

# Federal Transit Administration Title VI / Civil Rights Program Plan

Prepared by:

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## Introduction

As a direct recipient of Federal Transit Administration (FTA) funds and a subrecipient that receives funding “passed through” from an entity that received funding from FTA, 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 and Florida Department of Transportation (FDOT) 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 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. (See appendix B, pg. 13 Title VI Notice to the Public).
- Title VI Complaint Procedures (see appendix C, pg. 14) and complaint form (see appendix D, pg. 15 – 17).

- 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. *(See appendix E, pg. 18).*
- 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 a narrative or description of efforts the primary recipients uses to ensure subrecipients are complying with Title VI, as well as 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.
- 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.

### ***Notification to Beneficiaries of Title VI Protections***

Key West Transit is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with Title 49 CFR Section 21.9(d) and guidance provided in FTA Circular 4702.1B, Key West Transit’s Civil Rights Policy includes:

- I. A statement that the agency operates programs without regard to race, color, or national origin.
- II. 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.
- III. A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.

Key West Transit’s Title VI Civil Rights Program Plan can be found on the following websites:

<https://www.cityofkeywest-fl.gov/DocumentCenter/View/3222/Federal-Transit-Administration-2020-Title-VI-Civil-Rights-Program-Plan>

<https://kwtransit.com/>

#### **Effective Practices for Fulfilling the Notification Requirement**

1. **Disseminations:** Notice to the Public regarding Key West Transit’s Title VI Civil Rights Program Plan has been posted in the Transit Facility lobby, breakrooms, bus operators office, and in all transit revenue buses. *(See appendix B for Title VI Notice to Public).*
2. **Document translations:** Title VI obligations and complaint procedures shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and 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. (See *appendix B – Notice to the Public*) Below is a list of locations where the notice is posted:

- All Transit Revenue Vehicles
- Key West Transit Facility
- Kwtransit.com website
- City of Key West website

### **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 has been zero 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 and 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 Police Department Emergency Dispatch Division at (305) 809-1111. Below is an excerpt from Key West Police Departments website.

### **Florida Relay Service**

The City of Key West uses the Florida Relay System to communicate with persons with hearing or speech impairments. Customers with hearing or speech impairments dial the appropriate number from the list below and provide the operator with the phone number in the City that they want to communicate with, so that staff who uses standard telephone equipment can be reached.

### **Contact the City**

- Phone: 7-1-1(V)
- Phone: 800-955-8771 (TTY)
- Phone: 800-955-8770 (Voice)
- Phone: 877-955-5334 (STS)
- Phone: 877-955-8773 (Spanish)

### ***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**

To ensure compliance with 49 CFR Section 21.9, Key West Transit is required to conduct a Title VI equity analysis for new locations or facilities in order to ensure that locations are selected without regard to race, color, or national origin. Since last program submission, there were no plans for future facilities or new locations for future facilities.

**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 the 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 an 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 D: Title VI Complaint Form(s) (General Requirement) The complaint forms are also available in Spanish and French	14-16
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 G: 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 H: 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>	20-21
Appendix M: 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>	22

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.

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.

# **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 and 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 him/her 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 wishes 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.

**SECCION I:**

Nombre:

Teléfono (Celda / Inicio / Trabajo):

Dirección:

Dirección de correo electrónico:

**SECCION II:**

re que la discriminación que experimenté se basó en (marque todo lo que corresponda):

Raza     Color     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**

CITY OF KEY WEST DEPT. OF TRANSPORTATION	DATE (Month, Day, Year)	SUMMARY OF ALLEGATIONS (race, color, or National Origin)	STATUS (active or closed)	ACTIONS TAKEN / FINAL FINDINGS
<b>INVESTIGATIONS</b>				
1)				
2)				
<b>LAWSUITS</b>				
1)				
2)				
<b>COMPLAINTS</b>				
1)				
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 standards 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
23' Cutaway	15	0	15	0
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 five (5) route network :

- Four (4) routes in Key West operate a seven (7) day week (Northline, Southline, Duval Loop & Key West Rides On-Demand service)
- 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
Northline	1 hour & 15 min	16	7
Southline	1 hour & 15 min	16	7
Northline & Southline Weekend Service	AM service hours: 6am to 9:55am PM service hours: 3:45pm to 7:50pm	10 Northline 10 Southline	7
Duval Loop	20 mins	26	7
Key West Rides On-Demand Service	30 mins	16	7
Workforce Express Split Shift	AM service hours: 6am to 10:30am PM service hours: 3:40pm to 8:30pm	10	7
Lower Keys Shuttle (North / South)	2 hours	North – 20 South - 20	7

\*Please note as of June 5, 2023 the Northline and Southline are no longer in service and Workforce Express is in service.

## ON-TIME PERFORMANCE STANDARDS :

A vehicle is considered on time if it departs at 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 :

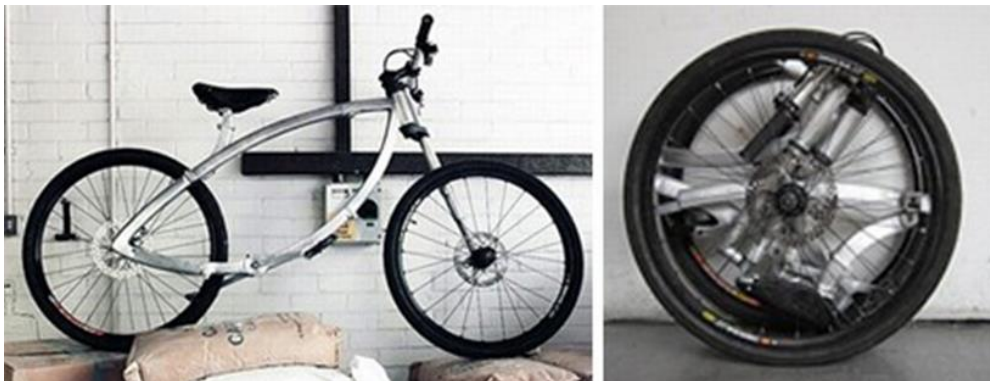
Key West Transit (KWT) services are to provide a safe, dependable and alternate mode of travel in the City of Key West and its' adjoining communities up to the City of Marathon; for residents and visitors alike.

KWT operates Key West On-Demand (KWRides), two (2) fixed routes and one (1) Commuter route which are:

- Workforce Express
- Duval Loop
- Lower Keys Shuttle (services Key West and up to City of 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 and four (4) cutaways 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. There are *No Bus Service* on Thanksgiving, Christmas Day, and New Year's Day.

KWDoT has four (4) 23' Cutaways, ten (10) 30' Gillig Low Floor buses and three (3) 35' Gillig Low Floor buses. The 35' Gillig buses only operate the Lower Keys Shuttle Route and the 30' Gillig buses are regularly assigned to different routes in the system so that no route is disproportionately served by the oldest to newest vehicles. The cutaways are used only in the City of Key West and Stock Island.

## TRANSIT AMENITIES POLICY

Key West 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. 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.



Whitehead and Eaton Street



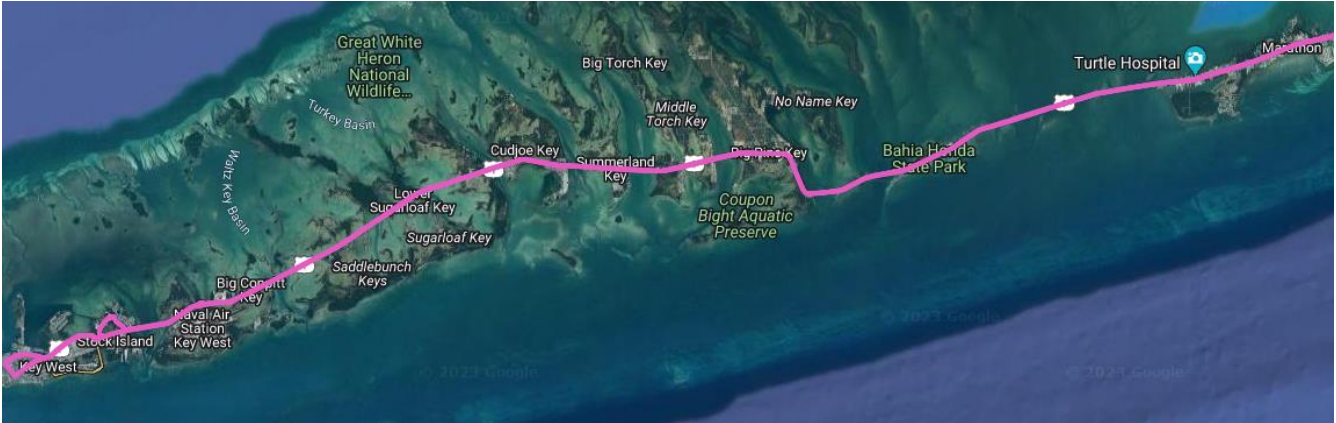
North Roosevelt / Home Depot



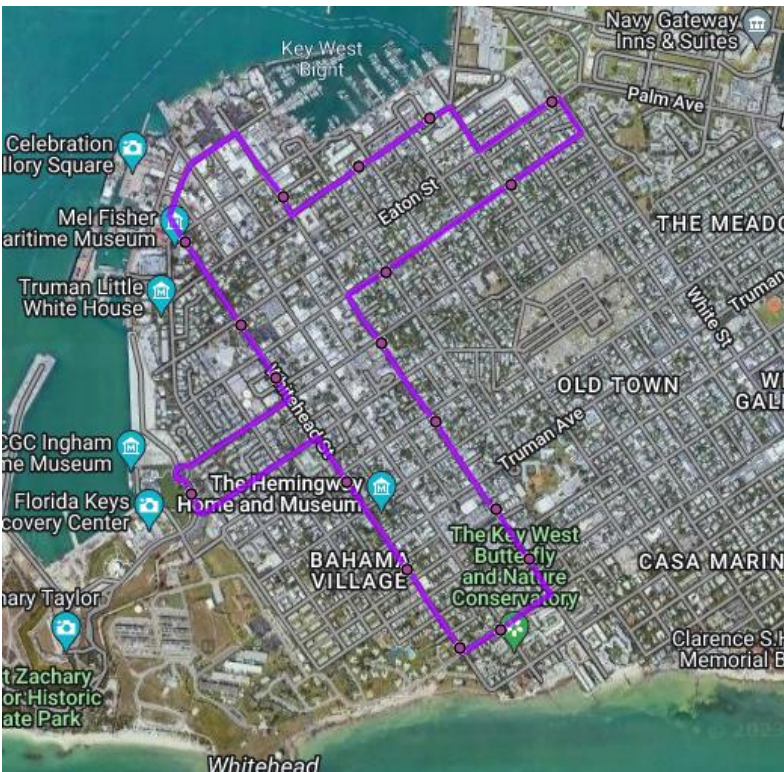
Truman Waterfront Park

KWT 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.

Lower Keys Shuttle Route Map:



Duval Loop Route Map :



# 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.