



Pasco County Public Transportation (GoPasco)

TITLE VI PROGRAM

**Effective October 1, 2023—
January 31, 2026**

October 2023

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REQUIREMENT TO PROVIDE TITLE VI ASSURANCES

In accordance with Title 49 of the Code of Federal Regulations (CFR) Section 21.7(a), Federal Transit Administration (FTA) grantees must provide assurance that the grantee will comply with U.S. Department of Transportation (USDOT) Title VI regulations.

Pasco County Public Transportation (GoPasco) fulfilled this requirement when it submitted its annual Certifications & Assurances to FTA, the text of which is available on FTA's website at <https://www.transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances>.

INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs or activities that receive Federal assistance. As a direct recipient of FTA funds, GoPasco is required to submit an update of its Title VI Program every three years, demonstrating compliance with Federal Title VI requirements. The objectives of FTA's Title VI Program are to:

- Ensure 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.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

This triennial update of GoPasco's Title VI Program covers the period from October 1, 2023 through January 31, 2026. This document has been prepared pursuant to Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," published October 1, 2012. This update also summarizes GoPasco's transit service provisions since the last program was completed in 2020 and provides compliance with all parameters of the Title VI Compliance Checklist for transit providers operating fixed-route transit service.

Title VI Program Checklist

Table 1 identifies the Title VI Program reporting requirements as described in FTA Circular 4702.1B and notes the associated page numbers in this report. The checklist follows the outline found in the circular and includes general requirements for all recipients of Federal funding assistance and all fixed-route transit and paratransit providers.

Table 1: Federal Title VI Program Requirements

Requirement	Location in Document
General Requirements	
Title VI Notice to the Public	Page 4; Appendix A
Title VI Complaint Procedures	4
Title VI Complaint Form	Page 5; Appendix B
Title VI Investigations, Complaints, and Lawsuits	Page 5
Public Participation Plan and Summary of Outreach Efforts	Page 5
Language Assistance Plan	Page 16
Minority Representation on Non-elected Committees	Page 18
Sub-Recipient Compliance with Title VI	Page 19
Approval of Title VI Documentation	Page 19; Appendix C
Requirements of Transit Providers	
Service Standards	Page 20
Service Policies	Page 22

TITLE VI PROGRAM POLICY STATEMENT

GoPasco recognizes its responsibility to the community it serves and is committed to a policy of nondiscrimination. GoPasco works to ensure nondiscriminatory transportation in support of its mission to provide safe, reliable, and professional transportation to the citizens and neighbors of Pasco County.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d).

The Environmental Justice (EJ) component of Title VI guarantees fair treatment for all people and provides for GoPasco to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information GoPasco provides.

EJ regulations are as follows:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

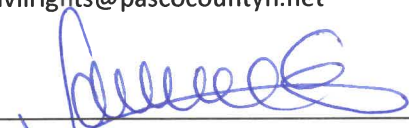
- c) To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

GoPasco's Business & Compliance Manager, currently Kirk Gagnard, is designated as its Title VI Liaison and is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs. He also is responsible for implementing all aspects of the Title VI Program. However, all GoPasco transportation supervisors and their staff share in the responsibility for making GoPasco's Title VI Program a success. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by GoPasco in its financial assistance agreements with USDOT.

To request a copy of GoPasco's Title VI Program, contact GoPasco at (727) 834-3200 or at civilrights@pascocountyfl.net. Any persons who believe they have been discriminated against under Title VI have the right to file a formal complaint within 180 days of the alleged discrimination. Individuals and organizations may file a complaint with the FTA Office of Civil Rights at <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta> or by completing the GoPasco Title VI complaint form.

The complaint form should be completed, signed, and sent to:

Title VI Liaison
Pasco County Public Transportation
8620 Galen Wilson Boulevard
Port Richey, Florida 34668
civilrights@pascocountyfl.net



Jannina Elkin, Public Transportation Director

12/13/23

Date

GENERAL REQUIREMENTS

The following information addresses Title VI general reporting requirements, as described in FTA Circular 4702.1B.

Title VI Notice to the Public

A Title VI Notice to the Public must be displayed to inform a recipient's customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency's website and in public areas of the agency's office(s). GoPasco has a Notice to the Public displayed on its website and on buses. A copy of GoPasco's Notice to the Public can be found in Appendix A.

Title VI Complaint Procedures

The following Title VI complaint procedures are posted on the GoPasco website and are in compliance with Title VI requirements.

1. Any person who believes he/she has been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color, or national origin under the Pasco County Public Transportation (GoPasco) program of transit service delivery or related services or programs may file an official Title VI complaint with the GoPasco Title VI Liaison, 8620 Galen Wilson Boulevard, Port Richey, FL 34668 or by calling (727) 834-3200. It is encouraged that complaints are submitted in writing, including name, address, and contact information (phone number, email, etc.)
 - a. Include how, why, and where the discrimination took place. Include the location, names, and contact information of any witnesses. If the alleged incident occurred on a bus, provide date, time of day, and bus number if available.
 - b. Letter of complaint must be signed.
2. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The GoPasco Title VI Liaison will review every complaint and, when necessary, will begin the investigation process. At a minimum, the investigation will:
 - a. Identify and review all relevant documents, practices, and procedures.
 - b. Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.
3. Upon completion of the investigation, the GoPasco Title VI Liaison will complete a final report for the Public Transportation Director. If a Title VI violation is found to exist, remedial steps, as appropriate and necessary, will be taken immediately. The Complainant will receive a final report together with any remedial steps. The investigation process and final report should take

no longer than twenty-five (25) business days. If no violation is found and the Complainant wishes to appeal the decision, he/she may contact the Federal Transit Administration, 230 Peachtree Street NW, Suite 1400, Atlanta, GA 30303; Attn: Region IV Civil Rights Officer, or by calling (404) 865-5600. Complainants may also file their initial Title VI complaint directly, no later than 180 days after the date of the alleged discrimination, and he/she may contact the Federal Transit Administration using the information listed above.

Title VI Complaint Form

The GoPasco Title VI complaint form is available in English and Spanish on GoPasco's webpage at www.GoPasco.com. A copy of both versions of the complaint form can be found in Appendix B.

List of Active Title VI Investigations, Complaints, and Lawsuits

Members of the public who feel they have been discriminated against based on race, color, national origin, age, gender, or disability are afforded the opportunity to have their concern documented through GoPasco and are encouraged to convey their concern via written communication; however, they may use direct telephone communication with the GoPasco Title VI Liaison. Complaints are documented and tracked for investigation. Once the investigation is completed, the customer is notified of the outcome of the investigation.

GoPasco has had no active Title VI complaints or lawsuits alleging discrimination within the last three-year period.

Civil Rights Compliance Review Activities

In 2019, FTA Region IV conducted a review of GoPasco's Title VI Program for compliance with FTA requirements. Results of the review were submitted to GoPasco in September 2019, with responses and necessary corrective action provided by GoPasco in this update of the plan.

Public Participation Plan

Recipients must promote inclusive public participation by integrating content from Title VI, the Executive order on LEP, and the USDOT LEP Guidance into a public participation plan or process. The document must explicitly describe the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. GoPasco follows the Pasco County Metropolitan Planning Organization's (MPO) Public Participation Plan (PPP) and completes additional public involvement activities to ensure that a wider range of opportunities is available for all persons to provide feedback on public transportation service. The GoPasco process has been designed to obtain a wide range of input from the community of both users and non-users. The Pasco County MPO's PPP, last updated in May 2018, is provided in its entirety on the MPO page on the Pasco County website. Additional details on public involvement activities are available in the LEP section of this plan.

GoPasco recognizes that, in compliance with Title VI, public involvement activities must focus on low-income and minority populations, thereby ensuring access to the transportation planning process for these populations through its public involvement process. As part of GoPasco's public outreach process, all meeting notices, press releases, and public service announcements are translated into other languages, as requested or needed, based on documentation of previous requests.

Public Outreach Techniques

In accordance with the Pasco County MPO's PPP, the following techniques are used to solicit feedback and input from the public, including minority, low-income, and LEP populations.

Formal Public Review and Comment Period

A formal public review and comment period is required prior to adoption of plans and programs or prior to fare changes and major service changes by the Pasco County Board of County Commissioners (BOCC). During this time, the public is encouraged to review the document and provide comments about the information presented. Public comments received that are specific to a planning activity are included in the record of the plan or program that they reference. However, members of the public may submit general comments to the BOCC at any time. During the comment period, draft documents are available on Pasco County's website and in hard copy by contacting Pasco County directly. Unless required otherwise, GoPasco uses a 30-day public comment period.

Comment Forms, Surveys, and Questionnaires

GoPasco uses public comment forms, surveys, and questionnaires to allow citizens to provide their opinions and suggestions concerning specific transportation planning activities. Throughout development of the Transit Development Plan (TDP), for example, the public is encouraged to be involved in the various plan development phases and comment forms, surveys, and questionnaires are used throughout the process.

Public Hearing

A public hearing is held to close out the public comment period for a plan, program, or proposed fare or service changes that has undergone a review and comment period. The public hearing is held during the BOCC meeting, at which members of the public are able to make formal comments. All comments received during the public comment period and at the public hearing are included in the project record and considered prior to adoption by the BOCC.

Pasco County Website

Information regarding events such as public meetings is provided on Pasco County's website at <http://www.pascocountyfl.net/>. GoPasco staff provide the material for the County website to keep all interested citizens informed on activities of GoPasco, including meeting schedules and links to agendas, newsletters, and a calendar of meetings. The County's website, including the GoPasco webpage, has the

functionality to translate content to Spanish and many other different languages to reach LEP communities.

Social Media Network

GoPasco connects with the community through the use of social media channels such as Facebook (<https://www.facebook.com/rideGOPASCO/>). These platforms are used to regularly inform GoPasco users, the community, and those interested in learning more about activities, plans, and programs.

Flyers, Fact Sheets, or Other Informational Items

Collateral materials such as brochures, flyers, or fact sheets are used to inform the public of major milestones during transportation planning activities and to assist the members of the public in making informed decisions.

Public Workshops

Public workshops are useful in providing to interested parties that are not knowledgeable about the transportation planning process an opportunity to learn firsthand the background, expected outcomes, and additional information about specific projects or plans. Materials provided at the workshops may include maps, fact sheets, project documents, newsletters, questionnaires or surveys, and other related project materials. Locations are identified that target specific citizen input based on geographical locations within the county, minority and income statistics, or other attributes that may improve the results of the public outreach effort.

Town Hall Meetings

Pasco County partners with different governmental agencies to hold town hall meetings, informal public meetings that give the members of a community an opportunity to discuss emerging issues and voice concerns and preferences for their community. These meetings include citizens and officials and provide an opportunity to talk personally in a relaxed environment about issues that are of importance in their community.

Media Relations

The County uses regionally distributed and local newspapers, special mailings through utility bills, and other methods to inform the public about various transportation projects. This has proven to be an efficient way to engage the community and provide a simple background on the transportation planning process and project recommendations, emphasize the significance to the average resident, and provide information on how the public can provide their comments and how to get involved. Pasco County places advertisements and coordinates with media contacts through newspapers such as the *Tampa Bay Times* (Pasco Section), *Suncoast News*, and *Laker/Lutz News*.

Recent Outreach Activities

GoPasco is required to submit a summary of public outreach efforts made in the last three years. No major public outreach opportunities have occurred over the three-year period. However, as an ongoing outreach effort, GoPasco staff engage the public at community events throughout the County to provide information about GoPasco and make the public aware of available transit-related resources. In the previous year GoPasco staff averaged 1-2 community events per month that targeted transportation disadvantaged communities in addition to senior communities.

Transit Development Plan (TDP)

GoPasco is the lead agency for conducting the TDP, with coordination and support from MPO staff. The TDP is a 10-year strategic transit plan that is updated every five years and specifically addresses the needs and objectives of the area transit operator. In developing the TDP, GoPasco analyzes the existing transit system, prioritizes transit service and capital improvements, justifies funding requests, and develops a prioritized list of transit improvements. GoPasco and the MPO work hand-in-hand in supporting the development of this multimodal transportation plan.

The most recent TDP Major Update (2019–2028) included an extensive public involvement process; public involvement activities included the following:

- *On-board Survey* – An on-board survey was conducted in March 2018 to collect socio-demographic and travel behavior information on GoPasco passengers. The survey was translated into Spanish for non-English-speaking passengers. A total of 349 GoPasco riders responded to the survey.
- *Public Workshops* – Four open house public workshops were held in February and May 2018, (two workshops in east Pasco and two in west Pasco) to identify the general attitudes of transit in the county and the needed improvements. The Title VI notice was included on every workshop flyer distributed to the public. In total, 329 people attended these workshops.
- *Discussion Group Workshops* – The workshops provided an opportunity for GoPasco and MPO staff to engage in a productive discussion with partners representing population segments and organizations crucial for transit growth, including bus operators and various MPO committees.
- *Social Media Outreach* – Social media such as Facebook was used to regularly inform GoPasco users, the community, and those interested in learning more about the 10-year plan. In addition, two email blasts were sent using an email distribution list before each series of public workshops to encourage the community to attend the events and provide input.
- *GoPasco Website* – Throughout development of the TDP, materials were posted on the GoPasco website (www.GoPasco.com) for the public to reference, and the Draft TDP was made available on the website for public review before final approval. GoPasco's website has a Google Translate feature that can translate webpages into over 100 different languages.

Program of Projects

Pasco County's List of Priority Projects (LOPP) is completed on an annual cycle as part of the Transportation Improvement Program (TIP). The first step creates a multimodal list of priority projects to be completed in the next five years and begins in August/September. The LOPP is presented to the MPO Board for adoption each September, with a transmittal deadline of October 1st to the Florida Department of Transportation (FDOT). The LOPP is used as input for development of FDOT's Tentative Five-Year Work Program (and, ultimately, the State's Transportation Improvement Program or STIP) for consideration as part of the statewide funding allocation process. The FDOT Work Program also has a public review and comment period in December, which leads to a public hearing and approval of a Final FDOT Work Program and a final MPO's TIP and LOPP, which moves forward into the MPO's next year TIP. The LOPP is adopted in June/July of the following year and is used to develop the next draft of the final TIP document. This cycle recurs in August/September for the next cycle of development of the LOPP. It should be noted that the public participation process for the TIP document also satisfies the Pasco County BOCC's public participation requirements for the FTA Section 5307 Program of Projects (POP).

Fare Increase and Service Changes

Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Section 5307(c)(1)(I), which requires "a locally developed process to consider public comments before raising a fare or carrying out major reduction in transportation service." To assure meaningful public involvement, especially from minority and low-income populations, GoPasco uses the public outreach techniques described above when considering fare increases and service reductions.

GoPasco has not undergone any of these changes in the last three years since the last Title VI Program was adopted.

Meaningful Access to LEP Persons

As a public transportation provider receiving Federal funding from FTA, GoPasco has a responsibility under Title VI of the Civil Rights Act of 1964 to take reasonable steps to ensure that LEP persons have meaningful access to benefits, services, information, and other important programs and activities provided by GoPasco. LEP persons include individuals who have a limited ability to read, write, speak, or understand English. This includes conducting a "four-factor analysis" to determine the specific language services that are appropriate to provide as part of the recipient's Language Assistance Plan.

Four-Factor Analysis

The four-factor analysis includes four steps that assist transit agencies in developing a cost-effective mix of language assistance measures. The factors that should be considered during the LEP needs assessment include:

1. Number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. Frequency with which LEP persons come into contact with the service.
3. Nature and importance of the program, activity, or service provided to people's lives.
4. Resources available to recipient for LEP outreach, as well as costs associated with the outreach.

Factor 1 – Number or proportion of LEP persons eligible to be served or likely to be encountered by program or recipient. The number and proportion of LEP persons within the GoPasco service area was assessed using the 2021 American Community Survey (ACS) Five-Year Estimates to determine the number of people who speak English less than “very well” for Pasco County as a whole and for each Census Tract within the GoPasco service area.

According to the 2021 ACS, Pasco County's population for ages 5 and over is 523,625. As shown in Table 2, approximately 4.87% of the total population speak English less than “very well,” with 63% of the LEP population speaking Spanish. About 9% of LEP persons speak a Russian, Polish, or other Slavic languages. Another 7% of the LEP population speaks another Indo-European language, which includes Italian, Portuguese, Greek, Hindi, etc. An additional 5% of the LEP population speaks Arabic. Since the Spanish LEP language group constitutes at least 1,000 persons, GoPasco is obligated to provide written translations of vital documents under the Safe Harbor Stipulation. While the Russian, Polish, or other Slavic language groups in addition to Other Indo-European language groups also constitute at least 1,000 persons, GoPasco is not obligated to provide written translations of documents for these groups as they are composed of more than one language and singularly do not break the Safe Harbor threshold. Since at least 1,000 LEP persons speak Arabic, further analysis of the 2021 ACS data and the specific census tracts containing Arabic speaking individuals who speak English less than well was conducted. It was determined that this group is not likely to be encountered by the program and therefore is not subject to the Safe Harbor Stipulation. Obligations under the Safe Harbor Stipulation are further discussed in the Language Assistance Plan. However, this analysis demonstrates that GoPasco is only required to translate vital documents into Spanish at this time.

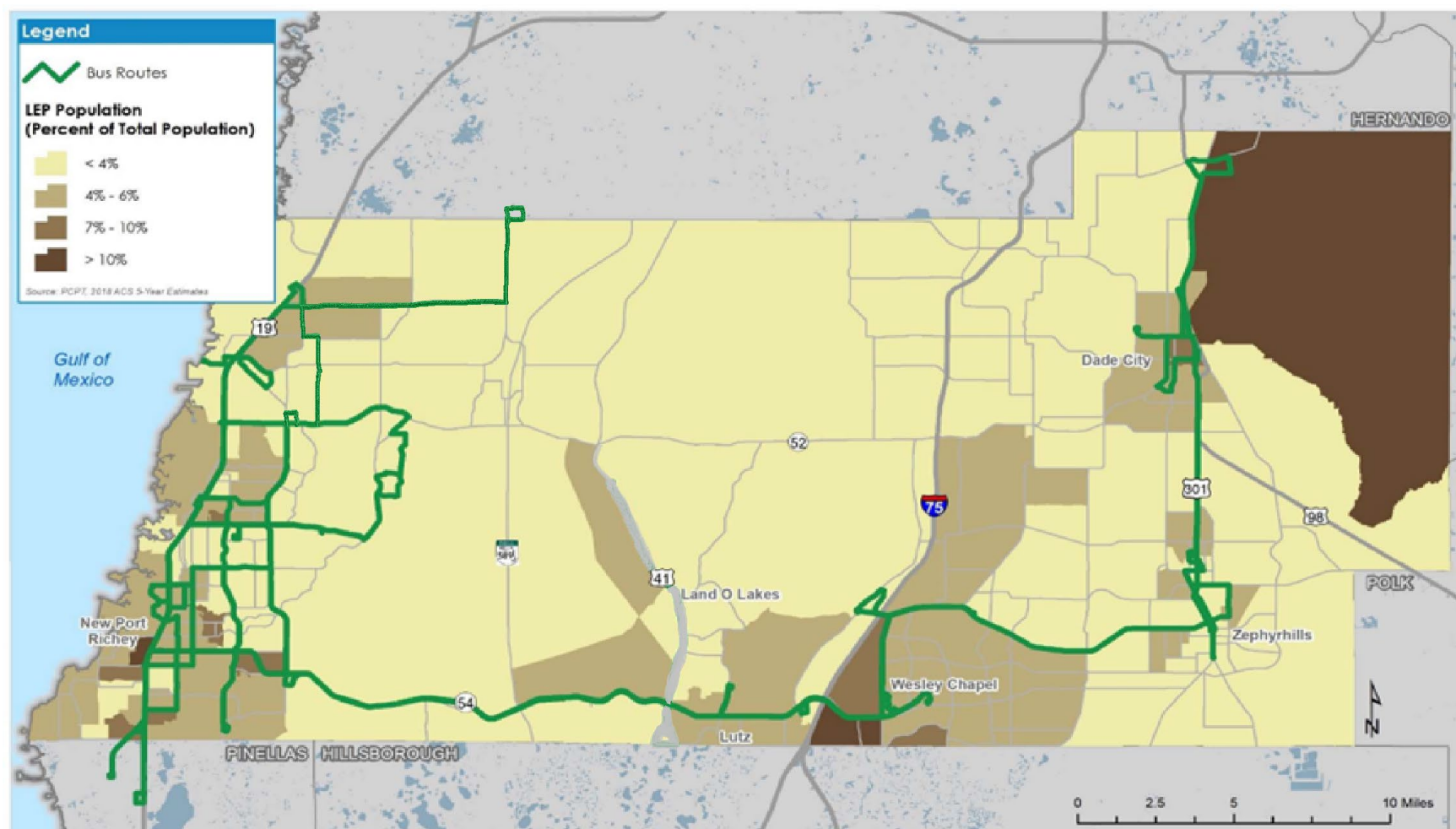
The geographic boundaries of the GoPasco service area and the existing routes are presented in Map 1. As shown, higher proportions of LEP populations reside in New Port Richey, Lutz, west of US 41, south of SR 54 in Wesley Chapel, and Dade City. Map 2 shows the distribution of the Spanish-speaking LEP population. The northeast corner of the county, along with parts of Dade City and north Zephyrhills, have the highest proportion of Spanish-speaking LEP populations. According to the ACS, approximately 3% of transit riders ages 16 and older are LEP persons. Map 3 shows the location of LEP populations who use public transportation to get to work.

Table 2: LEP Persons in Pasco County by Language Spoken

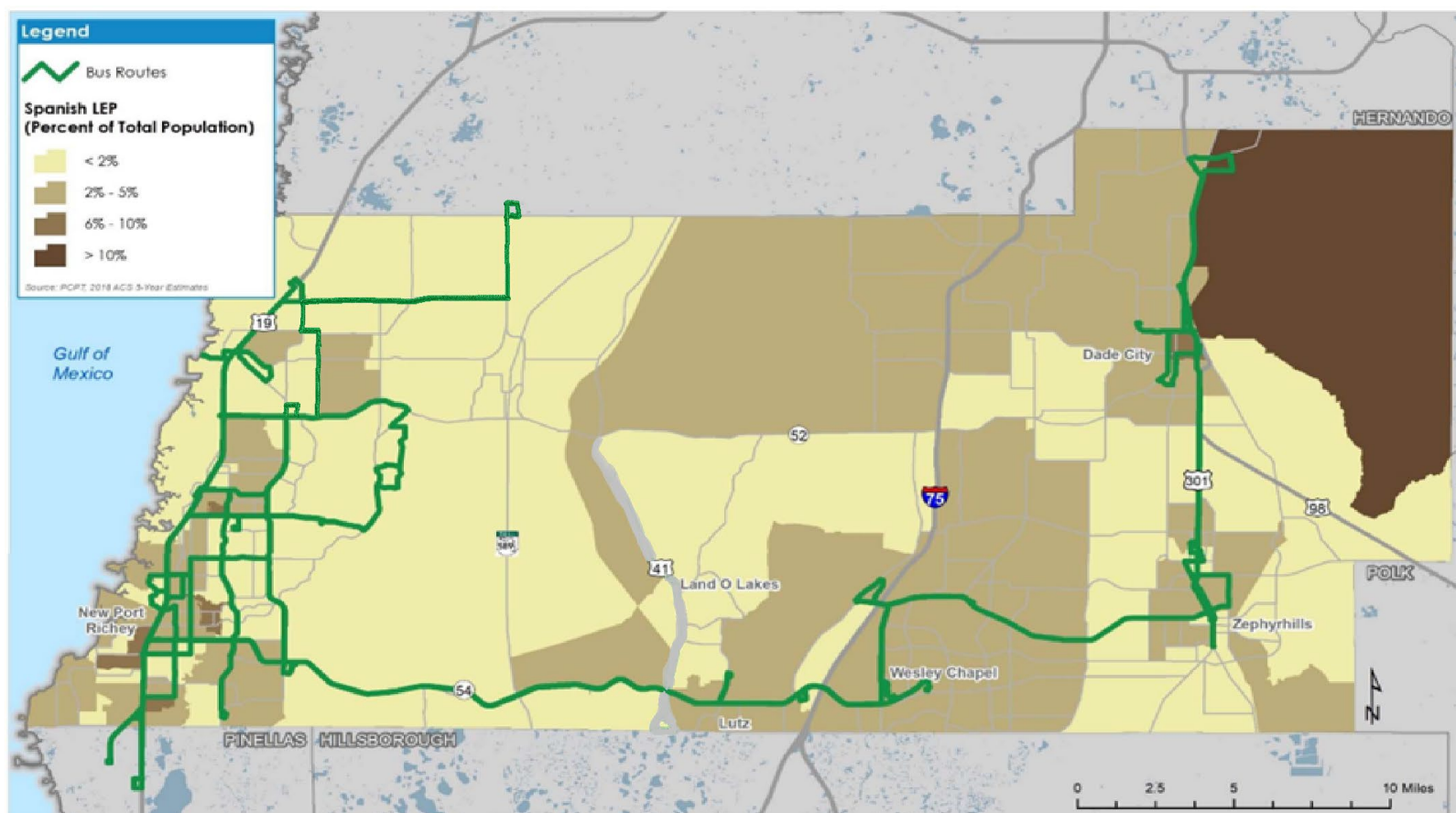
Language	Speak English Less Than "Very Well"	% of Pasco County Population	% of LEP Population
Spanish	16,066	4.14%	63%
Russian, Polish, or other Slavic languages	2,225	0.38%	9%
Other Indo-European languages	1,746	0.26%	7%
Arabic	1,204	0.20%	5%
Vietnamese	962	0.20%	4%
French, Haitian, or Cajun	894	0.18%	4%
Tagalog (incl. Filipino)	742	0.14%	3%
Other Asian and Pacific Island languages	656	0.07%	3%
German or other West Germanic languages	389	0.07%	2%
Chinese (incl. Mandarin, Cantonese)	251	0.06%	1%
Other and unspecified languages	248	0.03%	1%
Korean	141	0.01%	0.6%
Total	25,524	4.87%	100%

Source: ACS 2021 Five-Year Estimates, Table C16001

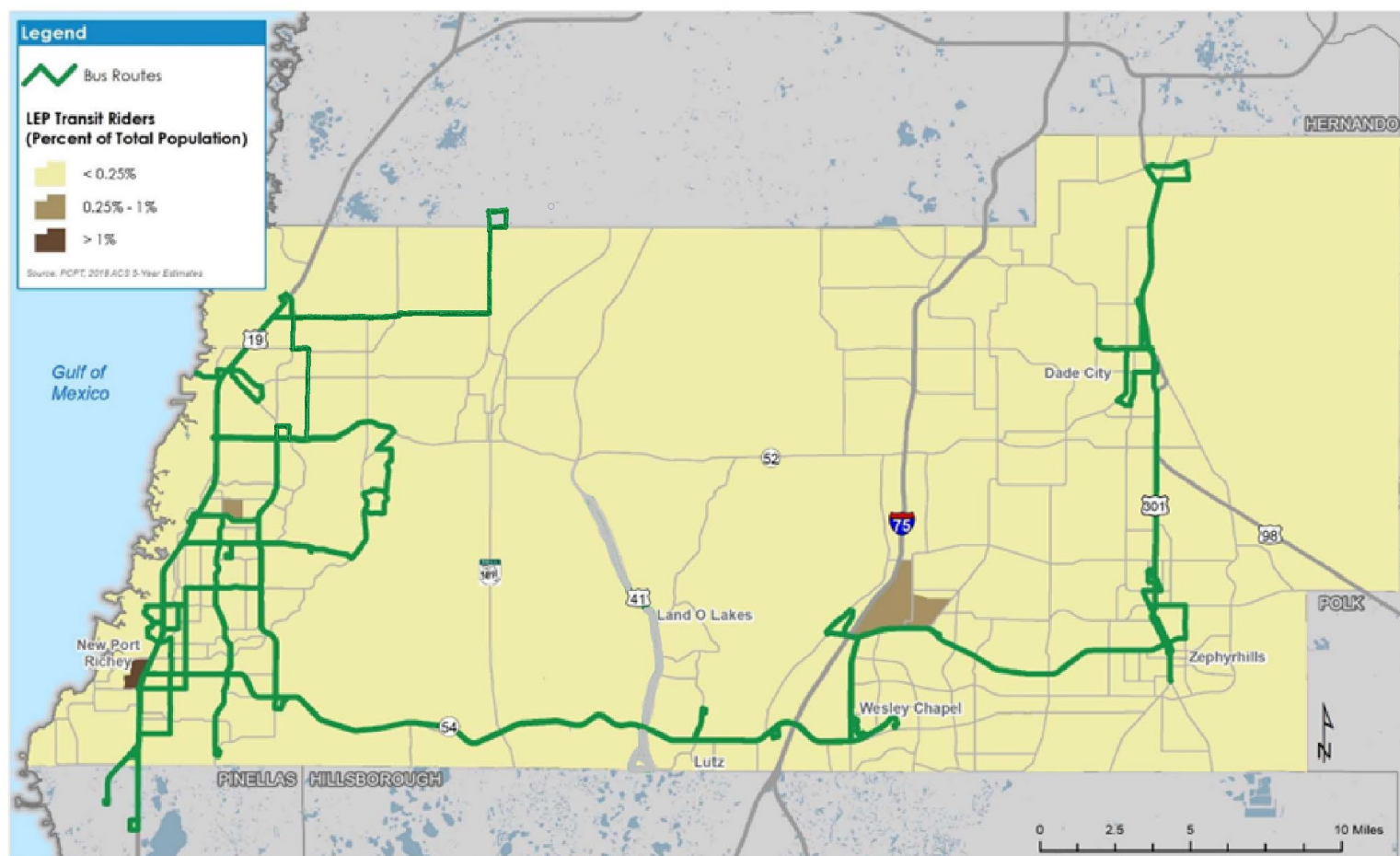
Map 1: LEP Population



Map 2: Spanish-Speaking LEP Population



Map 3: LEP Populations Using Public Transportation to Commute



Factor 2 – Frequency with which LEP persons come into contact with programs, activities, and services. Pasco County conducts regular board meetings and public hearings throughout the year. Community outreach and the County website are the main sources of potential contact between the GoPasco and LEP persons. As a result, the frequency of contact is difficult to anticipate. Current contact with LEP individuals is relatively infrequent, but the commitment to serve the LEP group is a priority. In areas with more concentrated LEP populations, LEP individuals often ride GoPasco buses with English-speaking family members. This is especially apparent along the East Pasco routes where there is a contingent of migrant workers located in the area.

The Pasco County Personnel Department is compiling an extensive list of employees who speak languages other than English who can be available for translation services if needed at public meetings. At workshops or other events, a bilingual staff member attends and translates as needed.

Factor 3 – Nature and importance of program, activity, or service provided by program to people’s lives. GoPasco realizes that public transportation services can be very important to LEP individuals who may need these critical services to travel to jobs, go shopping for basic items such as food and clothing, or for getting to medical appointments. To assist LEP persons in accessing public transportation services, GoPasco provides brochures, flyers, and schedules for the Spanish-speaking populations of Pasco County, which are available upon request throughout the entire county. Flyers announcing workshops, route or schedule changes, closings, and other significant events are also provided in Spanish and can be provided in additional languages, as needed. These are posted on buses for the most widespread notice to riders. Additionally, when a transportation planning activity calls for an on-board survey, it is distributed in English and Spanish. The Title VI Policy Statement, Title VI Complaint Procedures, and the Title VI Complaint Form are also provided in Spanish and are available on the GoPasco website. These documents also can be provided in large print formats if required.

GoPasco ensures that all segments of the population, including LEP persons, have been or have had the opportunity to be involved in the public transportation planning process. The impact of proposed transportation investments on underserved and under-represented population groups is part of the evaluation process for use of Federal funds in several major areas: 1) TDP, 2) Transportation Improvement Program, 3) Comprehensive Operational Analysis (COA), and 4) Long Range Transportation Plan (LRTP). Inclusive public participation is a priority in these plans, studies, and programs as well as the impacts of public transportation enhancements resulting from these planning activities impact all residents. Understanding and involvement are encouraged throughout the process, and every effort is made to make the planning process as inclusive as possible.

Factor 4 – Resources available to recipient for LEP outreach and costs associated with outreach. Given the significant size of the LEP population in Pasco County as well as financial constraints, full translation of all transportation documents is not reasonable at this time. However, bus schedules, information brochures, and flyers announcing public involvement activities, route or schedule changes, closings, and

other significant events as well as Title VI information are provided in Spanish. Items are printed in-house or by external print agencies.

Continued growth of Pasco County and its Spanish-speaking residents make offering Spanish translations in many areas a good community investment; therefore, the County continues to make efforts to partner with State and local agencies to provide language translation and interpretation services when practical within the scope of funding available. GoPasco suggests that the public make requests seven business days in advance of public meetings to accommodate LEP assistance.

GoPasco continues to monitor the need for additional language assistance, including the need for greater dissemination of information in the current languages provided and/or translation to new languages. If additional services are needed, GoPasco will determine which additional language assistance measures are cost-effective and feasible for implementation based on the current and projected financial resources.

Language Assistance Plan

Building on the results of the Four-Factor Analysis, the Language Assistance Plan includes four components, described as follows.

Component 1 – Describe how recipient provides language assistance services by language. As noted in the Four-Factor Analysis, approximately 4.87% of Pasco County’s population speak English less than “very well.” GoPasco currently undertakes the following to ensure that LEP persons have access to important information prepared by the transit agency:

- *Document translations* – GoPasco provides the Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI complaint form in Spanish.
- *Translation of informational items* – GoPasco offers Spanish versions of bus schedules, information brochures, flyers announcing workshops, route or schedule changes, closings, and other significant events.
- *Website translation feature* – GoPasco’s website includes a Google Translate feature that allows text to be translated into Spanish, Vietnamese, Arabic, German, French, Chinese, and many other languages.
- *Interpreter requests for public events* – Interpreter services are available free of charge upon request at least seven business days prior to public meetings or workshops.

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 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 these circumstances does not mean non-compliance, but rather provides recipients with 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% of the population or 1,000 persons, whichever is less, of eligible persons served or likely to be affected. Translations also can be provided orally. Under this law, GoPasco provides translations of vital documents in Spanish.

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.

Component 2 – Describe how recipient provides notice to LEP persons about availability of language assistance. USDOT LEP guidance indicates that once an agency has decided to provide language services, it is important that the recipient notify LEP persons of services available free of charge in languages LEP persons would understand. Examples of methods for notification include:

- Stating in outreach documents that language services are available.
- Signage when free language assistance is available with advance notice.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the public transportation services and the availability of language assistance.
- Providing information as to the availability of translation services (free of charge) when advertising for public hearings or public transportation-related workshops.

GoPasco takes reasonable steps to make available interpreter services, free of charge, and to include, at the minimum, Spanish translators upon request at least seven business days prior to transportation disadvantaged meetings, workshops, public hearings, or events. GoPasco defines an interpreter as 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.

Component 3 – Describe how recipient monitors, evaluates, and updates language assistance plan.

GoPasco provides an ongoing needs assessment to determine how best to continue reaching LEP persons in Pasco County and improving ongoing efforts. To ensure that the intent of the LEP plan remains current, GoPasco staff continues to monitor and update the plan and report progress every three years as part of the Title VI Program update; monitor interactions with LEP persons annually through review of on-line, written, or in-person requests for language translation; and review external agency LEP information, such as FTA, FDOT, and the Pasco County MPO, for assistance in developing internal LEP training and processes.

Component 4 – Describe how recipient trains employees to provide timely and reasonable language assistance to LEP populations. All GoPasco staff are provided with the LEP Plan and educated on the procedures and services available through training. This training discusses the following topics:

- Introduction to Title VI and Environmental Justice and how they differ
- Introduction to LEP
- Resources/language assistance services available
- Processes/procedures staff should be aware of

This information is also part of the GoPasco staff orientation process for new hires. Such training ensures that staff are fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals.

Minority Representation on Non-Elected Committees and Councils

Recipients that have transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those committees broken down by race and a description of efforts made to encourage the participation of minorities on such committees.

Pasco MPO has four advisory committees comprising non-elected volunteers that provide direction and advice to the MPO board on a wide range of planning topics; members of these committees are appointed by the MPO, with GoPasco having no appointment authority:

- **Bicycle/Pedestrian Advisory Committee (BPAC)** – makes recommendations to the MPO Board on matters concerning the comprehensive bikeway and pedestrian system/plan and promotes safety, security, education, and enforcement of laws pertaining to both pedestrians and bicycles; includes representatives from the Pasco County School Board and law enforcement agencies.
- **Citizens’ Advisory Committee (CAC)** – provides a citizen’s perspective on plans and programs relating to overall community needs and values to planning goals for transportation decisions; includes local community residents representing a broad spectrum of social and economic backgrounds and interests in transportation.
- **Transportation Disadvantaged Local Coordinating Board (LCB)** – serves as an advisory board and aid in planning and approving the Transportation Disadvantaged Service Plan; includes one County Commissioner/MPO Board member as chair and three citizens acting on behalf of the Transportation Disadvantaged community.
- **Technical Advisory Committee (TAC)** – meets to review technical matters and make recommendations concerning transportation plans and programs to the MPO Board; includes professional and technical representatives, planners, engineers, and other disciplines.

Table 3 summarizes the racial composition of the MPO’s four non-elected advisory committees, as requested by FTA Circulator 4702.1B.

Table 3: Racial Composition of Non-elected Committees

Category	Countywide Population*	BPAC	CAC	LCB	TAC
White	71.9%	55%	27%	64%	14%
Hispanic or Latino	16.7%	0%	0%	0%	0%
Black or African American	5.5%	0%	0%	0%	0%
Asian	2.7%	0%	0%	0%	0%
American Indian and/or Native Alaskan	0.2%	0%	0%	0%	0%
Native Hawaiian/Other Pacific Islander	0.1%	0%	0%	0%	0%
Other	0.3%	0%	0%	0%	0%
Two or more races	2.6%	9%	0%	7%	0%
Information not provided	-	36%	73%	29%	86%

*Based on 2018 ACS 5-year estimates ** 2018 Data reported

Sub-Recipient Compliance with Title VI

Title 49 CFR Section 21.9(b) states that “if a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” The primary recipient has a responsibility to provide assistance to and monitor sub-recipients for compliance with USDOT’s Title VI regulations. If the sub-recipient is not in compliance, then the primary recipient (GoPasco) is also not in compliance.

GoPasco currently has no sub-recipients that meet this requirement. If/when this changes, GoPasco will monitor any sub-recipient to ensure it meets all applicable Federal and State regulations.

Equity Analysis for New Facilities

The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin. The recipient must complete a Title VI equity analysis before the selection of a preferred site. Facilities under the purview of this requirement include storage facilities, maintenance facilities, operations centers, etc.

GoPasco has not recently built any new facilities.

Approval of Title VI Documentation

The Pasco County BOCC, who are responsible for ensuring that GoPasco’s policies are developed and followed must approve GoPasco’s Title VI Program. Once approved, the resolution will be provided in Appendix C.

REQUIREMENTS OF TRANSIT PROVIDERS

Chapter IV of FTA Circular 4702.1B provides program-specific guidance for all transit providers that operate fixed-route services.

System-Wide Service Standards

Service standards have been set for each mode of service operated by GoPasco, including local fixed-route bus and paratransit demand-response service. Quantitative standards for vehicle load, vehicle headway, on-time performance, and service availability are described below.

Vehicle Load

Vehicle load, or load factor, is a ratio of passengers carried versus passenger capacity on a vehicle during periods of peak travel. Load factors are used by transit systems to determine the extent of probable overcrowding or the need for additional vehicles. GoPasco's goal is to operate vehicle loads at a threshold that meets safety and performance standards. If overcrowding is reported, staff conduct follow-up checks to ensure that the vehicles assigned to these trips can accommodate peak passenger loads.

The average of all vehicle loads during the peak operating period should not exceed the vehicles' achievable capacities, as shown in Table 4. During off-peak hours, GoPasco's policy is to have no standing passengers.

Table 4: GoPasco Vehicle Load

Vehicle Type	Seated Capacity	Standing Capacity–Off-Peak	Standing Capacity–Peak	Max. Vehicle Load–Off-Peak	Max. Vehicle Load–Peak	Max. Load Factor–Peak
Gillig 30'	29	0	6	29	35	1.2
Gillig 35'	31	0	6	31	37	1.2
El Dorado 35'	41	0	20	41	61	1.5
Gillig 40'	38	0	19	38	57	1.5

Paratransit vehicles hold 12–26 seated passengers. Paratransit vehicle load will not exceed available seating capacity at any time.

Vehicle Headways

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given bus route or combination of bus routes. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

Local bus service should be scheduled with headways of not more than 60 minutes during peak periods and 90 minutes during off-peak periods. The current GoPasco service span is shown in Table 5.

Table 5: GoPasco Span of Service

	Monday–Friday		Saturday	
	Service Span	Headway	Service Span	Headway
14	5:30 AM – 7:50 PM	60 min	6:30 AM – 7:00 PM	60 min
16	5:00 AM – 7:50 PM	60 min	6:00 AM – 6:50 PM	60 min
18	5:45 AM – 6:40 PM	60 min	6:45 AM – 6:40 PM	60 min
19	5:00 AM – 10:40 PM	30 min	6:00 AM – 7:10 PM	30 min
20	5:30 AM – 8:20 PM	80 min	6:50 AM – 6:45 PM	80 min
21	4:55 AM – 8:15 PM	60 min	5:55 AM – 7:15 PM	60 min
23	4:45 AM – 8:20 PM	60 min	6:25 AM – 7:20 PM	60 min
25	5:30 AM – 7:10 PM	60 min	6:30 AM – 5:10 PM	60 min
30	4:45 AM – 7:45 PM	30–50 min	8:25 AM – 5:45 PM	40–80 min
31	7:25 AM – 7:00 PM	60 min	10:00 AM – 5:30 PM	60 min
54	4:40 AM – 7:30 PM	60 min	7:35 AM – 7:05 PM	60 min

On-Time Performance

GoPasco defines on-time performance as arrivals no earlier than the scheduled time and no more than five minutes past the scheduled time. The goal for GoPasco is to achieve 95% on-time performance for all fixed- route service; routes performing with an on-time performance lower than 95% that is not the direct impact of weather, traffic incidents, detours, and/or events over a consistent period of two or more weeks are reviewed to determine if schedule modifications are necessary to meet the on-time performance standard.

The paratransit on-time performance goal is 95%. Paratransit customers should be delivered no earlier than 30 minutes before their scheduled appointment time. Table 6 provides the quantitative on-time performance standards.

Table 6: GoPasco On-Time Performance Standards

Mode	On-Time Performance Measure (%)	On-Time Performance Measure (Time)
Fixed-route	95%	Arrive no earlier than scheduled time, no more than 5 mins past scheduled time
Paratransit	95%	Dropped off no earlier than 30 mins before scheduled appointment time

Service Availability

The basis of providing public transportation is to ensure access to those who need the service and to attract choice riders. To reach the maximum number of users within the available resources, GoPasco provides fixed-route service from 4:40 AM to 10:40 PM Monday through Friday and 5:55 AM to 7:20 PM on Saturdays.

Paratransit service for Americans with Disabilities Act (ADA) customers is provided consistent with ADA requirements. The current ADA service area is shown on Map 4. Service is provided to origins and destinations within $\frac{3}{4}$ of a mile on each side of each fixed route. The service area also includes places that are outside of the $\frac{3}{4}$ -mile buffer but are surrounded by transit corridors. This includes the region bordered by SR 52 to the north, Moon Lake Road to the east, Ridge Road to the south, and Little Road to the west. All other transportation disadvantaged citizens outside fixed-route service area may access door-to-door paratransit service contingent upon funding requirements and availability.

System-Wide Service Policies

Qualitative policies were developed for two indicators: distribution of transit amenities and vehicle assignments. These policies are described in more detail below.

Distribution of Transit Amenities for Each Mode

Bus stops and shelters are provided throughout the GoPasco service area to give the greatest level of access to the majority of system users. GoPasco currently has approximately 1,000 bus stops throughout its service area.

Fixed-route bus stops are provided based on the number of passengers boarding and alighting at stops, availability of right-of-way, and provision of ADA access. Shelters are placed at locations in the same manner as bus stops, but are geared toward stops with higher patronage. Benches are placed at bus stop locations that are requested by staff and/or passengers. Map 5 identifies the current bus stop locations for GoPasco bus service, along with the transfer center and park-and-ride locations.

Vehicle Assignment for Each Mode

GoPasco vehicles are assigned to specific runs based on load factors and the need for wheelchair securements. The process by which transit vehicles are assigned to routes throughout the system involves:

- Variation among vehicles (e.g., load factor)

- Types of service offered (e.g., demand, long- or short-haul, etc.)
- Timing of vehicle maintenance assignment (e.g., time of day, day of week, holiday/non-holiday)
- Other factors (e.g., origin points of vehicles, etc.)

CONCLUSION

This GoPasco Title VI Program Update was prepared pursuant to Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, “Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients (October 1, 2012).” The objectives of this Title VI program include ensuring that the level and quality of public transportation service are provided in a nondiscriminatory manner; promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency. According to the criteria described in this document, GoPasco is in compliance with Title VI requirements.

APPENDIX A: TITLE VI NOTICE TO THE PUBLIC

NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI PASCO COUNTY PUBLIC TRANSPORTATION (GoPasco)

GoPasco operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GoPasco.

For more information on GoPasco's civil rights program and the procedures to file a complaint, contact the Title VI Liaison at (727) 834-3200; email civilrights@pascocountyfl.net; or visit our administrative office at 8620 Galen Wilson Boulevard, Port Richey, FL, 34668. For more information, visit www.GoPasco.com.

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

If information is needed in another language, contact (727) 834-3200.

NOTIFICACIÓN AL PÚBLICO DE LOS DERECHOS BAJO EL TÍTULO VI TRANSPORTE PÚBLICO DEL CONDADO DE PASCO (GoPasco)

GoPasco opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que él o ella ha sido agraviada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el GoPasco.

Para obtener más información sobre el programa de derechos civiles de GoPasco y los procedimientos para presentar una queja, comuníquese con el contacto del Título VI al (727) 834-3200; correo electrónico civilrights@pascocountyfl.net; o visite nuestra oficina administrativa en 8620 Galen Wilson Boulevard, Port Richey, FL, 34668. Para obtener más información, visite www.GoPasco.com.

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, Edificio Este, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

Si necesita información en otro idioma, comuníquese con (727) 834-3200.

APPENDIX B: TITLE VI COMPLAINT FORM



PASCO COUNTY PUBLIC TRANSPORTATION (GoPasco)

TITLE VI COMPLAINT FORM

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of **race, color, or national origin** in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for GoPasco, to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information GoPasco provides.

GoPasco works to ensure nondiscriminatory transportation in support of our mission to provide effective and efficient management and delivery of public, specialized, and coordinated transportation services in Pasco County. GoPasco's Civil Rights Liaison is responsible for civil rights compliance and monitoring to ensure non-discriminatory provision of transit services and programs.

Complaint No.: _____

Home Number: _____ Email Address: _____

Work Number: _____

Address: _____

City: _____ Zip Code: _____

List type of discrimination (please check all that apply):

Race () National Origin () Color ()

Other _____

Please indicate your race/color, if it is a basis of your complaint: _____

Please describe your national origin, if it is a basis of your complaint: _____

Location where incident occurred: _____

Time and date of incident: _____

Name/Position title of the person who allegedly subjected you to Title VI discrimination:

Briefly describe the incident (use a separate sheet, if necessary): _____

Did anyone else witness the incident? Yes () No ()

List witnesses (Use a separate sheet, if necessary):

Name: _____

Address: _____

Telephone No.: _____

Name: _____

Address: _____

Telephone No.: _____

Have you filed a complaint about the incident with the Federal Transit Administration?

Yes () No () If yes, when? _____

Signature

Date



FORMULARIO DE RECLAMO PARA EL TITULO VI

El título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación en base a raza, color o nacionalidad en los programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI sostiene que “Ninguna persona en los Estados Unidos debe, en base a raza, color o nacionalidad, ser excluido de participar en, negarle los beneficios de o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera Federal.”

El componente de Justicia Ambiental del Título VI garantiza un trato justo para todas las personas y provee para GoPasco, el identificar y tomar acción, según sea apropiado, los efectos desproporcionadamente altos y adversos de sus programas, políticas y actividades en las minorías y en las poblaciones de bajos ingresos, tales como el tomar los pasos razonables para asegurar que las personas con Dominio de Inglés Limitado (LEP) tengan un acceso significativo a los programas, servicios e información que GoPasco provee.

GoPasco trabaja para asegurar transporte sin discriminación, apoyando de esta manera nuestra misión de proporcionar una eficaz y eficiente gestión, prestación y entrega de servicios, especializado y coordinado servicio de transporte en el Condado de Pasco. La oficina del Jefe Administrativo de GoPasco es responsable de cumplimiento y monitoreo de los Derechos Civiles para asegurar que no haya ninguna discriminación en los servicios de tránsito y sus programas.

Nombre y Apellido _____

Número de teléfono (casa) _____ Correo electrónico (e mail) _____

Número de teléfono (trabajo) _____

Dirección _____

Ciudad _____ Código Postal _____

Indique el tipo de discriminación (favor de marcar todas las que apliquen):

Raza () Nacionalidad () Color ()

Otro _____

Favor de indicar su raza/color, si es la base de su queja _____

Favor describir su nacionalidad, si es la base de su queja _____

Lugar donde ocurrió el incidente: _____

Hora y fecha del incidente: _____

Nombre/Título de la posición de la persona que alegadamente lo discriminó bajo el Título VI:

Describa brevemente el incidente (Si es necesario, adjunte otra hoja de papel)_____

¿Hubo algún otro testigo en el incidente?

Sí ()

No ()

Haga una lista de los testigos (Si es necesario, adjunte otra hoja de papel)

Nombre _____

Dirección _____

Número de teléfono _____

Nombre _____

Dirección _____

Número de teléfono _____

Ud. ha presentado una queja sobre el incidente a la Administración de Tránsito Federal?

Sí () No () Si es afirmativo, ¿cuándo? _____

Firma

Fecha

APPENDIX C: APPROVAL OF TITLE VI PROGRAM

BY THE BOARD OF COUNTY COMMISSIONERS

RESOLUTION NO. 24-044

A RESOLUTION BY THE BOARD OF COUNTY COMMISSIONERS OF PASCO COUNTY, FLORIDA, APPROVING PASCO COUNTY PUBLIC TRANSPORTATION'S TITLE VI PROGRAM FOR IMPLEMENTATION BY PASCO COUNTY PUBLIC TRANSPORTATION

WHEREAS, the Board of County Commissioners of Pasco County, Florida has the authority to implement the Title VI Program for Pasco County Public Transportation.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Pasco County, Florida, in regular session duly assembled, that:

1. The Title VI Program is approved.
2. The Chairman of the Board of County Commissioners of Pasco County, Florida, is hereby authorized to execute this resolution.
3. The Pasco County Public Transportation Director is authorized to implement the Title VI Program.

DONE AND RESOLVED with a quorum present and voting this 5th day of December, 2023.

(SEAL)

APPROVED
IN SESSION

DEC 05 2023

PASCO COUNTY
BCC

BOARD OF COUNTY COMMISSIONERS OF
PASCO COUNTY, FLORIDA



NIKKI ALVAREZ-SOWLES, ESQ.
CLERK & COMPTROLLER

Ronald E. Oakley
CHAIRMAN Ronald E. Oakley