



Jacksonville Human Rights Commission
117 W. Duval Street, Suite 350
Jacksonville, FL 32202

CITY OF JACKSONVILLE TITLE VI NONDISCRIMINATION POLICY AND PLAN

I. POLICY STATEMENT

The City of Jacksonville (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 of its communities and when those communities are involved in the transportation decision-making process. Thus, the 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, age, disability, religion or family status.

II. NONDISCRIMINATION ASSURANCES

Every three years, or commensurate with a change in executive leadership, the City must certify to the Federal Highway Administration (“FHWA”) and the Florida Department of Transportation (“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. Those wishing to view the City’s Nondiscrimination Assurance may do so by visiting the City’s website at www.coj.net, or the City’s administration offices.

III. COMPLAINT PROCEDURES

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 or family status in any City program, service or activity may file a complaint with the City’s Title VI/Nondiscrimination Coordinator:

Name: Wendy Byndloss, Executive Director
Jacksonville Human Rights Commission
Address: 117 West Duval Street, Suite 350

Jacksonville, FL 32202
Email: Byndlossw@coj.net
Phone: (904) 255-5372
TTY: (904) 630-4125

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 the complaint, the City will forward the complaint, along with a record of its disposition, to the appropriate FDOT District Office.

However, should the complainant be unable or unwilling to complain to the City, the written complaint may be submitted directly to FDOT at the address listed below. FDOT serves as a statewide clearinghouse for Title VI purposes and will either assume jurisdiction over the complaint or forward it to the appropriate federal or state authority for continued processing.

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

The City's Title VI Coordinator has "easy access" to the City's Chief Administrative Officer (CAO) and is not required to obtain management or other approval to discuss discrimination issues with the CAO.

IV. ADA/504 Posted 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 those with disabilities 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 also make every effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include representation by communities with disabilities 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 individuals with disabilities 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 five (5) calendar days prior to the need for accommodation.

Questions, concerns, comments or requests for accommodation should be made to the City's ADA Officer:

Name: Kara Tucker, Chief of Disabled Services
Address: 117 West Duval St., Suite 205
Jacksonville, FL 32202
Email: Karat@coj.net
Phone: (904) 255-5472
TTY: (904) 255-5475.

V. LIMITED ENGLISH PROFICIENCY (LEP) GUIDANCE

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the U.S. Department of Justice (DOJ) and the U.S. 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 an analysis of four factors:

- The number or proportion of LEP persons eligible to be served or likely to need 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 and the likely cost of providing LEP services.
1. Using Census data, the City has determined that LEP individuals speaking English less than well represent approximately 38% 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 individuals served by those entities. Spanish was reported to be the prevalent LEP language with an estimate of 48,462 citizens eligible to be served.

2. The City's 9-1-1 System received 6,188 requests for translation or interpretation of its programs, services or activities into Spanish or other languages. In addition, the City uses multi-media avenues to announce community outreach or public events.
3. The City believes that transportation is of critical importance to the 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 on how to access nondiscrimination and public involvement policies, as well as those that impact public safety, health and welfare, and emergency services.
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 seeks to establish cordial relationships with faith based and/or community organizations that offer competent language services at low or no cost to the City.
5. Finally, the City employs persons who are proficient in Spanish and other foreign languages and able to interpret and/or provide translation services.

An analysis of the four factors suggests that LEP services are 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 employees who regularly have contact with the public.
- Provide public notification in LEP languages of the availability of language assistance, free of charge.

In addition, the City has taken, or continues to take, the following steps:

- Review and update the City's website to make it accessible to LEP individuals.
- The City's Employee Services Department has developed a form to ask new employees during Employee Onboarding whether they would be willing to render language assistance services.
- Established procedures to regularly update the list of City employees available to provide translation or interpretation services to LEP individuals.
- Consult with the Mayor's Hispanic Advisory Board and the Mayor's Asian Advisory Board to compile a list of faith based and community organizations for dissemination of the City's LEP Plan.

- Create and implement a method of tracking data on the number of LEP individuals in the community, the languages spoken by LEP individuals, and the need for LEP services.
- Create and implement a method of tracking data on Title VI complaints.

The City understands that the characteristics of the community change and that the four-factor analysis may reveal the need for more or varied LEP services in the future. As such, the City 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.

VI. 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 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, which members of the City's staff attend. Further, City representatives attend and participate in other community events to promote the City's services to the public. In pursuit of public involvement for the City's long-range transportation plan for example, the City holds public outreach events in a geographically encompassing manner in an attempt to access all stakeholders equally. The City also enhances its public input by providing ADA compliant, online access to materials and information that allows online public participation.

Persons wishing to request special presentations by the City; volunteer in any of its activities; offer suggestions for improvement; or to simply learn more about the City's programs, services or activities should visit or contact:

Name and Title: Nikki Kimbleton, Director of Public Affairs
 Address: 117 W. Duval Street, Suite 400
 Jacksonville, FL 32202
 Email: NKimbleton@coj.net
 Phone: (904) 255-5020.

VII. 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. All transportation programs funded by the City in conjunction with the North Florida Transportation Planning Organization and the FDOT are prioritized by several metrics including equity. All racial and ethnic data compiled for those prioritization models are acquired from U.S. Census data, American Community Survey reports, Environmental Screening Tools (EST), driver and ridership surveys, our community development department

and other methods. Self-identification of personal data utilized by the City will always be voluntary and anonymous. Moreover, the City will not release or otherwise use this data in any manner inconsistent with federal regulations.