

Lauderdale-By-The-Sea Community Shuttle Program Title VI Plan



Date Adopted: Month/Day/Year

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

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

The Lauderdale-By-The-Sea Community Shuttle Program assures the Florida Department of Transportation (FDOT) that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the Town.

The Lauderdale-By-The-Sea Community Shuttle Program further agrees to the following responsibilities with respect to its programs and activities:

- Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
- Issue a policy statement signed by the Town Manager which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated to the general public and distributed to the Town staff. Such information shall be published where appropriate in language other than English.
- Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
- Develop a complaint process and attempt to resolve complaints of discrimination against the Lauderdale-By-The-Sea Community Shuttle Program.
- Participate in training offered on the Title VI and other nondiscrimination requirements.
- If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
- Have a process to collect racial and ethnic data on persons impacted by the Town’s Community Shuttle service programs.
- Submit the information required by the Federal Transit Authority (FTA) Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

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

Date: _____, 2018

Ralph “Bud” Bentley
Town Manager, Lauderdale-By-The-Sea

2.0 Introduction & Description of Services

Lauderdale-By-The-Sea submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of the Federal Transportation Administration (FTA) Circular 4702.1B, published October 1, 2012.

The Lauderdale-By-The-Sea is a sub-recipient of FTA funds and provides bus service in Lauderdale-By-The-Sea and portions of Fort Lauderdale, Sea Ranch Lakes, and Pompano Beach. A description of the current The Lauderdale-By-The-Sea Community Shuttle Program is provided in 2.01.

The Lauderdale-By-The-Sea Community Shuttle Program’s liaisons for Title VI issues and complaints within the organization are:

Title VI Liaison	Alternate Title VI Contact
Debbie Hime	Tony Bryan
Special Projects Coordinator	Deputy Town Manager
954-640-4205	954-640-4206

Key responsibilities of the Title VI Liaison include:

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

2.0.1 Introduction and Description of Services

The Lauderdale-By-The-Sea Community Shuttle Program’s current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

The Lauderdale-By-The-Sea Community Shuttle Program is provided by the Town of Lauderdale-By-The-Sea, which is a local government, non-profit organization. The Town is made up of 38 full-time employees, 0 part-time employees, and 0 volunteers. The Town Manager is responsible for all of the day-to-day operations of the organization and reports directly to our Town Commission. The Town Commission is committed to this program and has, therefore, incorporated our service within the County’s Public Transportation Program.

The Lauderdale-By-The-Sea Community Shuttle Program is in partnership with Broward County Transit (BCT). Services are provided in accordance with an Interlocal Agreement between the Town of Lauderdale-By-The-Sea and BCT, which includes an Operations Manual/System Safety/Security Program and its Transportation Disadvantaged Service Plan (TDSP). The Town of Lauderdale-By-The-Sea Community Shuttle Program will continue to operate at the previous year (2017) averaging 3636 annual service hours (assuming 355 operating days).

The Lauderdale-By-The-Sea Community Shuttle Program is provided by the Town of Lauderdale-By-The-Sea, which operates as a local government, non-profit organization. Lauderdale-By-The-Sea has an executed agreement with BTC signed by the County on September 30, 2014.

The Lauderdale-By-The-Sea Community Shuttle Program’s Title VI Plan Liaison is responsible for monitoring and management of our transportation program. BCT performs onsite reviews to assure LBTS third party contractor maintains all safety sensitive employees are required to complete FDOT approved safety and security training course as part of their new hire orientation. Town’s third-party contractor is responsible for all training. All new employees are also required to complete eighty (80) hours of on-the-road drivers’ training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The Title VI Liaison is responsible for annual renewal of all liability insurance for both FDOT and all vehicles used in the program, as well as vehicle registration renewal. It is the Title VI Liaison’s responsibility to administer all aspects of the transportation program.

Maintenance on the Town’s one community shuttle is provided by Limousines of South Florida (LSF). LSF employs only ASE certified technicians with experience in working on commercial passenger vehicles like the type our Town uses. All vehicle files and driver files are kept on-site at LSF operations base located at 3300 S. W. 11 Avenue, Fort Lauderdale, FL 33315 and are maintained by LSF. All records are maintained and retained for a minimum of four (4) years. Only employees of Limousines of South Florida that have completed all of the required safety and drivers training requirements will be allowed to drive the community shuttle.

Town has 39 employees, but our transportation contractor, Limousines of South Florida (LSF) has a total of two hundred seventy-five (275) employees that include: two hundred twenty (220) full-time drivers, seven (7) part-time drivers, twelve (12) administrators, and fifteen (15) support staff.

Transportation services provided through our Community Shuttle program are available to our residents and visitors who depend on the bus as their primary mode of transportation. Our program primarily enables elders to remain independent and in their homes for a longer period of time. Without the transportation services, many of the seniors would be isolated and unable to access community services to meet their basic needs. We provide a wide range of trip purposes that include: medical, nutrition, shopping, employment, social and recreation by incorporating stops such as at grocery stores, Town Hall, and downtown entertainment and dining. The route also provides service to a branch library, a regional hospital and related doctors’ offices outside of Town’s boundaries.

Our fleet includes one twenty (20) foot bus which is equipped for wheelchair service. Our contracted provider (LSF) supplements with another vehicle in their fleet when the bus requires servicing. We make 8 passenger trips per weekday, 17 per Saturday 28 and on Sunday, and leverage our fleet resources so that our vehicle is used in a responsible manner to provide full coverage and will retire the vehicle at the appropriate age and mileage.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

The Lauderdale-By-The-Sea is not a first time applicant for FTA/FDOT funding.

The following is a summary of the Lauderdale-By-The-Sea Community Shuttle Program’s current and pending federal and state transportation funding:

- Broward County Transit pays Lauderdale-By-The-Sea Fifteen Dollars (\$15.00) per Revenue Service Hour as financial assistance for the Lauderdale-By-The-Sea Community Shuttle Service.

During the previous three years, FDOT did not complete a Title VI compliance review of The Lauderdale-By-The-Sea Community Shuttle Program. The Lauderdale-By-The-Sea Community Shuttle Program has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

The Lauderdale-By-The-Sea Community Shuttle Program will remain in compliance with this requirement by annual submission of certifications and assurances as required by [FDOT] and/or Broward County Transit.

2.3 Title VI Plan Concurrence and Adoption

The Plan was approved and adopted by Lauderdale-By-The-Sea’s Town Commission during a meeting held on October 9, 2018. A copy of the meeting minutes and FDOT concurrence letter is included in Appendix C of this Plan.

This Title VI Plan received FDOT concurrence on _____, 2018.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to the Public

The Lauderdale-By-The-Sea hereby gives public notice that it is the policy of the Town of Davie to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statues and regulations in all programs and activities. It is our policy that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded

from the participation in, be denied the benefits of or be otherwise subjected to discrimination under any of our programs or activities.

Any person who believes they have been subjected to unlawful discriminatory practice under Title VI has a right to file a formal complaint and/or obtain a complaint form by contacting Broward County Transit (BCT) at (954) 357-8481, TTY (954) 357-8302, or by visiting BCT's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>, or in writing to the Broward County Transportation Department, Transit Manager - Compliance, 1 North University Drive, 3100A, Plantation, FL 33324. Any such complaint must be filed in writing within one hundred-eighty (180) days following the date of the alleged discriminatory action.

The notice will be translated into other languages, as necessary.

Notifying the Public of Rights Under Title VI

Lauderdale-By-The-Sea Community Shuttle Program

- The Lauderdale-By-The-Sea Community Shuttle Program 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 Broward County Transit.
- For more information on The Lauderdale-By-The-Sea Community Shuttle Program's civil rights program, contact 954-640-4200, (TTY 7-1-1); email debbieh@lbts-fl.gov; or visit our administrative office at 4501 N. Ocean Drive, Lauderdale-By-The-Sea, FL 33308. For more information, visit lbts-fl.gov.
- For more information on Title VI procedures, to file a complaint and/or obtain a complaint form contact Broward County Transit (BCT) at (954) 357-8481, TTY (954) 357-8302, or visit BCT's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>. You may also request information in writing to the Broward County Transportation Department, Transit Manager - Compliance, 1 North University Drive, 3100A, Plantation, FL 33324.
- If information is needed in another language, contact (954) 357-8481, TTY (954) 357-8302.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of the Lauderdale-By-The-Sea Community Shuttle Program's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of the Lauderdale-By-The-Sea Community Shuttle Program's office(s) including the reception desk and meeting rooms, and on the Lauderdale-By-The-Sea's website at lbts-fl.gov. Additionally, the Lauderdale-By-The-Sea Community Shuttle Program will provide notice at Town Hall and on transit vehicles.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

In accordance with the Interlocal Agreement with Broward County Transit on _____, the Town will use BCT's Complaint Process, Form and Procedures.

4.1 Complaint Procedure

A copy of the complaint procedure can be obtained at Broward County Transit's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>.

4.2 Complaint Form

A copy of the complaint form is provided in Appendix C and on Broward County Transit's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>,

4.3 Record Retention and Reporting

The Lauderdale-By-The-Sea Community Shuttle Program will submit Title VI Plans to FDOT and BCT for review and concurrence on an annual basis or any time a major change in the Plan occurs or upon request. Lauderdale-By-The-Sea will submit Title VI Plan to FDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to all primary recipients annually, as needed.

4.4 Sub-recipient Assistance and Monitoring

As a sub-recipient to FDOT, The Lauderdale-By-The-Sea Community Shuttle Program utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. The Lauderdale-By-The-Sea Community Shuttle Program does not have any sub-recipients. In the future, if The Lauderdale-By-The-Sea Community Shuttle Program has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.]

4.5 Contractors and Subcontractors

Lauderdale-By-The-Sea is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors.

The Town of Lauderdale-By-The-Sea, its contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects.

Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation*, the *Federal Highway Administration*, *Federal Transit Administration*, *Federal Aviation Administration*, and/or the *Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation*, the *Federal Highway Administration*, *Federal Transit Administration*, *Federal Aviation Administration*, and/or the *Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, Lauderdale-By-The-Sea shall impose contract sanctions as appropriate, including, but not limited to:
 - a) withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b) cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as Lauderdale-By-The-Sea Community Shuttle Program, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a part of the Joint Participation Agreement (JPA) with FDOT, The Lauderdale-By-The-Sea Community Shuttle Program and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. Lauderdale-By-The-Sea and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of FDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a part of the JPA with FDOT, vendors and contractors of The Lauderdale-By-The-Sea Community Shuttle Program shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with The Lauderdale-By-The-Sea Community Shuttle Program. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services for The Lauderdale-By-The-Sea Community Shuttle Program to likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for The Lauderdale-By-The-Sea Community Shuttle Program.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), Lauderdale-By-The-Sea will record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include, the date the investigation, lawsuit, or complaint was filed; summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by the Lauderdale-By-The-Sea Community Shuttle Program Community Shuttle Program in response; and final findings related to the investigation, lawsuit, or complaint.

The Lauderdale-By-The-Sea Community Shuttle Program has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years.

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for the Lauderdale-By-The-Sea Community Shuttle Program was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for the Lauderdale-By-The-Sea Community Shuttle Program service operations. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about the Lauderdale-By-The-Sea Community Shuttle Program services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix F to this Title VI Program.

The Lauderdale-By-The Sea Community Shuttle Program is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of The Lauderdale-By-The-Sea Community Shuttle Program's recent, current, and planned outreached activities.

- A public meeting regarding route updates was held May 9, 2018, and posted on the bus, in municipal buildings, at commission meeting and on lbts-fl.gov at least one week prior to the meeting.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about The Lauderdale-By-The Sea Community Shuttle Program and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** The Lauderdale-By-The Sea Community will proactively reach out and engage low-income, minority, and LEP populations for the Town's service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.

- Clarity and Relevance: Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- Responsive: The Town will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- Tailored: Public participation methods will be tailored to match local and cultural preferences as much as possible.
- Flexible: The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of The Lauderdale-By-The Sea Community and intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The Lauderdale-By-The Sea will conduct community meetings and listening sessions as appropriate with passengers, employers, community-based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Lauderdale-By-The Sea website (www.lbts-fl.gov) and all feedback on the site will be recorded and passed on to Lauderdale-By-The Sea management. Feedback collected over the phone will be recorded and passed on to Lauderdale-By-The Sea management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically.

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

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

For community meetings and other important information, Lauderdale-By-The Sea will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers at Town Hall
- Posting information on the website, press releases and briefings to media outlets
- Multilingual flyer distribution to community-based organizations, particularly those that target LEP populations

- Other methods required by local or state laws or agreements

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

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

The Lauderdale-By-The-Sea Community Shuttle Program operates a Community Shuttle service within Lauderdale-By-The-Sea and portions of Fort Lauderdale, Sea Ranch Lakes, and Pompano Beach.

The Language Assistance Plan (LAP) has been prepared to address the Lauderdale-By-The-Sea Community Shuttle Program’s responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP.

In the Lauderdale-By-The-Sea Community Shuttle Program service area there are 1,680 residents or 5.74% who describe themselves as not able to communicate in English very well (Source: US Census). The Lauderdale-By-The-Sea Community Shuttle Program is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Lauderdale-By-The-Sea Community Shuttle Program has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix E.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

The Lauderdale-By-The-Sea Community Shuttle Program does not have an elected transit-related committee or board, therefore this provision does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

The Lauderdale-By-The-Sea Community Shuttle Program has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, the Lauderdale-By-The-Sea Community Shuttle Program does not have any Title VI Equity Analysis reports to submit with this Plan. The Lauderdale-By-The-Sea Community Shuttle Program will utilize the demographic maps included in Appendix I for future Title VI analysis.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

The Lauderdale-By-The-Sea Community Shuttle Program is a fixed route service provider, which operates one fixed Community Shuttle route.

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

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The Lauderdale-By-The-Sea Community Shuttle Program has prepared standards for all modes it operates, which includes one twenty-five foot (25') mini bus that is wheelchair accessible.

<i>10.1 SERVICE STANDARDS</i>	
Type	Standard Description
Vehicle Load	1.5 capacity ratio for all vehicles.
Vehicle Headway-Weekday	Bus #1262 Monday - Thursday headway varies from 60 to 75 minutes from 9:00 a.m. – 5:25 p.m.
Vehicle Headway-Weekday	Bus #1262 Friday headways vary from 35 to 75 minutes from 9:00 a.m. - 10:00 p.m.
Vehicle Headway-Saturday	Bus #1262 Saturday headways vary from 35 to 50 minutes from 10:00 a.m. – 10:00 p.m.
Vehicle Headway-Sunday	Bus #1262 averages 35 minutes headway all day from 8:00 a.m. to 10:00 p.m.
On-Time Performance	80% On-Time Performance is expected of Community Shuttle routes. On time is defined based on departures of zero (0) minutes early to five (5) minutes late.
Service Availability	Community Shuttle routes operate to complement BROWARD COUNTY'S (COUNTY) local, breeze, express, and paratransit services. To the greatest extent possible the Community Shuttle will fill gaps in COUNTY service coverage and offer local circulation to neighborhood destinations.
<i>10.2 SERVICE POLICIES</i>	
Transit Amenities	The CITY collaborates with the COUNTY in the siting of transit amenities in accordance with a criteria based on ridership, community need, and available right-of-way. For passenger convenience, Community Shuttle stops are generally placed in close proximity of shopping plazas, grocery stores, hospitals, parks, and offices.
Vehicle Assignment	Vehicles in service for 5 years or 150,000 miles are prioritized for replacement. Routes regularly exceeding the vehicle capacity threshold should be addressed through additional service. The COUNTY is generally responsible for the procurement and replacement of transit vehicles based on need and available funding.

POLICY HEADWAYS AND PERIODS OF OPERATION			
Pelican Hopper Community Shuttle BCT 1262			
Weekday/Weekend	Day(s)	Avg. Headway	Hours of Operation:
Weekday	Mon - Thurs	60 to 75 minutes	9:00 a.m. – 5:25 p.m.
Weekday	Friday	35 to 75 minutes	9:00 a.m. – 10:00 p.m.
Weekend	Saturday	35 to 50 minutes	10:00 a.m. – 10:00 p.m.
Weekend	Sunday	35 mins all day	8:00 a.m. – 10:00 p.m.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	TITLE VI PROGRAM APPROVAL LETTER AND FDOT CONCURRENCE LETTER
APPENDIX C	TITLE VI COMPLAINT FORM
APPENDIX D	PUBLIC PARTICIPATION PLAN
APPENDIX E	LANGUAGE ASSISTANCE PLAN
APPENDIX F	OPERATING AREA LANGUAGE DATA: TRANSIT OPERATIONS SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAPS

Appendix A: FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by the Federal Transit Administration (FTA) Lauderdale-By-The-Sea will submit the following information to the FTA. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements:

- Title VI Notice to the Public, including a list of locations where the notice is posted;
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint);
- Title VI Complaint Form;
- List of transit-related Title VI investigations, complaints, and lawsuits;
- Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission;
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance;
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the Town uses to encourage the participation of minorities on such committees;
- Primary recipients shall include a description of how the Town monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions;
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.; and,
- A copy of the Lauderdale-By-The-Sea Community Shuttle Program Town Commission minutes, resolution, or other appropriate documentation showing that the Commission's reviewed and approved the Title VI Program.
- Additional information as specified in Chapters IV, V, and VI, for a transit provider. (see below)

Requirements of Transit Providers

- All requirements set out in Chapter III (General Requirements)
- Service standards
- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode
- Service policies
- Transit Amenities for each mode
- Vehicle Assignment for each mode

Appendix B: Title VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter

Insert a copy of the Title VI Plan adoption meeting minutes and the FDOT concurrence letter.



Transportation Department

TRANSIT DIVISION / Administration

1 N. University Drive, Suite 3100A • Plantation, Florida 33324 • 954-357-8300 • FAX 954-357-8305

LANGUAGE TRANSLATION SERVICE AVAILABLE

NOTE: If you require this Title VI Complaint Form to be translated into another language, please log onto www.broward.org/bct. Click on either "Microsoft Translator" or "Google Translate" at the top right corner of the web page and select the appropriate language for your translation.

SERVICIO DE TRADUCCIÓN LENGUA DISPONIBLE

NOTA: Si usted requiere de este Formulario de Queja del Título VI de ser traducido a otro idioma, por favor haga clic en cualquiera de "Microsoft Translator" o "Google Translate" en la esquina superior derecha de esta página web y seleccionar el idioma.

LANG TRADIKSYON SÈVIS KI DISPONIB

REMAK: Si w mande pou s a Tit VI Fòm Plent dwe tradui nan yon lòt lang, tanpri klike sou swa "Tradiktè Microsoft" oswa "Google Translate" nan kwen paj sa a web tèt dwat epi chwazi lang ki apwopriye a pou tradiksyon ou.

**Broward County Board of County Commissioners
Transportation Department**

COMPLAINT OF ADA and TITLE VI DISCRIMINATION

The Broward County Transit Division, as a recipient of federal financial assistance, is required to ensure that its transit service and related benefits are distributed in a manner consistent with Title VI of the Civil Rights Acts of 1964, as amended.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination under Title VI, on the basis of race, color, or national origin, may file a written complaint with the Broward County Transit Division.

We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please contact us at (954) 357-8481 or TTY: (954) 357-8302.

NOTE: Alternate means of filing complaint, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

1. Complainant Name: _____
 Street Address: _____
 City, State, Zip Code: _____
 Telephone: _____
 Email Address: _____

2. Person you believe discriminated against you (if known):
 Name: _____

3. Location of incident: _____

4. Are you represented by an attorney for this complaint?
 Yes _____ No _____

If yes, please complete the following:

- Attorney's Name: _____
 Street Address: _____
 City, State, Zip Code: _____
 Telephone: _____

5. Which of the following best describes the reason you believe the discrimination took place? Please circle.

Race	Color	National Origin	Sex	Income Status	Age
Disability	Retaliation	Sexual Orientation	Political Affiliation	Marital Status	

6. Date(s) of the alleged discrimination: _____

7. In the space below, please describe the alleged discrimination. Explain what happened and who you believe was responsible. (Include bus number, route number, name of transit employee(s) involved in the incident, date, location, and time of the incident, if applicable.) Attach additional sheet if necessary.

8. Have you filed a complaint of the alleged discrimination with a federal, state, or local agency; or with a state or federal court?

Yes_____ No_____

If yes, check all that apply:

Federal_____ Federal Court_____
State _____ State Court _____ Local Court _____

Please provide the name of the Agency where you filed your complaint.

Agency Name: _____

Contact Person: _____

Complainant Signature _____

Date of Signature _____

You may attach any additional information you think is relevant to your complaint.

Submit your signed complaint and any attachments to:

Broward County Transit Division
Attention: Transit Manager – Compliance
1 North University Drive, Suite 3100A, Box 306
Plantation, FL 33324

Appendix D: Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for the Lauderdale-By-The-Sea Community Shuttle Program was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for the Lauderdale-By-The-Sea Community Shuttle. The Lauderdale-By-The-Sea Community Shuttle Program also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community-based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about the Lauderdale-By-The-Sea Community Shuttle Program and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** The Lauderdale-By-The-Sea Community Shuttle Program will proactively reach out and engage low-income, minority, and LEP populations for the Lauderdale-By-The-Sea Community Shuttle Program service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** The Lauderdale-By-The-Sea Community Shuttle Program will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The Lauderdale-By-The-Sea Community Shuttle Program will conduct community meetings and listening sessions as appropriate with passengers, employers, community based organizations, and advisory committees to gather public input and distribute information about service quality, proposed changes or new service options.

The public will be invited to provide feedback on the Lauderdale-By-The-Sea website (www.lbts-fl.gov) and all feedback on the site will be recorded and passed on to Lauderdale-By-The-Sea Community Shuttle Program manager. The public will also be able to call the Lauderdale-By-The-Sea Town Hall at 954-640-4200 during its hours of operation. Feedback collected over the phone will be recorded and passed on to the Lauderdale-By-The-Sea Community Shuttle Program's management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public

comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

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

For community meetings and other important information, the Lauderdale-By-The-Sea Community Shuttle Program will use a variety of means to make riders and citizens aware, including some or all of the following methods:

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

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

Appendix E: Language Assistance Plan (LAP)

I. Introduction

The Lauderdale-By-The-Sea Community Shuttle Program operates a transit system within Lauderdale-By-The-Sea and portions of Fort Lauderdale, Sea Ranch Lakes, and Oakland Park. The Language Assistance Plan (LAP) has been prepared to address The Lauderdale-By-The-Sea Community Shuttle Program's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP.

In the Lauderdale-By-The-Sea Community Shuttle Program service area there are 1,680 residents or 5.74% who describe themselves as not able to communicate in English "very well" (Source: US Census). Lauderdale-By-The-Sea is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The Lauderdale-By-The-Sea Community Shuttle Program has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

For many LEP individuals, public transit is the principal transportation mode available. It is important for the Lauderdale-By-The-Sea Community Shuttle Program to be able to communicate effectively with all of its riders. When the Lauderdale-By-The-Sea Community Shuttle Program is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. The Lauderdale-By-The-Sea Community Shuttle Program is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this Town's services in accordance with Title VI.

This plan will demonstrate the efforts that The Lauderdale-By-The-Sea Community Shuttle Program undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying The Lauderdale-By-The-Sea staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use the Lauderdale-By-The-Sea Community Shuttle Program services and identify needs for language assistance. This analysis is based on the "Four Factor Analysis" presented in the Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

- 1) Demography: identifying the number and/or proportion of LEP persons served or encountered, and languages spoken in service area.
- 2) Frequency: determining the rate of contact with the City's programs, activities, and services.
- 3) Importance: gauging the nature and importance of City's program, service, and activities to people's lives.
- 4) Resources: assessing current and available resources, including language assistance services.

Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population

Of the 29,286 residents in the Lauderdale-By-The-Sea Community Shuttle Program service area, 1680 residents describe themselves as speaking English less than “very well”. For groups who speak English “less than very well” 2.36 speak Spanish/Spanish Creole. People of Spanish/Spanish Creole descent are the primary LEP persons likely to utilize the Lauderdale-By-The-Sea Community Shuttle Program services. For the Lauderdale-By-The-Sea Community Shuttle Program service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 94.26% speak English “very well”.

Appendix F contains a table that lists the languages spoken at home and by the ability to speak English for the population within the Lauderdale-By-The-Sea Community Shuttle Program service area.

Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Lauderdale-By-The-Sea Community Shuttle Program has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey.

As discussed above, Census data indicates that 5.74% speak English less than very well. Phone inquiries and staff survey feedback indicated that the Lauderdale-By-The-Sea Community Shuttle Program’s dispatchers and drivers interact infrequently with LEP persons. Over the past 3 years, the Lauderdale-By-The-Sea Community Shuttle Program has had no requests for translated documents.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People’s Lives

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s Policy Guidance Concerning Recipient’s Responsibilities to LEP Persons, providing public transportation access to LEP persons is crucial. A LEP person’s inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board passenger survey was conducted to collect data on usage of and access to the Lauderdale-By-The-Sea Community Shuttle Program services. According to the survey, the most common age among all the participants in the survey was 55 or older. This supports that the Lauderdale-By-The-Sea Community Shuttle Program can be considered a senior transit service as most of its patrons are over the age of 55.

To further assess personal mobility options, each respondent was asked how he or she would have made the surveyed trip had the Lauderdale-By-The-Sea Community Shuttle Program not been available, the most frequent response was “Walk/Wheelchair at 51%. This data indicates that the Lauderdale-By-The-Sea Community Shuttle Program service is very important as a primary means of transportation for its customers and visitors. 5.8% indicated they would not have made the surveyed trip if the service was not available.

Factor 4: The Resources Available to the Recipient and Costs

The Lauderdale-By-The-Sea Community Shuttle Program assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: contractor who provides drivers, administrative staff, supported by an annual FY 19 budget of \$150,276 in Town funding. The Lauderdale-By-The-Sea Bus Program provides a reasonable degree of services for LEP populations in its service area.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

Element 1: Identifying LEP Individuals Who Need Language Assistance

The Lauderdale-By-The-Sea Community Shuttle Program has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix F). As presented earlier, 78.43% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish/Spanish Creole (9.41%).

Of those whose primary spoken language is Spanish/Spanish Creole, approximately 2.36% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish/Spanish Creole and who identify themselves as speaking English less than “very well” account for 3.38% of the service area population.

The Lauderdale-By-The-Sea Community Shuttle Program may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards available at Lauderdale-By-The-Sea Bus Program meetings. This will assist the Lauderdale-By-The-Sea Community Shuttle Program in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to the Lauderdale-By-The-Sea Community Shuttle Program management to follow-up.
4. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

Element 2: Language Assistance Measures

The Lauderdale-By-The-Sea Community Shuttle Program has undertaken the following actions to improve access to information and services for LEP individuals:

- Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
- Provide Language Identification Flashcards onboard transit vehicles and in the Lauderdale-By-The-Sea Community Shuttle Program offices.
- Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
- When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

The Lauderdale-By-The-Sea Community Shuttle Program will utilize the demographic maps provided in Appendix G in order to better provide the above efforts to the LEP persons within the service area.

Element 3: Training Staff

In the case of the Lauderdale-By-The-Sea Community Shuttle Program, the most important staff training is for Customer Service Representatives and transit drivers. Several representatives are bilingual in English and Spanish as well.

The following training will be provided to the Lauderdale-By-The-Sea Community Shuttle Program Customer Service Representatives:

- Information on Title VI Procedures and LEP responsibilities
- Use of Language Identification Flashcards
- Documentation of language assistance requests

Element 4: Providing Note to LEP Persons

The Lauderdale-By-The-Sea Community Shuttle Program will make Title VI information available in English on the Town's website. Key documents are written in English. Notices are also posted in the Community Shuttle Program's office lobby and on buses. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether the Lauderdale-By-The-Sea Community Shuttle Program's financial resources are sufficient to fund language assistance resources needed

The Lauderdale-By-The-Sea Community Shuttle Program understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. The Lauderdale-By-The-Sea Community Shuttle Program is open to suggestions from all sources, including customers, the Lauderdale-By-The-Sea Community Shuttle Program Community Shuttle Program staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

The Lauderdale-By-The-Sea Community Shuttle Program service area does not have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish/Spanish Creole speakers do not qualify for the Safe Harbor Provision as the number of persons which speak English less than "very well" is counted as 2.36% or 691 persons.

Appendix F: Language Spoken at Home:

Language	Population	Percentage	Speak English "very well"		Speak English "less than very well"	
Service Area Total	29,286	100.00%				
Speak only English	22,968	78.43%				
Spanish or Spanish Creole	2,755	9.41%	2,064	7.05%	691	2.36%
French (incl. Patois, Cajun)	799	2.73%	521	1.78%	278	0.95%
French Creole	109	0.37%	99	0.34%	10	0.03%
Italian	324	1.11%	262	0.89%	62	0.21%
Portuguese or Portuguese Creole	321	1.10%	198	0.68%	123	0.42%
German	302	1.03%	245	0.84%	57	0.19%
Yiddish	19	0.06%	19	0.06%	-	0.00%
Other West Germanic languages	50	0.17%	50	0.17%	-	0.00%
Scandinavian languages	90	0.31%	83	0.28%	7	0.02%
Greek	275	0.94%	196	0.67%	79	0.27%
Russian	203	0.69%	82	0.28%	121	0.41%
Polish	87	0.30%	26	0.09%	61	0.21%
Serbo-Croatian	19	0.06%	13	0.04%	6	0.02%
Other Slavic languages	40	0.14%	12	0.04%	28	0.10%
Armenian	-	0.00%	-	0.00%	-	0.00%
Persian	22	0.08%	22	0.08%	-	0.00%
Gujarati	118	0.40%	101	0.34%	17	0.06%
Hindi	23	0.08%	23	0.08%	-	0.00%
Urdu	43	0.15%	43	0.15%	-	0.00%
Other Indic languages	-	0.00%	-	0.00%	-	0.00%
Other Indo-European languages	130	0.44%	83	0.28%	47	0.16%
Chinese	71	0.24%	55	0.19%	16	0.05%
Japanese	-	0.00%	-	0.00%	-	0.00%
Korean	-	0.00%	-	0.00%	-	0.00%
Mon-Khmer, Cambodian	-	0.00%	-	0.00%	-	0.00%
Hmong	-	0.00%	-	0.00%	-	0.00%
Thai	54	0.18%	24	0.08%	30	0.10%
Laotian	-	0.00%	-	0.00%	-	0.00%
Vietnamese	11	0.04%	11	0.04%	-	0.00%
Other Asian languages	137	0.47%	76	0.26%	61	0.21%
Tagalog	36	0.12%	21	0.07%	15	0.05%
Other Pacific Island languages	16	0.05%	16	0.05%	-	0.00%
Navajo	-	0.00%	-	0.00%	-	0.00%
Other Native American languages	-	0.00%	-	0.00%	-	0.00%
Hungarian	14	0.05%	14	0.05%	-	0.00%
Arabic	166	0.57%	156	0.53%	10	0.03%

Hebrew	49	0.17%	49	0.17%	-	0.00%
African languages	26	0.09%	26	0.09%	-	0.00%
Other and Unspecified languages	9	0.03%	9	0.03%	-	0.00%

Appendix G: Lauderdale-By-The-Sea Community Shuttle Program Demographic Map

