



City of Wilton Manors ♦ Leisure Services Department  
2020 Wilton Drive, Wilton Manors, FL 33305  
954-390-2130 ♦ Fax 954-390-2138  
WiltonManors.com/parks

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## **Title VI/Nondiscrimination Policy and Plan for Sub-Recipients in the Local Agency Program (LAP)**

### **Policy Statement:**

The City of Wilton Manors values diversity and welcomes input from all interested parties, regardless of cultural identity, background or income level. Moreover, the City believes that the best programs and services result from careful consideration of the needs of all of its communities and when those communities are involved in the transportation decision making process. Thus, the City of Wilton Manors does not tolerate discrimination in any of its programs, services or activities. Pursuant to Title VI of the Civil Rights Act of 1964 and other federal and state authorities, the City of Wilton Manors will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, sexual orientation, gender, gender identity, age, disability, religion, income or family status.

### **Complaint Procedures:**

The City of Wilton Manors has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been subjected to discrimination based upon race, color, national origin, sex, sexual orientation, gender, gender identity, religion, age, disability, family or income status in any of the City of Wilton Manors' programs, services or activities may file a complaint with the City's Title VI/Nondiscrimination Coordinator:

Dio Sanchez, Human Resources Director/ Nondiscrimination Coordinator  
2020 Wilton Drive  
Wilton Manors, FL 33305  
DSanchez@wiltonmanors.com  
(954) 390-2107  
(954) 390-2199  
Hearing Impaired: 1-800-955-8777

### **Hearing Impaired:**

If possible, the complaint should be submitted in writing and contain the identity of the complainant; the basis for the allegations (i.e., race, color, national origin, sex, religion, age, disability or family status); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, the complainant should contact the Title VI/Nondiscrimination Coordinator for assistance.

The Title VI/Nondiscrimination Coordinator will respond to the complaint within thirty (30) calendar days and will take reasonable steps to resolve the matter. Should the City be unable to satisfactorily resolve a



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complaint, the City will forward the complaint, along with a record of its disposition to the appropriate District of the Florida Department of Transportation (FDOT).

The City's Title VI Coordinator has 'easy access' to City's Chief Executive Officer (CEO) and is not required to obtain management or other approval to discuss discrimination issues with the CEO. However, should the complainant be unable or unwilling to complain to the City, the written complaint may be submitted directly to Florida Department of Transportation (FDOT). FDOT will serve as a clearing house, forwarding the complaint to the appropriate state or federal agency:

Florida Department of Transportation  
Equal Opportunity Office  
ATTN: Title VI Complaint Processing  
605 Suwannee Street MS 65  
Tallahassee, FL 32399

**ADA/504 Statement:**

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

The City will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. The City will make every effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include representation by the disabled community and disability service groups.

The City encourages the public to report any facility, program, service or activity that appears inaccessible to those who are disabled. Furthermore, the City will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, the City asks that requests be made at least thirty (30) calendar days prior to the need for accommodation.

Questions, concerns, comments or requests for accommodation should be made to the City's ADA Officer:  
Johnnie Goodnight, Office Manager, City Manager's Office  
2020 Wilton Drive, Wilton Manors, FL 33305  
JGoodnight@wiltonmanors.com  
Phone: (954) 390-2120  
Fax: (954) 390-2199



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### **Limited English Proficiency (LEP) Guidance:**

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and US Department of Transportation (DOT) require federal-aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently. To determine the extent to which LEP series are required and in which languages, the law requires the analysis of four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the City/County's programs, services or activities;
- The frequency with which LEP individuals come in contact with these programs, services or activities;
- The nature and importance of the program, service, or activity to people's lives and;
- The resources available to the City/County and the likely costs of the LEP services.

1. Using census data, the Agency has determined that LEP individuals speaking English less than well represent approximately 9.1% of the community. The Agency realizes that such statistical data can become outdated or inaccurate. Therefore, the Agency contacted local law enforcement, social services agencies, and the school board to validate the proportion of LEP served by those entities. Spanish was reported to be the prevalent LEP language with an estimate of 10.8% eligible to be served.
2. The Agency has not received requests for translation or interpretation of its programs, services, or activities into Spanish or other language(s). In addition, Agency sponsored community outreach or public events are not attended by significant numbers of LEP individual speakers. Thus, the Agency estimates its contact with LEP individuals to be infrequent.
3. The Agency believes that transportation is of critical importance to its public, as access to health care, emergency services, employment, and other essentials would be difficult or impossible without reliable transportation systems. In that spirit, the agency defines as essential, any document that advises the public of how to access nondiscrimination and public involvement policies, as well as those that impact public safety, health and welfare, and emergency services. A full list of translated documents is available by contacting the Agency Title VI/Nondiscrimination Coordinator.



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4. The Agency is fortunate to house within/near its jurisdiction one or more institutions of higher education which have extensive language resources. Further, the Agency maintains cordial relationships with community organizations that offer competent language services at low or no cost to the Agency. Finally, the Agency employs a number of proficient Spanish and Creole speakers that are able to interpret and/or provide translation services.

The analyses of these factors suggest that LEP services are required at this time. At a minimum the Agency commits to:

- Maintain a list of employees who competently speak the LEP language(s) and who are willing to provide translation and/or interpretation services.
- Distribute this list to staff that regularly has contact with the public.

The agency Understands that its community characteristics change and that the four factor analysis may reveal the need for more or varied LEP services in the future. As such, it will at least triennially examine its LEP plan to ensure that its remains reflective of the community's needs.

Persons requiring special language services should contact the Agency's Title VI/Nondiscrimination Coordinator.

#### **Public Involvement:**

In order to plan for efficient, effective, safe, equitable and reliable transportation systems, the City must have the input of its public. The City spends extensive staff and financial resources in furtherance of this goal and strongly encourages the participation of the entire community. The City holds a number of transportation meetings, workshops and other events designed to gather public input on project planning and construction. Further, the City attends and participates in other community events to promote its services to the public. Finally, the City is constantly seeking ways of measuring the effectiveness of its public involvement.

Persons wishing to request special presentations by the City; volunteer in any of its activities or offer suggestions for improvement of City public involvement may contact:

Dio Sanchez, Human Resources Director  
2020 Wilton Drive  
Wilton Manors, FL 33305  
[dsanchez@wiltonmanors.com](mailto:dsanchez@wiltonmanors.com)  
Phone: (954) 390-2126  
Fax: (954) 390-2199  
Hearing Impaired: 1-800-955-8771



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**Data Collection:**

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

**Assurances:**

Every three years, or commensurate with a change in City executive leadership year, the City must certify to FHWA and FDOT that its programs, services and activities are being conducted in a nondiscriminatory manner. These certifications are termed 'assurances' and serve two important purposes. First, they document the City's commitment to nondiscrimination and equitable service to its community. Second, they serve as a legally enforceable agreement by which the City may be held liable for breach. The public may view the assurance by visiting the City's offices.

  
\_\_\_\_\_  
Title VI Coordinator

  
\_\_\_\_\_  
Date