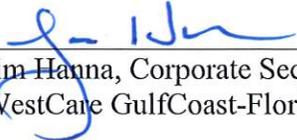
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BE IT FURTHER RESOLVED that the following persons are hereby, subject to the authority of their respective title and applicable contract policy, if any, authorized by the Corporation to execute and deliver all such documents and instruments related to the Funding Contracts, including but not limited to, any amendments, payment requests and budget modifications attendant to each specific contract, regardless of whether such acts were performed before or subsequent to the date of the adoption of this Resolution:

- Richard Steinberg President
- Ken Ortvals CEO
- Linda Erath CFO
- Frank Rabbito Chief Operational Officer
- Robert Neri Chief Program Services Officer
- Dr. Jason Engel Chief Clinical Officer
- Kristen Chaffee Regional Controller
- Stephen Wright Senior Vice President
- Ronda Lieberman Regional Accountant
- Savannah Jones Chief Administration Officer
- Dwayne Stevens Chief Information Officer
- Darrin Holman Senior Vice President

FINALLY, BE IT RESOLVED that this **Resolution WCGC 2023-02** shall continue in full force and effect and may be relied upon by the Corporation and the County, until the receipt of written notice of any change therein.

PASSED AND ADOPTED by the Board of Directors of the Corporation by unanimous vote on this 4th day of February, 2023.



Jim Hanna, Corporate Secretary
WestCare GulfCoast-Florida, Inc.

February 04, 2023

Date