

Town of Miami Lakes



Title VI Program Plan



6601 Main Street • Miami Lakes, Florida, 33016
Office: (305) 364-6100 • Fax: (305) 558-8511
Website: www.miamilakes-fl.gov

Miami Lakes

Title VI Program Plan

Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, national origin, sex, age, disability, religion, and family status in programs, services and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, national origin, sex, age, disability, religion, and family status, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, activity or service receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The Town of Miami Lakes is committed to ensuring that no person is excluded from participation in, or denied the benefits of all of its programs, services and activities on the basis of race, color, national origin, sex, age, disability, religion, and family status as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B and FHWA regulations 23 CFR 200.

This Plan was developed to guide the Town of Miami Lakes in its administration and management of Title VI-related programs.

Title VI Coordinator Contact information

Gina Inguanzo
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014
305-364-6100

Title VI Information Dissemination Procedure

Title VI information posters shall be prominently and publicly displayed on all programs, services or activities. The name and contact information of the Title VI coordinator is available on the Town's website, at www.miamilakes-fl.gov. Additional information relating to the Town's nondiscrimination obligation can be obtained from the Miami Lakes Title VI Coordinator.

Subcontracts and Vendors

The Town of Miami Lakes is responsible for ensuring that contractors and subcontractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors may not discriminate in the selection and retention of any lower tier subcontractors. The Town, contractors, and subcontractors may not discriminate in any activity in connection with federally-assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI/Nondiscrimination Plan.

All subcontractors and vendors who receive payments from The Town of Miami Lakes where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the vendor indicating the receipt of the Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination (Appendix C). The complaint should include the following information:

Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)

How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing to the Town of Miami Lakes at the following address:

Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

NOTE: The Town of Miami Lakes encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. Complaint must be mailed to the Title VI Coordinator no later than 180 days from the alleged date of discrimination.

What happens to the complaint once is it submitted?

All complaints alleging discrimination based on race, color, national origin, sex, age, disability, religion, and family status in a service or benefit provided by the Town of Miami Lakes will be directly addressed by the Title IV Coordinator who shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the Town of Miami Lakes shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Appendix B). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

The Town of Miami Lakes will send a final written response letter (see Appendix D) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix E), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from the Town of Miami Lakes, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by the Town of Miami Lakes, a written response will be drafted subject to review by the Town Attorney. If appropriate, the Town Attorney may administratively close the complaint. In this case, the Town of Miami Lakes will notify the complainant of the action as soon as possible.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

For Transit Complaints:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

For ALL Other Complaints:

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

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 services 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 32.30% 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 32.30% eligible to be served.

2. The Agency has 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 attended by significant numbers of LEP individuals speakers. Thus, the Agency estimates its contact with LEP individuals to be Moderate.

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 on the Agency website or by contacting the Agency Title VI/Nondiscrimination Coordinator.

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 faith based and/or community organizations that offer competent language services at low or no cost to the Agency. Finally, the Agency employs a number of proficient Spanish 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.
- Provide public notification in the LEP language of the availability of language assistance, free of charge.

In addition, the Agency:

1. Has a bilingual website in Spanish and English.
2. Has Spanish Speaking Staff at all events and Town Meetings.
3. Has a good relationship with St. Thomas University who may be called upon for translation service. Will continue to encourage bi-lingual services.
4. Has bilingual drivers who operate transit services on behalf of the Town.
5. Will educate our staff, contractors, and vendors on the Title VI Policy and LEP responsibilities and procedures.

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 it remains reflective of the community's needs

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

Gina Inguanzo
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014
305-364-6100

Public Involvement/Participation Element:

In order to plan for efficient, effective, safe, equitable and reliable transportation systems, the Agency must have the input of its public. The Agency spends extensive staff and financial resources in furtherance of this goal and strongly encourages the participation of the entire community. The Agency hosts an informative website that advises the public how it can access information and provide input. The Agency also holds public meetings, workshops and other events designed to gather public input on program/project planning and construction. Further, the Agency sponsors, attends and participates in other community events to promote its services to the public. Finally, the Agency is constantly seeking ways of measuring the effectiveness of its public involvement.

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

The Town of Miami Lakes continuously seeks innovative methods to engage the public in its planning and decision-making processes, as well as its marketing and outreach activities. Recent outreach initiatives have included:

- Engaging the business community in marketing and promotional efforts for all services and programs.
- Advertising Miami Lakes services and programs in the Town's local paper, "The Miami Laker", and inviting public inquiries.

Resolutions adopted by the Town to apply for and utilize Federal and State grant funding have been posted on the public hearing/meeting agenda web page and were subject to public notice and comment procedures.

The Town of Miami Lakes and its records are available to the public and the Town welcomes their input.

Persons wishing to request special presentations by the Agency; volunteer in any of its activities; offer suggestions for improvement; or to simply learn more about Agency programs and services should visit our website www.miamilakes-fl.gov. The Town's Title VI Complaint Procedure is available to the public 24 hours/7 days a week via our website www.miamilakes-fl.gov.

The Town of Miami Lakes



TITLE VI REQUIREMENTS FOR SERVICE PROVIDERS

Service Standards

The Town of Miami Lakes is not a fixed route service provider. Therefore, Chapter 10.0 does not apply.

The Miami Lakes On-Demand Transportation Service provides point to point ADA accessible transportation within the Town of Miami Lakes with average wait times between 10 to 20 minutes.

- **On-Demand Transportation load for each mode**

The Town of Miami Lakes is not a fixed route service provider. Therefore, Chapter 10.0 does not apply. Currently, the Town has three on-demand transportation shuttles, two shuttles are Polaris GEM e6, 5 passenger shuttles and one shuttle is a Zenith Motors Electric 10 passenger shuttle. Two of the three vehicles are ADA accessible; this includes one of the Polaris GEM e6 and the Zenith Motors Electric Shuttle. All three vehicles are full electric vehicles. Each of these vehicles are owned and operated by the Town's contracted vendor Freebee.

- **On time performance for each mode**

The Miami Lakes On-Demand Transportation Service typically has no significant issues with on time performance. Through additional route analysis and development, the Town plans to add vehicles to reduce wait times and improve overall performance of the service. The Miami Lakes On-Demand Transportation Service provides point to point transportation within the Town of Miami Lakes with average wait times between 10 to 20 minutes.

- **Service availability for each mode**

The Miami Lakes On-Demand Transportation Service is available 5 days a week and on Sundays with the exception of holidays, when the Town's office is closed. Service is available Monday through Friday from 6:00 a.m.-6:30 p.m. All vehicles adhere to ADA guidelines for passenger accessibility and encourage the use of alternative transportation methods such as; transit, walking, and biking.

Service Policies

- **Transit Amenities**

Through an Interlocal Agreement with Miami-Dade County the Town has the expanded the availability of transit stop amenities, which includes the usage of Miami-Dade County Metrobus benches and shelters. This allows passengers to wait for various modes of transit at one stop.

- **Vehicle Assignment**

The Miami Lakes Fleet currently consists of three vehicles which are provided through a contractual lease from the Town's transit vendor who own and operates the on-demand transportation services on the Town's behalf. The make and model of the shuttles are as follows:

Make: Polaris

Model: GEM e 6 (Electric)

ADA Accessible: 1 Vehicle

Make: Zenith Motor

Model: Electric Passenger Van

ADA Accessible: 1 Vehicle

These shuttles operate as an on-demand transportation service throughout the Town.

APPENDIX

Appendix A

Notifying the Public of Rights Under Title VI

The Town of Miami Lakes

- The Town of Miami Lakes operates its programs and services without regard to race, color, national origin, sex, age, disability, religion, and family status in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Town of Miami Lakes.
- For more information on the Town of Miami Lakes' civil rights program, and the procedures to file a complaint, contact 305-364-6100; email inguanzog@miamilakes-fl.gov; or visit Town Hall at 6601 Main Street, Miami Lakes, FL 33014. For more information, visit www.miamilakes-fl.gov.
- A complainant may 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, 5thFloor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If you require information in Spanish, contact 305-364-6100.
 - Si usted requiere información en español por favor llamar 305-364-6100.

Appendix B

Title VI Complaint Procedures

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, national origin, sex, age, disability, religion, and family status be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Any person who believes he or she has been discriminated against on the basis of race, color, national origin, sex, age, disability, religion, and family status by the Town of Miami Lakes (herein referred to as “Miami Lakes”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Miami Lakes investigates complaints received no more than 180 days after the alleged incident. The Town or its designated Title VI Coordinator will process complaints that are complete.

Once the complaint is received, the Title VI Coordinator 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.

The Town has 60 days to investigate the complaint. If more information is needed to resolve the case, the Town’s Title VI Coordinator may contact the complainant. The complainant will have 10 business days from the date of the letter to send the 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 10 business days, the Title VI Coordinator can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the case is investigated he/she 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 allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, he/she has 10 business days after the date of the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

APPENDIX C

Title VI Complaint Form

If you feel you have been discriminated against in the use of any Miami Lakes service, please provide the following information in order to assist us in processing your complaint and send it to:

Gina Inguanzo
Title VI Coordinator
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

Please print clearly:

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (home) _____ (cell) _____
(message)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

- _____ race or color
- _____ national origin
- _____ income
- _____ sex
- _____ age
- _____ disability
- _____ religion
- _____ family status
- _____ other

Appendix C1

Letter Acknowledging Receipt of Complaint

Today's Date

Complainant's Name
Complainant's Address

Dear (Mr/Ms):

This letter is to acknowledge receipt of your complaint against the Town of Miami Lakes alleging _____

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 305-364-6100, or write to me at this address.

Sincerely,
Gina Inguanzo
Town Clerk
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

Appendix C2

Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Complainant's Name
Complainant's Address

Dear (Mr/Ms):

The matter referenced in your letter of _____ (date) against the Town of Miami Lakes alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for bringing this important matter to our attention. You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,
Gina Inguanzo
Town Clerk
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

Appendix C3

Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Complainant Name
Complainant Address

Dear (Mr/Ms)

The matter referenced in your complaint of _____ (date) against the Town of Miami Lakes alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, national origin, sex, age, disability, religion, and family status in any program receiving federal financial assistance.

The Town Attorney has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from the Town, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,
Gina Inguanzo
Town Clerk
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

Appendix D

List of Title VI Investigations, Complaints, and Lawsuits

The Town of Miami Lakes does not have any investigations, complaints, or lawsuits to disclose at this time. Any future disclosures will be listed under this appendix in the Title VI Program Plan.

	Date of Complaint (Month, Date, Year)	Complaint (include basis of complaint; race, color, national origin, sex, age, disability, religion, and family status etc.)	Status of Complaint	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Appendix E

Employee Annual Education Form

Title VI Policy

No person shall, on the grounds of race, color, national origin, sex, age, disability, religion, and family status be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the Town of Miami Lakes and its contractors are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to contact;

Gina Inguanzo
Town Clerk
Town of Miami Lakes
6601 Main Street
Miami Lakes, FL 33014

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to respectfully address them without regard to race, color, national origin, sex, age, disability, religion, and family status.

Appendix F

Transit Planning and Advisory Bodies

The Town does not have a transit-related committee or board, therefore this requirement does not apply (reference FTA Circular 4702.1B, Chapter III, Paragraph 10 and FHWA Regulation 23 CFR 200.9(b)(4)). If any such advisory bodies are established in the future, this plan will be amended to depict minority representation on such advisory bodies, and to describe the efforts made to encourage participation of minorities on such advisory bodies.

Appendix G

Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Town of Miami Lakes Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its programs and services on the basis of race, color, national origin, sex, age, disability, religion, and family status as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B, and as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992.

Employee signature

Print your name

Date