




MEMORANDUM

Date: December 14, 2023

To: Honorable Mayor and Commissioners

Via: Albert P. Childress 
City Manager

From: Rodrigo Delostrinos
Director of Transportation

Subject: Approve the City of Key West Transit Triennial Civil Rights Title VI Program Plan and Limited English Proficiency Plan, as required by Federal Transit Administration (FTA).

Introduction

Approve the City of Key West Transit's Triennial Civil Rights Title VI Program Plan and Limited English Proficiency Plan (LEP) as are required for grant funding compliance of the Federal Transit Administration (FTA) and Florida Department of Transportation (FDOT).

Background

The Civil Rights Act of 1964- Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English proficient (LEP) persons. Under DOT's Title VI regulations, recipients of Federal financial assistance are prohibited from, among other things, using "criteria or methods of administering its program which have the effect of subjecting individuals to discrimination based on their race, color, or national origin." For example, facially neutral policies or 1 See Title VI Legal Manual, U.S. Department of Justice Civil Rights Division (2001), page 59. FTA C 4702.1B Chap. I-7 practices that result in discriminatory effects or disparate impacts violate DOT's Title VI regulations, unless the recipient can show the policies or practices are substantially justified and there is no less discriminatory alternative. In addition, Title VI and DOT regulations prohibit recipients from intentionally discriminating against people on the basis of race, color, and national origin.

As an FTA direct recipient and FDOT sub-recipient of grant funding, the City of Key West Department of Transportation, also known as Key West Transit (KWT), is required to submit a Civil Rights Act of 1964 Title VI Program Plan and Limited English Proficiency Plan (LEP) to FTA Region 4 office every three (3) years.

Procurement

Compliance with these policies ensures continued eligibility for federal and state financial assistance awards. FTA and FDOT require recipients and sub-recipients to adopt a Title VI / Civil Rights Program Plan and LAP program plan policy. The Title VI / Civil Rights Program Plan and LAP Program plan are valid for a three (3) year period.

Recommendation

Approve the City of Key West Transit's Triennial Civil Rights Title VI Program Plan and Limited English Proficiency Plan.

Exhibits:

Exhibit A Title VI Plan

Exhibit B Limited English Proficiency Plan