



Collier Area Transit (CAT) Public Participation Plan



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Acronyms

BCC – Board of County Commissioners

CAT – Collier Area Transit

CFR – Code of Federal Regulations

COA – Comprehensive Operational Analysis

DBE – Disadvantaged Business Enterprise

DOT – Department of Transportation

~~FAST - Fixing America's Surface Transportation Act~~

FDOT – Florida Department of Transportation

FHWA – Federal Highway Administration

FTA – Federal Transit Administration

FY – Fiscal Year

ISTEA – Intermodal Surface Transportation Efficiency Act of 1991

LEP – Limited English Proficiency

~~MAP 21/FAST – Moving Ahead for Progress in the 21st Century/Fixing America's Surface Transportation Act~~

MPO – Metropolitan Planning Organization

POP – Program of Projects

PPP – Public Participation Plan

PTNE – Public Transit & Neighborhood Enhancement

SAFETEA – Safe, Accountable, Flexible and Efficient Transportation Equity Act

SAFETEA-LU – Safe, Accountable, Flexible and Efficient Transportation Equity Act, a legacy for users

TAN – Transit Advisory Network

TDP – Transit Development Plan

TDSP – Transportation Disadvantaged Service Plan

TEA-21 – Transportation Equity Act for the 21st Century

Purpose

The Public Participation Plan (PPP) identifies a proactive public involvement process for the development of plans and programs of the Collier Area Transit (CAT) system. This process provides for complete information, timely public notice, full access to key decisions and early and continuing involvement of the public.

The obligation to provide information and consider public input in decision-making was made explicit by the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). This strong federal emphasis on public involvement was continued in the Transportation Equity Act for the 21st Century (TEA-21) in 1998, continued in the Safe, Accountable, Flexible and Efficient Transportation Equity Act (SAFETEA), sustained in the Safe, Accountable, Flexible and Efficient Transportation Equity Act, a legacy for users (SAFETEA-LU) and finally through [Moving Ahead for Progress in the 21st Century \(MAP-21\)](#), [the Fixing America's Surface Transportation \(FAST\) Act \(FAST Act\)](#). The true test of a successful public involvement plan is the level of public awareness and feedback. Too often, public participation does not occur until after the community-at-large becomes aware of an unpopular decision, at which point large citizen efforts become necessary to change decisions after the fact. A planning process that involves the average citizen early makes the public a participant in any decision that is ultimately made.

~~CAT previously adopted the Collier Metropolitan Planning Organizations (MPO) Public Participation Plan. However, with amendments of the MPO Plan which did not include a transit component, it became necessary for CAT to establish its own plan.~~

Background

Public transportation services for the over ~~375,386,000~~ 1,613,79,000 citizens living in Collier County, Florida are provided through Collier Area Transit (CAT). The Collier County Public Transit & Neighborhood Enhancement (PTNE) Division is responsible for planning, operating, and managing CAT public transportation services through a contract operator. CAT currently operates ~~eighteen~~ nineteen fixed-route bus routes as well as paratransit service within unincorporated Collier County, the City of Naples, Marco Island, and Immokalee. Since inception in 2001, CAT's annual ridership had increased from just fewer than 100,000 trips in 2001 to over 1.2 million trips in FY2012. Over roughly the same time period, from 2000 to 2010, the population in the county had grown by approximately 28 percent and has continued to increase each year.

Commented [A1]: Has this all been replaced with the Fixing America's Surface Transportation Act (FAST)?

Commented [D2R1]: Yes its now FAST, PPP is also to meet the requirements for Title VI

FTA Circular 4702.1B is the requirement for Title VI public participation

https://www.fhwa.dot.gov/planning/public_involvement/publications/pi_techniques/fhwahep15044.pdf

https://owadot.gov/systems_planning/pr_guide/Public%20Participation%20Process/PPP%20Best%20Practice%20Examples/IPTA-PPP-presentation.pdf

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Commented [A3]: Is this number still relevant?

Commented [D4R3]: Depends on who you ask, Collier EDO has it at 386,161

Commented [S5R3]: Going off of census data for everything else, I was keeping this consistent with the other data.

Commented [D6R3]: Sounds good.

Commented [A7]:

Should this section be updated to discuss a reduction in ridership with the pandemic but there has been an upward tick in early 2022? Or something to that affect.

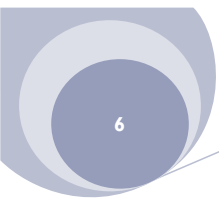
Commented [S8R7]: I didn't add a COVID section in the background as the document is more about the participation process versus the actual service we provide.

Public Participation Goals and Public Involvement Tools Evaluation

The effectiveness of any program and policy plan depends upon its success in meeting the expectations of the public. Further, plans and programs need to be reassessed periodically to determine if the public's evolving needs and expectations are adequately provided for through the plan. In order to ensure that this occurs, the public must be kept informed of activities, and must be given a meaningful opportunity to participate in the development and review of public policy. Thus, it is important to have an ongoing program to involve citizens through the use of the public transit ~~ad-hoc~~ advisory committee, public workshops, press releases and other public outreach activities.

The public participation goal of CAT is to provide complete information, timely public notice, and full access to key decisions during the planning process; and to support early and continuing involvement of the public.

PUBLIC INVOLVEMENT TOOL	EVALUATION CRITERIA	PERFORMANCE GOAL(S)	METHODS TO MEET GOAL(S)
Public Participation Plan	Annual report to indicate if the PPP reflects the practices and effectiveness of CAT.	Statistical increase in overall PPP evaluation score.	Update the PPP as needed to incorporate the improvement strategies resulting from the public involvement evaluations.
Transit Advisory Network	Number of returned items	Maximum of 2% return rate per mailing.	Make immediate corrections when items are returned.
Developing Community Knowledge of CAT	Number of community meetings attended	Increase number of community meetings attended.	Attend festivals, special events, lectures, etc.
Press Releases	Number of press releases submitted per year	Minimum of 15 advertisements per year.	Encourage publication of press releases in order to keep the public and media informed of CAT activities.
Small Group Meetings	Calls, letters, etc.; Meet the expectations of the group	N/A. These meetings are held at the request of affected groups.	PTNE & CAT staff will be available in a timely manner to hold small group meetings regarding any CAT activity or issue. The meeting should be formatted



			to provide specific information requested by the group and should highlight issues that are interest to the group.
Public Transit Advisory Committee	Calls, letters, etc.; Attendance	Monitor committee member attendance and contact the BCC for direction if members do not meet the specific attendance requirements of the adopted bylaws.	PTNE staff will encourage appointed members to attend committee meetings. Lack of attendance may indicate the need to replace that committee member.
CAT Logo	Call, letters, etc.	Recognition of the logo.	The CAT logo should be used on all CAT products and publications and materials for all CAT sponsored activities.
Take Ones	Number of Take Ones Posted on Buses	100% of all releases posted on buses.	PTNE & CAT staff shall post the releases to ensure that the riders are informed of CAT activities.

Public Outreach Techniques

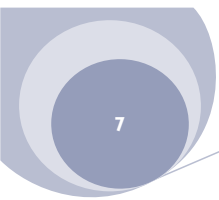
Collier County PTNE staff uses several different techniques for public outreach. Listed below are the techniques currently being pursued:

Limited English Proficiency Plan (LEP)

The intent of the CAT Limited English Proficiency Plan is to ensure access to the planning process and information published by CAT where it is determined that a substantial number of residents in the planning area do not speak or read English proficiently. The production of multilingual publications and documents and/or interpretation at meetings or events will be provided to the degree that funding permits based on current laws and regulations. The LEP is included in Appendix 1.

Transit Advisory Network (TAN)

The Collier County PTNE staff maintains a Transit Advisory Network (TAN) which includes, but is not limited to the following individuals:



1. Elected officials
2. Local Government staff
3. Individuals expressing an interest in transportation planning activities.
4. Local media
5. Minority publications and/or other media outlets, when and where available
6. Homeowner’s Associations
7. Civic groups
8. Collier County Libraries

Collier PTNE staff shall, when feasible, electronically distribute announcements/invitations to the TAN for upcoming activities.

Website

Collier County staff shall maintain a website for the transit system. The website shall, at a minimum, contain the following information:

1. Contact information (mailing address, phone, fax and email)
2. Meeting calendar
3. Routes & Schedule
4. Work products and publications
5. Comment/Question Forms

Media Coverage

Collier County PTNE staff submits legal ad notices as required for plans and programs. Legal ads are submitted to the Naples Daily News, the newspaper of general circulation in Collier County. When applicable, legal ads are also submitted to ~~Nuevos Ecos, a bi-weekly publication~~ Imagen Semanal, a monthly publication.

Public Hearings

Public hearings will be held as required by Federal, State, or local laws require. The public hearing may be held as part of a regularly scheduled Board of County Commissioners (BCC), Metropolitan Planning Organization (MPO) Board or Public Transit ~~Ad Hoc~~ Advisory Committee meeting.

Public Workshops

Public workshops may be held prior to the adoption of a plan or program or may be held to gain input on the transit system.

Brochures

Collier County PTNE staff distributes information brochures about the transit system to local jurisdictions, local libraries, Chambers of Commerce, etc.

Commented [A9]: Are we doing this?

Commented [D10R9]: No we need to develop a distribution list.

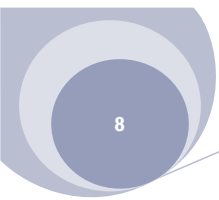
Commented [S11R9]:

Commented [D12R9]: Please create the list

Commented [D13]: I don't believe our website has a calendar

Commented [A14R13]: Elena needs to add a calendar. It should have PTAC but could also contain some of the MSTU committees.

Commented [S15R13]: Will add calendar along with approval of PPP



Social Media

Collier County PTNE staff ~~will work toward distributing~~ distributes information about the transit system to the public via social media.

Public Transit Advisory Committee and Advertisement Requirements

On February 26, 2013, the Collier County Board of County Commissioners (BCC) adopted a resolution creating the Public Transit Advisory Committee. The purpose of this committee is to provide input to staff to assist in identifying ways to improve the transit system, serve as advocates for the system and make recommendations to the Board of County Commissioners in matters related to transit policies, issues, programs and plans to provide mass transit services to the citizens of Collier County. ~~The duration of this advisory committee is one year from the date of its first meeting.~~—The committee consists of:

- ~~7~~ 9 voting members
 - ~~6~~ 8 representatives from large employers, health care related services, social services, and transportation and planning professionals. A minimum of 2 of the representatives must be passengers of the system.
 - 1 representative appointed by the Collier County School Board

Staff will strive to have a press release published a minimum of seven days prior to the meeting. The press releases will also be posted on all buses. Agendas will be mailed or emailed to committee members and interested parties a minimum of ~~5~~ 7 days prior to the meeting.

Public Participation Plan

The Public Participation Plan (PPP) will be reviewed annually by the Collier County Public Transit & Neighborhood Enhancement (PTNE) staff to ensure the CAT planning process provides full and open access to the general public. The PPP shall also be reviewed as part of the triennial certification process conducted by the Federal Transit Administration (FTA).

A public comment period of 45 days shall be provided prior to the adoption or amendment of the PPP. Notice of the 45 days comment period shall be published in a newspaper of general circulation in Collier County and a notification will be mailed out to the TAN.

A copy of the proposed amendments will be published on the Collier Area Transit website.

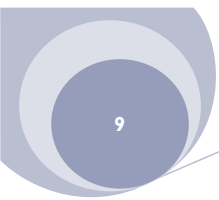
The specific public involvement process for the public participation plan is included in Appendix 2 (45 Days Public Involvement Process for Transit Plans & Programs).

Commented [A16]: This needs to be updated. I think we now have only 7 members.

Commented [S17R16]: Updated

Commented [A18]: We are definitely not doing this. Should we change this to 3 or 4? Or should we try to get it out by Thursday which is 5 days prior to the meeting?

Commented [S19R18]: Changed to 5 days prior



The following programs and plans will utilize the 30 Days Public Involvement Process for Transit Plans & Programs included in Appendix 3.

Title VI Program

As required by the Federal Transit Administration, CAT must review and update a Title VI Program every 3 years. This plan ensures that the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color or national origin; and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Fare Modifications

Fare increases are increases to the base full adult fare. When the full adult fare is increased, discount fares and fare media may also be increased at the same time. Fare decreases are decreases to the base full adult fare. When the full adult fare is decreased, discount fares and fare media may also be decreased at the same time. Fare modifications are adopted by the Collier County BCC and implemented by CAT.

Service Reductions

Service reductions occur when CAT does the following to an individual route or to set of routes:

1. Reduce the span of service hours (hours in a day when service operates) and/or
2. Reduce the days in which service operates and/or
3. Reduce the frequency of service and/or
4. Eliminate a route in its entirety or major portion thereof, unless that route was a planned service development or experimental services that has been in existence less than two years.

Service Expansions

Service expansions occur when CAT does the following to an individual route or to set of routes:

1. Increase the span of service hours (hours in a day when service operates) and/or
2. Increase the days in which service operates and/or
3. Increase the frequency of service and/or
4. Add a new route.

Disadvantaged Business Enterprise Program and Goal Setting

Collier County BCC has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation, 49 Code of Federal Regulations (CFR) Part 26 applicable to all federally funded transit projects. It is the policy of the BCC to ensure that DBEs as defined in Part 26, have an equal opportunity to receive and participate in Department of Transportation (DOT) assisted contracts. Every three years a goal must be established. The methodology for determining the goal is contained in the DBE program.

Program of Projects

A program of projects (POP) is a list of projects proposed by a designated recipient to be funded from urbanized area formula FTA funds. The POP includes a brief description of the projects, total project costs and federal share for each project. The POP is developed on an annual basis.

Comprehensive Operational Analysis

A comprehensive operational analysis (COA) is an in-depth study of a transit system designed to identify strengths and weaknesses, and development recommendations for improvement.

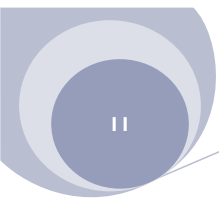
Transit Development Plan (Major Update)

A transit development plan (TDP) is a Florida Department of Transportation (FDOT) required; 10-year horizon plan intended to support the development of an effective multi-modal transportation system. The TDP serves as the basis for defining public transit needs which is a prerequisite to receive state funds. Collier County is required to develop and adopt a TDP major update every 5 years. This document is produced in coordination with the Collier Metropolitan Planning Organization (MPO). Collier County PTNE staff will coordinate the public involvement requirements identified in the CAT PPP, while the MPO staff shall be responsible for completing the public involvement requirements identified in their adopted PPP.

The following programs and plans will utilize the 15 Days Public Involvement Process for Transit Plans & Programs included in Appendix 4. Also, all documents and activities not specifically listed otherwise in this document will follow the standard process included in Appendix 4.

Transit Development Plan (Minor Update)

The FDOT requires annual updates in the form of a progress report on the TDP. The minor update must include the following elements:

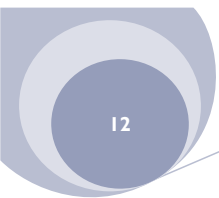


1. Past year accomplishments compared to the original recommendations from the last major update;
2. Reasons for any discrepancies between the plan and its implementation for the past year;
3. Revisions to the coming year's recommendations, as appropriate;
4. Added detail to recommendations for the final years of the updated plan; and
5. A revised standardized financial plan, including revised financial tables.

Collier County PTNE staff will coordinate the public involvement requirements identified in the CAT PPP, while the MPO staff shall be responsible for completing the public involvement requirements identified in their adopted PPP.

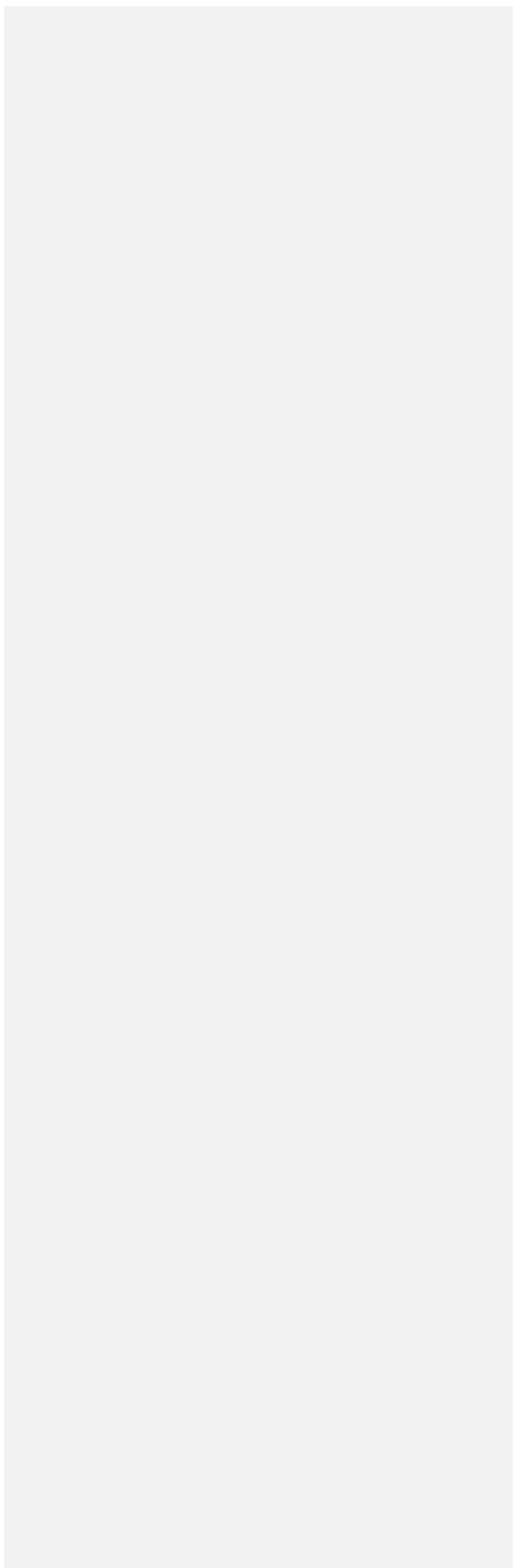
Transit Priorities

Annually the FDOT requests priorities that they consider for funding in the development of their work program. Transit priorities are usually coordinated with the Collier MPO. Collier County PTNE staff will coordinate the public involvement requirements identified in the CAT PPP, while the MPO staff shall be responsible for completing the public involvement requirements identified in their adopted PPP.



Appendix 1

Limited English Proficiency Plan



Limited English Proficiency Plan

Collier Area Transit (CAT) operates under the supervision of the Collier County Public Transit & Neighborhood Enhancement (PTNE) Division for the Collier County Growth Management Department. CAT serves as the public transit provider for Collier County, serving the Naples, Marco Island, and Immokalee areas. CAT funds the transit program with the use of local, state and federal dollars. Involving our citizens in the transit planning process including the utilization of funds, communicating the program of projects, and more importantly communicating our level of service standards to the community are all vital processes that CAT undertakes as part of ensuring that services are provided in accordance with Title VI.

Reaching all parts of our population and providing language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that our services are safe, reliable, convenient, and accessible to everyone in our community including LEP persons. The **Limited English Proficiency (LEP) Plan** plays an integral role in this process. This document will detail the LEP Plan, developed in conjunction with best practice standards for public involvement.

Background Information

Limited English proficient individuals or “LEP” are individuals who have a limited ability to read, write, speak, or understand English, who speaks a language at home other than English as his/her primary language, and who speaks or understands English ‘not well’ or ‘not at all’.

According to the 2020 U.S. Census American Community Survey 5-year Estimates, more than 5 million households have reported that they do not speak English at all, or do not speak English well. The number of persons reporting that they do not speak English at all or do not speak English well grew by 80 percent from 1990 to 2013. Among limited English speakers in Collier, Spanish is the language most frequently spoken, followed by French, Haitian, or Cajun, and other Indo-European languages, Chinese (Cantonese or Mandarin), Vietnamese, and Korean.

Public transit is a key means of achieving mobility for many LEP persons. According to the 2020 Census American Community Survey 5-Year Estimates, more than 11 about 9% of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 4% of English speakers.

Catering to LEP persons will help increase and retain ridership among the agency’s broader immigrant communities in two important ways:

Agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued.

Commented [D20]: Does this match our Title VI?

Commented [S21R20]: I didn't see any contradictions in the Title VI plan

Commented [A22]: Did you mean Creole instead of Cajun?

Commented [S23R22]: This was the wording listed on the Census, they only list creole under “Jamaican Creole” in a different classification than Indo-European languages.

Commented [A24]: What are the stats for Collier? I think we should add because I am not sure Chinese is 2nd to Spanish here.

Commented [S25R24]: Updated for Collier stats

Commented [A26]: Why did we switch to 2000 census from 2020?

Commented [S27R26]: Updated to 2020

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Community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.

Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency was signed in year 2000 to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part,

“Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.”

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance, but also state and local recipients are required to comply with Title VI and LEP guidelines of the federal agency from which they receive funds.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property and other assistance. Recipients of federal funds range from state and local agencies to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all components of a recipient's operations are covered. **Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.**

The US Department of Transportation (DOT) published “Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Person” in the December 14, 2005 Federal Register.

The guidance explicitly identifies local transit operators as organizations that must follow this guidance:

*The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and **local transit operators**, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.*

The intent of this **Limited English Proficiency Plan** is to ensure access to the planning process and information published by Collier Area Transit where it is determined that a substantial numbers of residents in Collier County do not speak or read English proficiently. The production of multilingual publications and documents and/or interpretation at meetings or events will be provided to the degree that funding permits based on current laws and regulations.

Laws and Policies Guiding Limited English Proficiency Plans

The ~~Federal Transit Administration (FTA)~~ ~~FTA~~ references the DOT LEP guidance in its Circular 4702.1A, "Title VI and Title VI-Dependent Guidelines for FTA Recipients," which was published on April 13, 2007. Chapter IV part 4 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that ~~Federal Transit Administration (FTA)~~ recipients and sub recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

As part of the DOT and FTA requirements, the *LEP Plan* will be assessed and evaluated. The following matrix illustrates these laws, policies and considerations:

Title VI of the Civil Rights Act of 1964	Limited English Proficiency Executive Order 13166
Federal Law	Federal Policy
Enacted in 1964	Enacted in August 2000
Considers all persons	Considers eligible population
Contains monitoring and oversight compliance review requirements	Contains monitoring and oversight compliance review requirements
Factor criteria is required, no numerical or percentage thresholds	Factor criteria is required, no numerical or percentage thresholds
Provides protection on the basis of race, color, and national origin	Provides protection on the basis of national origin
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using four factor criteria
<i>Annual Accomplishment and Upcoming Goals Report to FHWA</i>	<i>Annual Accomplishment and Upcoming Goals Report to FHWA</i>

Who is an LEP individual?

As defined in the 2000 United States Census, it is any individual who speaks at home other than English as his/her primary language, and who speaks or understands English “not well” or “not at all”.

Determining the need

As a recipient of federal funding, Collier Area Transit (CAT) must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the Federal Register/ Volume 70, Number 239/ Wednesday, December 14, 2005/ Notices, there are **four factors** to consider in determining “reasonable steps”.

Factor 1 - The number and proportion of LEP persons served or encountered in the eligible service population

Factor 2 - The frequency in which LEP persons encounter Transit Programs, Activities and Services

Factor 3 - The nature and importance of the program, activity, or service provided by the recipient to people’s lives

Factor 4 - The resources available to the recipient and cost

The DOT Policy Guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in Collier County in relation to the four factors and the transit planning process.

LEP Assessment for Collier Area Transit

For the purposes of conducting this assessment, Collier Area Transit is utilizing information derived from the ~~2020~~ [2010 census American Community Survey](#) in addition to charts, maps and other demographic information and documents prepared by Collier Metropolitan Planning Organization.

Factor 1 – The Number and proportion of LEP persons served or encountered in the eligible service population

The first step towards understanding the profile of individuals who could participate in the transit planning of services process is a review of Census data. Tables 1 and 2 displays the primary language spoken and number of individuals that are LEP.

For our purposes, we are considering people that speak English ‘not well’ or ‘not at all,’ and only the top four language groups are included in the analysis.

Commented [A28]: The tables actually says 2010. Will we be updating our analysis with 2020 data?

Commented [S29R28]: Updated

Commented [D30R28]: Is it census or American Community Survey? I don't believe the census data from 2020 has been released.

Table 1, derived from the [2020 US Census American Community Survey \(ACS\) 5-Year Estimates](#), shows the number and percent of the population, with regard to their English language skills, for the cities and the unincorporated portions of the County. As indicated, over 15% of the area population 5 years of age or older is not proficient in English; that is, they speak English less than “very well”.

Jurisdiction	Population	Population 5 years and over	Number of LEP Persons (5 years and over)	Percentage of LEP Persons (5 years and over)
Everglades City	228334	310228	05	0.0022%
City of Naples	20,09121,750	19,66721,430	724713	3.6833%
City of Marco Island	16,57317,963	16,17217,802	1,199915	7.4151%
Naples Area (Including the unincorporated County)	320,087339,404	302,602323,221	48,89549,694	16.4915.4%
Total Area (includes all cities and unincorporated County)	357,085379,345	338,751362,681	51,81851,327	15.3014.2%

Table 2 shows the number and percent of LEP persons by language spoken at the individual's home. Of the LEP persons within the area, ~~11.12~~^{11.12}% speak Spanish at home making this the most significant percent of the area's population. The second most common language of the area's LEP population is Other Indo-European languages, with ~~2.57~~^{2.57}%. Asian and Pacific Islander languages represents ~~0.48~~^{0.48}% and 0.06% speak "other" languages at home.

LEP Persons	Spanish Language	Other Indo-European Languages	Asian & Pacific Islander Languages	Other Languages
5 Years and over – Everglades City	59	0	0	0
5 Years and over – City of Naples	363302	292377	4034	540
5 Years and over – Marco Island	903624	259261	3722	98
5 Years and over – Naples Area (including the unincorporated County)	39,80639,251	8,9068,545	4,0441,685	442213

5 Years and over – Total	41,072 <u>40,182</u>	9,462 <u>9,183</u>	1,088 <u>1,741</u>	196 <u>221</u>
Percent of Total Populations 5 Years and over	12.12 <u>11.1</u> %	2.79 <u>2.5</u> %	0.32 <u>0.48</u> %	0.06%

Factor 2 – The frequency in which LEP Persons encounter transit programs, ~~activities~~activities, and services

Based on the ~~2010-2020 census~~ACS 5-Year Estimates information there is a small, but growing size of the LEP population in this region that will likely increase the probability of future contact with the CAT program, services and activities. In recognition of a growing LEP population CAT has taken proactive steps to ensure that communication about transit services, meetings, activities, surveys and other important information is provided in the three main spoken languages: English, Spanish and Creole. In addition to providing literature in these three languages, we also ensure to have available persons (mostly staff members) to serve as language interpreters in public meetings in addition to a sign language person when requested.

Factor 3 – The nature and importance of the program, activity, or service provided by the recipient to people’s lives

Collier Area Transit provides an essential service to the community during emergency evacuation such as hurricanes, fires and other disasters. We also help disseminate information to the public on security awareness, emergency preparedness and the importance of the modes and type of services we provide. If this information is not accessible to people with limited English proficiency, or if language services in these areas are delayed, the consequences to these individuals could be life threatening. It is precisely because of this that CAT ensures that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transit planning of services process to be consistent with the goal of the Federal Environmental Justice program and policy.

The impact of proposed transit projects and investments on underserved and under-represented population groups is part of the evaluation process in use of federal funds during the preparation of our program of projects and two essential transit documents:

- The Transit Development Plan (TDP)
- The Transportation Disadvantaged Service Plan (TDSP)

Inclusive public participation is a priority consideration in all transit plans, ~~studies~~studies, and programs. The impacts of transit improvements resulting from these planning activities have an

impact on all residents. Understanding and continued involvement are encouraged throughout the process. Collier Area Transit is concerned with input from all ~~stakeholders, and~~ stakeholders and makes every effort to ensure that the planning process is as inclusive as possible.

Factor 4 - The resources available to the recipient and cost

Given ~~the cost of services-the current financial constraints,~~ full multi-language translations of large transit planning documents such as the TDP, TDSP and other large planning documents are not considered to be warranted at this time. However, Collier Area Transit ensures that all vital communication information of programs, activities and services are made available to the LEP population in English, Spanish and Creole, which are the three main spoken languages in the area.

Collier Area Transit will continue efforts to provide language translation and interpretation services taking into account the available funding. As new ~~2010-2020~~ Census data becomes available, Collier Area Transit will monitor LEP population and adjust its LEP policy accordingly. If warranted in the future, CAT will consider new techniques to reach the LEP population, such as (1) the translation of executive summaries for key documents, such as the TDP and TDSP (2) the translation of document summaries, which are designed to capture all of the significant points of the full document.

Commented [A31]: Has the referenced financial constraint been noted before in this document?

Commented [S32R31]: No, wording changed

Collier Area Transit has translated many essential documents such as:

- Bus Schedules and route maps
- Riders Guide
- Notice of right to language assistance
- Fare Announcements
- Service Change announcement
- Notices pertaining to upcoming events
- Power Point Presentations
- Title VI language in English, Spanish and Creole
- Public Notices
- Information on website
- Prohibited behavior signage

Meeting the Requirements

Engaging the diverse population within the Collier County area is important. Collier Area Transit is committed to providing quality services to all citizens, including those with limited English proficiency. All language access activities detailed below will be coordinated in collaboration with the CAT staff.

Safe Harbor Stipulation

Federal law provides a ‘safe harbor’ stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A ‘safe harbor’ means that as long as a recipient (CAT) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four-factor analysis.

Evidence of compliance with the recipient’s written translation obligations under ‘safe harbor’ includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation also can be provided orally. The ‘safe harbor’ provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

Providing Notice to LEP Persons

US DOT guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of services available free of charge in a language the LEP persons would understand. Example methods for notification include:

- Signage that indicates when free language assistance is available with advance notice;
- Stating in outreach documents that language services are available;
- Working with community-based organizations and other stakeholders to inform LEP individuals of CAT services and the availability of language assistance;
- Using automated telephone voice mail or menu to provide information about available language assistance services;
- Including notices in local newspapers in languages other than English;
- Providing notices on non-English-language radio and television about MPO services and the availability of language assistance; and
- Providing presentations and/or notices at schools and community based organizations (CBO).

Collier Area Transit will publicize the availability of interpreter services, free of charge, if requested at least 7 days prior to meetings, workshops, forums or events. These events will be

Commented [A33]: Are we doing this?

Commented [D34R33]: We distribute it in different language but we don't say that a translator will be available.

Commented [S35R33]: Some of our documents note that assistance will be available with at least 48 hour notice, i.e. the bottom of our PTAC agendas

Commented [D36R33]: Ok if we have a boiler plate script, we need to make sure its on all notices.

publicly advertised via web site, onboard our buses, newspaper, etc. We will also continue to use additional tools as appropriate such as:

- Signage
- Flyers
- Take-ones
- Handouts available in vehicles and at stations
- Announcements in vehicles and at stations
- Agency website
- Newspaper and radio advertisements
- [Community-based organizations](#)
- Collier County [Library systems](#)
- Announcements and community meetings
- Surveys

An interpreter is a person who translates spoken language orally, as opposed to a translator, who translates written language and transfers the meaning of written text from one language into another. CAT will provide language interpreter and translating services as needed.

As covered under Title VI requirements for nondiscrimination, CAT will include Title VI language in all Public Notice material as applicable.

Language Assistance

A goal of the Collier Area Transit is to provide user-friendly materials that will be appealing and easy to understand. CAT will continue to provide materials to the LEP population in alternative formats, such as schedules, flyers, user's guide, depending on the work product.

CAT Staff Training

What the Guidance Says:

“Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:

Staff knows about LEP policies and procedures.

Staff having contact with the public (or those in a recipient's custody) is trained to work effectively with in-person and telephone interpreters.

In order to establish meaningful access to information and services for LEP individuals, CAT will continue to train its employees and will include LEP training as part of the new employee orientation. In addition, CAT will make a list of staff identifying the different languages that they can assist with. This list will be kept in the front desk in case an LEP person request language assistance, the staff member will be able to promptly locate an interpreter for public assistance.

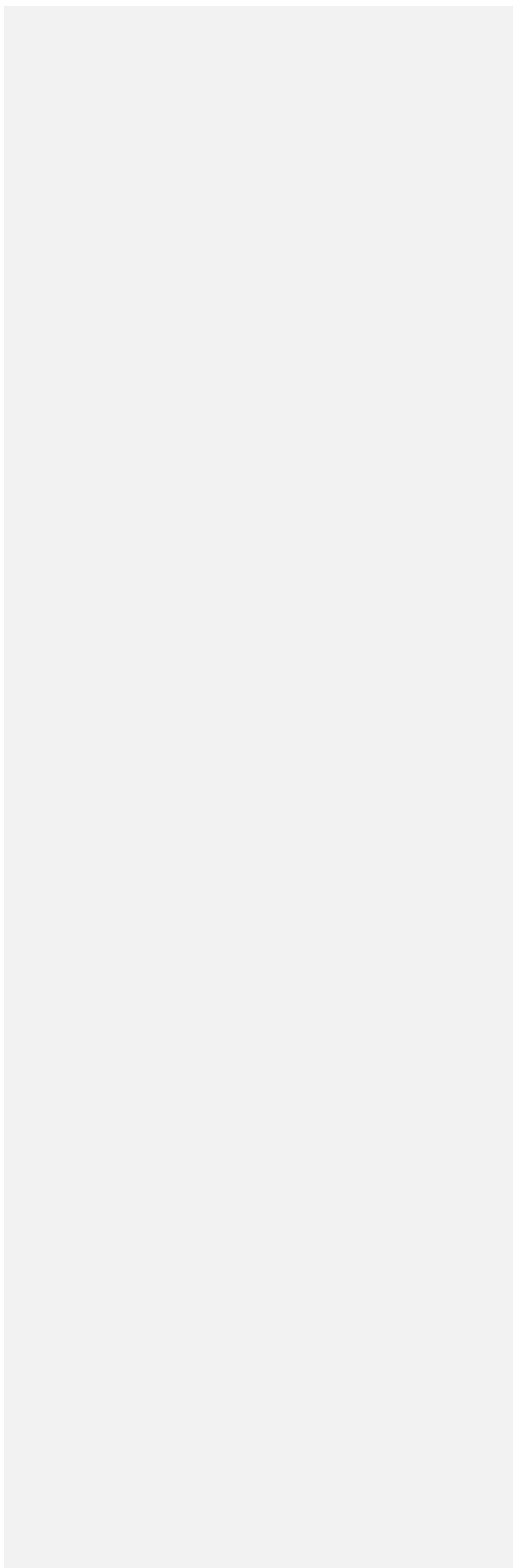
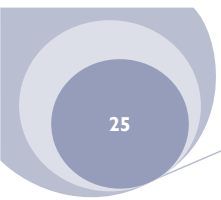
Commented [A37]: Do we have this list written down and available?

Commented [S38R37]: Not yet, will create along with approval off PPP

Commented [D39R37]: Please create the list

Appendix 2

45 Day Public Involvement Process for Transit Plans & Programs



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45 Day Public Involvement Process for Transit Plans & Programs

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Update & Amendments

- CAT staff will update and amend transit plans and programs as required.
- When updating or amending, CAT staff shall include any new federal or state requirements.

Public Workshop (If Required)

- CAT staff will submit a news release at least 7 days prior to the workshop that will provide detailed information regarding the location, time and subject matter.
- CAT staff will post news release at least 7 days prior to the workshop in interior advertising area on all buses.
- CAT staff will respond to public comments made at the workshop.

Advertisement

- CAT staff to submit a legal advertisement announcing the public comment period in one newspaper of general circulation.
- CAT staff to submit a legal advertisement announcing the public comment period in one newspaper of general circulation that is published in Spanish, if a paper so exists.
- CAT staff will submit a news release announcing the public comment period.
- CAT staff will post a news release in interior advertising area on all buses announcing the public comment period.

Public Comment Period

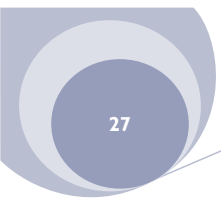
- At least 45 days prior to the public meeting and adoption of the plan/program, CAT staff will distribute copies of the draft plan/program and comment forms to local government agency offices and libraries.
- At least 45 days prior to the public meeting and adoption of the plan/program, CAT staff will post the draft plan/program and comment forms to the CAT website.
- CAT staff will distribute electronic copies of the draft plan/program with notice of the public comment period to the transit advisory network and others upon request.
- CAT staff to provide electronic copy of draft plan/program to applicable advisory committees for review, this will be accomplished in coordination with appropriate advisory committee staff liaisons.

Response

- CAT staff will respond verbally or in writing to all public input received during the public comment period.
- When significant written and/or oral comments are received on the draft plan/program, a summary of the comments and responses shall be provided to the adopting Board for review.

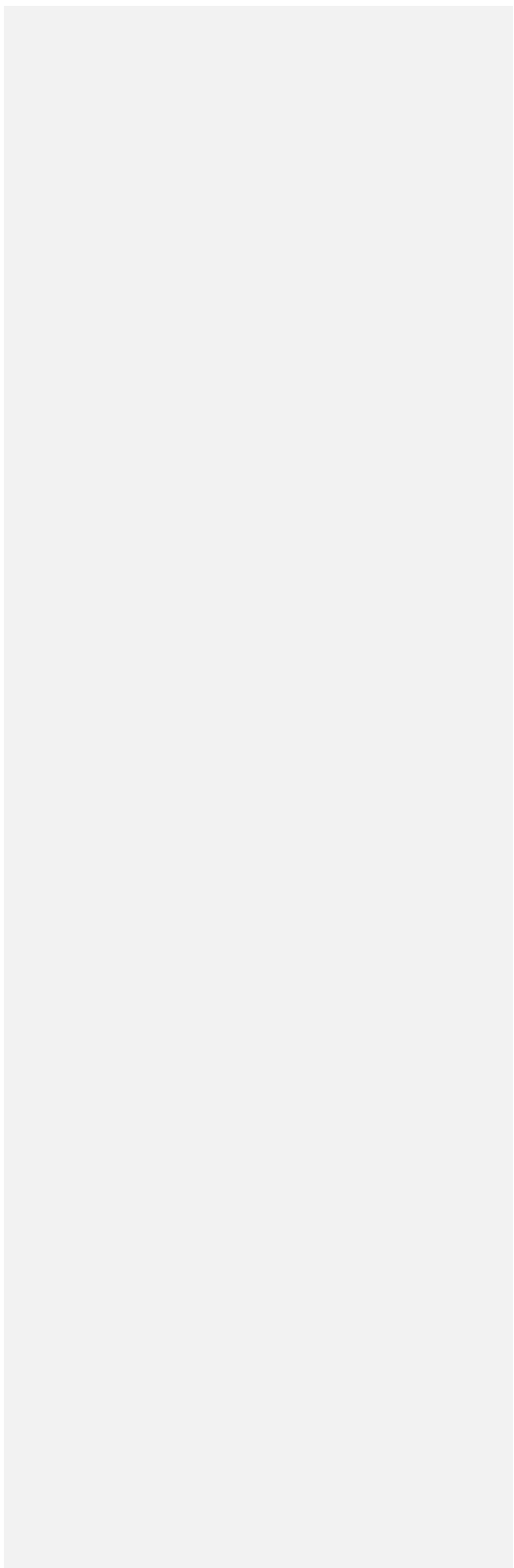
Adoption

- The adopting Board will meet at the end of the public comment period.
- The adopting Board will consider the recommendations of any applicable reviewing committee/Board when adopting the plan/program.
- The adopting Board will consider the comments received during the public comment period when adopting the plan/program.



Appendix 3

30 Day Public Involvement Process for Transit Plans & Programs



30 Day Public Involvement Process for Transit Plans & Programs

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Update & Amendments

- CAT staff will update and amend transit plans and programs as required.
- When updating or amending, CAT staff shall include any new federal or state requirements.

Public Workshop (If Required)

- CAT staff will submit a news release at least 7 days prior to the workshop that will provide detailed information regarding the location, time and subject matter.
- CAT staff will post news release at least 7 days prior to the workshop in the interior advertising area on all buses.
- CAT staff will respond to public comments made at the workshop.

Advertisement

- CAT staff to submit a legal advertisement announcing the public comment period in one newspaper of general circulation.
- CAT staff to submit a legal advertisement announcing the public comment period in one newspaper of general circulation that is published in Spanish, if a paper so exists.
- CAT staff will submit a news release announcing the public comment period.
- CAT staff will post a news release in the interior advertising area on all buses announcing the public comment period.

Public Comment Period

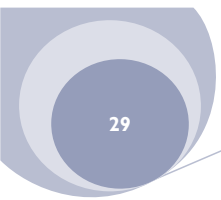
- At least 30 days prior to the public meeting and adoption of the plan/program, CAT staff will distribute copies of the draft plan/program and comment forms to local government agency offices and libraries.
- At least 30 days prior to the public meeting and adoption of the plan/program, CAT staff will post the draft plan/program and comment forms to the CAT website.
- CAT staff will distribute electronic copies of the draft plan/program with notice of the public comment period to the transit advisory network and others upon request.
- CAT staff to provide electronic copy of draft plan/program to applicable advisory committees for review, this will be accomplished in coordination with appropriate advisory committee staff liaisons.

Response

- CAT staff will respond verbally or in writing to all public input received during the public comment period.
- If formal Board action is required, when significant written and/or oral comments are received on the draft plan/program, a summary of the comments and responses shall be provided to the adopting Board for review.

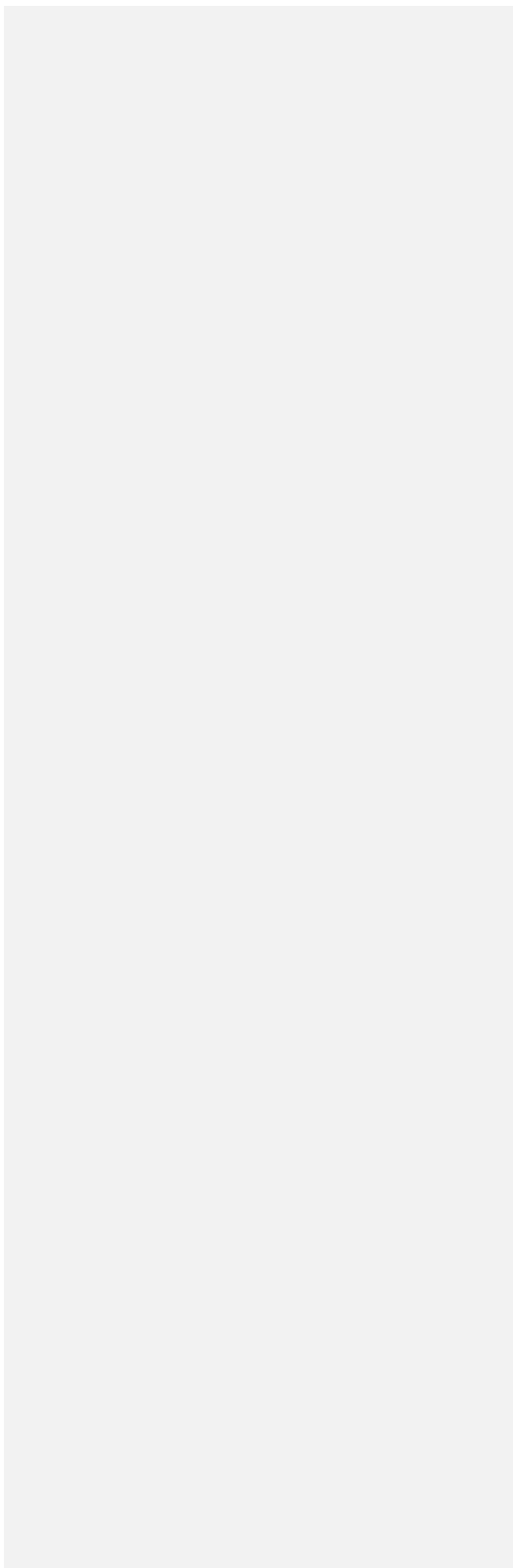
Formal Board Action (if required)

- The adopting Board will meet at the end of the public comment period.
- The adopting Board will consider the recommendations of any applicable reviewing committee/Board when adopting the plan/program.
- The adopting Board will consider the comments received during the public comment period when adopting the plan/program.



Appendix 4

15 Day Public Involvement Process for Transit Plans & Programs



15 Day Public Involvement Process for Transit Plans & Programs

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