



RIVER TO SEA TRANSPORTATION PLANNING ORGANIZATION

TITLE VI POLICY STATEMENT AND DISCRIMINATION COMPLAINT PROCEDURES

TITLE VI POLICY STATEMENT

The River to Sea Transportation Planning Organization (R2CTPO) values diversity and both welcomes and actively seeks input from all interested parties, regardless of cultural identity, background or income level. Moreover, the River to Sea TPO does not tolerate discrimination in any of its programs, services or activities. The River to Sea TPO will not exclude participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age, disability, religion, income or family status. The River to Sea TPO will actively work to ensure the inclusion of everyone in our community so that the River to Sea TPO's programs, services and activities represent the diversity we enjoy.

The purpose of the River to Sea TPO Title VI program is to establish and implement procedures that comply with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990 (ADA), and other related federal and state statutes and regulations. These procedures have been adopted to conform to Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) regulations, as well as to the Florida Department of Transportation (FDOT) guidelines.

COMPLAINT PROCEDURES

Filing of Title VI Complaints of Discrimination

Any person who feels that he/she has been subjected to race, color or national origin discrimination under Title VI of the Civil Rights Act of 1964, or other forms of discrimination based upon sex, age, disability, religion, family or income status discrimination under related nondiscrimination laws and regulations, may file a complaint with the River to Sea TPO.

A complaint must be filed within one hundred eighty (180) days after the date of the alleged discrimination, unless the time for filing is extended by the FTA, FHWA or other federal authorities.

If possible, complaints should be submitted in writing, signed by the complainant or his/her representative(s), and must include the following information:

1. Complainant(s) name, address and telephone number
2. Basis of the complaint (i.e. race, color, national origin, sex, age, disability, religion, family or income discrimination)
3. Date of the alleged discrimination
4. Statement of the complaint
5. Other agencies (state, local or federal) where the complaint has been filed
6. Explanation of the actions the complainant has taken or proposed to resolve the allegation in the complaint

Allegations of discrimination received via facsimile, mail or e-mail will be acknowledged and processed within five (5) business days. Allegations received by telephone will be documented in writing and provided to the complainant(s) for review before processing. If the complainant is hearing or speech-impaired, call the Florida Relay Service (FRS) by dialing 711 or 1-800-955-8771 (TTY) or email the Title VI Coordinator for assistance.

Complaints should be submitted to:

River to Sea Transportation Planning Organization
ATTN: Pamela Blankenship, Title VI Coordinator
2570 W. International Speedway Boulevard, Suite 100
Daytona Beach, FL 32114
Phone: 386.226.0422, ext. 20416
Fax: 386.226.0428
pblankenship@r2ctpo.org

Complaint Investigation

Upon receipt of a signed complaint, the River to Sea TPO Title VI Coordinator will, within five (5) business days, provide the complainant or his/her representative with a written acknowledgement of the complaint.

The Title VI Coordinator will take reasonable steps to resolve the matter and respond to the complaint within thirty (30) business days of receipt. The Title VI Coordinator will notify the complainant in writing of the final decision and/or action recommended to be taken. The River to Sea TPO's Title VI Coordinator has 'easy access' to the TPO Executive Director and will immediately

report allegations of discrimination to the Executive Director.

If the ~~complainant is dissatisfied with the River to Sea TPO's final decision~~TPO is unable to informally resolve the complaint, the River to Sea Title VI Coordinator ~~shall~~will forward the complaint, along with a record of its disposition, to the Florida Department of Transportation (FDOT) Title VI Coordinator for further processing.

Should the complainant be unable or unwilling to complain to the River to Sea TPO, or if the complainant is dissatisfied with the River to Sea TPO's handling of a complaint, a written complaint may be submitted directly to the Florida Department of Transportation (FDOT) Title VI Coordinator.

The Florida Department of Transportation (FDOT) Title VI Coordinator can be contacted at:

Jacqueline E. Paramore
Florida Department of Transportation (FDOT) Title VI Coordinator
605 Suwannee Street
Tallahassee, FL 32399-0450
850-414-4753
Jacqueline.Paramore@dot.state.fl.us

Complaints may also be submitted directly to the U.S. Department of Justice (DOJ). The DOJ will ensure that the matter is assigned to the correct federal or state authority for processing.

The U.S. Department of Justice may be contacted at:

U.S. Department of Justice
Civil Rights Division
Federal Coordination and Compliance Section, NWB
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Title VI Hotline: 1-888-TITLE-06 (1-888-848-5306) (Voice /TTY)
<https://www.justice.gov/crt/fcs/TitleVI-Overview>

RETALIATION

Retaliation is prohibited under Title VI of the Civil Rights Act of 1964 and related federal and state nondiscrimination authorities. It is the policy of the River to Sea TPO that persons filing a complaint of discrimination should have the right to do so without interference, intimidation, coercion or fear of reprisal. Anyone who feels he/she has been subjected to retaliation should report such incident to the River to Sea TPO's Title VI Coordinator.

The TPO Title VI Coordinator will maintain a log of all verbal and written complaints received by the TPO. The log will include:

1. Name of Complainant
2. Basis of Complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status, income discrimination or retaliation)
3. Date of verbal or written complaint
4. Explanation of the actions the TPO has taken or proposed to resolve the issue raised in the complaint

ADA/504 STATEMENT

Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their needs are equitably represented in the transportation planning process.

The River to Sea TPO will make every effort to ensure that its facilities, programs, services and activities are accessible to those with disabilities. The River to Sea TPO will also make every effort to ensure that its advisory committees and public involvement activities include representation of the disabled community and disability service groups.

The River to Sea TPO encourages the public to report any facility, program, service or activity that appears inaccessible to the disabled. Furthermore, the River to Sea TPO will provide reasonable accommodations to disabled individuals who wish to participate in public involvement events or who require special assistance to access River to Sea TPO facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, the River to Sea TPO asks that requests be made at least five (5) calendar days prior to the need for accommodations.

The following notice is provided on all meeting agendas and notices:

Individuals covered by the Americans with Disabilities Act of 1990 in need of accommodations for this public meeting should contact the River to Sea TPO office, 2570 W. International Speedway Blvd., Suite 100, Daytona Beach, Florida 32114-8145; (386) 226-0422, extension 20416, at least

five (5) working days prior to the meeting date.

Questions, concerns, comments or requests for accommodations should be made to:

River to Sea Transportation Planning Organization
ATTN: Pamela Blankenship, Title VI Coordinator
2570 W. International Speedway Boulevard, Suite 100
Daytona Beach, FL 32114
386.226.0422, ext. 20416
Fax: 386.226.0428
pblankenship@r2ctpo.org

PUBLIC INVOLVEMENT

In order to plan for efficient, effective, safe, equitable and reliable transportation systems, the River to Sea TPO must solicit the input of the public. The TPO expends extensive staff and financial resources in the furtherance of this goal and strongly encourages the participation of the entire community. The TPO offers a number of volunteer roles for those wishing to become more involved in the planning process. The TPO also holds a number of transportation meetings, workshops and other events designed to gather public input on planning activities. In addition, the TPO attends and participates in other community events to promote its services and improve its name recognition among the public. The TPO is constantly seeking ways of measuring the effectiveness of its public involvement.

For more information on the TPO's public involvement and measures of effectiveness, the public may view the TPO Public Participation Plan (PPP), on the River to Sea TPO's website (<http://www.r2ctpo.org/resources/planning-documents><https://www.r2ctpo.org/public-involvement/public-participation-documents/>) and at the TPO office. Persons wishing to request special presentations by the TPO, volunteer for any of its activities or offer suggestions for the improvement of TPO public involvement activities may contact:

River to Sea Transportation Planning Organization
ATTN: Pamela Blankenship, Title VI Coordinator
2570 W. International Speedway Boulevard, Suite 100
Daytona Beach, FL 32114
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Fax: 386.226.0428
pblankenship@r2ctpo.org

DATA COLLECTION

Federal Highway Administration (FHWA) regulations require federal-aid recipients to collect racial, ethnic and other similar demographic data on beneficiaries of those affected by TPO programs, services and activities. The TPO accomplishes this through the use of Census data, American Community Survey reports, Environmental Screening Tools (EST), driver and ridership surveys as well as other methods. From time to time, the TPO may find it necessary to request voluntary identification of certain racial, ethnic or other data from those who participate in its public involvement events. This information assists the TPO with improving its targeted outreach and measures of effectiveness. Self-identification of personal data to the TPO will always be voluntary and anonymous. Moreover, the TPO will not release or otherwise use this data in any manner inconsistent with the federal regulations.

ASSURANCES

Each year, the TPO must certify to FHWA and FDOT that its programs, services and activities are being conducted in a nondiscriminatory manner. These certifications are termed ‘assurances’ and serve two important purposes. First, they document the TPO’s commitment to nondiscrimination and equitable service to its community. Second, they serve as a legally enforceable agreement by which the TPO may be held liable for breach. The public may view the annual assurances on the TPO website (www.r2ctpo.org) or by visiting the TPO offices.

TITLE VI PROGRAM REVIEW AND TRAINING

The TPO's Title VI Program will be reviewed on an annual basis by the Title VI Coordinator to ensure compliance with Title VI (policies, regulations, procedures, etc.). Updates to the Title VI Plan will be made as needed. Revisions to the Title VI Plan that include only minor changes and do not affect policy or specific details may be made as an “administrative modification.” An administrative modification does not require public review and comment.

The TPO's Title VI Coordinator will provide comprehensive staff training on Title VI and Limited English Proficiency (LEP) on an annual basis.

River to Sea to Sea Transportation Planning Organization

Title VI / Nondiscrimination Program

Complaint of Discrimination

Complainant(s) Name:	Complainant(s) Address:
Complainant(s) Phone Number:	E-mail Address:

Complainant's Representative's Name, Address, Phone Number and Relationship (e.g. friend, attorney, parent, etc.):

Name and Address of Agency, Institution, or Department Whom You Allege Discriminated Against You:

Names of the Individual(s) Whom You Allege Discriminated Against You (If Known):

Discrimination Because of:	<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	Date of Alleged Discrimination:
	<input type="checkbox"/> Sex	<input type="checkbox"/> Age	<input type="checkbox"/> Handicap/Disability	
	<input type="checkbox"/> Income Status	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Other	

Please list the name(s) and phone number(s) of any person, if known, that the River to Sea Transportation Planning Organization could contact for additional information to support or clarify your allegation(s).

Please explain as clearly as possible **how**, **why**, **when** and **where** you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Additional pages may be attached if needed.

Complainant(s) or Complainant(s) Representative(s) Signature:	Date of Signature:
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Título VI / Programa Antidiscriminatorio

Querrela de Discriminación

Nombre del querellante:	Dirección:
Número de teléfono:	Dirección de correo electrónico:

Nombre, dirección, teléfono y relación (ej. amigo, abogado, pariente, etc.) del Representante del querellante:

Nombre y dirección de la Agencia, Institución, o Departamento que usted alega discrimino en su contra:

Nombre(s) del Individuo(s) Quien(es) Usted Alega Discrimino Contra Usted Si lo(s) Conoce:

Razón de la discriminación:	<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origen Nacional	Fecha de la alegada discriminación:
	<input type="checkbox"/> Incapacidad/Impedimento Físico	<input type="checkbox"/> Edad		
	<input type="checkbox"/> Sexo	<input type="checkbox"/> Represalia	<input type="checkbox"/> Status de Ingreso	
	<input type="checkbox"/> Otro			

Favor de indicar el nombre (s) y número(s) de teléfono(s) de alguna persona(s) que el Rio al Mar Organización de Planificación Transporte puede comunicarse para información adicional que clarifique o respalde su alegación o alegaciones.

Favor de explicar tan claro como sea posible, **como, porque, cuando y donde** usted cree que fue discriminado. Incluya suficiente información acerca de los antecedentes según le sea posible, de los alegados actos de discrimen. Puede añadir paginas adicionales, si es necesario.

Firma del Querellante(s) o su Representante:	Fecha:
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River to Sea Transportation Planning Organization

Limited English Proficiency Access Plan

I. Introduction

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities. It has been recognized that one form of discrimination occurs through an inability to communicate due to a limited proficiency in the English language. This limitation is often the result of an individual's national origin. Title VI of the Civil Rights Act of 1964, Executive Order 13166 and various directives from the U.S. Department of Justice (DOJ) and U.S. Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services and activities by those who do not speak English well.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the River to Sea TPO's programs, services or activities;
2. The frequency with which LEP individuals come in contact with these programs, services or activities;
3. The nature and importance of the program, service, or activity to people's lives; and
4. The resources available and the overall cost to the River to Sea TPO.

The goal of the *River to Sea Transportation Planning Organization (R2CTPO) Limited English Proficiency (LEP) Access Plan* is to ensure that the River to Sea TPO recognizes the needs of limited English proficient (LEP) members of the community, implements a plan to communicate effectively and ensures reasonable access to our processes, information and decision-making.

Background

On August 11, 2000, the President issued Executive Order 13166, entitled "Improving Access to Services by Persons with Limited English Proficiency," 65 FR 50121 (August 16, 2000). On the same day, the Assistant Attorney General for Civil Rights at the U.S. Department of Justice (DOJ) issued a Policy Guidance Document, entitled "Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons ~~W~~with Limited English Proficiency" (*hereinafter referred to as "DOJ LEP Guidance"*), reprinted at 65 FR 50123 (August 16, 2000). In addition, the U.S. Department of

Transportation (USDOT) issued a policy guidance document, titled "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons," reprinted at 70 FR 74087, dated December 14, 2005.

Executive Order 13166 requires federal agencies to: (1) examine services provided, (2) identify specific needs necessary to provide meaningful access for Limited English Proficiency (LEP) persons, and (3) implement a system to provide meaningful access to such services. The DOJ LEP Guidance advises each federal department or agency to "take reasonable steps to ensure 'meaningful' access [to LEP individuals] to the information and services they provide." [DOJ LEP Guidance, 65 FR at 50124]. The DOJ LEP Guidance goes on to provide that:

What constitutes reasonable steps to ensure meaningful access will be contingent on a number of factors. Among the factors to be considered is the number or proportion of LEP persons in the eligible service population, the frequency with which LEP individuals come in contact with the program, the importance of the service provided by the program, and the resources available to the agency.

The DOJ LEP Guidance explains that the identification of "reasonable steps" to provide oral and written services in languages other than English is to be determined on a case-by-case basis through a balancing of all four factors. The DOJ LEP and USDOT Guidance focus principally on the obligation of federal departments and agencies extending federal financial assistance to clarify the long-standing legal obligation on the part of recipients of such assistance to address the language needs of their otherwise-eligible LEP beneficiaries. Executive Order 13166 applies this same obligation to programs and activities undertaken directly by a federal department or agency. Section 2 of the Executive Order directs each federal department or agency "to prepare a plan to improve access to . . . federally conducted programs and activities by eligible LEP persons . . . consistent with the standards set forth in the LEP Guidance . . ."

The River to Sea TPO's Limited English Proficiency Plan works in concert with its Public Participation Plan (PPP), which identifies specific tactics for outreach and involvement.

II. River to Sea TPO Four-Factor Analysis

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors. The following sections address each of these factors with respect to the River to Sea TPO planning area.

Factor 1: Review of LEP Populations

Understanding the needs of the community begins with identifying the number of Limited English Proficiency (LEP) persons eligible to be served, likely to be served or likely to be encountered by the River to Sea TPO through its programs, services or activities. In an effort to determine potential LEP needs within the River to Sea TPO planning area, TPO staff reviewed the data available through the U.S. Census Bureau American Fact Finder for the period of ~~2013~~2016 through ~~2018~~2020. Data collected for Volusia County indicated that ~~3.8%~~1.7% of households ~~speaking English "less than very well"~~are limited English proficient." A further breakdown of ~~the~~those households that ~~are limited~~ speak English

proficient “~~less than very well~~” showed that ~~2.7%~~10.8% speak Spanish as the primary language. Other languages (other than Spanish) spoken in households that ~~speak are limited~~ English proficient “~~less than very well~~” include Indo-European (~~0.6%~~), Asian and Pacific Islander (~~0.4%~~1.4%) and Other (~~0.1%~~) (see Table 1). -This information led staff to review the Spanish speaking LEP group to identify whether this population was concentrated into specific communities.

Table 1: Limited English-Speaking Households~~The Top Languages Spoken at Home~~ in Volusia County

Table 1: The Top Five Languages Spoken at Home <u>Limited English-Speaking Households</u> in Volusia County (US Census Bureau’s 2013-2018 <u>2016-2020</u> American Community Survey)						
Population 5 years and older	Number of LEP Persons in Volusia County	Percent of Population over 5 years old that are LEP	Percent of LEP Persons who speak Spanish	Percent of LEP Persons who speak Indo-European Languages	Percent of LEP Persons who speak Asian and Pacific Islander Languages	Percent of LEP Persons who speak Other Languages
502,616	19,395 <u>3,841</u>	3.8% <u>1.7%</u>	2.7% <u>10.8%</u>	0.6% <u>3.6%</u>	0.4% <u>1.4%</u>	0.1% <u>0.7%</u>

After reviewing a breakdown of Volusia County Spanish LEP populations by city, (~~2013-2018~~2016-2020 American Community Survey Five-Year Estimates), ~~it became clear that much of the data was not statistically significant when viewed on a local level; however, there~~ data did appear to indicate was a concentration of Spanish speaking LEP ~~persons~~ households in the city of Deltona (~~7.1%~~7.3%) and the town of Pierson (~~30.4%~~7.0%). Because the River to Sea TPO realizes that statistical data can be outdated or inaccurate, TPO staff worked with the local public transit provider, Votran, to confirm estimates of LEP populations. Under the Title VI program, Spanish was reported to be the prevalent LEP language and the geographic locations of those populations were consistent with the TPO analysis.

Table 2: Limited English-Speaking Households~~The Top Languages Spoken at Home~~ in Flagler County

Table 2: <u>Limited English-Speaking Households</u> The Top Five Languages Spoken at Home in Flagler County (US Census Bureau’s 2013-2018 <u>2016-2020</u> American Community Survey)						
Population 5 years and older	Number of LEP Households in Flagler County	Percent of Population over 5 years old that are LEP	Percent of LEP Persons who speak Spanish	Percent of LEP Persons who speak Indo-European Languages	Percent of LEP Persons who speak Asian and Pacific Islander Languages	Percent of LEP Persons who speak Other Languages
102,808 <u>105,546</u>	7,093 <u>44,040</u>	6.8% <u>3.8%</u>	2.9% <u>7.5%</u>	5.2% <u>8.8%</u>	0.8% <u>1.7%</u>	0.04% <u>0.3%</u>

Flagler County does not have a substantial population of people who rely solely on a language other than English; however, as Table 2 (above) shows, an estimated ~~6.8%~~3.8% of ~~the population 5 years and households are limited English proficient~~over speak English “less than very well.” While a sizeable portion of that group is comprised of Spanish speakers (~~2.9%~~7.5%), ~~5.2%~~8.8% are those who speak Indo-European languages. This family of languages (other than Spanish) includes Russian, along with other major language groups such as Irish, Polish, French, German, Portuguese and Italian. Anecdotally, this has been attributed to a significant Russian-speaking population in Flagler County (See Table 2). Other languages (other than Indo-European) spoken in households that limited English proficient include Spanish (7.5%), Asian and Pacific Islander (1.7%) and Other (0.3%) (see Table 2).

Factor 2: Assessing Frequency of Contact with LEP Persons

The results of the Census data indicate that Spanish is the most prevalent language spoken by the LEP population in the area covered by the River to Sea TPO. To date, the TPO has not received any requests for translation or interpretation of its programs, services or activities into Spanish or any other language. The TPO has translated and distributed a Spanish language version of the “Tell the TPO” transportation survey. In ~~2018–2020~~ four–eight Spanish-language surveys were returned to the TPO. In addition, Connect 2045, the TPO’s 2045 Long Range Transportation Plan, initiated a survey in 2020 which was made available in Spanish; only one Spanish survey was returned. The TPO has not; to our knowledge, ~~for the most part,~~ had any LEP attendees at public events.

Factor 3: Assessing the Importance of TPO Programs

All of the River to Sea TPO programs are important; however, those related to safety, public transit, right-of-way, the environment, nondiscrimination and public involvement are among the most important. The TPO must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice Program and Policy.

Factor 4: Determining Available Resources

When planning any activity, it is imperative that an organization assess the resources available to conduct the activity in a way that is meaningful and balances those efforts with the overall cost to the organization. Given the size of the Spanish LEP population in the River to Sea TPO planning area and current financial constraints, full language translations of plan documents are not considered warranted or cost feasible at this time; however, the River to Sea TPO is fortunate to house within its jurisdiction a number of institutions of higher education and military facilities, both of which have extensive language services. The TPO will continue to evaluate its programs, services and activities to ensure that persons who may be LEP are always provided with meaningful access.

Four Factor Analysis Summary

The analyses of these four factors suggest that, although the costs for providing access are reasonable, the need is limited and extensive LEP services are not required at this time. Nevertheless, the River to

Sea TPO believes that Spanish language assistance is necessary for certain activities in order to provide broad access by members of the public.

III. Language Access Implementation Plan and Procedures

A limited English proficiency plan helps management and staff members understand their roles and responsibilities with respect to overcoming language barriers for LEP individuals. It is a management roadmap that outlines how the agency defines tasks, assigns responsibilities and allocates the resources necessary to come into, or maintain compliance with, language access requirements. It describes how the agency will meet the service delivery standards delineated in the policy directives, provide notice of language assistance services, provide staff training and conduct ongoing monitoring and evaluation. The following sections outline the activities that are being undertaken by the River to Sea TPO to comply with LEP needs.

Administer LEP services by:

1. Assigning a staff member to oversee the LEP program; this includes the development and implementation of this plan and annually examining the LEP plan to ensure that it remains reflective of the community's needs.
2. Documenting the number and type of contacts by LEP persons and activities and events requiring LEP assistance.
3. Ensuring that the River to Sea TPO staff is familiar with the requirements and resources for LEP persons.

Provide verbal translation as follows:

1. The Census Bureau's "I Speak" language cards are available in the TPO's Community Outreach Coordinator's office and TPO staff is able to identify language needs in order to match them with available services.
2. A list of support contacts who competently speak Spanish and who are willing to provide translation and/or interpretation services is maintained. The resource list has been distributed to TPO staff.
3. Agreements have been made with local agencies, colleges, universities and community partners to provide oral and written LEP services with reasonable notification.
4. Events and activities that may require a translator to ensure meaningful access by LEP persons have been identified and will be periodically updated.

Provide written translation as follows:

1. Meeting notifications are provided in English and Spanish, where appropriate.
2. Outreach documents include a notice that language services are available free of charge in a language LEP persons can understand: "Persons who require translation services, which are provided at no cost, should contact the River to Sea TPO at (386) 226-0422 or by email at PBlankenship@r2ctpo.org -at least five (5) business days prior to the event."

3. Spanish language outreach materials from other organizations including federal, state and local transportation agencies are provided whenever possible.
4. Documents that will be provided in Spanish language format have been, and will continue to be identified.

LEP Services Required

Given the four-factor analysis, the River to Sea TPO has identified the following documents for translation into Spanish language format:

- The TPO's Walk and Ride Bicycle & Pedestrian Safety Video
- The *Tell the TPO Survey*, which is issued biannually
- Spanish, as well as other language formats, have been made available on the TPO website using Google Translate

The TPO has also identified ~~the that events in Northwest Volusia and Deltona following events and activities that will~~ may require a Spanish language translator.:

- ~~Univision Telefutura Health Fair~~
- ~~Public outreach events in Northwest Volusia~~

For questions or concerns regarding the River to Sea TPO's commitment to nondiscrimination or to request LEP services, contact Pamela Blankenship, Title VI Coordinator, at (386) 226-0422 ext. 20416 or by email at PBlankenship@r2ctpo.org.

Administrative Revisions

Revisions to the Limited English Proficiency Plan that include only minor changes and do not affect policy or specific details may be made as an "administrative modification." An administrative modification does not require public review and comment.