

# Federal Transit Administration Title VI / Civil Rights Program Plan

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## Introduction

As a direct recipient of Federal Transit Administration (FTA) funds, the City of Key West Department of Transportation, also known as Key West Transit (KWT), is required to submit a Title VI Plan to FTA Region 4 office every three years.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Executive Order 13166 addresses services to those individuals with Limited English Proficiency (LEP). Executive Order 12898 addresses Environmental Justice Plan in minority and low-income populations. Key West Transit exercises every effort possible to assure that all compliance is met about regulations and rules adopted by the Federal Transit Administration as noted in FTA Circular 4702.1B.

## Chapter 2: Program Overview

City of Key West Department of Transportation assures that by adopting this program plan, Key West Transit will meet the following requirements:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

## Chapter 3: General Requirements and Guidelines

Chapter 3 is dedicated to descriptions of requirements that all Federal Transit Administration recipients and subrecipients shall follow to ensure that programs, policies and activities comply with DOT Title VI requirements and regulations; as well as the Environmental Justice offering guidance on integrating, into programs, policies, and activities, considerations expressed in DOT Order on Environmental Justice.

Chapter 3 is intended to identify and outline all steps to be taken, at a minimum, in detail with regard to the following:

- Requirement to provide Title VI Assurances (annually) – City of Key West shall comply with Annual submissions of the required and approved Title VI “Annual Certification and Assurance” documentation by August 1<sup>st</sup>, of each calendar year period.
- Requirement to prepare and submit a Title VI program – Title VI / Civil Rights Act of 1964 requires that tri-ennial updated or rewrites to your agency program plan documents shall be submitted to your regional office of FTA – except if substantive changes occur at a more frequent interval – at which time the agency is required to revise and resubmit annually, the agency Title VI Civil Rights Program Plan document to FTA

*Every Title VI Program shall include the following information:*

- Title VI Notice to the Public, that indicates the recipient complies with title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.
- Title VI Complaint Procedures and complaint form (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)

- List of transit-related Title VI investigations, complaints, and lawsuits filed with the recipient since the time of last submission. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part of.
- 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 last Title VI Program submission. A recipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.
- 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 agency uses to encourage the participation of minorities on such committees. (Not applicable to Key West Transit)
- Primary recipients shall include description of how the agency monitors its Subrecipients for compliance with Title VI, and a schedule of subrecipient 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., 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.
- A copy of board meeting minutes, resolutions or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA
- Additional information as specified in chapters IV, V and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

## ***Notify Beneficiaries of Protection Under Title VI***

City of Key West maintains annual posted notices of Title VI / Civil Rights posters in all city buses as well as via our automated Real Time Passengers Information System at [www.kwtransit.com](http://www.kwtransit.com); as well as the City's main website at [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov).

### Title VI notice shall include:

1. A statement that the agency operates programs without regard to race, color, or national origin.
2. A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations.
3. A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.

### Effective Practices for Fulfilling the Notification Requirement

1. Disseminations: Agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comments cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program.

2. Document translations: Notices detailing a recipient's Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.
3. Subrecipients: In order to reduce the administrative burden associated with this requirement, subrecipients may adopt the Title VI Notice developed by the primary recipient; however, subrecipients shall notify passengers and other interested persons that they may file discrimination complaints directly with the subrecipient.

### ***Notice to the Public***

Key West Transit's goal is not to discriminate against any person with respect to any transit program or service. A copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted. (*see appendix B*)

### ***Title VI Complaint Procedures and Complaint Form(s)***

Inasmuch as customers of public transit are entitled to know their rights and understand the steps required to file a formal complaint of possible discrimination; the attached complaint form(s) in three (3) identified LEP languages are available and are part of this program plan document. This notice is posted in all transit vehicles, Transit Facility lobby, bus operators room, on the City's website at [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov) and [www.kwtransit.com](http://www.kwtransit.com). (See Appendix C & D)

A complaint may also be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building 5<sup>th</sup> Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

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

KWT maintains a file for Title VI complaints, investigations and lawsuits. Since the time of the last submission, there is one (1) known investigation, complaint or lawsuit. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient submitting the report, not necessarily the larger agency or department of which the recipient is a part of. *See appendix E.*

Communication and correspondence (electronic and other) associated with Title VI investigations, complaints, lawsuits and grant funds will be maintained by the City of Key West Department of Transportation for the length of the project and funding as required by the grant program plan funding agreement; which will be determined on a case by case basis; or at a minimum of five (5) years; whichever is greater.

### ***Public Participation Plan***

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 Program submission. A recipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

City of Key West utilizes interior advertisements racks on transit vehicles to post all notices of public hearings or other related public transit information and public input/public comment type meetings. To that end, the City also posts these notices in accordance with ADA requirements, in at least one (1) local newspaper and advertises in multiple languages via radio ad spots. Key West City is also a member of various civic, environmental and other community minded organizations which include but are not limited to LCB (Local Coordinating Board), City's Ambassadors Program, and the Florida Outreach Coalition, and so on. This provides

public participation and public outreach to a diverse cross representation of both the Key West City communities but also the Lower Keys areas of the Florida Keys.

### ***Provide Meaningful Access to LEP Persons***

Key West DoT has taken reasonable steps by following the Four Factor Analysis below to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for individuals who are limited-English proficient.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to LEP persons.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

City of Key West has adopted “assistance programs and plans” Citywide, which provides for contract arrangements of professional translation services via internet access with providers who are available 24 hours per day / 7days per week. This is facilitated through our City of Key West Police Department Emergency Dispatch Division at (305) 809-1111. LEP included herein with Title VI Plan. *Appendix I*

### ***Non-Elected Committees & Councils***

Not applicable to the City of Key West Department of Transportation.

### ***Monitoring of Sub-recipients***

The City of Key West Department of Transportation is a direct recipient of FTA funds and also a sub recipient of FTA funds from Florida Department of Transportation (FDOT) via Section 5311 grant funds. Therefore, KWT will submit the Title VI Program to both agencies, unless otherwise noted to not submit to both agencies, but only submit to one.

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

The City of Key West incorporates “construction project analysis” in with our service and fare analysis with regard to environmental justice processes- to that end, the environmental tests are performed in accordance with Chapter III – 11 / FTA C 4702.1B as noted therein and included as part of Title VI. KWT has not done any construction during the reporting period and have not conducted any equity analysis for fare changes.

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

Upon approval of the Title VI plan, KWT will submit the resolution in TRAMS.

### ***Additional Information Upon Request***

The Notice to Beneficiaries as well as our Compliant Procedural Notice posters / flyers – both have inclusive language wherein “additional information is available at the City of Key West Department of Transportation” contained there.

Procedures for the City of Key West are attached hereto and made a part of hereof by reference. Additionally, detailed information and guidance is available in appendices provided under Circular C, FTA 4701.1B herein.

## Chapter 4: Requirements and Guidelines for Fixed Route Transit Providers

Chapter 4 applies to all providers of fixed route public transportation (also known as transit providers) that receive Federal financial assistance, inclusive of States, local and regional entities, and public and private entities. Transit providers that are subrecipients will submit the information required in this chapter to their primary recipient every three (3) years on a schedule determined by the primary recipient. Direct and primary recipients will submit the information required in this chapter to FTA every three (3) years.

All transit providers – whether direct recipients, primary recipients or subrecipients – that receive financial assistance from FTA are also responsible for following the general requirements in Chapter III of this circular. The requirements in this chapter are scaled based on this size of the fixed route transit provider.

Requirement Chart:

Requirement	Transit Providers that operate fixed route service	Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more population
Set system-wide standards and policies	Required	Required
Collect and report data	Not required	Required: <ul style="list-style-type: none"> <li>• Demographic and service profile maps and charts</li> <li>• Survey data regarding customer demographic and travel patterns</li> </ul>
Evaluate service and fare equity change	Not required	Required
Monitor transit service	Not required	Required

## Chapter 5: Requirements for States

Not applicable to the City of Key West, Florida

## Chapter 6: Requirements for Metropolitan Transportation Planning Organizations

Not applicable to the City of Key West, Florida

## Chapter 7: Effecting Compliance with DOT Title VI Regulations

Chapter 7 addresses methods to utilize as best practices and procedures for effecting compliance of Title VI, per 49 CFR 21.13(a). FTA has provided outline and information on how to effect compliance should a recipient or subrecipient be found non-compliant at any time.

This document is provided as an outline of the wealth of information available in Circular C, FTA 4702.1B, as attached and made a part hereof, with regard to Title VI of the Civil Rights Act 1964, as amended. Please refer to this outline and further refined procedures utilized internally for implementation of all requirements.

## Chapter 8: Compliance Reviews

This chapter describes the review process FTA will follow when determining whether a recipient is compliant or noncompliant with DOT Title VI regulations, subsequent to the award of Federal financial assistance, and describes the information and actions expected from recipients that are subject to these reviews.

## Chapter 9: Complaints

In this chapter grantees are provided guidance on how to offer opportunities for complaints to be filed and how to handle complaints, should a complaint be received. This section covers all you need to know and more. Refer to Chapter 9 for information such as:

- Right to file a complaint
- Compliant Acceptance
- Investigations
- Letters of Finding and Resolution
- Appeals Process



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Appendix E: List of Transit-Related Investigations, Complaints, & Lawsuits (General Requirement) <i>There has been one (1) complaint, or lawsuit against the City of Key West Department of Transportation Alleging discrimination on basis of race, color, national origin, or ethnicity with respect to service, or other Transit benefits during the past three (3) years.</i>	17
Appendix F: Service Standards (Requirements for All Fixed Route Transit Providers) <i>FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.</i> <ul style="list-style-type: none"><li>• Vehicle load for each mode</li><li>• Vehicle headways for each mode</li><li>• On-time performance for each mode</li><li>• Service availability for each mode</li></ul>	18-19
Appendix G: Service Policies (Requirement for All Fixed Route Transit Providers) <i>FTA requires that all providers of fixed route public transportation develop qualitative policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.</i> <ul style="list-style-type: none"><li>• Vehicle Assignment</li><li>• Transit Amenities</li></ul>	20
Appendix H: Service and Fare Analysis Questionnaire Checklist (Requirement for Transit Providers that Operate 50 or more Fixed Route Vehicles in Peak Service and Located in Urbanized Areas (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV) <i>Not applicable to the City of Key West, Florida, but to be consistent with 2017 Title VI Program Plan, KWT will continue to conduct an equity analysis for any fare changes or major service change according to the Service and Fare Analysis that is provided in this plan.</i>	21-23
Appendix I: Title VI and Limited English Proficiency Technical Assistance Resources <i>Resource listing of technical support services for all recipients and sub recipients required to integrate planning and operations requirements for Limited English Proficiency plan – into the Title VI program document.</i> <p>This document is provided as an outline/overview only as it relates to revisions set forth in Title VI / Civil Rights, Circular C FTA 4702.1B, dated October 1, 2012, adopted herein by the City of Key West Department of Transportation, 5701 College Road, Key West, FL 33040.</p> <p>Detailed, step by step procedures utilized by the City of Key West Department of Transportation, in the day to day operations of the fixed route public transportation services, follow, in English, Spanish, and French (Creole) as three (3) primary identified Limited English Proficient populations residing in Key West City limits.</p>	24

## **TITLE VI PROGRAM CHECKLIST FOR ALL GRANTEES**

All recipients should submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub recipients shall submit the information below to their direct recipient.

### **GENERAL REQUIREMENTS (Chapter III)**

All recipients must submit:

- 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 population (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 agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient 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.
- A copy of the board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA
- Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

### **REQUIREMENTS OF TRANSIT PROVIDERS (Chapter IV)**

All Fixed Route Transit Providers must submit:

- 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

*Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:*

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board of other governing entity or official(s) considered, was aware of the results, and approved the analysis is
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- ☐ Results of service and / or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware e of, and approved the results of the analysis

### **REQUIREMENTS OF STATES (Chapter V)**

States must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ The requirements set out in Chapter IV (Transit Provider) if the State is a provider of fixed route public transportation
- ☐ Demographic profile of the State
- ☐ Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- ☐ Analysis of the State’s transportation system investments that identifies and addresses any disparate impacts
- ☐ A description of the Statewide planning process that identifies the transportation needs of minority populations
- ☐ Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance
- ☐ Description of the procedures the agency uses to provide assistance to potential subrecipients, including efforts to assist applicants that would serve predominantly minority populations

### **REQUIREMENTS OF MPOs (Chapter VI)**

Metropolitan Planning Organization and other planning entities must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ The requirements set out in Chapter IV (Transit Provider) if the MPO is a provider of fixed route public transportation
- ☐ Demographic profile of the metropolitan area
- ☐ A description of the procedures by which the mobility needs of minority populations are identified an considered within the planning process
- ☐ Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
- ☐ Analysis of the MPO’s transportation system investments that identifies and addresses any disparate impacts
- ☐ Description of the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)
- ☐ Description of the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)



## TITLE VI NOTICE TO PUBLIC

YOUR RIGHTS UNDER TITLE VI, CIVIL RIGHTS ACT OF 1964, as amended

If you believe you may have been discriminated against based on your sex, race, color, religion, or national origin, you have the right to file a complaint under Title VI, Civil Rights.

The City of Key West Department of Transportation (KWDoT) is required by law to comply with all Title VI, Civil Rights regulations and must afford you the opportunity to file a complaint, conduct an investigation of findings and provide for an appeal process under these rules and regulations.

Complaint forms are available at the KWDoT office, 5701 College Road, Key West, Florida 33040, or at the City's website by visiting [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov) or [www.kwtransit.com](http://www.kwtransit.com). These can be obtained by mail upon request to (305) 809-3910.

Complaint forms must be filled out completely and returned to the attention of the KWDoT Civil Rights Officer at 5701 College Road, Key West, FL 33040

KWDoT Title VI Civil Rights Plan documents are available to the public during regular business hours the 1<sup>st</sup> Wednesday of each month.

For additional information call (305) 809-3910

## Key West Transit

***Title VI Complaint Procedure***

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by Key West Transit (KWT) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form(s). KWT investigates complaints received no more than 180 days after the alleged incident. KWT will process complaints that are complete.

Once the complaint is received, KWT will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

KWT has 30 days to investigate the complaint. If more information is needed to resolve the case, KWT may contact the complainant. The complainant has twenty (20) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within twenty (20) business days, KWT can administratively close the case. A case can also be administratively closed if the complainant no longer wished to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegation and the interviews regarding the alleged incident, and explains whether any disciplinary actions, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has ten (10) days after the date of the letter or the LOF to do so.

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

City of Key West Department of Transportation



Title VI Complaint Form

This form is provided to persons who feel they may have been discriminated against with regard to race, color, or national origin. If you feel you were discriminated against for any of these reasons you are entitled to file a complaint using this form and formally request an investigation (and action is deemed appropriate) with the City of Key West, KWT Civil Rights Officer, 5701 College Road, Key West, FL 33040.

**SECTION I:**

Name: \_\_\_\_\_

Telephone (Cell / Home / Work): \_\_\_\_\_

Address: \_\_\_\_\_

Electronic Mail Address: \_\_\_\_\_

**SECTION II:**

I believe the discrimination I experienced was based on (check all that apply):

Race       Color       National Origin

Date (Month, Day, Year) and time of Alleged Discrimination: \_\_\_\_\_

Bus #: \_\_\_\_\_ Route: \_\_\_\_\_ Location: \_\_\_\_\_ Driver's Name: \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of any witnesses. If more space is needed, please use the back of this form.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person or mail to: Key West Transit, Civil Rights Officer, 5701 College Rd., Key West, FL 33040.



City of Key West Department of Transportation

Formulario de queja del Título VI

Este formulario se proporciona a las personas que sienten que pueden haber sido discriminadas con respecto a la raza, el color o el origen nacional. Si usted siente que fue discriminado por cualquiera de estas razones, tiene derecho a presentar una queja utilizando este formulario y solicitar formalmente una investigación (y la acción se considera apropiada) ante la Ciudad de Key West, Oficial de Derechos Civiles de KWT, 5701 College Road, Key West, FL 33040.

<b>SECCION I:</b>
Nombre:
Teléfono (Celda / Inicio / Trabajo):
Dirección:
Dirección de correo electrónico:
<b>SECCION II:</b>
reco que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional
Fecha (Mes, Día, Año) y hora de supuesta discriminación: _____
Autobús # _____ Ruta: _____ Ubicación: _____ Nombre del conductor: _____
Explica lo más claramente posible lo que sucedió y por qué crees que fuiste discriminado. Describe a todas las personas que participaron. Incluya el nombre y la información de contacto de los peron que le discriminaron (si se conocen), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use detrás de este formulario.
_____
_____
_____
_____
_____

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja. Firma y fecha requeridas a continuación:

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Envíe este formulario en persona o por correo a: Key West Transit, Civil Rights Officer, 5701 College Rd., Key West, FL 33040.

Spanish



City of Key West Department of Transportation

**Fom plent Tit VI**

Cette forme à ceux qui estiment qu'ils peuvent être discriminés en tenant compte de la race, la couleur ou l'origine nationale. Si vous pensez avoir fait l'objet de discrimination pour l'une ou l'autre des raisons pour lesquelles vous êtes autorisé à déposer une plainte en utilisant ce formulaire et à demander officiellement une enquête (et une action jugée appropriée) auprès de la ville de Key West, agente des droits civils du KWT, 5701 Road College, Key West, FL 33040.

<b>MA SECTION:</b>
Nom:
Téléphone (Cellule / Accueil / Travail):
Adresse:
Adresse électronique de courrier :
<b>SECTION II:</b>
Je crois que la discrimination que j'ai vécue était fondée sur (vérifiez tout ce qui s'applique):
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Origine nationale
Date (mois, jour, année) et temps de discrimination alléguée : _____
Bus #: _____ Trajet: _____ Emplacement: _____ Nom du conducteur: _____
Expliquez aussi clairement que possible ce qui s'est passé et pourquoi vous croyez avoir été victime de discrimination. Décrivez toutes les personnes impliquées. Inclure le nom et les coordonnées de tous les témoins. Si plus d'espace est nécessaire, s'il vous plaît utiliser le dos de ce formulaire.
_____
_____
_____
_____
_____

Vous pouvez joindre tous les documents écrits ou d'autres renseignements qui, selon vous, sont pertinents à votre plainte. Signature et date requise ci-dessous :

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Veillez soumettre ce formulaire en personne ou par la poste à : Key West Transit, Agent des droits civiques, 5701 College Rd., Key West, FL 33040.

*French*



**KWDoT LIST OF ALLEGED DISCRIMINATION**

<b>CITY OF KEY WEST DEPT. OF TRANSPORTATION</b>	<b>DATE (Month, Day, Year)</b>	<b>SUMMARY OF ALLEGATIONS (race, color, or National Origin)</b>	<b>STATUS (active or closed)</b>	<b>ACTIONS TAKEN / FINAL FINDINGS</b>
<b>INVESTIGATIONS</b>				
1) FILE #2019-6DL	September 13, 2019	Color	closed	No Findings / Closure letter sent / Refresher Training for Driver
2)				
<b>LAWSUITS</b>				
1)				
2)				
<b>COMPLAINTS</b>				
1) FILE #2019-6DL	JUNE 20, 2019	COLOR	CLOSED	INVESTIGATED / NO FINDINGS /
2)				

The City of Key West Department of Transportation (KWDoT aka KWT) is the *only* fixed route system serving Key West and the Lower Florida Keys, including Marathon. Services standard for KWDoT are reviewed every other week to ensure equity of transit throughout the service community.

#### VEHICLE LOAD STANDARDS :

KWDoT is located in a Nonurbanized area (under 200,000 in population) with less than 50 buses utilized during peak service hour. There has been no overloading of passengers on any vehicle during service hours. KWDoT will address vehicle overloads by placing higher capacity vehicles on overloaded routes or using plug buses for short term unexpected overloads until a system service change can be implemented to increase scheduled frequency on targeted routes.

VEHICLE	SEATING	STANDING	TOTAL	MAXIMUM LOAD FACTOR
30' Low Floor Bus	23	10	33	1.4
35' Low Floor Bus	32	15	47	1.5

#### VEHICLE HEADWAY STANDARDS :

KWT bus service is based on a seven (7) route network :

- Two (2) routes in Key West operate a six (6) day week (Red & Orange)
- Three (3) routes in Key West operate a seven (7) day week (Blue, Green & Duval Loop)
- Two (2) routes for the Lower Keys Shuttle operate a seven (7) day week (North & South)

Log onto [kwtransit.com](http://kwtransit.com) to view current schedule and also access the Real Time Passenger Information System (RTPIS) for the location and arrival of each bus.

ROUTES	VEHICLE HEADWAY	SERVICE HOURS	# DAYS OF SERVICE
Red	1 hour & 43 min	15.50	6
Orange	1 hour & 45 min	14.25	6
Blue	1 hour & 34 min	16.25	7
Green	1 hour & 32 min	18	7
Duval Loop	15 mins	36.25	7
Commuter Shuttle	2 hours	9.5	5
Lower Keys Shuttle (North / South)	2 hours	North – 20 South - 20	7

### ON-TIME PERFORMANCE STANDARDS :

A vehicle is considered on time if it departs a scheduled time point no more than 3-5 minutes late. KWT's on-time performance objective is eighty (80%) percent or better. Transit drivers will complete their routes no more than five (5) minutes late in comparison to the established scheduled / published timetables. KWT's staff continuously monitors on-time performance and makes adjustments when required.

### SERVICE AVAILABILITY STANDARDS :

Key West Transit (KWT) services is to provide a safe, dependable and alternate mode of travel in the City of Key West and its' adjoining communities up to the City of Marathon ; for residents and visitors alike.

KWT operates seven (7) routes – four (4) Key West / Stock Island, one (1) downtown Key West, and two (2) in the Lower Florida Keys up to Marathon, Florida. All routes are evaluated annually as part of the Transit Development Plan to revise or add services to areas that are needed.

All buses are ADA accessible and provide bike racks for the City and Lower Keys Routes. Foldable portable bikes are allowed on the buses as well.



## ***SERVICE POLICIES***

### **VEHICLE ASSIGNMENT POLICY**

No transit buses are regularly assigned to any specific route or service, with the exception of the 35' Gillig Low Floor buses. On a seven (7) day week, all buses operate, with the exception of the Red and Orange route. The Red and Orange route operate six (6) days a week, Monday through Saturday.

The Red and Orange *Do Not* operate on Memorial Day, 4th of July, and Labor Day. There are *No Bus Service* on Thanksgiving, Christmas Day, and New Year's Day.

KWDoT has fifteen (15) 30' Gillig Low Floor buses and five (5) 35' Gillig Low Floor buses. The 35' Gillig buses only operate the Lower Keys Shuttle Route and the 30' Gillig buses are interchangeable between the City routes and the Lower Keys Shuttle routes.

### **TRANSIT AMENITIES POLICY**

Key West Department of Transportation facility is located about 5.0 miles from old town/downtown area of Key West. Transit amenities such as bus stop signs are located at *All* of our designated stops. About 30% of our designated stops are equipped with a bus shelter, trash and recycle receptacles, and colored conch shell to show which route assist that location. Amenities at all other designated stops may be equipped with stand-alone benches, trash and recycle receptacles. Those areas will be based on safety, ADA compliance, average daily boarding, and proximity to major trip generators, customer and community requests.

KWDoT has upgraded the Real Time Passenger Information System (RTPIS) kwtransit.com to include nearby stops based off of cellular global positioning system (GPS) locations and also teamed up with Trillium Solutions Inc. Trillium Solutions implements Google maps for public transit agencies and also provides website and interactive maps design, website hosting, and strategic consulting for technology and marketing all geared towards public transportation. KWT staff continues to research new customer amenities to include bus schedule arrival times at stops, driver scheduling software, and solar powered LED bus lighting.

## Service and Fare Equity Analysis Questionnaire Checklist

Requirement for transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized area (UZA) of 200,000 or more people, or that otherwise meet the threshold defined in Chapter IV.

### Analysis of Proposed Service and Fare Changes

The City of Key West Department of Transportation defines the service and/or fare numeric threshold for purposes of a major fare or service change as :

**MAJOR** service and/or fare changes which proposes a net result of service expansion or reduction that changes a value **equal to or greater than 33%** of the total sum value of all public transit services (system-wide) in operation at the time of said discussion and proposal – will allow for public comment, public input and public participation processes. Such changes will justify a MAJOR service/fare change proposal and will trigger the best practice “FTA Service & Fare Analysis Questionnaire” identified in Chapter IV of said provisions on Service and Fare Analysis.

A **MINOR** change to service and/or fare will be any other changes that result in a **value less than 33%** total ; when compared to the total system hours or miles operated and currently in service at the time of the change, in all transit service areas. A minor service change will not trigger the best practice “FTA Service & Fare Analysis Questionnaire” identified in Chapter IV of these provisions.

In an effort to exemplify this process – the following has been provided as a checklist to be used for any and all route changes, route revisions, fare changes or other related service area changes with regard to public transportation services for Key West Transit and the Lower Keys area currently served by the City of Key West Department of Transportation.

- 1) What service and/or fare changes does KWT propose?
- 2) Please describe the nature of the change, the basis or rationale for the change, the modes of service impacted, and the communities affected by the change.
- 3) What are the impacts of the service changes on minority and/or low-income communities?
- 4) What are the transit alternatives available for riders who would be impacted by proposed service changes?
- 5) What, if any measures would KWT take to avoid, minimize, or mitigate any adverse effects of the service and/or fare change on minority populations and/or low-income populations? What, if any enhancements or offsetting benefits would KWT implement in conjunction with the service and/or fare change?
- 6) Would the proposed service and/or fare change have a disproportionately high and adverse effect on minority populations and/or low-income populations?
- 7) What steps does KWT Plan to take to seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach and involvement activities?
- 8) Does KWT believe that it is necessary to disseminate information on the service changes / fare increases that are accessible to Limited English Proficient persons? If so, what steps to provide information in languages other than English does KWT propose?

Note: Title VI and its implementing regulations require the FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). What steps a recipient decides to take should depend on the number and proportion of LEP persons served by the recipient, the frequency with which LEP individuals come into contact with the program, activity, or service, the nature and importance of the program, and the resources available to the recipient and costs of providing language assistance.

Further, please note that all regulations outlined in Circular FTA C 4702.1B, will be adhered to with regard to assessment of environmental justice as noted in the October 1, 2012, revision of same.

## Checklist of Proposed Service and Fare Changes

The following checklist will be used by Key West Transit (KWT) for route changes, route revisions, fare changes, or other related services area changes with regard to public transportation services for Key West and the Lower Keys area currently served by the City of Key West Department of Transportation.

- 1) What service and/or fare changes does KWT proposes?
- 2) Please describe the nature of the change, the bases or rationale for the change, the modes of service impacted, and the communities affected by the change.

Service changes:

Fare changes:

- 3) What are the impacts of the service changes on minority and/or low-income communities?

Route changes:

Span of service:

Fare changes:

- 4) What are the transit alternatives available for riders who would be impacted by proposed service changes?

Service changes:

Fare changes:

- 5) What, if any measures would KWT take to avoid, minimize, or mitigate any adverse effects of the service and/or fare change on minority populations and/or low-income populations? What, if any enhancements or offsetting benefits would KWT implement in conjunction with the service and/or fare change?
- 6) Would the proposed service and/or fare change have a disproportionately high and adverse effect minority populations and/or low-income populations?

*A disproportionately high and adverse effect is that (1) is predominately borne by a minority population and /or a low-income population, or (2) will be suffered by the minority population and /or low-income population and is appreciably more sever or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.*

*In making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancements measures that will be taken and all offsetting benefits to the affected minority and low-income populations may be taken into account.*

- 7) What steps does KWT plan to take to seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach and involvement activities?

*In general, an agency should have a public participation process that offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. Agencies have wide latitude to determine how often specific public involvement measure should take place and what specific measures are most appropriate. Agencies should make these determinations based on the composition of the population affected by the recipient's action, the type of public involvement process planned by the recipient, and the resources available to the agency. Efforts to involve minority and low-income people in the public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical, or*

*other barriers that may prevent minority and low-income populations from effectively participating in a recipient's decision making.*

- 8) Does KWT believe that it is necessary to disseminate information on the service changes/fare increase that is accessible to Limited English Proficient persons? If so, what steps to provide information in language other than English does KWT propose?

*Note: Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). What steps a recipient decides to take should depend on the number and proportion of LEP persons served by the recipient, the frequency with which LEP individuals come into contact with the program, activity, or service, the nature and importance of the program, activity or service, and the resources available to the recipient and costs of providing language assistance.*

*Further, please note that all regulations outlined in Circular FTA C 4702.1B, will be adhered to with regard to assessment of Responsibilities of Limited English Proficient (LEP) Persons as noted in the October 1, 2012, revision of same.*

## **TITLE VI AND LIMITED ENGLISH PROFICIENCY**

### TECHNICAL ASSISTANCE RESOURCES

The following resources should help recipients and subrecipients integrate the guidance and procedures of this circular into their planning and operations. Recipients seeking additional resources that may have been published subsequent to the date of this circular may inquire with their local FTA Regional Office of FTA's Office of Civil Rights. Technical assistance resources will be published at the FTA Office of Civil Rights website, [www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-compliance](http://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-compliance); on an ongoing basis.

1) Relevant Website – Recipients and subrecipients are encouraged to review information on the following websites :

- a. FTA's Title VI Website – provides an overview of FTA's Title VI activities, including links to recent compliance reviews of recipients, related Web sites, policy guidance and procedures, and instructions on how to file a Title VI complaint. [www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-compliance](http://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-compliance).
- b. Federal Interagency Working Group on Limited English Proficiency Website is at [www.lep.gov](http://www.lep.gov). At this website you will find promotional and cooperative understanding of the importance of language access to Federal programs and Federally assisted programs. The site acts as a clearing house, providing and linking to information, tool, and technical assistance regarding limited English proficiency and language services for Federal agencies, recipients of Federal funds, users of Federal programs and Federally assisted programs, and other stakeholders.
- c. U.S Department of Justice Civil Rights Division. [www.justice.gov/crt](http://www.justice.gov/crt). The Civil Rights Division of the Department of Justice, established in 1957, is the program institution within the Federal Government responsible for coordinating the implementation and enforcement of Federal statutes prohibiting discrimination on the basis of race, color, national origin, and other protected classes.
- d. Community Impact Assessment Website. [www.transit.dot.gov/environmental-justice/fag](http://www.transit.dot.gov/environmental-justice/fag)  
The Community Impact Assessment (CIA) website seeks to inform transportation officials and the general public about the potential impacts of proposed transportation actions on communities and their subpopulations.
- e. United We Ride. [www.transit.dot.gov/ccam/resources/united-we-ride-national-dialogue](http://www.transit.dot.gov/ccam/resources/united-we-ride-national-dialogue). [www.transit.dot.gov/ccam/about/faqs](http://www.transit.dot.gov/ccam/about/faqs). United We Ride is an interagency Federal national initiative that supports States and their localities in developing coordinated human service delivery systems. In addition to State coordination grants, United We Ride provides State and local agencies a transportation-coordination and planning self-assessment tool, help along the way, technical assistance, and other resources to help their communities succeed.

2) Technical Assistance Products. Recipients and subrecipients are encouraged to review information on the following technical assistance products. Interested parties can access these products through the relevant website or by contacting FTA's Office of Civil Rights.

- a. "How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision Making". [www.fhwa.dot.gov/planning/publications/low\\_limited/index.cfm](http://www.fhwa.dot.gov/planning/publications/low_limited/index.cfm). This report documents "best practices" in identifying and engaging low-literacy and limited-English-proficiency populations in transportation decision making. These "best practices" were collected during telephone interviews with individuals in 30 States.
- b. "Disaster Response and Recovery Resource for Transit Agencies"  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/Tips\\_LEP\\_emergency\\_preparedness.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/Tips_LEP_emergency_preparedness.pdf)  
This resource provides local transit agencies and transportation providers with useful information and best practices in emergency preparedness and disaster response and recovery, including information on how to respond to the needs of low-income persons, limited English proficient persons, persons with disabilities, and older adults.



# Limited English Proficiency



## Program Plan Document

**(Providing Language Access to Persons with  
Limited English Proficiency and Low Literacy)**

**(Appendix to Title VI / Civil Right Act, 1964 as amended)**

City of Key West  
Department of Transportation  
Limited English Proficiency (LEP) Standards

**Introduction**

The Federal Transit Administration (FTA) and the US Department; along with the State of Florida Department of Transportation district offices require a Limited English Proficiency Plan for those individuals to be afforded the same or equal opportunity to all services rendered of all public transportation agencies. Thus, a plan for evaluation, development and implementation of Limited English Proficiency in the fixed route public transit service area is required.

Title VI of the Civil Rights Act 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receive Federal financial assistance.

**Executive Order 13166**

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" reprinted at 65 FR 50121 (August 16, 2000) directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.

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

**Application of the Four Factor Framework**

FTA/Region IV provides best practices and standards which include the "Four Factor Framework" as guidance to assist agencies with assessment, development and implementation of a Limited English Proficiency (LEP) program plans. This plan is then required to be adopted and included as the City of Key West Department of Transportation (KWDoT) also known as Key West Transit (KWT) Title VI of the Civil Rights Plan.

In Circular C, FTA 4702.1B refers to assistance of whom, how and other facts rendered on the legal basis for language assistance programs and requirements. This section is intended to provide necessary framework via FTA/LEP guidance for applying the four factors of data to the LEP program plan – for compliance and update, as follows below:

- Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program or Recipient.
- Factor 2: The Frequency with which LEP Persons come into Contact with the Program.
- Factor 3: The Nature and Importance of the Program, Activity, or Services provided by the Program to people's lives.
- Factor 4: The Resources Available to the Recipient for LEP outreach, as well as the Costs Associated with that Outreach.

## **Four Factor Analysis**

### **1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, recipient, or service**

Agencies are recommended to examine prior experiences with LEP individuals which also provides for agency insight and adoption of best practices methodologies on how to measure the ratio of customers or populations in your service area who may have limited English proficiency by communicating on a regular basis with your agencies dispatchers, bus drivers and supervisors, as well as maintenance employees who are the frontline employees that come into contact with these individuals of limited English proficiency in performance of their daily job duties. Those positions that are included in this process at KWDoT are:

- Transit vehicle operators
- Transit mechanics / helpers
- Dispatch
- Supervisors

Additional mechanisms which are factored into our data collection include but are not limited to:

- Call records to the agency
- Attendance and participation of civic organization events, public hearings, city commission meetings and other community outreach events.
- Website information postings via [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov)
- Real Time public transit information system (GPS, AVL, IVR and posted web-based notices on [www.kwtransit.com](http://www.kwtransit.com) - where text, voice and mapping options are available 24 hours per day / 7 days per week, via (305) 600-1455.

By utilizing data via State and Federal (2018 US Census) information – it is recommended that recipients and subrecipients become familiar with information available, along with data from the American Community Survey (ACS) branch; and incorporate this data into the evaluation process. This will serve to assist agencies with identifying geographic boundaries of the area that each agency serves in order to evaluate the need for language assisted programs.

City of Key West Department of Transportation (KWDoT) / Key West Transit (KWT) incorporates quarterly staff meetings with drivers and dispatch personnel to identify specific areas of service that might require language assisted programs be developed. To date, KWT is aware that LEP programs need to be offered to two (2) distinct populations in the City of Key West – they are Spanish and French or Creole speaking customers.

Part of our new driver orientation and training process includes distribution of pocket reference booklets to be used by our operators in an active bus route service - to assist with any issue which may arise regarding a language barrier situation but also to further the process of identification of the LEP persons' primary language so that we can offer and provide necessary translation services as may be required. The City of Key West Police Department (KWPD) has contract providers on call 24/7 for this service.

It is required to analyze the data collected; and, then identify concentrations of LEP persons within the service area. This has been successfully accomplished most recently with information gathered via our quarterly bus driver and supervisory staff meetings but also as a direct result of recent 2018 US Census data.

By using State and Local resources which we also incorporate into our data gathering processes; together with agencies requiring a community outreach or reach out program for identified LEP organizations or persons. All of which is included in our quarterly exchange of information internally and externally as well as our efforts to be involved and participate at as many community programs as possible but a minimum of four (4) per calendar year.

# PEOPLE

Population	
Population estimates, July 1, 2019, (V2019)	74,228
Population estimates base, April 1, 2010, (V2019)	73,090
Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)	1.6%
Population, Census, April 1, 2010	73,090
Race and Hispanic Origin	
White alone, percent	89.3%
Black or African American alone, percent(a)	6.9%
American Indian and Alaska Native alone, percent(a)	0.5%
Asian alone, percent(a)	1.4%
Native Hawaiian and Other Pacific Islander alone, percent(a)	0.1%
Two or More Races, percent	1.8%
Hispanic or Latino, percent(b)	24.9%
White alone, not Hispanic or Latino, percent	65.8%

**Fact Notes:** (a) includes persons reporting only one race, (b) Hispanics may be of any race, so also are included in applicable race categories

## 2. The frequency with which LEP individuals come in contact with the program.

Requires that the agency identify programs and services rendered, along with the information gathered from the community, civic and governmental organizations for assessment of the language assisted program highlights and areas of service in concentrated populations.

KWT participates in community organizational events and public meetings such as Local Coordinating Board (LCB), City of Key West Commission Meetings, Goombay Activities, College of the Florida Keys Community Day, National Night Out, and few other events. These events are held at a minimum of once per quarter/year in all areas of Key West and the Lower Keys, Florida.

KWT is fortunate to have a good representation internally of employees who are of the Hispanic and Creole/French ethnicity. These employees are also great ambassadors for KWT with regard to their immediate residential communities as well as the religious affiliated organizations. See table below for language spoken in Monroe County.

Monroe County, Florida						
Total						
Percent of specified language speakers						
2018 ACS 5-Year Estimates	Total		Speak English only or speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	72,775	+/-46	65,373	+/-620	7,402	+/-627
Speak only English	55,809	+/-904	(X)	(X)	(X)	(X)
Speak a language other than English	16,966	+/-911	9,564	+/-780	7,402	+/-627
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>						
Spanish	12,773	+/-721	6,979	+/-608	5,794	+/-582
Other Indo-European languages	3,121	+/-625	2,066	+/-429	1,055	+/-340
Asian and Pacific Island languages	820	+/-234	337	+/-126	483	+/-200
Other languages	252	+/-138	182	+/-108	70	+/-60

**3. The nature and importance of the program, activity, or service provided by the program to people’s lives**

KWT Operations are aware of the importance of providing meaningful access to information and services for LEP persons. Due to the large share of Spanish and French/Haitian Creole speaking persons in the Key West Transit’s service area, Customer Service Representatives, bus operators, management are available to provide assistance to customers who speaks Spanish and French/Creole.

KWT will work with social services, Monroe County Transit (MCT), Key West Housing Authority, and other public services within the fixed route service area that focuses on outreach to these LEP populations.

**4. The resources available to the grantee/recipient and costs.**

All processes have been identified earlier in the Plan document which the agencies should constantly monitor and evaluate their LEP plans for revision accordingly – all based on feedback from both customers and employees, community representatives, staff and internal monitoring, as well as obvious changes to demographic structures or environmental issues or concerns.

KWT will consider new techniques to reach the LEP population, such as (1) the translation of key elements of the Transit Website, (2) the translation of other appropriate materials typically used to increase ridership and help LEP individuals best utilize the system. Additionally, KWT will continue to explore the use of internal and City staff in other departments to assist with citizen outreach.

**Section III Developing a Language Assistance Plan**

**Task 1** – Identify LEP persons, communities or neighborhoods within your service areas is critical to the success of any LEP program. Based on the current resources available, KWT is providing the most cost-effective means of delivering LEP assistance in its service area. KWT will continue to monitor the need for additional language assistance in Spanish or translation to new languages for the following:

- Requests for information in a language other than English
- Translation requests for materials
- Translation requests for public meetings

Key West Transit is very fortunate with employing a diverse multilingual staff to assist with any issue which may arise regarding a language barrier situation. The City of Key West Police Department (KWPD) has contract providers on call 24/7 for this service.

**Task 2** - Providing the LEP assistance identified and required to customers of the transit agency is also critical to the successes of any program – this requires that we identify programs and services rendered,

along with the information gathered from the community, civic and governmental organizations for assessment of the language assisted program highlights and areas of service in concentrated populations.

In order to plan for efficient, effective, safe, equitable, and reliable transportation service, KWT must have input of its public. The City and KWT spends extensive staff and financial resources in furtherance of this goal and strongly encourages the participation of the entire community. Any person may attend the City Commission meeting and speak during the Public portion of the agenda concerning a matter of City business of concern to the person. City Commission meetings are generally held the first and third Tuesday of each month, held at the City of Key West City Hall, 1300 White Street, Key West, FL 33040. Workshop and/or special meetings are on an “as needed basis” and are scheduled and publicly noticed if needed. Interested parties should check the City’s website [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov) or [www.kwtransit.com](http://www.kwtransit.com) for any changes to meeting dates, times, and location.

**Task 3** - Providing notice to LEP persons – requires agencies work toward establishing a needs assessment process and hosting of various public hearings with language assisted services advertised for said meetings in identified LEP translated forms.

KWT will provide the Title VI information in English on the City’s website as well as the Transit’s website. Notices are also posted in the Transit Facility lobby and in all transit vehicles. 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.

**Task 4** – This plan is designed to be flexible and 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
- Determine as to whether the need for translation services has changed

Key West Transit understands the value that its service plays in the lives of individual who rely on this service and the importance of any measures undertaken to make the use of system easier.

**Task 5** – Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions to implement Task 5 of the Language Assistance Plan:

- Identify agency staff likely to come into contact with LEP individuals
- Identify existing staff training opportunities
- Provide regular re-training for staff dealing with LEP individual needs
- Designing and implementing LEP training for agency staff

Key West Transit is very fortunate to have good representation internally of employees who are of Hispanic and Creole ethnicity.