

St. Johns County

Resolution No. 2022-417



Title VI Plan 2022 Update

Adopted: November 15, 2022

Table of Contents

1.0	Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Program.....	3
2.0	Introduction & Description of Services.....	4
2.1	First Time Applicant Requirements	5
2.2	Annual Certifications and Assurances	5
2.3	Title VI Plan Concurrence and Adoption.....	5
3.0	Title VI Notice to the Public	5
3.1	Notice to Public.....	5
3.2	Notice Posting Locations.....	6
4.0	Title VI Procedures and Compliance.....	6
4.1	Complaint Procedure.....	6
4.2	Complaint Form	7
4.3	Record Retention and Reporting Policy.....	7
4.4	Sub-recipient Assistance and Monitoring.....	7
4.5	Contractors and Subcontractors.....	7
5.0	Title VI Investigations, Complaints, and Lawsuits.....	9
6.0	Public Participation Plan	10
7.0	Language Assistance Plan	10
8.0	Transit Planning and Advisory Bodies.....	10
9.0	Title VI Equity Analysis.....	11
10.0	System-Wide Service Standards and Service Policies.....	11
10.1	Service Standards.....	12
10.2	Service Policies.....	13
11.0	Appendices.....	14
APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS	
APPENDIX B	CURRENT SYSTEM DESCRIPTION	
APPENDIX C	TITLE VI PROGRAM ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER	
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC	
APPENDIX E	TITLE VI COMPLAINT FORM and FILING PROCEDURES	
APPENDIX F	PUBLIC PARTICIPATION PLAN	
APPENDIX G	LANGUAGE ASSISTANCE PLAN	
APPENDIX H	OPERATING AREA LANGUAGE DATA: St Johns County	
APPENDIX I	DEMOGRAPHIC MAPS	

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

St Johns County Board of County Commissioners (SJCBOCC) assures the Federal Transit Administration 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.

St Johns County Board of County Commissioners 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 St Johns County Board of County Commissioners.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

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

Hunter S Conrad

Hunter S. Conrad
County Administrator, St Johns County

11/17/22

Date

LEGALLY SUFFICIENT

[Signature]
Name

Date: [Signature]

2.0 Introduction & Description of Services

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

The SJCBOCC is a direct recipient of FTA funds and provides service in the St Augustine Urbanized Area via a contracted operator, the St Johns County Council on Aging (COA). A description of the current public transportation system is included in Appendix B.

St Johns County must designate a liaison for Title VI issues and complaints within the organization. The liaisons are the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

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

The SJCBOCC has designated the following liaisons for Title VI issues and complaints within the organization:

St Johns County Council on Aging Title VI Contact

Rebecca Yanni, Executive Director, St Johns County Council on Aging
(904) 209-3685
180 Marine Street
St Augustine, FL 32084

St Johns County Title VI Liaison

Katie Diaz
St Johns County Title VI/ADA Coordinator
904-209-0653
500 San Sebastian View Rm 017
St Augustine, FL 32084

2.1 First Time Applicant Requirements

St. Johns County is not a first time applicant for FTA/FDOT funding. The following is a summary of the County's current and pending federal and state funding.

Current and Pending FTA Funding

1. FTA 2018-039, \$250,000, Current
2. FTA 2018-125, \$250,000, Current
3. FTA 2019-077, \$1,842,146, Current
4. FL-2020-044, \$3,077,127, Current
5. FTA 2021-025, \$2,143,338, Current
6. FL 6410-2021-1, \$2,584,178, Pending

Current and Pending FDOT Funding

1. Block FP# 418441-1-84-21, \$550,783, Current
2. Block FP# 418441-1-84-22, \$581,146, Current

During the previous three years, the Federal Transit Administration and/or the State of Florida Department of Transportation did not complete a Title VI compliance review. St Johns County has not been found to be in noncompliance with any civil rights requirements.

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.

St Johns County will remain in compliance with this requirement by annual submission of certifications and assurances as required by FTA and FDOT.

2.3 Title VI Program Concurrence and Adoption

The Plan was approved and adopted by St Johns County Board of County Commissioners during a public meeting held on July 16, 2019. A copy of the meeting minutes are included in Appendix C.

3.0 Title VI Notice to the Public

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 Program. 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 English and Spanish notice is included in Appendix D of this Plan.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of St Johns County'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 the County administrative offices, including the COA and meeting rooms, and on the Sunshine Bus at website at <https://sunshinebus.net/>. Additionally, notices will be posted on all transit vehicles.

4.0 Title VI Procedures and Compliance

4.1 Complaint Procedure

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

Once the complaint is received, St Johns County 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.

St Johns County has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, St Johns County 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, St Johns County 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 the websites at: <https://sunshinebus.net/rider-forms/> and <http://www.sjcfl.us/Transportation/Transit.aspx>.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E, and on the Sunshine Bus website at <https://sunshinebus.net/rider-forms/> and <http://www.sjcfl.us/Transportation/Transit.aspx>.

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. St Johns County will submit Title VI Programs to the FTA and 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

St Johns County does not have any sub-recipients to provide monitoring and assistance. All public transportation service is by contract with the St Johns County Council on Aging. In the future, if St Johns County has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B. The St Johns County Transit Grants Specialist monitors compliance with contractual requirements utilizing the following strategies:

- Periodic on-board customer surveys
- Review of contractors published Title VI policies and procedures to ensure they are properly posted and compliant with Title VI regulations
- Day to day technical assistance

4.5 Contractors and Subcontractors

The SJCBOCC 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. St. Johns County's 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 (USDOT) Title 49, Code of Federal Regulations, Part 21, (Regulations) as they may be amended from time to time, which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion, or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including 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.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, St. Johns County shall impose contract sanctions as appropriate, including, but not limited to:

- a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination, or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the SJCBOCC, 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

The SJCBOCC 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. St. Johns County 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 FTA and 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

The SJCBOCC and its vendors and contractors 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 County and its vendors or contractors. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for St. Johns County 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 St. Johns County.

5.0 Title VI Investigations, Complaints, and Lawsuits

In accordance with 49 CFR 21.9(b), St. Johns County 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 St. Johns County 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 updates.

St. Johns County 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.

6.0 Public Participation Plan

The Public Participation Plan (PPP) for St. Johns County 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 the County's transportation system. Policy and service delivery decisions 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 St. Johns County transportation services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included in Appendix F.

Current Outreach Efforts

The SJCBOCC 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 St. Johns County's recent, current, and planned transportation related outreach activities.

- Annual Sunshine Bus on-board surveys
- Annual Transit Development Plan Updates
- Public meetings with local elected officials and key community stakeholders
- Triennial DBE Goal Methodology and Program Plan

7.0 Language Assistance Plan

The Language Assistance Plan (LAP) has been prepared to address St. Johns County'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 St. Johns County's service area there are 6,012 residents or 2.48% who describe themselves as speaking English less than "very well." (Source: US Census). St. Johns County 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. St. Johns County 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

St. Johns County does not have a transit-related committee or board, therefore the requirement to provide a table depicting the racial breakdown of members does not apply.

9.0 Title VI Equity Analysis

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, 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, St. Johns County will ensure the following:

1. The SJCBOCC 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, national origin. St. Johns County will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, the SJCBOCC will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If the SJCBOCC determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, St. Johns County 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. St. Johns County must demonstrate and document how both tests are met. St. Johns County 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.

St. Johns County has not recently constructed any transit facilities nor does it currently have any facilities in the planning stage. St. Johns County does not have any Title VI Equity Analysis reports to submit with this Plan. The SJCBOCC will utilize the demographic maps included in Appendix I for future Title VI analysis.

10.0 System-Wide Service Standards and Service Policies

The Sunshine Bus Company is a deviated fixed route service provider. FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system and must ensure that the manner of the distribution affords users access to these assets.

St Johns County has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. St. Johns County has prepared standards for its deviated fixed route service.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Minivans (5)	16	1	17	1.1
Vans (2)	13	1	14	1.1
Cutaways (10)	15	4	19	1.3

a. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
<u>Weekday Deviated</u>	<u>Peak</u>	<u>Base</u>	<u>Evening</u>	<u>Night</u>
Blue		130 min		
Green		130 min		
Orange		130 min		
Red		130 min		
Purple		220 min		
Teal		160 min am 240 min pm		
Connector		120 min		
Express		120 min		
Circulator		140 min		

POLICY HEADWAYS AND PERIODS OF OPERATION				
<u>Saturday Deviated</u>	<u>Peak</u>	<u>Base</u>	<u>Evening</u>	<u>Night</u>
Blue		130 min		
Green		130 min		
Orange		130 min		

Red		130 min		
Purple		220 min		
Teal		160 min am 240 min pm		
Connector		120 min		
Express		120 min		
Circulator		140 min		

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than zero (0) minutes early and no more than ten (10) minutes late. St. Johns County’s on-time performance objective is 90% or greater. St. Johns County continuously monitors on-time performance.

d. Service Availability

St. Johns County currently distributes transit service so that approximately 21% of all residents in the service area are within a ¼ mile walk of a bus route.

10.2 Service Policies

a. Distribution of Transit Amenities

Sunshine Bus uses a combination of flag down stops and regular bus stops. Installation of transit amenities along bus routes is based on the number of passengers boarding at stops and at locations where flag stops are not safe. Transit amenities such as bus stop signs and shelters located along Sunshine Bus routes are present in communities with higher concentrations of low income, minority, and Limited English Proficiency individuals.

b. Vehicle Assignment

Vehicles are rotated among the routes in order to minimize excessive mileage on any particular bus. Bus assignments also take into account the operating characteristics of the route. Due to very narrow roadways in certain parts of the service area that require tight turns, shorter buses are assigned to certain routes.

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

The vision for the transportation program is to provide the opportunity for every person in St. Johns County to enjoy wellness, longevity and quality of life choices within a strong, healthy community through the provision of public transportation. The mission of St. Johns County and the St. Johns County Council on Aging is to provide safe, affordable and reliable mobility options to the public and the transportation disadvantaged citizens of the County.

The COA is a private non-profit 501(c)(3) organization that provides paratransit services for the County's transportation disadvantaged population, and also operates, on behalf of the County, the Sunshine Bus deviated fixed route service which is open to the public. The COA is the Community Transportation Coordinator (CTC) for St. Johns County.

St. Johns County Government contracts with the St. Johns County Council on Aging for the provision of mobility services. The COA is responsible for the operation and management of the transportation program with overall administration and oversight being the responsibility of the County.

Maintenance on all agency vehicles is also provided by the COA. All maintenance is performed according to the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are maintained by the Director of Transportation and are kept at the County Transit Center located at 2595 Old Moultrie Road, St Augustine, FL 32086.

The COA's transportation program staff consists of the transportation director, two transportation managers, two full time road supervisors, two full-time customer service/dispatch representatives, one full-time billing/media coordinator, three full-time customer service representatives, two full-time fleet maintenance mechanics, one full-time facility coordinator, one full time human resources assistant, and both full and part-time drivers. Together the program staff are responsible for the deviated fixed route and demand response services.

7. Only transportation employees that have completed all of the required safety and driver's training requirements are allowed to drive the agency vehicles. All drivers are required to carry a Florida Commercial Driver's License with a "P" endorsement. Demand response drivers can have a Florida "E" or higher Driver's License. All drivers undergo a Florida Department of Law Enforcement background check, Driver's Record Check, FDOT or Federal Motor Carrier Physical Exam and are subject to pre-employment, random, post-accident and reasonable suspicion drug and alcohol testing.

8. Sunshine Bus service operates nine routes Monday through Saturday from approximately 5:30 a.m. until 8:05 p.m. although individual schedules vary. The Sunshine Bus fare is currently \$2.00 per ride, \$4.00 per all-day pass or \$30.00 for an unlimited use monthly pass. The fare is discounted by 50% for individuals aged 60+, children under 6, disabled persons or Medicare recipients. With an

advance registration, riders can request a Sunshine bus deviation of up to ¼ mile from the fixed route for an additional fare of \$4.00.

Demand Response services provided by the COA serve a variety of trip purposes that include medical, nutrition, shopping, and social service destinations. Services are provided on a subscription and demand-response basis six days per week. Although the COA policy calls for 48 hour advance reservations, same day services can be accommodated on a space-available basis. The Demand Response fleet is comprised of a variety of vehicles ranging from 8 to 16 passengers and most are wheelchair accessible.

Demand Response fares are based on trip length starting at \$2.63 per mile plus a \$2.75 loading fee for ambulatory trips, \$2.63 per mile plus \$5.50 loading fee for wheelchair trips, \$2.63 per mile plus \$60.00 loading fee for stretcher trips and \$2.63 per mile plus \$31.56 per trip or per hour for group trips.

Appendix C

Title VI Program Adoption Meeting Minutes | FDOT Concurrence Letter

(Insert when available)

Appendix D

Notice to Public (English)

Notifying the Public of Rights Under Title VI St. Johns County

- St. Johns County and the St. Johns County Council on Aging (COA) operate programs and services without regard to race, color, or 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 may file a complaint with St. Johns County or the COA.
- For more information on St. Johns County's civil rights program, and the procedures to file a complaint, contact the St. Johns County Council on Aging's Executive Director at (904) 209 – 3700; email byanni@stjohnscoa.com, or visit the administrative office at 180 Marine St., St. Augustine, FL 32084.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact (904) 209-0653.

Notice to Public (Spanish)

Notifying the Public of Rights St. Johns County

- Condado de St. Johns y el Consejo del Condado de St. Johns Sobre el Envejecimiento (COA) operan programas y servicio, sin distinción de raza, color, origen nacional, con arreglo a título VI de la Ley de Derechos Civiles. Cualquier persona que cree que el o ella ha sido perjudicada por cualquier práctica discriminatoria ilegal puede presentar una queja con el condado de St. Johns o el COA.
- Para obtener más información sobre el programa de derechos civiles del condado de St. Johns, así como los procedimientos para presentar una queja, pueden contactar al Consejo del Condado de St. Johns Sobre el Envejecimiento del Director Ejecutivo al (904) 209 - 3700; correo electrónico byanni@stjohnscoa.com, o la oficina administrativa a 180 San Marino, St. Augustin, FL 32084.
- Un demandante puede presentar una queja directamente con el Federal Transit Administration presentando una queja ante la Oficina de Derechos Civiles, atención: Coordinador del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- Si se necesita información en otro idioma, por favor llame al (904) 209-0653.

Appendix E
Title VI Complaint Form
St. Johns County
Discrimination 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"/> Sex <input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____				
Section IV				

Have you previously filed a Title VI complaint with this agency?	Yes	No
--	-----	----

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

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:	

Signature and date required below

Signature Date

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

Katie Diaz, St. Johns County	Or	Federal Transit Administration
Title VI/ADA Coordinator		Office of Civil Rights
500 San Sebastian View, Room 005A		1200 New Jersey Ave. SE
St. Augustine, FL 32084		Washington, D.C. 20530

Or

Rebecca Yanni, Executive Director
St. Johns County Council on Aging
180 Marine St.
St. Augustine, FL 32084

Condado de St. Johns
Formulario de Quejas de Discriminación

Sección 1:				
Nombre:				
Dirección				
Teléfono (Casa):			Teléfono (Trabajo):	
Dirección de correo electrónico:				
Requisitos de formato accesible?	ampliación de foto		Cinta de audio	
	TDD		Otro	
Sección II:				
Está presentando esta queja en su propio nombre?			Si*	No
*Si su respuesta es "sí" a esta pregunta, vaya a la Sección III.				
Si su respuesta es "no" a esta pregunta, por favor ponga el nombre y la relación de la persona a la que usted se queja:				
Por favor, explique porqué se ha declarado en un tercero:				
Por favor, confirma que ha obtenido la autorización de la parte perjudicada si está presentando en nombre de un tercero.			Si	No
Sección III:				
Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Años <input type="checkbox"/> Sexo <input type="checkbox"/> Discapacidad <input type="checkbox"/> Condición Religiosa o Familiar <input type="checkbox"/> Otros (explicar) _____				
Fecha de la discriminación alegada (mes, día, año): _____				
Explicar lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluir el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor use el reverso de esta forma.				

Sección IV				
Ha presentado previamente una queja del Título VI con esta agencia?			Si	No

Sección V	
Ha presentado esta queja con cualquier otro federal, estatal o agencia local, o con cualquier tribunal federal o estatal?	
<input type="checkbox"/> Si	<input type="checkbox"/> No
En caso afirmativo, marque lo que corresponda:	
<input type="checkbox"/> Agencia Federal: _____	
<input type="checkbox"/> Corte Federal: _____	<input type="checkbox"/> Corte Estatal: _____
<input type="checkbox"/> Corte Estatal: _____	<input type="checkbox"/> Agencia Local: _____
Por favor proporcionar información sobre la persona de contacto en la agencia / tribunal donde se presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección VI	
Nombre de la agencia cual la queja es en contra:	
Persona de Contacto:	
Título:	
Número de teléfono:	

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha requerida a continuación

Firma Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo, o envíe este formulario.

Katie Diaz

Condado de St. Johns
 Coordinador del Título VI/ADA
 500 San Sebastián , Habitación 005A
 St. Augustine. FL 32084

Or
 Oficina de Derechos Civiles
 Administración de Tránsito Federal
 1200 New Jersey Ave., SE
 Washington, D.C. 20590

Or

Rebecca Yanni, Director Ejecutivo
 Consejo del Condado de St. Johns sobre el Envejecimiento
 180 San Marino
 St. Augustine, FL 32084

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for St. Johns County 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 the County's mobility services. 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 St. Johns County transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services including web based surveys, on-board surveys and publicly noticed informational meetings. The SJCBOCC also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, and 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 St. Johns County Transit and its operations. The goals for this PPP include:

Inclusion and Diversity: St. Johns County will proactively reach out and engage low-income, minority, and LEP populations so these groups will have an opportunity to participate.

Accessibility: All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.

Clarity and Relevance: Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed service adjustments will be described in language that is clear and easy to understand.

Responsive: St. Johns County will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.

Tailored: Public participation methods will be tailored to match local and cultural preferences as much as possible.

Flexible: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods:

- The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of The Sunshine Bus Co., which intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

St Johns County will conduct community meetings as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options. The public will be invited to provide feedback to the Transportation office at 904-209-3718 during its hours of operation. Feedback collected over the phone will be recorded and passed on to management. Formal customer surveys to measure performance, and to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

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

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

For community meetings and other important information, the Sunshine Bus Co. will use a variety of means to make riders and citizens aware, including some or all of the following methods:

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

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

Appendix G

Language Assistance Plan

I. Introduction

St. Johns County operates a transit system for all County residents. The Language Assistance Plan (LAP) has been prepared to address St. Johns County'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 St Johns County there are 4,289 residents or 2.1% who describe themselves as not able to communicate in English "very well" (Source: US Census). St. Johns County 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. St. Johns County 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, national origin, sex, religion, age, disability, family or religious status, 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 SJCOCC to be able to communicate effectively with all of its riders because then the service provided is safer, more reliable, convenient, and accessible for all within its service area. The SJCOCC 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 St. Johns County 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 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 St. Johns County 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 St. Johns County program, activity or service.
2. The frequency with which LEP persons come in contact with St. Johns County programs, activities or services.
3. The nature and importance of programs, activities or services provided by St. Johns County to the LEP population.
4. The resources available to St. Johns County 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

For the St. Johns County service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s estimated population of 242,718, 91% speak only English and 6,012 residents, or 2.48% describe themselves as speaking English less than “very well”. Spanish is the most spoken language for the primary LEP persons likely to utilize St. Johns County services. Appendix H contains a table which lists the languages spoken at home by the ability to speak English for the population within the St. Johns County 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.

St. Johns County 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 and on-board surveys. Census data indicates that the Spanish speaking population is the most prominent group who speak English less than very well. See Appendix H for the County Language Data.

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.

An on-board passenger survey was distributed to customers riding the Sunshine Bus Company deviated fixed-route system from July 10, 2020, February 16, 2021 and February 17, 2021 to collect information about rider demographics, travel characteristics and satisfaction with the service. According to the survey, 63% were male and 80% indicated they had no working, registered vehicle at home, and at least 30% had no drivers license. Additionally, 78% had a total household income of less than \$20,000.

To further assess personal mobility options, each respondent was asked how he or she would have made the surveyed trip if the Sunshine Bus service was not available. The most frequent response was "ride with someone else" at 22%, and 18% indicated they would not have made the trip if the service was not available.

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

The relatively small percentage of the County's population who describe themselves as speaking English "less than very well" coupled with the very infrequent encounters between transportation program staff and LEP individuals make some accommodations cost prohibitive. However, St. Johns County recognizes its responsibilities to provide assistance to the LEP population. Following are the language assistance strategies the County utilizes:

- Notice of rights to language assistance - Spanish translations are posted on vehicles and on the Sunshine Bus (COA) website. The website also contains a Google link that translates the content into other languages.
- Title VI complaint forms and procedures – Spanish translations are posted on the Sunshine Bus (COA) website.
- Public notices and announcements – Important public notices and announcements involving access to transit are provided in Spanish.

- Translation services – Translation services are provided upon request.
- Ongoing evaluation – St. Johns County will continue to monitor Census data and any interactions with the LEP population and will make modifications to its language assistance plan as appropriate.

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.

St. Johns County has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 91.3% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (3.9%). Of those whose primary spoken language is Spanish, approximately 1% identify themselves as speaking English less than “very well”. Those residents whose primary language is not English and who identify themselves as speaking English less than “very well” account for just over 2.48% of the service area population.

St. Johns County will identify language assistance need for an LEP group by 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.

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.

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

1. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from bi-lingual staff members. If necessary, professional translation services or qualified community volunteers will be utilized.
2. The Sunshine Bus website includes a language translator.

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 St. Johns County, the most important staff training is for customer service representatives and transit drivers. The following training will be provided:

1. Information on Title VI Procedures and LEP responsibilities
2. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Notice to LEP Persons

St. Johns County will ensure Title VI information is available in English and Spanish on the County and COA websites. Key documents are written in English and Spanish. Notices are also posted 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

- Determination as to whether St. Johns County financial resources are sufficient to fund language assistance resources needed

St. Johns County 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 of the system easier. St. Johns County is open to suggestions from all sources, including customers, 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 the 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 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 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.

St. Johns County does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, 6,012 speakers qualify for the Safe Harbor Provision as the number of persons which speak English less than "very well" is counted as 2.48%

Appendix H

Operating Area Language Data St. Johns County

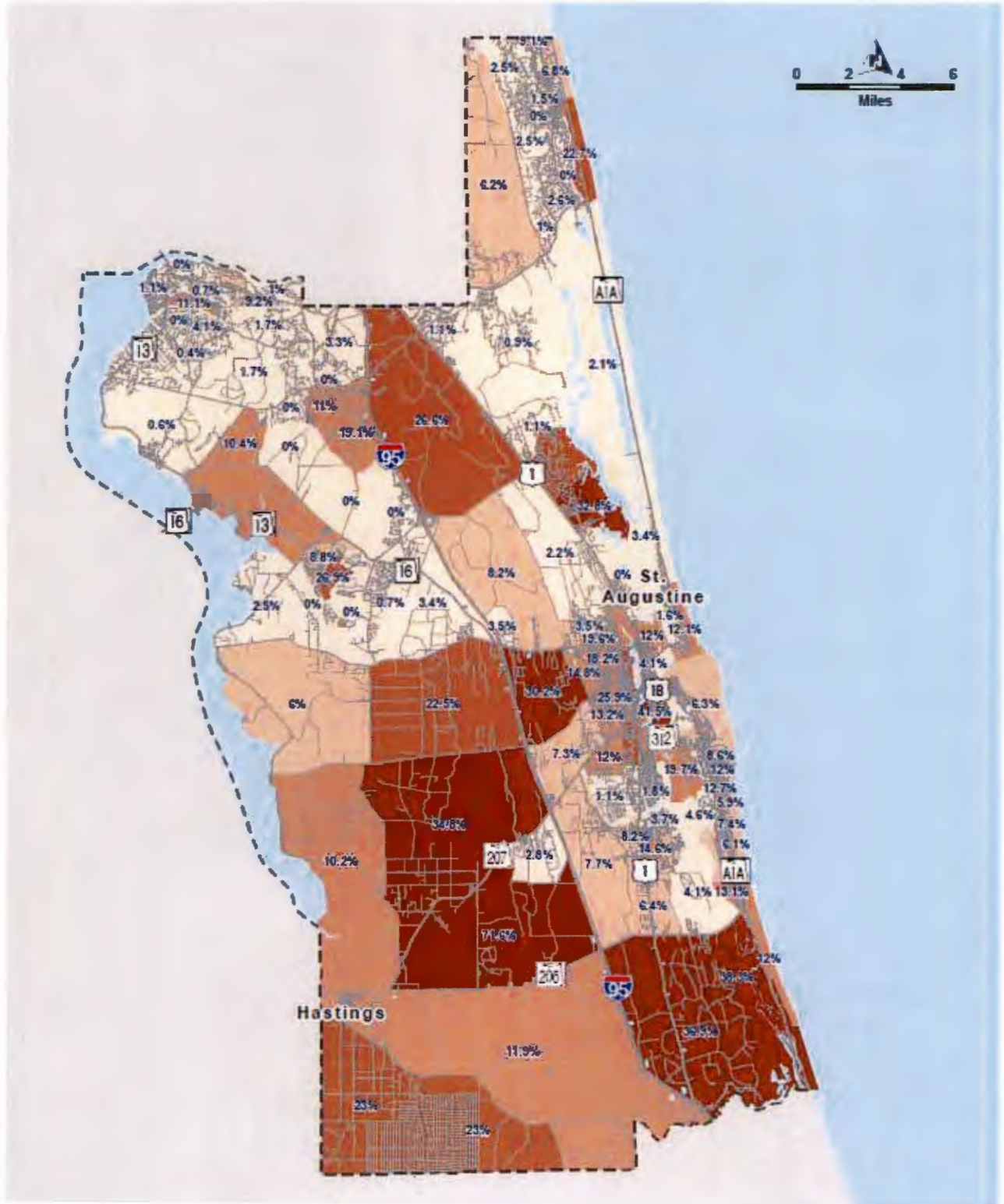
C16001 LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER
American Community Survey 5-Year Estimates

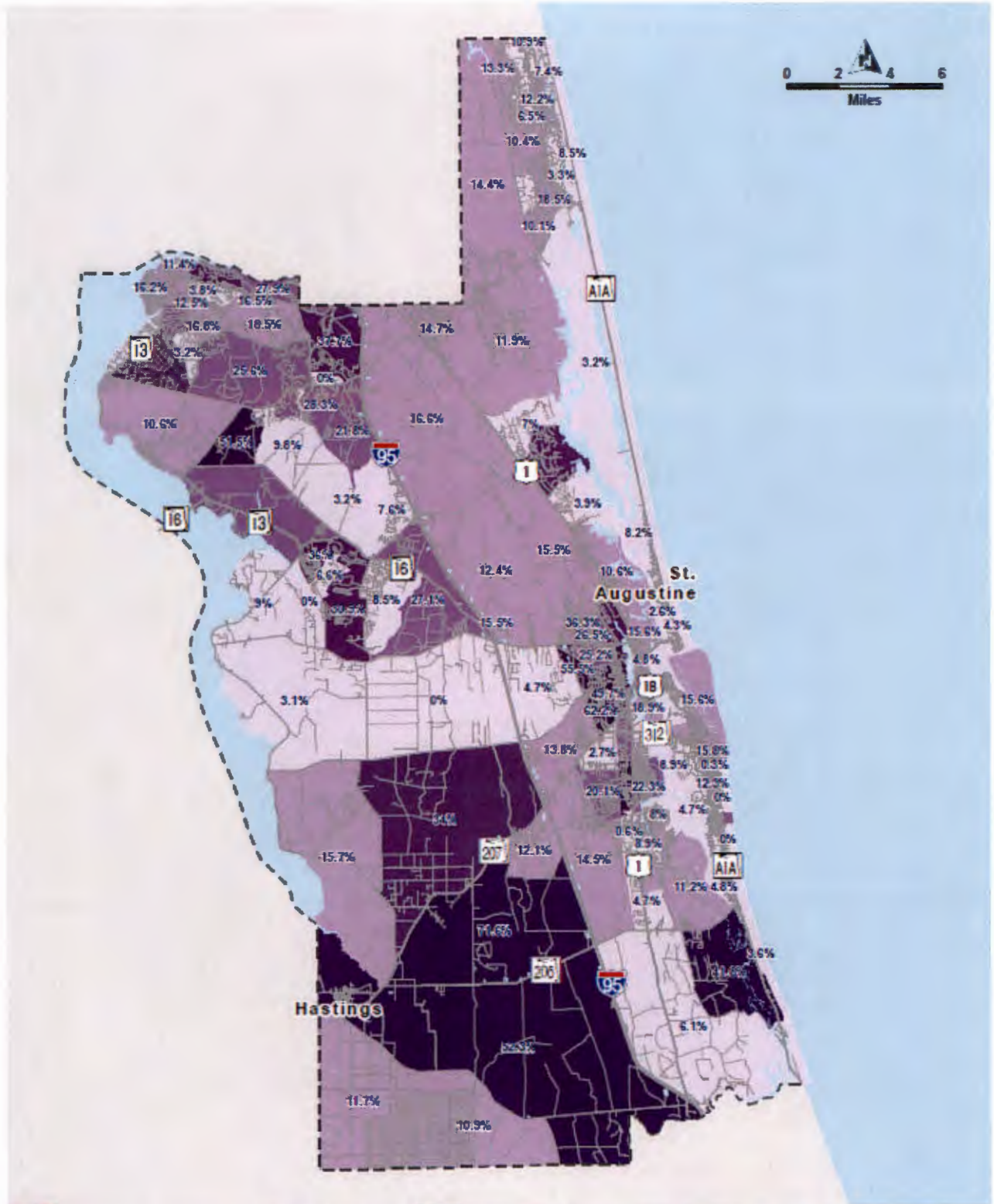
	St. Johns County	Percent of Population
Total Population	242,718	100.00%
Speak only English	221,809	91.39%
Spanish	9,520	3.92%
Speak English "very well"	7,082	2.92%
Speak English less than "very well"	2,438	1.00%
French, Haitian, or Cajun	1,143	0.47%
Speak English "very well"	844	0.35%
Speak English less than "very well"	299	0
German or other West Germanic languages	1,418	0.58%
Speak English "very well"	1,349	0.56%
Speak English less than "very well"	69	0
Russian, Polish, or other Slavic languages	1,274	0.52%
Speak English "very well"	836	0.34%
Speak English less than "very well"	438	0
Other Indo-European languages	3,503	1.44%
Speak English "very well"	2,081	0.86%
Speak English less than "very well"	1,422	0
Korean	78	0.03%
Speak English "very well"	19	0.01%
Speak English less than "very well"	59	0
Chinese (incl. Mandarin, Cantonese)	1,265	0.52%
Speak English "very well"	565	0.23%
Speak English less than "very well"	700	0
Vietnamese	290	0.12%
Speak English "very well"	245	0.10%
Speak English less than "very well"	45	0
Tagalog (incl. Filipino)	704	0.29%
Speak English "very well"	615	0.25%
Speak English less than "very well"	89	0.0004
Other Asian and Pacific Island languages	1,133	0.47%

Speak English "very well"	875	0.36%
Speak English less than "very well"	258	0.0011
Arabic	233	0.10%
Speak English "very well"	118	0.05%
Speak English less than "very well"	115	0.0005
Other/Unspecified languages	348	0.14%
Speak English "very well"	268	0.11%
Speak English less than "very well"	80	0.0003
TOTAL Speak English less than "very well"	6,012	2.48%

Appendix I

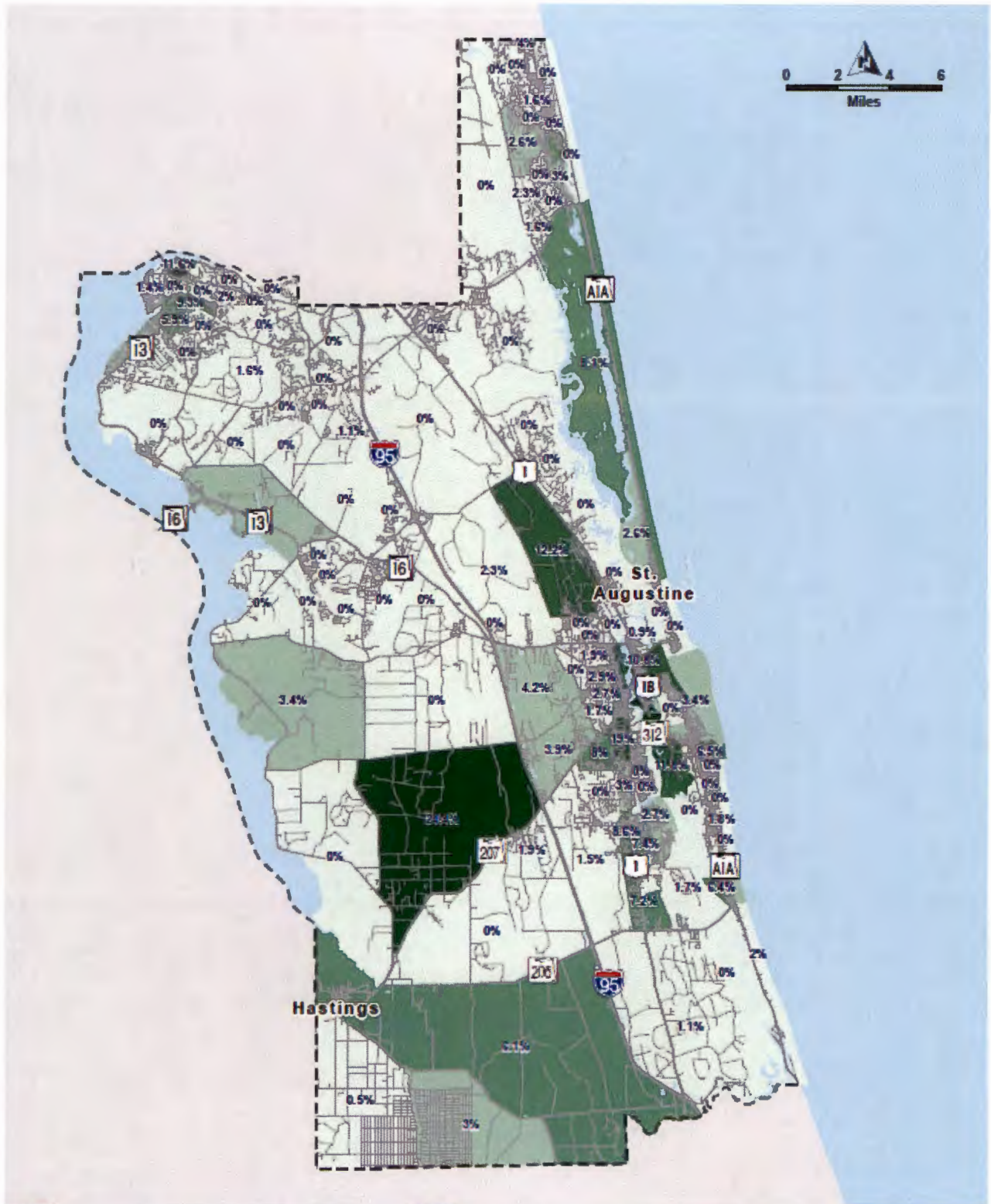
Demographic Maps





	0% - 10%	30.1% - 40%	Title VI/Nondiscrimination Program St. Johns County Percentage of Minority Population <small>Source: US Census ACS 2020</small>
	10.1% - 20%	> 40%	
	20.1% - 30%		

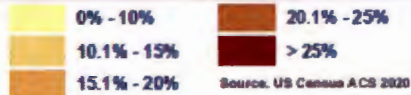
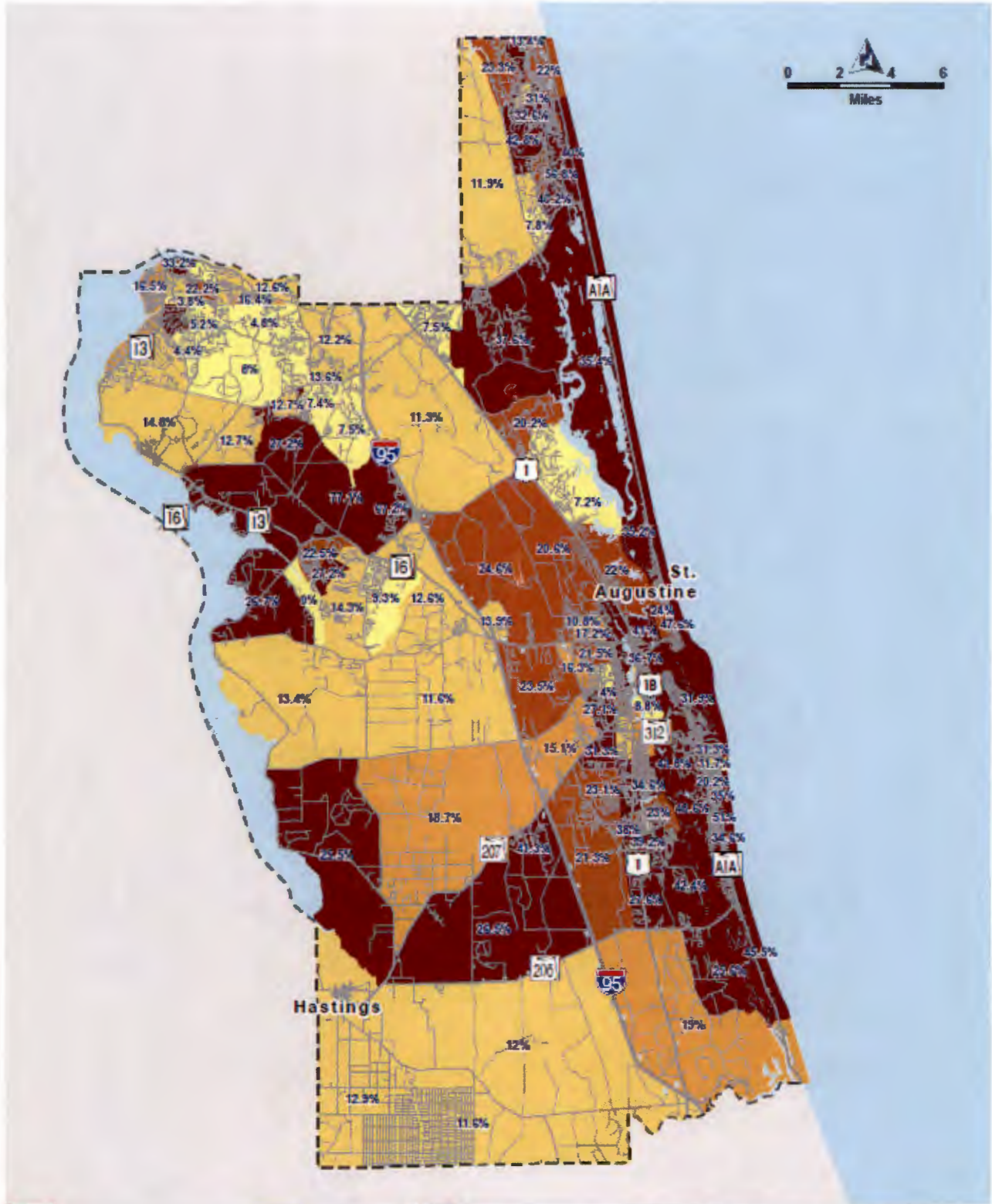
FDOT District Two



	0% - 2.5%	10.1% - 20%	Title VI/Nondiscrimination Program St. Johns County Percentage of Zero-Vehicle Households
	2.6% - 5%	5.1% - 10%	

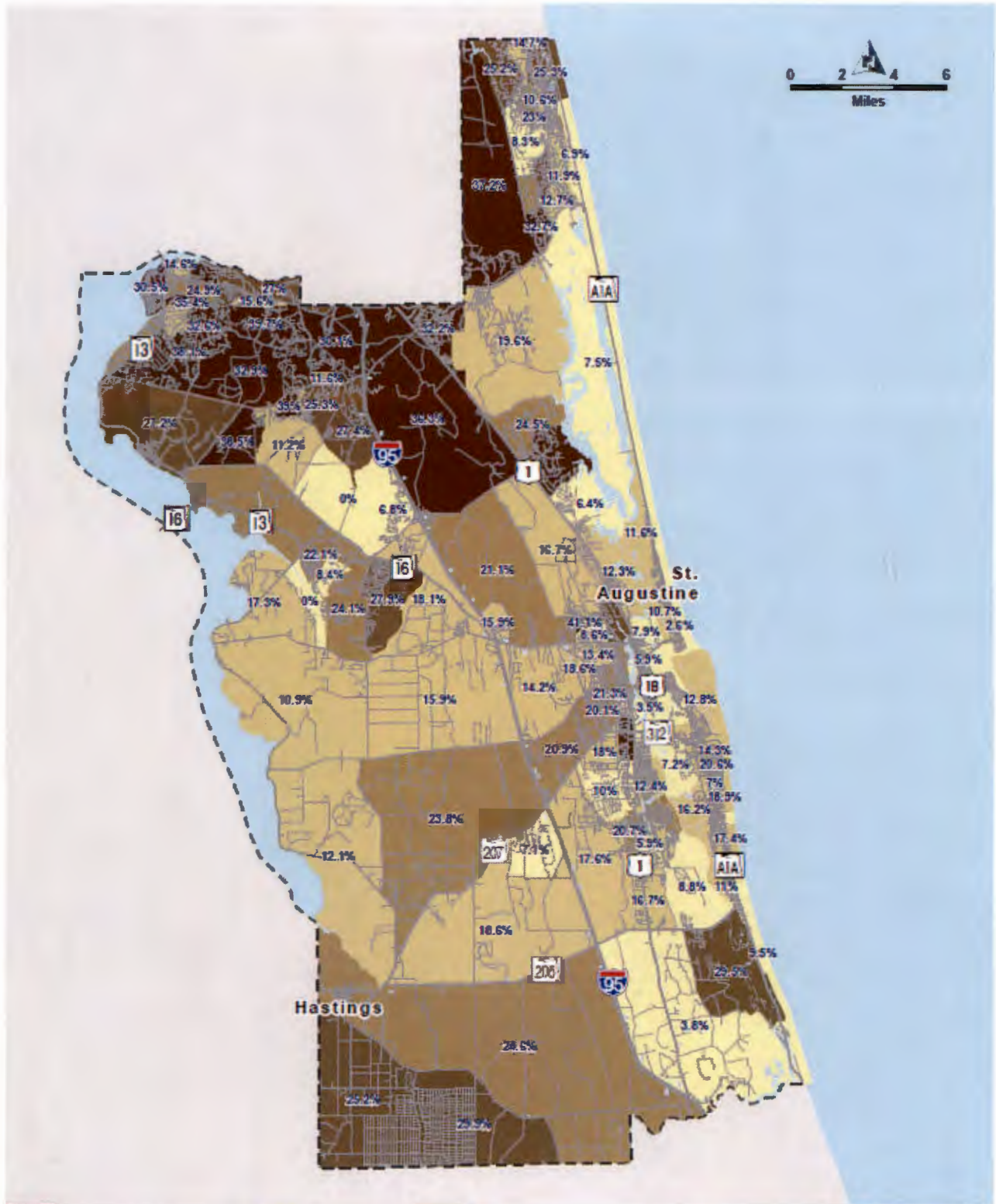
Source: US Census ACS 2020

FDOT District Two

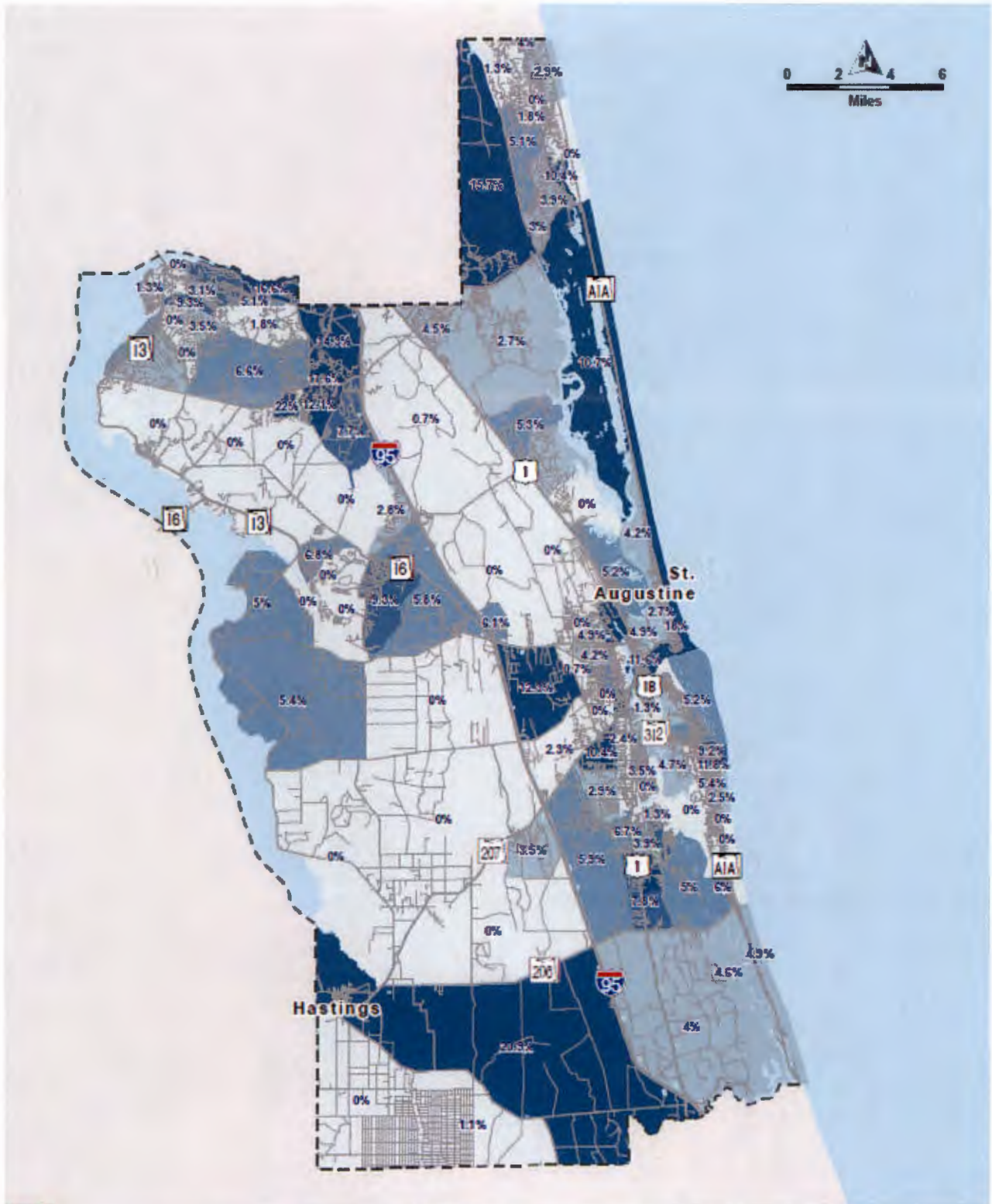


Title VI/Nondiscrimination Program
St. Johns County
Percentage of Population Age 65 or above

FDOT District Two

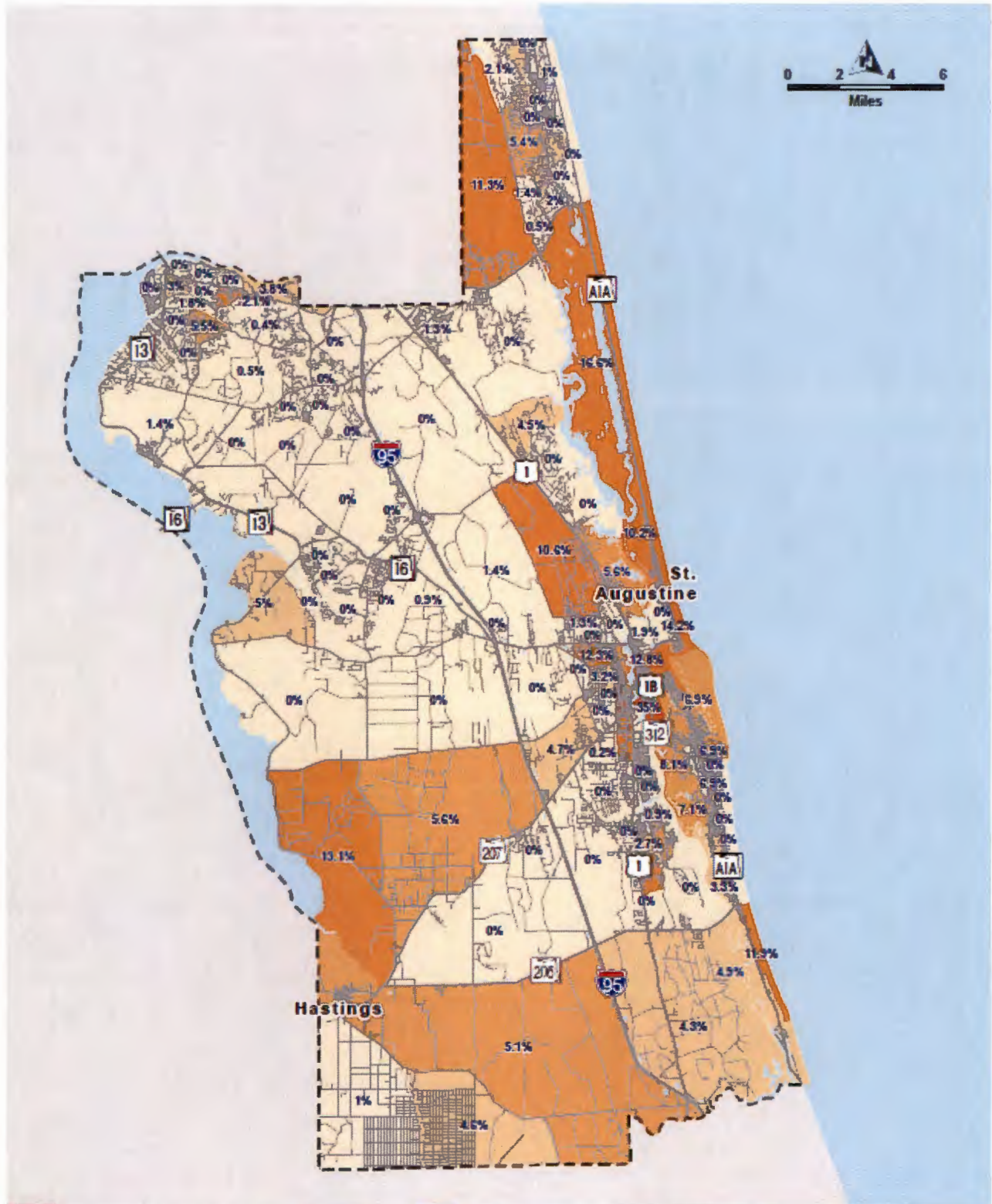


	0% - 10%	25.1% - 30%	<p>Title VI/Nondiscrimination Program St. Johns County Percentage of Population Age 18 or below</p> <p style="font-size: small;">Source: US Census ACS 2020</p> <p style="font-size: x-small;">FDOT District Two</p>
	10.1% - 20%	> 30%	
	20.1% - 25%		



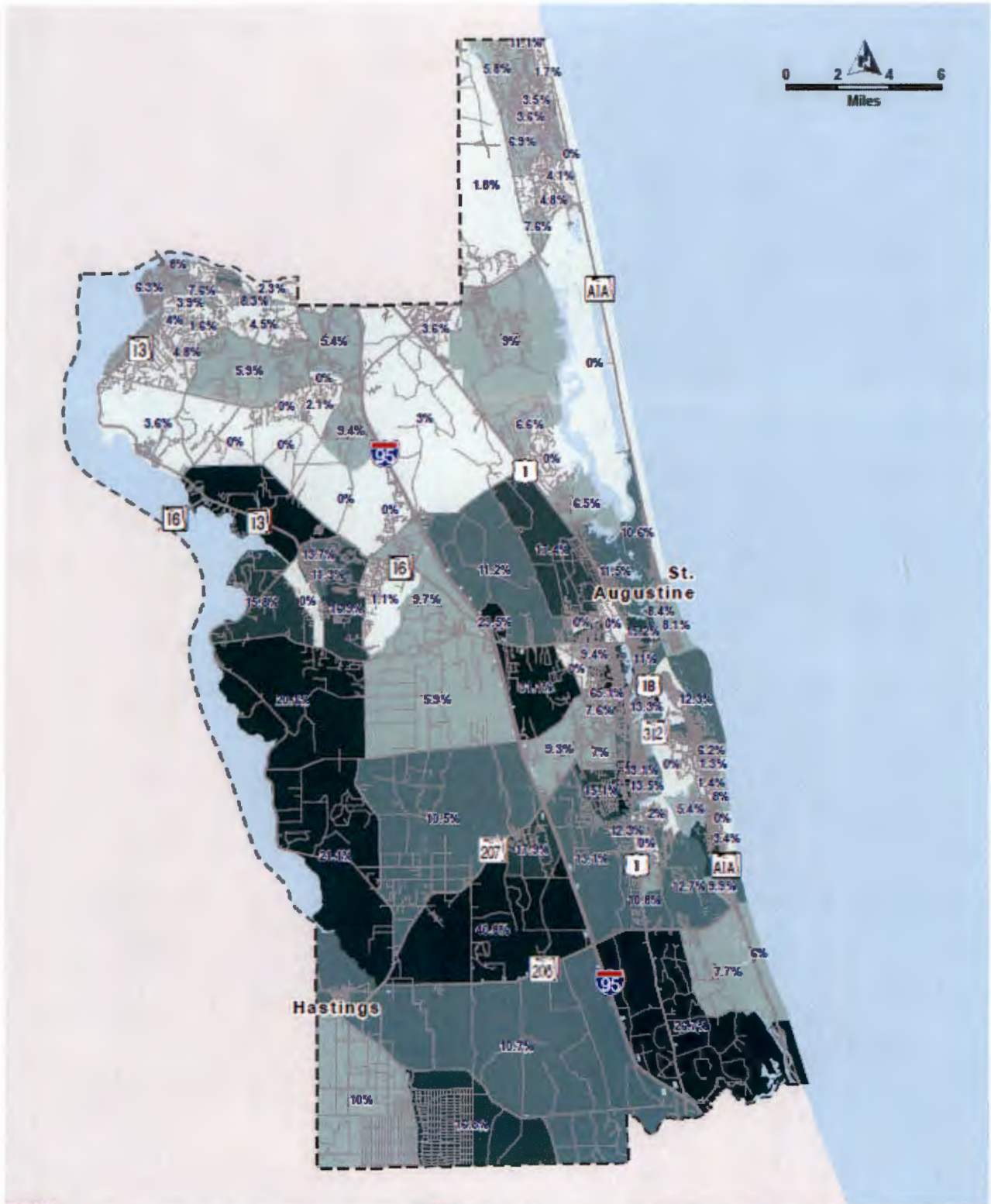
Title VI/Nondiscrimination Program
St. Johns County
Percentage of Households with Limited English Proficiency

FDOT District Two



	0% - 2.5%	10.1% - 20%	Title VI/Nondiscrimination Program St. Johns County Percentage of Population Relying on Public Transport to Work <small>Source: US Census ACS 2020</small>
	2.6% - 5%	> 20%	
	5.1% - 10%		

FDOT District Two



	0% - 5%	15.1% - 20%
	5.1% - 10%	> 20%
	10.1% - 15%	Source: US Census ACS 2020

Title VI/Nondiscrimination Program
St. Johns County
Percentage of Population 20 to 64 Years with Disability

FDOT District Two

Appendix J

Title VI Complaint Procedures

If anyone believes they have been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin while accessing transit services in St Johns County the following complaint procedures are available.

In filing a Title VI complaint, the following information is encouraged to be submitted in writing.

- Your name, address and how to contact you (phone number, email address, etc.)
- How, why, when and where you believe you were discriminated against. Include the location, names and contact information of any witnesses. If the alleged incident occurred on the bus, give date, time of day, and bus number if available.
- You must sign your letter of complaint

Copies of the Title VI Complaint form are in Appendix E of the Title VI Plan

All complaints will be investigated within 30 days of receipt. Reasonable measures will be undertaken to preserve any information that is confidential. Complaints will first be directed to the Director of Transportation Services. He or she can be contacted at 2925 Old Moultrie Road, St Augustine Fl. 32086, Telephone (904) 209-3718. The Director of Transportation will contact the County Transit Planner at 4040 Lewis Speedway, St Augustine Fl. 30084, Telephone (904) 209-0630.

The Director of Transportation Services will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigation officer will:

Identify and review all relevant documents, practices and procedures;

Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, the Director of Transportation Services will complete a final report for the Executive Director with a copy to the General Counsel. If a Title VI violation is found to exist, remedial factors as appropriate and necessary will be taken immediately. The Complainant will also receive a final report together with any remedial factors. The investigation process and final report should take no longer than twenty-five (25) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the Council on Aging Executive Director at 180 Marine Street, St. Augustine, FL 32084, or by phone at (904) 209-3685.

Complaints may also be filed directly with the Federal Transit Administration's Office of Civil Rights, no later than 180 days after the date of the alleged discrimination to the Office of Civil Rights,

Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590, or by the toll-free FTA Assistance Line at 1-888-446-4511.

Complaint procedures are the responsibility of both St Johns County and their Transportation Provider the St Johns County Council on Aging. The responsible persons in each organization are as follows:

Katie Diaz, St Johns County
Title VI/ADA Coordinator
500 San Sebastian View, Room
005A St Augustine, FL 32084
Tel (904) 209-0653

Becky Yanni, COA
Executive Director
180 Marine St.
St Augustine FL
32084 Tel (904)
209-3700

The Director of Transportation Services and the County Title VI Coordinator shall maintain a log of Title VI complaints received from this process. The log shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken in response to the complaint.