



## **CITY OF MIRAMAR**

### **TITLE VI NON-DISCRIMINATION POLICY AND PLAN**

#### **PURPOSE**

The City of Miramar, (hereafter, the City) as a recipient of Federal financial assistance and under Title VI of the Civil Rights Act of 1964 and the related statutes, ensures that no person shall on the grounds of race, color, national origin, sex, religion, age, disability, family or income status be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination or retaliation under any federally and/or non-federally funded City programs or activities administered by the City or its contractors.

#### **POLICY**

The City 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 its communities and when those communities are involved in the transportation decision making process. Thus, City 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 will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, religion, age, disability, family or income status.

#### **NOTICE TO THE PUBLIC**

The City is committed to the delivery of equitable and accessible transportation services and to ensuring that no person is excluded from participation in or denied services on the basis of race, color, national origin, sex, religion, age, disability, family or income status, as provided by Title VI of the Civil Rights Act of 1964. In addition to Title VI of the Civil Rights Act, the City of Miramar also prohibits discrimination based on gender, age, (dis)ability, or sexual orientation. Any person who believes that they have been subjected to discrimination in the delivery of transportation services on the basis of race, color, national origin, sex, religion, age, disability, family or income status, or of other classes protected by the City, may file a complaint by using the information provided below. Details on the program can be found at the following website: <http://www.miramarfl.gov/TitleVI>.

#### **PROCEDURE**

The City 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, religion, age, disability, family or income status in any of City's programs, services or activities may file a complaint with the City Title VI/Nondiscrimination

Coordinator:

Sheron Harding, Interim Assistant Director of Human Resources  
954.602.3835  
[smharding@miramarfl.gov](mailto:smharding@miramarfl.gov)  
2300 Civic Center Place - Miramar, FL 33025

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, family or income 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 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 the City 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/county, the written complaint may be submitted directly to 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 seven (7) to ten (10) calendar days prior to the need for accommodation. Questions, concerns, comments or requests for accommodation should be made to the city/county's ADA Officer:

Sheron Harding, Interim Assistant Director of Human Resources  
954.602.3835  
[smharding@miramarfl.gov](mailto:smharding@miramarfl.gov)  
2300 Civic Center Place - Miramar, FL 33025

**LIMITED ENGLISH PROFICIENCY (LEP) GUIDELINES**

- a. 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 services are required and in which languages, the law requires the analysis of four factors:
  - b. 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.
  - c. The frequency with which LEP individuals come in contact with these programs, services or activities.
  - d. The nature and importance of the program, service, or activity to people's lives and.
  - e. The resources available to the City/County and the likely costs of the LEP services.
1. Using census data, the City has determined that LEP individuals speaking English less than well represent approximately 14.80% of the community. The City realizes that such statistical data can become outdated or inaccurate. Therefore, the City 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 70.00% eligible to be served.
2. The City has received request for translation or interpretation of its programs, service or activities into Spanish or other language(s). In addition, City sponsored community outreach or public events are attended by significant numbers of LEP individual speakers. Thus, the City estimates its contact with

LEP individuals to be frequent.

3. The City 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 City 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 on the City website or by contacting the City Title VI/Nondiscrimination Coordinator.
4. The City is fortunate to house within/near its jurisdiction one or more institutions of higher education which have extensive language resources. Further, the City maintains cordial relationships with faith based and/or community organizations that offer competent language services at low or no cost to the City. Finally, the City employs several proficient Spanish speakers that are able to interpret and/ or provide translation services.

The analyses of these factors suggest that LEP services are not required at this time. At a minimum, the City 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.
- Provide public notification in the LEP language of the availability of language assistance, free of charge.

The City 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 it remains reflective of the community's needs. Persons requiring special language services should contact the City'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 hosts an informative website that advises the public how it can access information and provide input. The City also holds public meetings, workshops and other events designed to gather public input on program/project planning and construction. Further, the City sponsors, 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, offer suggestions for involvement, or to simply learn more about the City programs and services should visit: [www.miramarfl.gov/31/Community](http://www.miramarfl.gov/31/Community). Or contact:

Name: Sheron Harding, Interim Assistant Director of  
Human Resources  
Address: 2300 Civic Center Place, Miramar, FL, 33025  
Email: [smharding@miramarfl.gov](mailto:smharding@miramarfl.gov)  
Phone: 954-602-3835

**DATA COLLECTION**

FHWA 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 City programs, services or activities. This information assists the City with improving service equity and ensuring effective outreach. 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 FHWA regulations.

By:   
City Manager

Date 8-25-2021