

THE SENIORS FOUNDATION OF NORTHWEST BROWARD, Inc.



Title VI Program

Date Adopted: September 2015

Date Updated: June 2020



Title VI Program Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks
02/20/2020	Triennial Review – District 4 FDOT 5310 Program	Renee Kinney, Renaissance Planning Consultant	Triennial Review Report - 3/31/2020
06/04/2020	Update and corrections	Terry Lieberman, Operations Manager Karin Diaz, Project Director	

**Title VI Program Activity Log
(Continued)**

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1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Program

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, 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 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.


 Signature
 Karin Diaz

Project Director, Northwest Focal Point Senior Center District
Date: June 4, 2020

2.0 Introduction & Description of Services

THE SENIORS FOUNDATION OF NW BROWARD, INC. through the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT submits this Title VI Program in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

THE SENIORS FOUNDATION OF NW BROWARD, INC. is a sub-recipient of FTA funds and provides service in the northwest quarter of Broward County.

THE SENIORS FOUNDATION OF NORTHWEST BROWARD, INC. is a non-profit 501(c)(3) organization, which operates through the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT with a CTC agreement with the BCC. The CTC agreement was executed on December 17, 2014.

The organization includes a total of 11 full-time employees, 9 part-time employees, and 50 volunteers. The NORTHWEST FOCAL POINT SENIOR CENTER Transportation service provides group and individual rides, according to the different programs the Center offers, from a fleet of 8 clean vehicles; where 7 of the vehicles are equipped for wheelchair service. All 7 drivers carry CDL licenses. Our transportation service extends over 10 cities located in the NW quarter of Broward County: Coconut Creek, Coral Springs, Lauderdale Lakes, Lauderhill, North Lauderdale, Margate, Parkland, Pompano Beach (west of the Turnpike), Sunrise and Tamarac. The Center serves more than 1,800 clients, and performs over 40,000 one-way rides annually. The goal is to deliver transportation services in a safe, reliable, timely and efficient manner.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. It is through the transportation service that the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT is able to fulfill its mission, to improve the quality of life of seniors 60 years and older and to provide support services for all older adults, including those with special needs.

Maintenance on all agency vehicles is provided by Public Works from the City of Margate. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at the Center located at 6009 NW 10th Street, Margate, FL 33063 and are maintained by the Operations Manager. All records are maintained and retained for a minimum of seven (7) years.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT must designate a liaison for Title VI issues and complaints within the organization. The liaison is the Focal Point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.

- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

Title VI Liaison

Karin Diaz
Project Director
954-973-0300
6009 NW 10th Street
Margate, FL 33063

Alternate Title VI Contact

Terry Lieberman
Operations Manager
954-977-6558
6009 NW 10th Street
Margate, FL 33063

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

Annual Certifications and Assurance

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT and Broward County Paratransit Division.

Title VI Program Concurrence and Adoption

This Title VI Program received FDOT concurrence on October 15, 2015. This Program was approved and adopted by THE NORTHWEST FOCAL POINT SENIOR CENTER's Board during a meeting held on October 28, 2015.

The updated Title VI Program was approved and re-adopted by the NORTHWEST FOCAL POINT SENIOR CENTER's Board during the Board Meeting held on Wednesday June 17th, 2020.

Copies of the meetings minutes and FDOT concurrence letters are included in Appendix B of this Plan.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Program. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in **Appendix C** of this Plan.

A complainant may also file a complaint directly with Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT bulletin board and on the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT website at margatefl.com/government/Departments/Northwest Focal Point Senior Center.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT notice to the public will be posted at the following locations:

Location Name	Address	City
NWFP SC D Administrative Office	6009 NW 10 th Street,	Margate FL 33063
NWFP SC Front Desk	6009 NW 10 th Street,	Margate FL 33063
5310 Vehicles	6009 NW 10 th Street,	Margate FL 33063

A sample version of the Complaint Form is included in Appendix D of this Plan along with any translated versions of the notice, as necessary.

NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT Title VI Complaint Form is posted on the Website

www.margatefl.com/government/departments/northwestfocalpointseniorcenter/transportation

The forms are also available upon request at the front desk and at administration office.

4.0 Title VI Procedures and Compliance

Complaint Procedure

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E) to the NWFP SC Title VI Liaison, Karin Diaz, at 6009 NW 10th Str., Margate FL33063. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT investigates complaints received no more than 180 days after the alleged incident. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will process complaints that are complete. To be considered complete, complainants must, at a minimum, include their name, contact information, date of alleged incident, and a description of the incident.

Once the complaint is received, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT 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 NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT may contact the complainant. The complainant has ten (10) business days from the date of the letter to send 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 ten (10) business days, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he 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. A 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, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available, in the future, to the public on the Northwest Focal Point Senior Center website www.margatefl.com/government/departments/northwest_focal_point_seniorcenter. Currently they are available at the front desk and at administration office

Complaint Form

A copy of the complaint form in English and Spanish is provided in **Appendix D**

Record Retention and Reporting Policy

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three (3) years. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will submit Title VI Programs to FDOT for concurrence on an annual basis or any time a major change in the Program occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

Sub-recipient Assistance and Monitoring

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

Contractors and Subcontractors

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. THE NORTHWEST FOCAL POINT SENIOR CENTER, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Program. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Currently the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT does not have Contractors or Subcontractors

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Program when it is submitted to FDOT .

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for THE NORTHWEST FOCAL POINT SENIOR CENTER. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT transportation services. The PPP is included as **Appendix E** for this Title VI Program.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

7.1 Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis used to identify LEP needs and assistance measures.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

Safe Harbor Provision, DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes **five percent (5%) or 1,000 persons**, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary

language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

7.2 Four Factor Analysis

The analysis provided in this report has been developed to identify LEP populations that may use THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT services and identify needs for language assistance. This analysis is based on the "Four Factor Analysis" presented in the Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's program, activity or service.
2. The frequency with which LEP persons come in contact with THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's program, activity or service.
3. The nature and importance of programs, activities or services provided by THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's program, activity or service to the LEP population.
4. The resources available to THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's program, activity or service and overall cost to provide LEP assistance.

Factor 1: The Number and Proportion of LEP Persons Serviced or Encountered in the Eligible Service Population

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT service area has an LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix F, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT Spanish or Spanish Creole speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" is counted as 8.94% and 150,154 persons.

Of the 1,679,692 residents in the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT service area 248,936 residents describe themselves as speaking English less than "very well". Spanish and Spanish Creole speakers are the primary LEP persons likely to utilize the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's services. For the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 85.24% speak English "very well. For groups who speak English "less than very well", 60.57% speak Spanish and Spanish Creole.

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT service area. The following is a summary of THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT Language Data Table:

Broward County, Florida	Estimate	Percentage
Total:	1,798,285	100%
Speak only English	1,064,726	59.2%
Speak a Language other than English	733,559	40.8%
Speak English "very well"	1,431,440	84.0%
Speak English less than "very well".	238,440	16.0%

Data: Broward by the Numbers/July 2018* No.2018-01

Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessments include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that Spanish or Spanish Creole speakers who speak English less than "very well" constitute the 16.0% of the service area population. Phone inquiries and staff survey feedback indicated that THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT dispatchers and drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has undertaken the following actions to facilitate and improve access to information and services for LEP individuals:

- Transportation team consists of bilingual drivers and dispatcher
- Additional supporting bilingual staff is available to explain and/or translate information.
- Promotional materials are available at the Center in Spanish.
- An interpreter or translator is available during recreational and health activities when needed.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People's Lives

Transportation is an essential component for individuals to access the tools required to maintain and enhance their quality-of-life. THE NORTHWEST FOCAL POINT SENIOR CENTER

DISTRICT recognizes that LEP individuals require additional assistance in order to effectively utilize the transportation services and provides additional accommodations when necessary.

Therefore, our services help increase the mobility for older adults and individuals with disabilities throughout the NW quarter of Broward County. THE NORTHWEST FOCAL POINT SENIOR CENTER's transportation service is very important as a primary way of mobilization for its clients.

Factor 4: The Resources Available to the Recipient and Costs

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations.

The Center's Transportation Department has multiple bilingual employees which are available to translate in person and over the phone. There is no additional cost for the provision of these services, as 53% of staff is bilingual and is already present at THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT.

7.3 Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix F). As presented earlier 59.2% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish 25.9%. Of those whose primary spoken language is Spanish, approximately 39.6% identify themselves as speaking less than "very well". Those residents whose primary language is not English or Spanish and who

identify themselves as speaking English less than “very well” (from over 40 other languages) account for 14.9% of the service area population.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.
3. New clients are asked during the initial interview, what languages they speak and if they need assistance with reading informational materials or while attending events or meetings.

Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events, public hearings, and transit committee meetings.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and other recruiting efforts for new employees.
4. When an interpreter is needed in person or on the telephone, bilingual staff or qualified community volunteer will be called for assistance with translation service.

Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained. Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-

training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT, the most important staff training is for customer service representatives and drivers. Several representatives are bilingual in English and Spanish, Creole, French, German, Italian and Portuguese.

The following training will be provided to customer service representatives and drivers:

1. Information on Title VI Procedures and LEP responsibilities
2. Documentation of language assistance requests
3. How to handle a potential Title VI/LEP complaint

Element 4: Providing Notice to LEP Persons

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in THE NORTHWEST FOCAL POINT SENIOR CENTER staff lounge and in vehicles. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT's financial resources are sufficient to fund language assistance resources needed

THE NORTHWEST FOCAL POINT SENIOR CENTER's Transportation staff understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of the system easier. THE NORTHWEST FOCAL POINT SENIOR CENTER is open to suggestions from all sources, including customers, THE NORTHWEST FOCAL POINT SENIOR CENTER staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT does not have a transit-related committee or Board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will ensure the following:

1. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT must demonstrate and document how both tests are met. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will consider and analyze

alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT does not have any Title VI Equity Analysis reports to submit with this Plan.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT is not a fixed route service provider.

11.0 Appendices

- APPENDIX A FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT
- APPENDIX B TITLE VI PROGRAM ADOPTION MEETING MINUTES AND FDOT CONCURRENCE
LETTER
- APPENDIX C TITLE VI SAMPLE NOTICE TO PUBLIC
- APPENDIX D TITLE VI COMPLAINT FORM
- APPENDIX E PUBLIC PARTICIPATION PLAN
- APPENDIX F OPERATING AREA LANGUAGE DATA: THE NORTHWEST FOCAL POINT SENIOR
CENTER SERVICE AREA

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ☐ Title VI Complaint Form
- ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ☐ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- ☐ A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ☐ Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- ☐ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- ☐ Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Appendix B

Title VI Program Adoption Meeting Minutes and FDOT Concurrence Letter

Title VI Program adoption meeting minutes and the FDOT concurrence letter.

Appendix C

Title VI Sample Notice to Public

Notifying the Public of Rights Under Title VI**NORTHWEST FOCAL POINT SENIOR CENTER**

- THE NORTHWEST FOCAL POINT SENIOR CENTER operates its programs and services without regard to race, color, and national origin 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 NORTHWEST FOCAL POINT SENIOR CENTER.
- For more information on THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT civil rights program, and the procedures to file a complaint about the transportation program, contact the Title VI Liaison at (954)973-0300 or seniorcenter@margatefl.com , or visit our administrative office at 6009 NW 10th Street, Margate, FL 33063, phone # (954) 973-0300
- A complainant may file a complaint directly with the Florida Department of Transportation by filing a complaint with the District IV Title VI Coordinator Sharon Singh Hagyan (954) 777-4190 or sharon.singh.hagyan@dot.state.fl.us
- A complainant may also file a complaint directly with Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

**Notificación de derechos bajo el Título VI del Servicio de Transporte
del
Northwest Focal Point Senior Center District al público:**

- El Servicio de Transporte del Northwest Focal Point Senior Center District opera sus programas de transporte y servicios, sin importar la raza, color, origen nacional y de conformidad con lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964.
Cualquier persona que cree que ella o él ha sido agraviada/o por cualquier práctica discriminatoria ilegal en virtud del Título VI puede presentar una queja con el Northwest Focal Point Senior Center.
- Para obtener más información sobre el programa de derechos civiles, y los procedimientos para presentar una queja sobre el programa de transporte del Northwest Focal Point Senior Center, puede contactar al Representante de Título VI, en el 954-973-0300, o en nuestra oficina administrativa 6009 NW 10th Street, Margate, FL 33063, o via correo electrónico seniorcenter@margatefl.com
- El demandante puede presentar una queja directamente con el Departamento de Transporte de la Florida mediante la presentación de una queja ante el Coordinador del Distrito 4 Título VI (Sharon Singh Hagyan (954) 777-4190 or sharon.singh.hagyan@dot.state.fl.us)
- Un demandante también puede presentar una queja directamente con la Administración Federal de Transporte mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Queja Team, East Building , 5th Floor - TCR , 1200 New Jersey Ave., SE, Washington, DC 20590 .

Appendix D

Title VI Complaint Forms

NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age				
<input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain) _____				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____ _____				
Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Si ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court _____

☐ State Agency _____

☐ State Court _____

☐ Local Agency _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Firma

Fecha

Por favor someta esta forma en persona o envíe por correo a:

Title VI Liaison

Karin Diaz, Project Director

954-973-0300

NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT

6009 NW 10th Street, Margate, FL 33063

NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT

Title VI - Formulario para Quejas

Section I:				
Nombre:				
Direccion:				
Telefono :			Telefono (Secundario):	
Direccion de correo electronico :				
Requisitos de format accesible?	Impression grande		Cinta de audio	
	TDD		Otro	
Section II:				
Esta presentando esta queja en su propio nombre?			Si*	No
*Si respondió Si, prosiga a la Sección III.				
Si respondió No, provea el nombre de la persona para quién esta sometiendo esta aplicación:				
Cual es su relación con este individuo: _____				
Explique por que esta presentando esta queja en nombre de otra persona				
Por favor, confirme que ha obtenido el permiso de la parte agraviada para poner esta queja en su nombre.			Yes	No
Section III:				
Creo que la discriminacion que he experimentado fue basado en <i>(marque todas las que correspondan)</i> :				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origin nacional <input type="checkbox"/> Edad <input type="checkbox"/> Desabilidad <input type="checkbox"/> Familia o Religión <input type="checkbox"/> Other (explain) _____				
Fecha en que ocurrió la discriminación (Mes, día, año): _____				
Explique lo mas claramente posible lo ocurrido y por que Ud. considera que fue objeto de discriminación:				
Describa todas las personas involucradas. Incluya el nombre e información de contacto de la persona/s que discriminaron en contra suya (si lo conoce) y el nombre e información de contacto de los testigos. Si necesita mas espacio, utilice una hoja adicional. _____ _____				
Section IV				

Ha Ud. presentado una denuncia de Titulo VI anteriormente ante esta agencia?	Si	No
Section V		
Ha presentado esta queja ante cualquier otra agencia local, estatal o federal, o con cualquier tribunal federal o estatal? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Si respondio Si, marque todas las respuestas que aplican:		
<input type="checkbox"/> Agencia Federal : _____		
<input type="checkbox"/> Tribunal Federal: _____	<input type="checkbox"/> Agencia Estatal: _____	
<input type="checkbox"/> Tribunal Estatal: _____	<input type="checkbox"/> Agencia Local: _____	
Por favor, proporcione información acerca de una persona de contacto en la agencia/tribunal donde se <u>presento</u> la denuncia.		
Nombre:		
Titulo:		
Agencia:		
Direccion:		
Telefono:		
Section VI		
Nombre de la agencia contra quien se hizo la denuncia:		
Persona de contacto:		
Titulo:		
Numero de teléfono::		

Usted puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo o denuncia.

Firma y fecha son necesarios para completar la forma siguiente:

Firma

Fecha

Por favor, entregue este formulario en persona o por correo en la siguiente dirección:

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT Liaison
Karin Diaz, Project Director
954-973-0300
6009 NW 10th Street
Margate, FL 33063

Appendix E

Public Participation Plan (PPP)

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

Introduction

The Public Participation Plan (PPP) for THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for the Northwest Focal Point Senior Center. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT transportation services and to provide a variety of methods for receiving and considering public comment prior to implementing changes to services.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will reach out and engage low-income, minority, and LEP populations for the THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to services will be described in language that is clear and easy to understand.
- **Responsive:** THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.

- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of the Northwest Focal Point Senior Center. THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will conduct community meetings and listening sessions as appropriate with passengers, caregivers and community leaders to gather public input and distribute information about proposed changes or new service options. The public will be invited to provide feedback through the THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT website (www.margatefl.com/government/seniorcenter), which is linked to the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT management. The public will also be able to call the THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT office at 954-973-0300 during its hours of operation. Feedback collected over the phone will be documented and passed on to THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT management as well. A formal customer surveys, to measure performance, is conducted annually.

Meetings with the Advisory Council members, who are all part of the diverse population at the Northwest Focal Point Senior Center, will be conducted. All comments documented will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the members in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. In each case, an agenda for the meetings will be created to achieve the stated goals and is relevant to the subject and not overwhelming for the public. The meetings will be held at 6009 NW 10th Street, Margate Florida 33063, a facility that is accessible for persons with disabilities.

For community meetings and other important information, THE NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters, flyers and notices in Center monthly newsletter
- Posting information on website
- Multilingual flyer distribution to clients and public.
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria.

Public Hearing

The NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT is not required to perform public hearings. The following is a list and short description of the NORTHWEST FOCAL POINT SENIOR CENTER’s planned outreach activities.

- Make clients and visitors aware of the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT’s willingness to provide translated documents or communicate the offered programs to LEP individuals.
- Over the past three (3) years, the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT management has ensured that resources are available to accommodate any requests or needs for translation service and language assistance.
- Over the past three (3) years, the Center’s Project Director and Eldercare Advocate have visited various condominium association groups in the community to speak about the transportation services available at the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT.
- The Eldercare Advocate works year round at the NW Medical Center where she meets with patients that are 60 years of age and older and informs them of the transportation services that are available to them at the NORTHWEST FOCAL POINT SENIOR CENTER DISTRICT.
- The City of Margate holds an annual event called National Night Out Against Crime. Staff members from the NORTHWEST FOCAL POINT SENIOR CENTER work at a table at this event every year in order to be able to speak to members of the community and inform them of the Center’s transportation services.

Appendix F

Operating Area Language Data:

NORTHWEST FOCAL POINT SENIOR CENTER

DISTRICT Service Area

ENGLISH FLUENCY

More than 40% of Broward County's population speaks a language other than English. Twenty-five percent (25%) of the County's population is bilingual, fluent in English and another language. Spanish is the most widely spoken foreign language (25%), followed by Haitian Creole (6%). "Linguistically isolated" households account for 10% of the total and are scattered throughout Broward. Lack of fluency in English can pose communication problems, particularly during emergencies.

ENGLISH SPEAKING POPULATION

A greater number of Broward County residents are speaking languages other than English. Between 2006 and 2016, the share of population that speaks other languages increased from 35% to 41%. At the same time, the number of people that speak only English in the County has slightly declined.

	2006 Estimate*	%	2016 Estimate*	%
Speak only English	1,085,194	65.0	1,064,726	59.2
Speak a Language other than English	584,686	35.0	733,559	40.8

*Population ages 5 years and over.

Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Years 2006, 2016; Table S1601, B16001

ENGLISH FLUENCY

Overall, English fluency is fairly stable in Broward. Between 2006 and 2016, the share of residents that speak English well dropped slightly from 86% to 84%. Over a third (38%) of new residents are not fluent in English. Even though an increasing number of residents speak other languages, English may be their second language.

POPULATION TOTALS* BY ENGLISH FLUENCY - 2006 & 2016				
	2006 Estimate*	%	2016 Estimate*	%
Fluent	1,431,440	85.7	1,510,551	84.0
Not Fluent	238,440	14.3	287,734	16.0

*Population ages 5 years and over.

Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Years 2006, 2016; Table B16001

BILINGUAL POPULATION

Bilinguals are fluent in at least two languages. Bilinguals in Broward have increased between 2006 and 2016, from 21% to 25%. At the same time, lack of fluency in English has also increased, from 14% to 16%. Not speaking English well poses challenges in communication and the provision of services, particularly during emergencies. Local governments often translate forms and websites into Spanish and Haitian Creole, among others, and have staff that can communicate in other languages.

LANGUAGE DATA

"Primary language" has multiple definitions and often refers to their most dominant or preferred language at any moment in time. Today, when many people are bilingual (fluent in two languages), the language spoken at home may not be the primary language. The survey excludes people who know other languages and do not speak them at home or use them infrequently.

DEFINITIONS

FLUENCY

A person's ability to speak a language, as reported on the ACS on a scale from 'very well' to 'not at all'. Respondents who select less than 'very well' have some difficulty with English and are not considered fluent.

HOUSEHOLD LANGUAGE

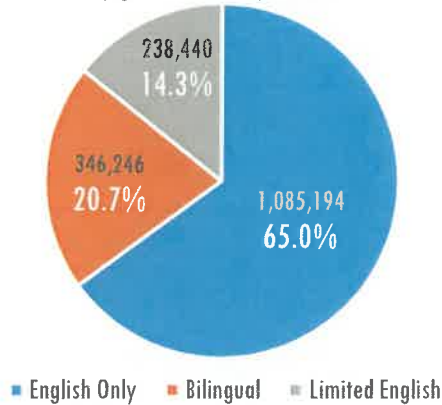
Language assigned to a housing unit based upon a hierarchy of household members, beginning with the language spoken by the householder.

LINGUISTIC ISOLATION

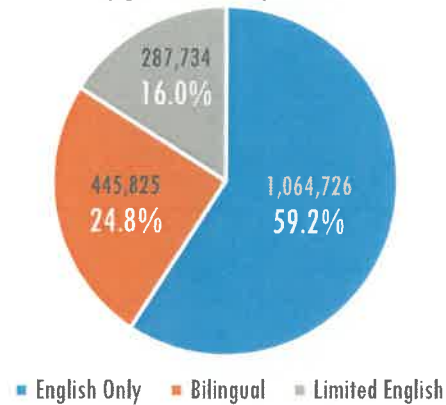
Household where no one age 14 and over speaks English only or 'very well'.

¹ ACS 1-Year Estimates are calculated at a 90% confidence level that includes a margin of error (see appendix).

English Fluency in Broward
(ages 5 and over) **2006**



English Fluency in Broward
(ages 5 and over) **2016**

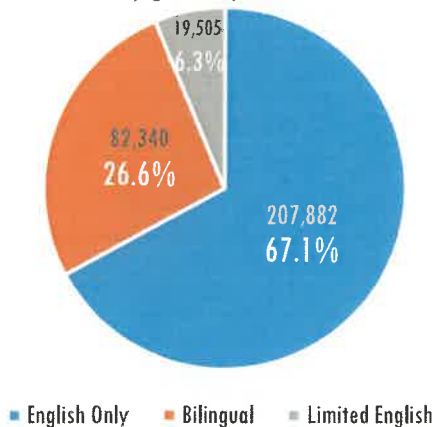


Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Years 2006, 2016; Table B16001

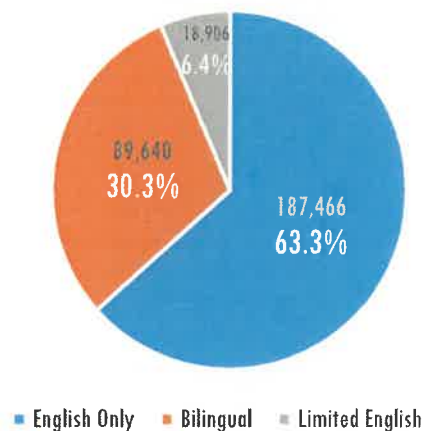
ENGLISH FLUENCY IN YOUNG POPULATION

English fluency and bilingualism are more common among Broward's young population. Since 2006, the total population between the ages of 5 and 17 has remained roughly the same, but an increased share is now bilingual. Only 6% of the young population is not fluent in English, compared to 16% for the County's overall population. English exposure through school, among other factors, plays a role towards higher English fluency. Children may speak the language of their parents at home but prefer English in other environments. Almost one third of children 5 -17 years are bilingual (2016).

Broward English Fluency in Youth
(Ages 5-17) **2006**



Broward English Fluency in Youth
(Ages 5-17) **2016**



Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Years 2006, 2016; Table B16004

FLUENCY AND CITIZENSHIP

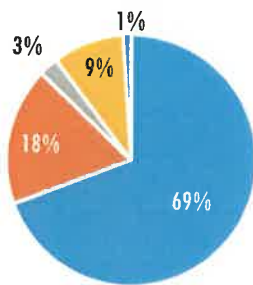
English fluency and bilingualism are higher for naturalized citizens over non-citizen residents, for both children (ages 5-17) and adults (18+ years). In both groups, English fluency and bilingualism is more frequent among young people. As expected, English fluency in the native population is greatest (both age groups) and bilingualism is lowest (for both). Children are still more bilingual than adults, regardless of citizenship status. Children who are born here (whether

immigrant parents or not) prefer to speak only English and tend to lose fluency in the second language. Naturalized youth who are brought here with immigrant parents are the most bilingual of all groups. Children brought here who aren't citizens still demonstrate high rates of English fluency (70% - blue, orange and yellow) and bilingualism (52% - orange and yellow).

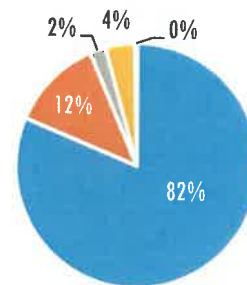
English Fluency by Age and Place of Birth



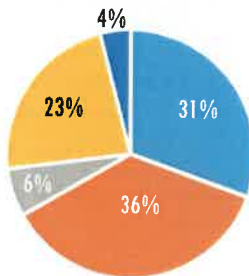
Native Population 5-17



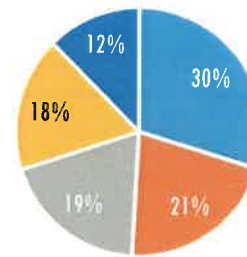
Native Population 18+



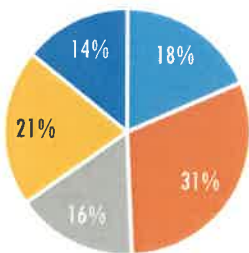
Naturalized Citizen 5-17



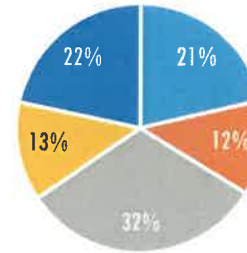
Naturalized Citizen 18+



Not a Citizen 5-17



Not a Citizen 18+



Source: U.S. Census Bureau, American Community Survey 5-Year Estimates, Years 2012 - 2016; Table B16008

According to the Public Policy Institute (PPI) of California, English language skills increase with years of residency in the United States. On the other hand, bilingualism in children is lost through generations. The third generation of immigrants tend to speak mostly English and generally speak very little of their grandparent's language. English fluency is also tied

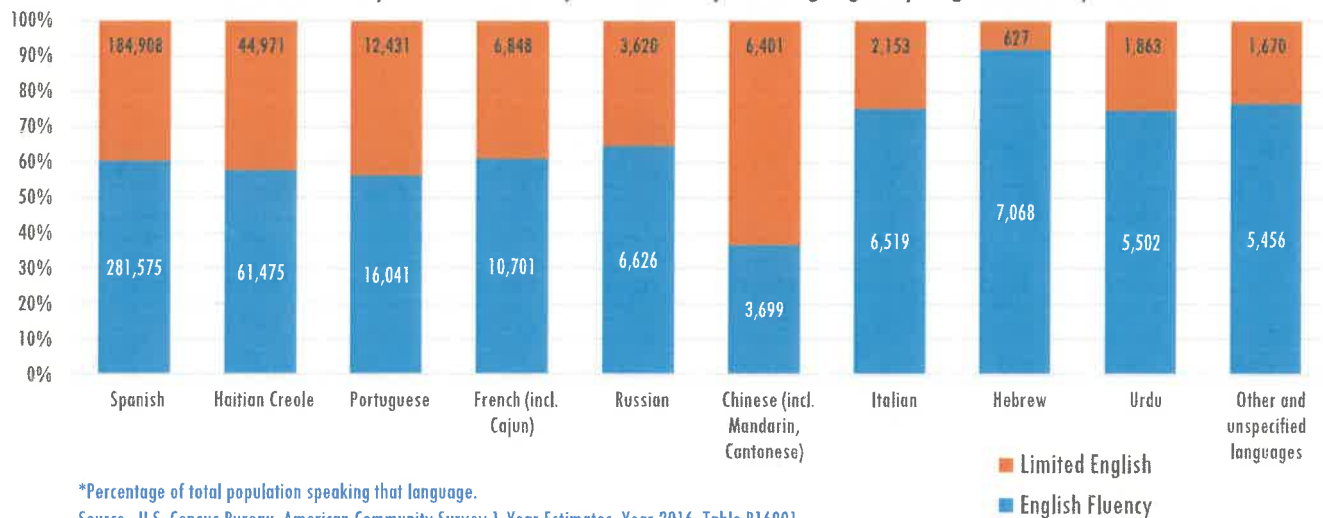
to educational attainment and 71% of US immigrants with college degrees are fluent in English. Among immigrants without high school degrees, 67% are not fluent in English.

TOP LANGUAGES SPOKEN

The US Census Bureau collects data on 42 languages and language groups, of which many are spoken in Broward County. The top languages spoken are Spanish (26%), Haitian Creole² (6%), Portuguese (2%), and French (1%) (including Cajun and Canadian derivatives). Spanish spoken in Broward's large Hispanic/Latino population derives from various regions in South and Central America, which often differ in expression and meaning of common words.

For bilinguals, English fluency is consistently 60% or higher across of the most top 10 languages spoken in Broward. Of the 466,483 people who speak Spanish as their primary language, 40% are not fluent in English. English fluency is lowest for people whose primary language is Chinese.

Broward County -- Number of Speakers of Top 10 Languages by English Fluency - 2016



LANGUAGE DISTRIBUTION BY HOUSEHOLD

English fluency generally improves when viewed at the household level. While 60% of the Spanish speaking population is fluent in English, 76% live in households where some family members are fluent. Households where no one above the age of 14 is fluent in English are known as "linguistically isolated". Linguistically isolated (LI) households in Broward County account for 10% (69,426) of all households. LI households that speak Spanish make up 6.3% (43,062) of the total. French, Haitian, or Cajun LI households make up 2% of all households. Languages with the lowest rates of English fluency such as Chinese (including Mandarin and Cantonese) also demonstrate higher rates of linguistic isolation. (See appendix).

CONCENTRATIONS OF NON-ENGLISH SPEAKERS

While concentrations of non-English speaking households are present, LI households are found throughout the County. These households face additional barriers receiving goods and services. They are also placed at increased risk during the

² French-based creole languages that are not Haitian are grouped in "Other and unspecified languages".

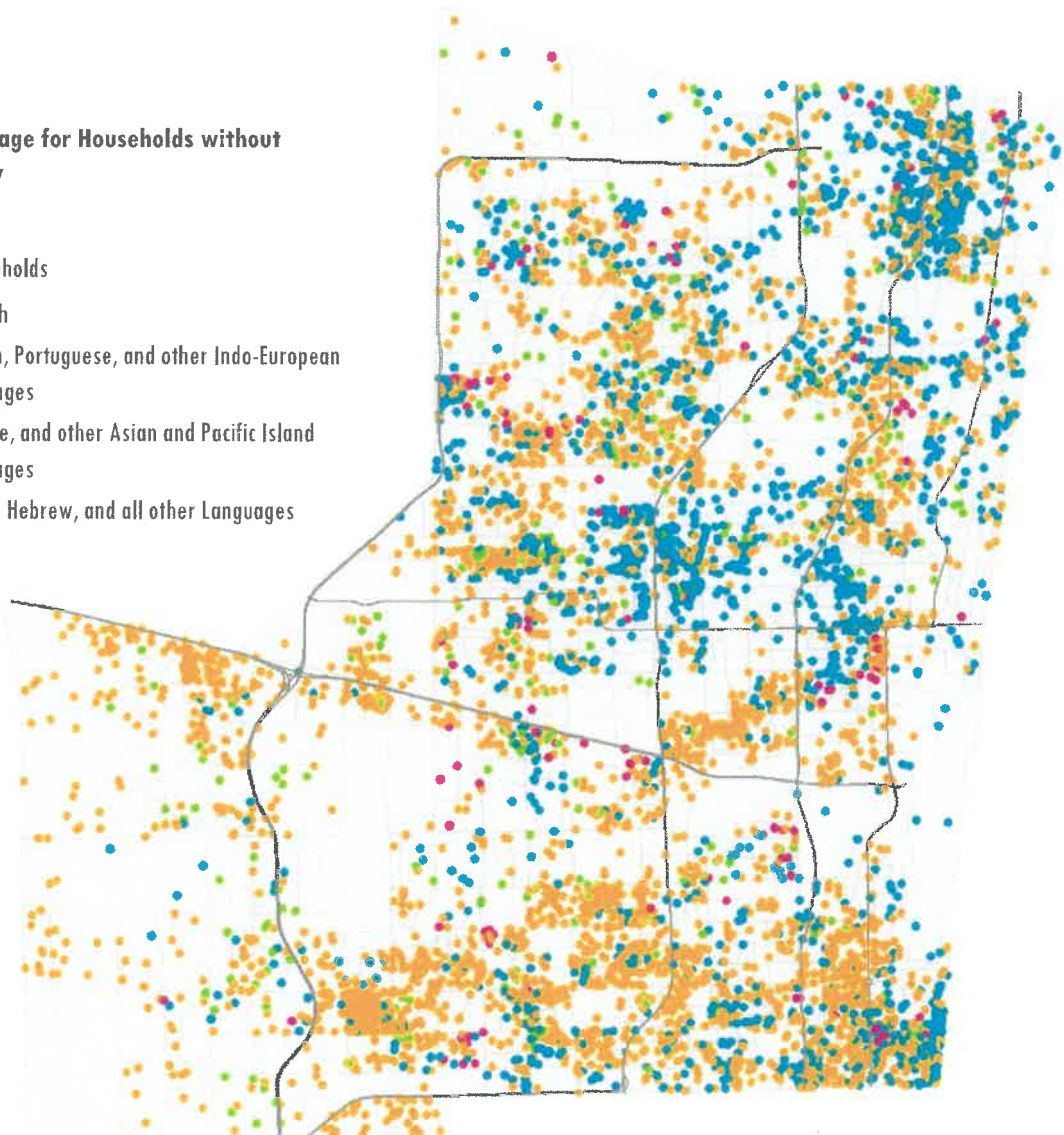
event of an emergency or disaster as they cannot understand emergency communications in English. Local foreign language radio stations are generally limited to Spanish and Haitian. While there are many foreign language radio websites, local news may be more difficult to access. Word of mouth is often the source of news for many LI household members, as well as places of worship and informal newspapers found at local ethnic restaurants.

ENCLAVES of LINGUISTICALLY ISOLATED HOUSEHOLDS³

Primary Language for Households without English Fluency

1 Dot = 10 Households

- Spanish
- Haitian, Portuguese, and other Indo-European Languages
- Chinese, and other Asian and Pacific Island Languages
- Arabic, Hebrew, and all other Languages



Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates; Table C16002, Census Block Group Level

³ Languages at the household level are simplified into 4 group classifications at the local level, shown colorized here and in the appendix tables. At the County level, languages at the household level are simplified into 12 groups plus English. (See “Language Distribution by Household in 2016” in the appendix for data at the County level).

TECHNICAL APPENDIX

Languages Spoken (at Home) in 2016								
Language Spoken	Group Classification	Population Estimate*	Margin of Error ⁴	%	English Fluency	%**	Limited English	%**
Total:		1,798,285						
English only		1,064,726	+/-18,007	59.2				
Spanish	<i>Spanish</i>	466,483	+/-8,577	25.9	281,575	60.4	184,908	39.6
Haitian	<i>Indo-European</i>	106,446	+/-11,273	5.9	61,475	57.8	44,971	42.2
Portuguese	<i>Indo-European</i>	28,472	+/-4,561	1.6	16,041	56.3	12,431	43.7
French (incl. Cajun)	<i>Indo-European</i>	17,549	+/-2,887	1.0	10,701	61.0	6,848	39.0
Russian	<i>Indo-European</i>	10,246	+/-2,469	0.6	6,626	64.7	3,620	35.3
Chinese (incl. Mandarin, Cantonese)	<i>Asian and Pacific Island</i>	10,100	+/-3,018	0.6	3,699	36.6	6,401	63.4
Italian	<i>Indo-European</i>	8,672	+/-2,783	0.5	6,519	75.2	2,153	24.8
Hebrew	<i>All Other Languages</i>	7,695	+/-2,074	0.4	7,068	91.9	627	8.1
Urdu	<i>Indo-European</i>	7,365	+/-2,886	0.4	5,502	74.7	1,863	25.3
Other and unspecified languages	<i>All Other Languages</i>	7,126	+/-2,627	0.4	5,456	76.6	1,670	23.4
Arabic	<i>All Other Languages</i>	6,351	+/-2,611	0.4	2,577	40.6	3,774	59.4
Other Indo-European languages	<i>Indo-European</i>	6,068	+/-2,534	0.3	3,824	63.0	2,244	37.0
Tagalog (incl. Filipino)	<i>Asian and Pacific Island</i>	5,043	+/-1,663	0.3	4,104	81.4	939	18.6
Vietnamese	<i>Asian and Pacific Island</i>	4,480	+/-1,519	0.2	1,537	34.3	2,943	65.7
German	<i>Indo-European</i>	4,167	+/-968	0.2	3,235	77.6	932	22.4
Hindi	<i>Indo-European</i>	3,813	+/-1,847	0.2	2,890	75.8	923	24.2
Yiddish, Pennsylvania Dutch or other West Germanic languages	<i>Indo-European</i>	3,802	+/-2,085	0.2	3,170	83.4	632	16.6
Polish	<i>Indo-European</i>	3,296	+/-2,345	0.2	1,884	57.2	1,412	42.8
Ukrainian or other Slavic languages	<i>Indo-European</i>	2,547	+/-1,165	0.1	1,783	70.0	764	30.0
Gujarati	<i>Indo-European</i>	2,247	+/-1,486	0.1	1,929	85.8	318	14.2
Tamil	<i>Indo-European</i>	2,204	+/-1,280	0.1	1,344	61.0	860	39.0
Persian (incl. Farsi, Dari)	<i>Indo-European</i>	2,124	+/-1,238	0.1	1,399	65.9	725	34.1
Greek	<i>Indo-European</i>	1,794	+/-1,005	0.1	1,339	74.6	455	25.4
Serbo-Croatian	<i>Indo-European</i>	1,727	+/-764	0.1	1,092	63.2	635	36.8
Bengali	<i>Indo-European</i>	1,617	+/-1,357	0.1	1,252	77.4	365	22.6
Nepali, Marathi, or other Indic languages	<i>Indo-European</i>	1,606	+/-1,043	0.1	1,077	67.1	529	32.9
Malayalam, Kannada, or other Dravidian languages	<i>Indo-European</i>	1,527	+/-929	0.1	981	64.2	546	35.8
Other languages of Asia	<i>Asian and Pacific Island</i>	1,331	+/-890	0.1	863	64.8	468	35.2
Yoruba, Twi, Igbo, or other languages of Western Africa	<i>All Other Languages</i>	1,030	+/-611	0.1	908	88.2	122	11.8

⁴ To view fluency margins of error for all languages, view the full table at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Thai, Lao, or other Tai-Kadai languages	<i>Asian and Pacific Island</i>	984	+/-530	0.1	589	59.9	395	40.1
Telugu	<i>Indo-European</i>	923	+/-640	0.1	795	86.1	128	13.9
Korean	<i>Asian and Pacific Island</i>	915	+/-766	0.1	356	38.9	559	61.1
Japanese	<i>Asian and Pacific Island</i>	800	+/-498	0.0	404	50.5	396	49.5
Other Native languages of North America	<i>All Other Languages</i>	696	+/-479	0.0	444	63.8	252	36.2
Swahili or other languages of Central, Eastern, and Southern Africa	<i>All Other Languages</i>	682	+/-713	0.0	170	24.9	512	75.1
Punjabi	<i>Indo-European</i>	608	+/-848	0.0	322	53.0	286	47.0
Armenian	<i>Indo-European</i>	483	+/-380	0.0	425	88.0	58	12.0
Ilocano, Samoan, Hawaiian, or other Austronesian languages	<i>Asian and Pacific Island</i>	399	+/-279	0.0	329	82.5	70	17.5
Amharic, Somali, or other Afro-Asiatic languages	<i>All Other Languages</i>	141	+/-170	0.0	141	100.0	0	0.0
Hmong	<i>Asian and Pacific Island</i>	0	+/-221	0.0	0	N/A	0	N/A
Khmer	<i>Asian and Pacific Island</i>	0	+/-221	0.0	0	N/A	0	N/A
Navajo	<i>All Other Languages</i>	0	+/-221	0.0	0	N/A	0	N/A
Total:					445,825		287,734	

*Population ages 5 and over.

**Percentage of total population speaking that language.

Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Year 2016; Table B16001

Language Distribution by Household in 2016

Household Language	Group Classification	Household Estimate	English Fluency	%*	Limited English	%*
Total:		681,474				
English only		385,574				
Spanish	<i>Spanish</i>	182,837	139,775	76.4	43,062	23.6
French, Haitian, or Cajun	<i>Indo-European</i>	47,679	35,312	74.1	12,367	25.9
Other Indo-European	<i>Indo-European</i>	27,381	21,288	77.7	6,093	22.3
Russian, Polish, or other Slavic	<i>Indo-European</i>	8,853	6,791	76.7	2,062	23.3
Other and unspecified languages	<i>All Other Languages</i>	8,372	7,387	88.2	985	11.8
German or other West Germanic	<i>Indo-European</i>	5,832	5,072	87.0	760	13.0
Chinese (incl. Mandarin, Cantonese)	<i>Asian and Pacific Island</i>	4,525	2,706	59.8	1,819	40.2
Other Asian and Pacific Island	<i>Asian and Pacific Island</i>	4,345	3,754	86.4	591	13.6
Arabic	<i>All Other Languages</i>	2,429	1,518	62.5	911	37.5
Tagalog (incl. Filipino)	<i>Asian and Pacific Island</i>	1,614	1,562	96.8	52	3.2
Vietnamese	<i>Asian and Pacific Island</i>	1,547	877	56.7	670	43.3
Korean	<i>Asian and Pacific Island</i>	486	432	88.9	54	11.1
Total:			226,474		69,426	

*Percentage of total households speaking that language.

Source: U.S. Census Bureau, American Community Survey 1-Year Estimates, Year 2016; Tables B16002, S1602



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