


CITY OF LARGO ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL	
Policy: Title VI Nondiscrimination Policy and Plan for LAP	Policy Number: FP-01-17
Originating Department/Division: Community Development/Engineering	
Effective Date: July 1, 2017	Approved By: 
Supersedes Policy: N/A	Dated: N/A

POLICY

The City of Largo (the City), as the FDOT designated sub-recipient, has a goal not to discriminate against any person with respect to a City program, activity or service. To meet this goal, the City developed a Title VI Program pursuant to Title VI of the Civil Rights Act of 1964 as amended.

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, income or family status.

PROCEDURE

The City has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found specific to the LAP project. 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 the City's LAP projects may file a complaint with the City's LAP Title VI/Nondiscrimination Coordinator:

City Engineer
LAP Nondiscrimination Coordinator
Mailing Address: Engineering Services Department,
201 Highland Avenue P.O. Box 296, Largo, Florida 33779
Physical Address: 201 Highland Avenue, Largo, Florida 33770
Phone: (727) 587-6700
Fax: (727) 586-7413
Hearing Impaired: Florida Relay 7-1-1

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 LAP Title VI/Nondiscrimination Coordinator for assistance.

The LAP 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 LAP Title VI/Nondiscrimination Coordinator will forward the complaint, along with a record of its disposition to the appropriate District of the Florida Department of Transportation (FDOT) for further processing.

The City's LAP Title VI/Nondiscrimination Coordinator has easy access to the City Manager and is not required to obtain management or other approval to discuss discrimination issues with the City Manager. However, should the complainant be unable or unwilling to complain to the City, or if the complainant is dissatisfied with the City's handling of the complaint, the written complaint may be submitted directly to the Florida Department of Transportation (FDOT). FDOT will ensure that the matter is assigned to the correct Federal or State authority for processing.

Florida Department of Transportation
Equal Opportunity Office
ATTN: LAP 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 accommodations to disabled individuals who wish to participate in public events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodations may require outside assistance, organization or resources, the City asks that requests be made at least seven (7) calendar days prior to the need for accommodation.

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

Assistant City Manager

ADA Officer

Mailing Address: P.O. Box 296, Largo, Florida 33779

Physical Address: 201 Highland Avenue, Largo, Florida 33770

Phone: (727) 587-6700

Fax: (727) 586-7413

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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 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'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 and the likely costs of the LEP services.

Using census data, the City has determined that LEP individuals speaking English represent less than approximately 4% of the community. The City realizes that such statistical data can be outdated or inaccurate. Given this information, the City reasons that a relatively small portion of its service population are LEP speakers.

The City understands that its community profile is changing and the four factor analysis may reveal the need for more LEP services in the future. As such, it will biannually 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 LAP 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, or offer suggestions for improvement of City public involvement may contact:

Community Outreach Coordinator

Mailing Address: 201 Highland Avenue P.O. Box 296, Largo, Florida 33779

Physical Address: 201 Highland Avenue, Largo, Florida 33770

Phone: (727) 587-6700
Fax: (727) 586-7413
Hearing Impaired: Florida Relay 7-1-1

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 annual assurance on the City's website or by visiting the City's offices.