

**CCARC, Inc. dba Key Training Center Title VI**



# **CCARC, Inc. dba Key Training Center**

## **2019 Title VI Plan**

Prepared by:

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Approved January 22, 2019

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## **Introduction**

As a direct recipient of Federal Transit Administration (FTA) funds, CCARC, Inc. dba Key Training Center is required to submit a Title VI compliance report to the FDOT's District 7 office every three years. This document highlights the CCARC, Inc.'s efforts with regards to Title VI compliance. Annual updates are required by FTA.

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, creed, sex, age, or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. To address these federal requirements, Key Training Center (KTC) has developed a Title VI Plan, a Limited English Proficiency Plan (LEP) and an Environmental Justice Plan. The following sections provide a summary of KTC's activities relating to those requirements.

## **Notice to the Public – Process**

KTC's goal is not to discriminate against any person with respect to any transit program or other service. This commitment is incorporated into all public outreach efforts to engage all segments of the population in the transportation planning process. KTC actively provides information regarding its Title VI obligations to the public using a variety of methods.

Information, such as reference to the FTA circulars and the KTC Title VI and LEP programs and complaint procedure is available upon request at the main office and on the website. Notice of the non-discrimination policy is included in all transit contracts and bid advertisements. KTC must certify each year that there have been no Title VI complaints or lawsuits.

As a policy, staff is educated on the Title VI requirements including how to assist a person who has limited English proficiency. The entire FTA non-discrimination clauses are included in all consultant contracts. The Title VI Notice is shown in Appendix A and posted at the KTC Office, on the website and on all KTC transit vehicles.

## **Title VI Complaint Process and Procedures**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by KTC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (Appendix B). KTC investigates complaints received no more than 180 days after the alleged incident. KTC will process complaints that are complete. Once the complaint is received, KTC will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

KTC has 10 business days to investigate the complaint. If more information is needed to resolve the case, KTC may contact the complainant. The complainant has 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 10 business days, KTC can administratively close the case. A case can be administratively closed also 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.

An 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 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

### **List of Title VI Investigations, Complaints or Lawsuits**

KTC maintains a file for Title VI complaints, investigations and lawsuits. Since the time of the last submission, there are no known investigations, complaints or lawsuits.

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigation</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.	12/18	Employment	Govt. shut down	Schedule a
2.		Discrimination	delay	Notice of Appearance

### **Public Participation**

KTC seeks out and considers viewpoints of all persons including low-income, minority, elderly, disabled, Limited English Proficiency (LEP), ethnic and religious groups in the course of conducting public outreach and involvement activities in regards to transit activities. KTC utilizes the approved Hernando-Citrus County MPO Public Participation Plan to achieve this objective. KTC solicits feedback formally every year by putting out a satisfaction survey to all clients, families and stakeholders.

Public outreach methods or activities include:

- Website and Publications: KTC includes information on its website regarding transit activities and the Title VI Plan. KTC can supply most documents, upon request, in a variety of alternative formats and the use of Google Translator enables multi-lingual options. Transit related documents are available on the website.
- Surveys: KTC conducts annual surveys of riders on its transit system. Surveys request feedback from the passengers, families and other interested parties on how better to serve their needs. Staff considers the needs of those who cannot read or write and will verbally read the survey and record the respondent's comments.

### **Summary of Outreach Efforts**

The Transportation Disadvantaged Coordinating Board (TDCB) meets four times a year with the meetings advertised in the local newspaper. KTC participates in these meetings.

The TDCB has an Annual Public Hearing advertised in the local newspaper.

### **Language Assistance Plan**

To provide meaningful access to KTC's transit programs and services KTC's Language Assistance Plan (LAP) utilizes the MPO's adopted Limited English Proficiency Plan to achieve this objective. It serves as a training tool and guide for staff on how to recognize a person who may need language assistance and how to provide that assistance. The LAP Plan was developed pursuant to the Department of Transportation's guidance and is attached as Appendix C.

### **Membership of Non-Elected Committee's and Councils**

Key Training Center has no transit-related committees. All decisions relating to the transit service are made by the senior management and approved by CCARC, Inc. Board of Directors, a voluntary body. KTC does not have a non-elected, agency specific appointed Board of Directors.

The racial breakdown of the membership is as follows.

Body	Caucasian	Latino	African American	Asian American	Other American
Population	89%	4.90%	3.10%	1.60%	1.40%
CCARC, Inc.	99.00%	0%	1.00	0%	0%

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### **Monitoring of Sub recipients**

CCARC, Inc. dba Key Training Center does not have sub recipients.

Should KTC have sub recipients, the following monitoring mechanisms would apply:

1. Yearly service surveys of riders/customers
2. Periodic unannounced inspections/visits of the system routes and facilities
3. A review of the contractors published Title VI policy.
4. KTC will review any complaint made by a citizen against a sub recipient to ensure necessary and appropriate action

To insure these tasks are completed a log is maintained and is available upon request.

### **Determination of Site or Location of Facilities**

Key Training Center operates (2) Adult Training Centers, (1) Adult Day Care, (16) licensed group homes, (4) ALF's and (4) apartment complexes. The sites were selected without regard to race, color, or national origin with no displacement of persons from their residences and/or business.

### **Resolution for Approval of Title VI Plan**

Attached as Appendix D is a copy of the executed resolution of the CCARC, Inc. Board of Directors for the Title VI Plan.

## Service Standards (for Systems Under 50 Vehicles)

### A. Vehicle Load Standards

The vehicle load for each of the vehicles utilized in the deviated fixed-route with ADA complementary service is identified in the following chart.

Deviated Fixed Route Buses				
VEHICLE TYPE	QUANTITY	SEATS	WHEEL CHAIRS	
Freight Liner	1	28	2	
Eldorado	2	3	3	
Glaval	2	20	7	
Glaval	1	20	2	
Total	6			

### B. Vehicle Headway Standards

Transportation to/from the Adult Day Training programs utilize deviated fixed routes. Deviated Fixed Route service operates on eight routes throughout KTC on 120-minute headways from 6:30 a.m. until 8:30 p.m., Monday-Friday. Deviated Fixed Route service headways do not fluctuate. Demand response service operates based upon the scheduling of trips based upon rider need. Demand response service is utilized at each residential facility operated by KTC. The KTC residential facilities operate vehicles according to residential needs.

Scheduling involves consideration of a number of factors including: ridership, transit/pedestrian friendly streets, density of transit-dependent population and activities, land use connectivity and transportation demand management and length of trips.

### C. Service Availability Standards (for each mode)

Key Training Center's service availability for demand response service is determined by whether or not client needs can be met on the vehicle available. Individual considerations are made due to location of pick up/ drop point.

Due to the varying densities of the service area, specific service standards for bus stop locations have not been established. Rather, through environmental justice input, client and stakeholder input, analysis of the service area, specific locations for bus stops were and are implemented.



**Service Policies (for Systems Under 50 Vehicles)****A. Transit Amenities**

KTC picks up and drops off at a person's residence whenever possible. If a congregate pick up/drop off point is used then proximity, available shelter and safe accommodation are established.

**B. Vehicle Assignment for Each Mode**

KTC does not assign vehicles to routes or type of service based upon vehicle age or other factors. The assignment is made based upon ridership demands, spare ratio, and population densities. Demand response vehicles are assigned by the size of the vehicle for the services needed.

## **TITLE VI APPENDIX A**

## ***TITLE VI NOTICE TO THE PUBLIC***

# **TITLE VI - NOTICE TO PUBLIC**

CCARC, Inc. dba Key Training Center operates its programs and services without regard to race, color, national origin, age, sex, religion, disability, familial or income status. Any person who believes he or she has been subjected to any unlawful discriminatory practice under Title VI may file a complaint with CCARC, Inc..

Any person who believes that he or she, has been subjected to discrimination or retaliation, from the CCARC's administration of federally funded programs, may file a written complaint. Note: If the person filing a complaint believes they have been discriminated against by another branch of the Key Training Center, they are directed to contact the Key Training Centers of Human Resources office at (352) 795-5541. All written complaints received by the MPO are referred immediately to the FDOT's District Seven Title VI Coordinator for processing in accordance with approved State procedures. In order to request additional information on the Title VI program or requirements, please send them to Laura Johnson, Human Resource Director, Title VI Specialist, 5399 W. Gulf to Lake Hwy, Lecanto, FL 34461 or by email at [hrdir@keytrainingcenter.org](mailto:hrdir@keytrainingcenter.org) or by phone at 352-795-5541.

This Title VI Notice is posted at the Key Training Center main office, on the website and on all KTC transit vehicles.

### **Written complaints or questions may be sent to:**

Laura Johnson, Title VI Specialist  
CCARC, Inc.  
5399 W. Gulf to Lake Hwy  
Lecanto, FL 34461  
Phone: (352) 795-5541  
Email: [hrdir@keytrainingcenter.org](mailto:hrdir@keytrainingcenter.org)

If information is needed in another language or accessible in another required format, please contact us at the above phone number and assistance will be provided.

Si necesita información en otro idioma o accesibles en otro formato requerido, por favor contacte con nosotros en el número de teléfono arriba y se prestará asistencia.

Si necesita información en español, por favor comuníquese con Laura Johnson al 352-527-8228 y se le prestará asistencia.

## TÍTULO VI AVISO AL PÚBLICO

# TÍTULO VI - AVISO PÚBLICO

CCARC, Inc. dba Key Training Center opera sus programas y servicios, sin distinción de raza, color, origen nacional, edad, sexo, religión, discapacidad, estado familiar o ingresos. Cualquier persona que cree que él o ella ha sido objeto de cualquier práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante Key Training Center.

Cualquier persona que cree que él o ella, ha sido objeto de discriminación o represalia, desde la administración del CCARC, Inc. de los programas financiados por el gobierno federal, puede presentar una queja por escrito. Nota: Si la persona que presenta una queja cree que han sido discriminados por otra rama del Gobierno del Key Training Center, que se dirigen a ponerse en contacto con la Oficina de Recursos Humanos Key Training Center, al (352) 795-5541. Todas las quejas escritas recibidas por la MPO son referidos inmediatamente al Coordinador del Distrito Siete Título VI del FDOT para el procesamiento de conformidad con los procedimientos aprobados del Estado. Para solicitar información adicional sobre el programa o los requisitos del Título VI, por favor envíelas a Laura Johnson, Human Resources Director, Título VI Especialista, CCARC, Inc. 5399 W. Gulf to Lake Hwy, Lecanto, FL 34461, o por correo electrónico a [hrdir@keytrainingcenter.org](mailto:hrdir@keytrainingcenter.org) o por teléfono al 352-795-5541.

Título VI Aviso se registró en la Centro de Formación Clave oficina principal, en el sitio web y en todos los KTC vehículos de tránsito.

### **Quejas o preguntas por escrito pueden ser enviados a:**

Laura Johnson, Especialista en el Título VI  
CCARC, Inc.  
5399 W. Gulf to Lake Hwy  
Lecanto, FL 34461  
Teléfono: (352) 795-5541  
Correo electrónico: [hrdir@keytrainingcenter.org](mailto:hrdir@keytrainingcenter.org)

Si se necesita información en otro idioma o accesible en otro formato requerido, por favor contacte con nosotros en el número de teléfono arriba y se prestará asistencia.

Si Necesita Information in Otro idioma o Accesibles en Otro formato Requerido, por favor contacte con Nosotros en El Número de Teléfono arriba y se Prestara Asistencia.

Si Necesita Información en español, favor comuníquese con por Laura Johnson al 352-527-8228 y se le Prestara Asistencia.

**TITLE VI APPENDIX B**  
***COMPLAINT FORM (IN ENGLISH & SPANISH)***

TITLE VI PROGRAM AND RELATED STATUTES DISCRIMINATION COMPLAINT AGAINST Key Training Center				
Name:		Telephone (home):		Telephone (work):
Address:		City, State, Zip Code:		
Name of Key Training Center Staff Person that You Believe Discriminated Against You:				
Address:		City, State, Zip Code:		
Date of Alleged Incident:				
You were discriminated because of:				
Race Color	Retaliation National Origin (Language)	Sex Age	Familial Status Disability	Religion Other
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. Also attach any written material pertaining to your case.				

<b>Signature:</b>		<b>Date:</b>	
<b>FORMULARIO DE QUEJA</b> <b>Key Training Center</b>			
Nombre de la persona discriminada:		<small>Número de Tel</small> (residencia):	<small>Número de Tel</small> (trabajo):
Direccion de Residencia (Numero y calle, numero de departamento):		Ciudad, Estado y Código Postal de Residencia:	
Nombre de la persona que discrimina contra usted, y nombre de la dependencia (si lo sabes):			
Direccion de la persona o dependencia que discrimina contra usted:		Ciudad, Estado y Código Postal de la persona o dependencia que discrimina contra usted:	
Fecha del incidente discriminatorio:			
Causa de la discriminación:			
Raza	Retaliación	Sexo	Estado Civil
Color de Piel	Nacionalidad	Edad	Impedimento Físico o Mental
			Religión
			Otro
Explique claramente como sucedió la discriminación y quienes participaron en ella. Incluya en su explicación cualquier conocimiento que tenga de tratamiento diferente a otras personas. Adjunte cualquier otro escrito relacionado con su caso.			
<b>Firma:</b>		<b>Fecha:</b>	

## TITLE VI APPENDIX C

## ***Language Assistance Plan***

### **Key Training Center**

## ***Language Assistance Plan***

**Approved January 22, 2019**



**Prepared by:  
Key Training Center  
5399 W. Gulf to Lake Hwy  
Lecanto, FL 34461  
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Fax: (352) 527-8964**



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## **Introduction**

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

## **Executive Order 13166**

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-- National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities, and subrecipients.

## **Plan Summary**

CCARC, Inc dba Key Training Center (KTC) has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to KTC programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details the procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

The Key Training Center relied very heavily on the Citrus County Transits expertise and experience in developing the plan. In developing the plan while determining KTC's extent of obligation to provide LEP services, KTC undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in KTC to be served or likely to encounter a KTC program, activity, or service; 2) the frequency with which LEP individuals come in contact with a KTC program; 3) the nature and importance of the program, activity or service provided by KTC to the LEP population; and 4) the resources available to KTC and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## **Four Factor Analysis**

### **1. The number or proportion of LEP persons eligible to be served or likely to encounter a KTC program, activity, or service.**

Citrus County Transit examined the US Census Bureau's 2011 Language Mapper data and was able to determine that approximately 1.54% or 2,150 of the Citrus County population age 18 and older spoke a language other than English at home.

As the Language Mapper indicates, of the 2,150 persons who speak a language other than English, 0.99% speak Spanish or Spanish Creole, 0.43% speak Other Indo-European languages, 0.1% speak Asian and Pacific Island languages.

Of the 0.99% of persons that speak Spanish or Spanish Creole, approximately 25% or 1.1% speak English less than "very well."

### **2. The frequency with which LEP individuals come in contact with KTC programs, activities, or services.**

KTC assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying stakeholders, clients and families. Since the last update, KTC has recorded zero requests for an interpreter in any language and zero requests for translated County documents.

### **3. The nature and importance of the program, activity, or service provided by the County to LEP community.**

While there is a relatively small concentration of Spanish-speaking persons in Citrus County, KTC will evaluate the need on an individual basis.

### **4. The resources available to KTC and overall costs**

KTC assessed its available resources that could be used for providing LEP assistance. This included identifying what staff and volunteer language interpreters (see Appendix B) are readily available, how much a professional interpreter and translation service would cost, which documents should be translated, taking an inventory of available organizations that KTC could partner with for outreach and translation efforts, examining which financial and in-kind sources could be used to provide assistance, and what level of staff training is needed.

After analyzing the four factors; KTC developed the plan outlined in the following section for assisting persons of limited English proficiency.

### **How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When KTC sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English; ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in table. While staff may not be able to provide translation assistance at a particular meeting, the cards can be an excellent tool to identify language needs for future meetings. Also, have the cards available at the KTC office reception area and,
- Post a notice of available language assistance at KTC reception area.

### **Language Assistance Measures**

When an interpreter is needed, in person or on the telephone, first determine what language is required. KTC staff cannot currently provide any informal verbal interpretation. If the required language is not available or if a formal interpretation is required, staff shall use the telephone interpreter service, Language Line, at 1-800-752-6096 and this service is available 24 hours a day, 7 days a week.

The following KTC documents are currently available in Spanish: the Title VI discrimination complaint form.

**KTC Staff Training**

All office staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the KTC staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities;
- What language assistance services KTC offers;
- Use of LEP "I Speak Cards;"
- How to access an interpreter;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on KTC's LEP program responsibilities and their obligation to provide language assistance.

**Providing Notice of Available Language Service to LEP Persons**

Post signs that language assistance is available in KTC buildings and transit vehicles.

**Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, KTC will follow the Title VI Program update schedule for the LEP Plan. The next required Title VI Program update must be forwarded to the FTA by October 1, 2019.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Citrus County?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified County programs? Are there other programs that should be included?
- Have KTC's available resources, such as technology, staff, and financial costs changed?
- Has KTC fulfilled the goals of the LEP Plan?
- Were any complaints received?

### **Dissemination of KTC Limited English Proficiency Plan**

KTC will post the LEP Plan on its website at: [www.keytrainingcenter.org](http://www.keytrainingcenter.org). Additionally, the Policy Statement and Complaint Procedure will be posted at the offices of KTC, and all of the listed agencies included in Appendix C. The Policy Statement and Complaint Procedure are also included on all the vehicles.

Any person, including social service, non -profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal Internet service, all Citrus County libraries offer free Internet access. Copies of the LEP Plan will be provided to the Florida Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy. Each County subrecipient and program participants will be provided a copy and will be educated on the importance of providing language assistance. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to KTC Title VI Specialist:

Human Resources Director  
 CCARC, Inc.  
 5399 W. Gulf to Lake Hwy  
 Lecanto, FL 34461  
 Phone: (352) 795-5541  
 Fax: (352) 527-8964  
 Email: [hrrdir@keytrainingcenter.org](mailto:hrrdir@keytrainingcenter.org)

LAP APPENDIX A  
POPULATION PER CENTAGES

1

## U.S. Census Bureau



B16001

## LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over

2006-2010 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, for 2010, the 2010 Census provides the official counts of the population and housing units for the nation, states, counties, cities and towns. For 2006 to 2009, the Population Estimates Program provides intercensal estimates of the population for the nation, states, and counties.

	Citrus County, Florida	
	Estimate	Margin of Error
Total:	135,188	+/-104
Speak only English	126,359	+/-661
Spanish or Spanish Creole:	4,243	+/-399
Speak English "very well"	2,621	+/-319
Speak English less than "very well"	1,422	+/-245
French (incl. Patois, Cajun):	646	+/-197
Speak English "very well"	542	+/-178
Speak English less than "very well"	104	+/-75
French Creole:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136
Italian:	473	+/-148
Speak English "very well"	302	+/-115
Speak English less than "very well"	171	+/-81
Portuguese or Portuguese Creole:	170	+/-129
Speak English "very well"	142	+/-121
Speak English less than "very well"	28	+/-37
German:	617	+/-219
Speak English "very well"	711	+/-198
Speak English less than "very well"	106	+/-82
Yiddish:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136
Other West Germanic languages:	124	+/-79
Speak English "very well"	124	+/-79
Speak English less than "very well"	0	+/-136
Scandinavian languages:	103	+/-75
Speak English "very well"	37	+/-42
Speak English less than "very well"	66	+/-62
Greek:	73	+/-58
Speak English "very well"	47	+/-56
Speak English less than "very well"	26	+/-36
Russian:	75	+/-77
Speak English "very well"	45	+/-42
Speak English less than "very well"	30	+/-47
Polish:	172	+/-86



	Citrus County, Florida	
	Estimate	Margin of Error
Speak English "very well"	124	±73
Speak English less than "very well"	48	±44
Serbo-Croatian:	36	±38
Speak English "very well"	36	±38
Speak English less than "very well"	0	±136
Other Slavic languages:	111	±87
Speak English "very well"	111	±87
Speak English less than "very well"	0	±136
Armenian:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Persian:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Gujarati:	179	±223
Speak English "very well"	106	±135
Speak English less than "very well"	73	±90
Hindi:	44	±81
Speak English "very well"	13	±23
Speak English less than "very well"	31	±69
Urdu:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Other Indic languages:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Other Indo-European languages:	104	±140
Speak English "very well"	56	±87
Speak English less than "very well"	48	±66
Chinese:	184	±147
Speak English "very well"	110	±102
Speak English less than "very well"	74	±93
Japanese:	143	±90
Speak English "very well"	128	±80
Speak English less than "very well"	15	±19
Korean:	155	±98
Speak English "very well"	77	±65
Speak English less than "very well"	78	±88
Mon-Khmer, Cambodian:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Hmong:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Thai:	28	±33
Speak English "very well"	21	±32
Speak English less than "very well"	7	±11
Laotian:	0	±136
Speak English "very well"	0	±136
Speak English less than "very well"	0	±136
Vietnamese:	110	±127
Speak English "very well"	81	±81
Speak English less than "very well"	29	±49
Other Asian languages:	116	±77
Speak English "very well"	116	±77
Speak English less than "very well"	0	±136
Tagalog:	466	±188
Speak English "very well"	394	±181
Speak English less than "very well"	72	±81

	Citrus County, Florida	
	Estimate	Margin of Error
Other Pacific Island languages:	73	+/-117
Speak English "very well"	73	+/-117
Speak English less than "very well"	0	+/-136
Navajo:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136
Other Native North American languages:	116	+/-138
Speak English "very well"	116	+/-138
Speak English less than "very well"	0	+/-136
Hungarian:	10	+/-16
Speak English "very well"	10	+/-16
Speak English less than "very well"	0	+/-136
Arabic:	58	+/-64
Speak English "very well"	58	+/-64
Speak English less than "very well"	0	+/-136
Hebrew:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136
African languages:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136
Other and unspecified languages:	0	+/-136
Speak English "very well"	0	+/-136
Speak English less than "very well"	0	+/-136

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

While the 2006-2010 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2006-2010 American Community Survey

#### Explanation of Symbols:

1. An "—" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An "-" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An "-" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "\*\*\*\*" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "\*\*\*\*\*" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An "(X)" means that the estimate is not applicable or not available.

## **LAP APPENDIX B**

### **List of Available Resources**

#### **Informal Staff Translation and Interpretation:**

Spanish

If the required language is not available or if a formal interpretation is required, staff shall use the telephone interpreter service.

#### **Formal Interpreter and Translation Service:**

KTC will utilize the Language Line Interpreter Services at 1-800-752-6096.

## **LAP APPENDIX C**

### **Discrimination Complaint Procedure**

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color and national origin for programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, the CCARC, Inc. dba Key Training Center has in place a Title VI complaint procedure.

1. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, from the Key Training Center (KTC) administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by KTC are referred immediately by KTC's Title VI Specialist, to the FTA's Title VI Coordinator for processing in accordance with approved procedures.

#### **Written complaints may be sent to:**

Human Resources Director (Title VI Specialist)

CCARC, Inc.

5399 W. Gulf to Lake Hwy

Lecanto, FL 34461

Phone: (352) 795-5541

Email: [hrrdir@keytrainingcenter.org](mailto:hrrdir@keytrainingcenter.org)

2. KTC's Title VI Specialist shall resolve verbal and non-written complaints received by KTC informally. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the Complainant shall be referred to the FTA's Title VI Coordinator for processing in accordance with approved procedures.

3. KTC's Title VI Specialist will advise the FTA's Title VI Coordinator within five (5) calendar days of receipt of the allegations. The following information will be included in every notification to the FTA's Title VI Coordinator:

- A. Name, address, and phone number of the Complainant;
- B. Name and address of KTC;
- C. Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation);
- D. Date of alleged discriminatory act(s);
- E. Date complaint received by KTC;
- F. A statement of the complaint;
- G. Other agencies (state, local or Federal) where the complaint has been filed; and
- H. An explanation of the actions KTC has taken or proposed to resolve the allegation(s) raised in the complaint.

4. Within ten (10) calendar days, KTC's Title VI Specialist will acknowledge receipt of the allegation(s), inform the Complainant of action taken or proposed action to process the allegation(s), and advise the Complainant of other avenues of redress available, such as the FTA's Equal Opportunity Office (EOO).
5. Within sixty (60) calendar days, the recipient's KTC Title VI Specialist will conduct and complete a review of the verbal or non-written allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to KTC's Director of Program Operations.
6. Within ninety (90) calendar days of the verbal or non-written allegation(s) receipt, KTC's Director of Program Operations will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the FTA's EEO if they are dissatisfied with the final decision rendered by KTC. KTC's Title VI Specialist will also provide the FTA's Title VI Coordinator with a copy of this decision and summary of findings.
7. KTC's Title VI Specialist will maintain a log of all verbal and non-written complaints received by the recipient. The log will include the following information:
  - A. Name of Complainant;
  - B. Name of Respondent;
  - C. Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation);
  - D. Date verbal or non-written complaint was received by the recipient;
  - E. Date recipient notified the FTA's Title VI Coordinator of the verbal or non-written complaint; and
  - F. Explanation of the actions KTC has taken or proposed to resolve the issue raised in the complaint.

**LAP APPENDIX D**

**Notice to Citrus County Transit Grant and Program Participants**

All programs and operations of entities that receive assistance from the federal government, including KTC and its participants, must comply to the fullest reasonable extent for improving access to services for Limited English Proficient (LEP) persons.

Participants are encouraged to have in place written policies on the provision of interpreter and translation services.

I acknowledge that a copy of Citrus County's Limited English Proficiency Plan has been provided to our organization and I have read the contents and fully understand the LAP Plan obligations and responsibilities.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Organization

3. To the extent that there are typographical or administrative errors that do not change the tenor, tone, or concept of this Title VI Plan, then this resolution may be revised without subsequent approval of the Board of Directors for CCARC, Inc.

**ADOPTED** by the Board of Directors for CCARC, Inc., State of Florida, this 22<sup>nd</sup> day of January, 2019.

Motion made by Board Member Dale Coburn, seconded by Board Member Carolyn Zemamik, and carried for adoption by the Board on the 22<sup>nd</sup> day of January, 2019.

**BOARD OF CCARC, Inc.**

ATTEST:



By:

David Detmer

Witness, Notarized with Seal

David Detmer, President of Board