

CITY OF HOLLYWOOD COMMUNITY SHUTTLE PROGRAM



TITLE VI PROGRAM

Date Adopted: February 7, 2023

Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Program -----	Page 1
2.0 Introduction & Description of Services-----	Page 2
2.0.1 Current Description of System -----	Page 2
2.1 First Time Applicant Requirements -----	Page 3
2.2 Annual Certifications and Assurances -----	Page 4
2.3 Title VI Program Concurrence and Adoption-----	Page 4
3.0 Title VI Notice to the Public-----	Page 4
3.1 Notice Posting Locations -----	Page 5
4.0 Title VI Procedures and Compliance-----	Page 5
4.1 Complaint Procedure -----	Page 5
4.2 Complaint Form-----	Page 5
4.3 Record Retention and Reporting Policy -----	Page 5
4.4 Sub-recipient Assistance and Monitoring -----	Page 6
4.5 Contractors and Subcontractors-----	Page 6
5.0 Title VI Investigations, Complaints, and Lawsuits-----	Page 8
6.0 Public Participation Plan -----	Page 8
7.0 Language Assistance Plan -----	Page 9
8.0 Transit Planning and Advisory Bodies-----	Page 9
9.0 Title VI Equity Analysis-----	Page 10
10.0 System-Wide Service Standards and Service Policies -----	Page 10
10.1 Service Standards -----	Page 10
10.2 Service Policies -----	Page 12
11.0 Appendices-----	Page 13-27
APPENDIX A	FTA CIRCULAR 4702.1 B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	TITLE VI PROGRAM APPROVAL LETTER AND FDOT CONCURRENCE LETTER
APPENDIX C	TITLE VI COMPLAINT FORM
APPENDIX D	PUBLIC PARTICIPATION PLAN
APPENDIX E	LANGUAGE ASSISTANCE PLAN
APPENDIX F	OPERATING AREA LANGUAGE DATA: HOLLYWOOD INNER-CITY TRANSIT SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAP

Hollywood Community Shuttle Program Title VI

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

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 City of Hollywood Community Shuttle Program (CSP) 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 Hollywood CSP 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 City of Hollywood Community Shuttle Program.
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

George Keller, Jr, City Manager

Date

2.0 Introduction & Description of Services

The City of Hollywood Community Shuttle Program submits this Title VI Plan 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 City of Hollywood Community Shuttle Program is a sub-recipient of FTA funds and provides service in the City of Hollywood and portions of the City of Hallandale. A description of the current Hollywood Community Shuttle Program system is included in Appendix B.

Title VI Liaison

Clarissa Ip, P.E
City Engineer
(954) 921-3915
2600 Hollywood Blvd., Rm 308
Hollywood, FL. 330022

Alternate Title VI Contact

Mark L. Johnson, P.M.P
Senior Project Manager
(954) 921-3991
2600 Hollywood Blvd., Rm 308
Hollywood, FL. 330022

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.

2.0.1 Current Description of System

The City of Hollywood's Community Shuttle Program's current and long-term focus as a transportation provider is on maintaining the best coordinated transportation system possible for the City of Hollywood. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

The City of Hollywood Community Shuttle Program (CSP) is provided by the City of Hollywood, which operates as a local government, non-profit organization. The City is made up of 1275 full-time employees, 181 part-time employees, and 32 Temporary/ Seasonal employees. The City Manager is responsible for all of the day-to-day operations of our organization and reports directly to the City Commissioners.

The City of Hollywood operates its CSP in partnership with Broward County Transit (BCT). Transportation services are provided in accordance with an Interlocal Agreement between the City and BCT, which includes an Operations Safety/Security Program and a Transportation Disadvantaged Service Plan (TDSP). The City of Hollywood will operate at the established service within the Interlocal Agreement.

The City of Hollywood contracts out all Community Shuttle Program services including training and management of the CSP. All safety sensitive employees are required to complete FDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on- the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheelchair lifts and securement devices. The Transportation Services Manager is responsible for annual renewal of all liability insurance for both FDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transportation Manager's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

Maintenance on all agency vehicles is provided by Broward County Transit as part of the Interlocal Agreement. Currently, a variety of vehicles to provide passenger services are used. The fleet includes four (4) buses all are equipped for wheelchair service. A contract is in place with Broward County to provide these vehicles to be operated by the current contractor the City of Hollywood is under contract with.

The City of Hollywood CSP provides transportation services that are available to all residents and visitors. Our service is a community shuttle bus program, which enables those residents and visitors who do not have a means of transportation and may not be capable of operating a vehicle to remain independent.

Many of the seniors who utilize the Hollywood CSP may have no means of transportation. The Hollywood CSP provides functional transportation for seniors. Without, would otherwise be isolated and unable to access community services to meet their basic needs. Hollywood CSP provides a wide range of trip purposes that include transportation to: The Senior Centers; medical appointments; local grocery stores; local malls and department stores; recreational and cultural activities; local license facilities; libraries or other community locations.

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

The City of Hollywood CSP does not receive any funding from FTA or FDOT. The Hollywood CSP receives funding from Broward County through an Inter-Local Agreement between Broward County and the City of Hollywood for Community Shuttle Service.

Current and Pending FTA Funding – N/A

Current and Pending FDOT Funding – N/A

Current and Pending Federal Funding (non TA)-
N/A

Current and Pending State Funding (non-DOT)-
N/A

During the previous three years, no Federal Agency or State Agency completed a Title VI compliance review of Hollywood CSP. The Hollywood CSP has not been found to be in noncompliance with any civil rights requirements.

2.2 Annual Certifications and Assurances

FTA Circular 4702.18, 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.

This Title VI Program was reviewed and approved by the Hollywood City Manager, which serves as the executive official for the City that is responsible for the administration of all departments and City operations. A copy of the City Manager's letter affirming the review and approval of the Program, as well as the FDOT concurrence letter is included in Appendix B of this Program.

The City of Hollywood will remain in compliance with this requirement by annual submission of certifications and assurances as required by the Broward County Inter-Local Agreement between Broward County and the City of Hollywood for Community Shuttle Service.

2.3 Title VI Program Concurrence and Adoption

The Program was reviewed and approved by the City Manager, which serves as the executive official for the City of Hollywood that is responsible for the administration of all departments and City operations. The City's letter affirming the review and approval of the Program is included in Appendix B.

3.0 Title VI Notice to the Public

FTA Circular 4702.18, 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.

Notifying the Public of Rights Under Title VI

Hollywood Community Shuttle Program

- The City of Hollywood Community Shuttle Program (CSP) 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 City of Hollywood Engineering, Transportation, and Mobility Division.

For more information on the Hollywood CSP civil rights program, contact 954-921-3900 or 954-921-8126, TTY number 1-800-955-8771 (V-TDD), or visit the Hollywood Engineering, Transportation, and Mobility office at 2600 Hollywood Boulevard, Room 308, Hollywood, Florida 33022. For more information, visit the City's web site at www.hollywoodfl.org.

- For more information on Title VI procedures, to file a complaint and/or obtain a complaint form contact Broward County Transit (BCT) at (954) 357-8481, TTY (954) 357-8302, or visit BCT's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>. You may also request information in writing to the Broward County Transportation Department, Transit Manager - Compliance, 1 North University Drive, 3100A, Plantation, FL 33324.
- If information is needed in another language, contact (954) 357-8481, TTY (954) 357-8302.

3.1 Notice Posting Locations

The notice to Public will be posted at many locations to apprise the public of Hollywood CSP's 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 facilities and on the City web site at www.hollywoodfl.org and on all other media opportunities.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.18, 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.

4.1 Complaint Procedure

In accordance with the Interlocal Agreement with Broward County Transit on ??, the City of Hollywood will use BCT's Complaint Process, Form and Procedures.

4.2 Complaint Form

A copy of the complaint form is provided in Appendix D and on Broward County Transit's website at <http://www.broward.org/BCT/Pages/TitleVI.aspx>.

4.3 Record Retention and Reporting Policy

The City of Hollywood will submit Title VI Programs to FDOT, BCT and any other primary recipient that provides funding to the City of Hollywood 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.

4.4 Sub-recipient Assistance and Monitoring

FTA Circular 4702.18, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

The City of Hollywood's CSP provides monitoring and assistance both by the City of Hollywood's Engineering, Transportation, and Mobility Department and by contracting the transit program out. As a sub-recipient to FDOT through Broward County, the City of Hollywood CSP utilizes the sub-recipient assistance and monitoring provided by Broward County, as needed. In the future, if the City of Hollywood CSP has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

4.5 Contractors and Subcontractors

The City of Hollywood Engineering, Transportation, and Mobility Department 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. Hollywood CSP, 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 Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate, either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit*

Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the City of Hollywood shall impose contract sanctions as appropriate, including, but not limited to:
 - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the City of Hollywood's CSP, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.18, 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.

Hollywood CSP 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.

6.0 Public Participation Plan

FTA Circular 4702.18, 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 individuals with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for the Hollywood CSP 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 Hollywood CSP. 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 Hollywood CSP services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The PPP is included as Appendix E to this Title VI Plan.

Current Outreach Efforts

Hollywood CSP is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of the Hollywood CSP's recent, current, and planned outreach activities.

- The City of Hollywood Communications and Marketing Team have promoted the Hollywood CSP in various ways. The city believes this community transit service is an essential service provided to the residents, and as such the city has used every communication vehicle available to spread the word to the community.
- Since the City launched its monthly newsletter two (2) years ago, several stories have been included in the publication to educate residents about the service. The newsletter is mailed to more than 20,000 households within the City limits.

- The City of Hollywood provides a paperless option for those residents who take advantage of the internet by placing the Hollywood Community Shuttle Program information on the City Website at www.hollywoodfl.org
- On a continuous basis, anyone who calls the City of Hollywood and is placed on hold; watches the City's local access Channel 78; or visits the City website has an opportunity to learn more about the Hollywood Community Shuttle Program.
- Social media plays a vital role in the City's communication with residents, and periodically, the city posts information about free service on all the city social platforms. Analytics have shown these posts to have very good engagement.

7.0 Language Assistance Plan

FTA Circular 4702.18, 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).

The City of Hollywood operates a transit system within Hollywood and portions of Hallandale Beach. The Language Assistance Plan (LAP) has been prepared to address the City of Hollywood's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the Hollywood Community Shuttle Program service area there are 153,067 residents (Source: US Census April 2020). The principal languages among the Hollywood residents are English and Spanish. According to the U.S. Census Bureau, specifically the 2021 American Community Survey, Table ID: S1601, 49.3% of City residents reported speaking only English at home, and 50.7% speaking languages other than English at home. Of the 38.1% who reported speaking Spanish at home, 16.8% reported they speak English less than "very well". Of the remaining City residents, 10.8% reported speaking other Indo-European languages, 0.8% reported speaking Asian and Pacific Islander languages, and 0.9% reported speaking "other languages".

The Hollywood Community Shuttle Program is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important programs and activities for individuals who are LEP. The Hollywood Community Shuttle Program has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LEP. The LEP is included in this Title VI Plan as Appendix E.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.18, 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 City of Hollywood Community Shuttle Program does not have a transit-related committee or board; therefore, this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.18, 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.

The City of Hollywood Community Shuttle Program has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, the City of Hollywood Community Shuttle Program does not have any Title VI Equity Analysis reports to submit with this plan. The City of Hollywood Community Shuttle Program will utilize the demographic maps included in appendix H for future Title VI analysis.

The City of Hollywood contracts out the transportation program so it does not have a transit-related dedicated facility just for buses; therefore, this requirement does not apply.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.18, 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.

Hollywood Community Shuttle Program is a fixed route service provider.

FTA Circular 4702.18 requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

Hollywood Community Shuttle Program has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

10.1 Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The City of Hollywood, Community Shuttle Program has prepared standards for all modes it operates including community shuttle bus service.

A. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Chevy Cutaway 450	16 + 2WC	5	23	1.5
Chevy Cutaway 450	16 + 2WC	5	23	1.5
Chevy Cutaway 450	16+2WC	5	23	1.5
Chevy Cutaway 450	16+2WC	5	23	1.5
Chevy Cutaway 450	16+2WC	5	23	1.5

B. Vehicle Headway

10.1 SERVICE STANDARDS	
Type	Standard Description
Vehicle Load	1.5 capacity ratio for all vehicles.
Vehicle Headway-Weekday/Weekend	(City Route 1) averages 39-minute headway all day.
Vehicle Headway-Weekday/Weekend	(City Route 2) averages 23-minute headway all day.
Vehicle Headway-Weekday/Weekend	(City Route 3) averages 40-minute headway all day.
Vehicle Headway-Weekday/Weekend	(City Route 4) averages 56-minute headway all day
On Time Performance	80% On-Time Performance is expected of Community Shuttle routes. On time is defined based on departures of zero (0) minutes early to five (5) minutes late.
Service Availability	Community Shuttle routes operate to complement BROWARD COUNTY'S (COUNTY) local, breeze, express, and paratransit services. To the greatest extent possible the Community Shuttle will fill gaps in COUNTY service coverage and offer local circulation to neighborhood destinations.

	Headways	Periods of Operation
ROUTE	PEAK	BASE
Route 1	40 minutes	Monday-Sunday 9.00 a.m. to 5.00 p.m.
Route 2 (Bus 1)	23 minutes	Monday-Thursday 8.00 a.m. to 6.06 p.m.
Route 2 (Bus 2)	23 minutes	Friday – Sunday 8.00 a.m. to 7.56 p.m.
Route 3	40 minutes	Monday – Sunday 9 am to 5.51 pm
Route 4	56 minutes	Monday – Sunday 9am to 5.24 pm

C. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than zero (0) minutes early and no more than five (5) minutes late. The City of Hollywood Community Shuttle Program Intercity Transit Program on-time performance objective is 80% or greater. The City of Hollywood Community Shuttle Program continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

D. Service Availability

The City of Hollywood Community Shuttle Program will operate the transit service in accordance with the Broward County ILA. All residents in the service area, will have access to the CSP

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. The Hollywood Community Shuttle Program has prepared standards for the operation of the community shuttle bus service.

10.2 Service Policies

10.2 SERVICE POLICIES	
Transit Amenities	The CITY collaborates with the COUNTY in the siting of transit amenities in accordance with a criteria based on ridership, community need, and available right-of-way. For passenger convenience, Community Shuttle stops are generally placed in close proximity of shopping plazas, grocery stores, hospitals, parks, and offices.
Vehicle Assignment	Vehicles in service for 5 years or 150,000 miles are prioritized for replacement. Routes regularly exceeding the vehicle capacity threshold should be addressed through additional service. The COUNTY is generally responsible for the procurement and replacement of transit vehicles based on need and available funding.

FTA requires fixed route transit providers to develop a policy for service indicators. Hollywood Community Shuttle Program has prepared the following policies for its transit system.

A. Distribution of Transit Amenities

Installation of transit amenities along shuttle routes are based on the number of passengers boarding at stops and stations along those routes.

B. Vehicle Assignment

Vehicles are provided through an Interlocal Agreement with Broward County Transit. The vehicles are standard 24 foot, 20-passenger, propane/gasoline/diesel, Chevy 4500 buses, with handicap lifts to accommodate two wheelchairs. Operating characteristics are consistent with the neighborhood routes in which they serve.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	TITLE VI PROGRAM CITY OFFICIAL APPROVAL LETTER AND FDOT CONCURRENCE LETTER
APPENDIX C	TITLE VI COMPLAINT FORM
APPENDIX D	PUBLIC PARTICIPATION PLAN
APPENDIX E	LANGUAGE ASSISTANCE PLAN
APPENDIX F	OPERATING AREA LANGUAGE DATA: HOLLYWOOD COMMUNITY SHUTTLE PROGRAM SERVICE AREA
APPENDIX G	DEMOGRAPHIC MAPS

Appendix A: FTA Circular 4702.IB 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
 - o Vehicle load for each mode
 - o Vehicle headway for each mode
 - o On time performance for each mode
 - o Service availability for each mode
- Service policies
 - o Transit Amenities for each mode
 - o Vehicle Assignment for each mode

Appendix B: TITLE VI PROGRAM CITY OFFICIAL APPROVAL LETTER

Appendix C: TITLE VI COMPLAINT FORM

LANGUAGE TRANSLATION SERVICE AVAILABLE

NOTE: *If you require this Title VI Complaint Form to be translated into another language, please log onto www.broward.org1bct. Click on either "Microsoft Translator" or "Google Translate" at the top right corner of the web page and select the appropriate language for your translation.*

SERVICO DE TRADUCCJON LENGUA DISPONIBLE

NOTA: *Si usted require de este Formulario de Queja de/ Titulo VI de ser traducido a otro idoma, por favor haga clic en cualquiera de "Microsoft Translator" o "Google Translate" en la esquina superior derecha de esta pagina web y seleccionar el idioma.*

LANG TRADIKSVON SEVIS KI DISPONIB

REMAK: *Si w mande pou s a Tit VI Fom Plent dwe tradui nan yon lot fang, tanpri klike sou swa "Tradikte Microsoft" oswa "Google Translate" nan kwen paj sa a web tet dwat epi chwazi fang ki apwopriye a pou tradiksyon ou.*

Broward County Board or County Commissioners
Transportation Department

COMPLAINT OF ADA and TITLE VI DISCRIMINATION

The Broward County Transit Division as a recipient of federal financial assistance is required to ensure that its transit service and related benefits are distributed in a manner consistent with Title VI of the Civil Rights Acts of 1964, as amended.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination under Title VI, on the basis of race, color, or national origin, may file a written complaint with the Broward County Transit Division.

We are asking for the following information to assist us in processing your complaint. If you need help in completing this form. Please contact us at (954) 357-8461 or TTY: (954) 357-8302.

NOTE: *Alternate means of filing complaint, such as personal interviews or a tape recording of the complaint will be made available to persons with disabilities upon request.*

1. Complainant Name: _____
 Street Address: _____
 City, State, Zip Code: _____
 Telephone: _____
 Email Address: _____

2. Person you believe discriminated against you (if known):
 Name: _____

3. Location of incident: _____

4. Are you represented by an attorney for this complaint?

Yes _ _ _ No _ _ _

If yes, please complete the following:

Attorney's Name: _____
 Street Address: _____
 City, State, Zip Code: _____
 Telephone: _____

5. Which of the following best describes the reason you believe the discrimination took place? Please circle.

Race	Color	National Origin	Sex	Income Status	Age
Disability	Retaliation	Sexual Orientation	Political Affiliation	Marital Status	

6. Date(s) of the all alleged discrimination: _ _ _ _ _

7. In the space below, please describe the alleged discrimination. Explain what happened and who you believe was responsible. *(Include bus number, route number, name of employee(s) involved in the incident, date, (location, and time of the Incident if applicable.)* Attach additional sheet if necessary.

8. Have you filed a complaint of the alleged discrimination with a federal, state, or local agency; or with a state or federal court?

Yes___ _ No___ _

If yes check all that apply:

Federal___ _ Federal Court___ _

State _____ State Court _____ Local Court___ _

Please provide the name of the Agency where you filed your complaint.

Agency Name: _____

Contact Person: _____

Complainant Signature

Date of Signature

You may attach any additional information you think is relevant to your complaint.

Submit your signed complaint and any attachments to:

Broward County Transit Division
Attention: Transit **Manager** - Compliance
1 North University Drive, Suite 3100A, Box 306
Plantation, FL 33324

Appendix D: PUBLIC PARTICIPATION PLAN (PPP)

Introduction

The Public Participation Plan (PPP) for the City of Hollywood Community Shuttle Program 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 City of Hollywood Community Shuttle Program. 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 Hollywood Community Shuttle Program services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. The Hollywood Community Shuttle Program also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community-based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Current Outreach Efforts

The City of Hollywood Community Shuttle Program is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of the City of Hollywood's Community Shuttle Program, current, and planned outreach activities:

- The City of Hollywood's Communications and Marketing Team have promoted the Hollywood Community Shuttle Program in various ways. The city believes this community transit service is an essential service provided to the residents, and as such the city has used every communication vehicle available to spread the word to the community.
- Since the City launched its monthly newsletter two (2) years ago, several stories have been included in the publication to educate residents about the service. The newsletter is mailed to more than 20,000 households within the City limits.
- The City of Hollywood provides a paperless option for those residents who take advantage of the internet by placing the Hollywood Community Shuttle Program information on the City Website at www.hollywoodfl.org.
- On a continuous basis, anyone who calls the City of Hollywood and is placed on hold; watches the City's local access Channel 78; or visits the City website has an opportunity to learn more about the Hollywood Community Shuttle Program.
- Social media plays a vital role in the City's communication with residents, and periodically, the city posts information about free service on all the city social platforms. Analytics have shown these posts to have very good engagement.

Appendix E: LANGUAGE ASSISTANCE PLAN (LAP)

I. Introduction

The City of Hollywood operates a transit system within Hollywood. The Language Assistance Plan (LAP) has been prepared to address the City of Hollywood's Community Shuttle Program responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, understand English are LEP. In the City of Hollywood's Community Shuttle Program service area, the principal languages are English and Spanish. According to the U.S. Census Bureau, specifically the 2021 American Community Survey, Table ID: S1601, 49.3% of City residents reported speaking only English at home, and 50.7% speaking languages other than English at home. Of the 38.1% who reported speaking Spanish at home, 16.8% reported they speak English less than "very well". Of the remaining City residents, 10.8% reported speaking other Indo-European languages, 0.8% reported speaking Asian and Pacific Islander languages, and 0.9% reported speaking "other languages".

Community Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. The City of Hollywood's Community Shuttle Program has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four-factor analysis to develop its LAP.

For many LEP individuals, public transit is the principal transportation mode available. It is important for City of Hollywood's Community Shuttle Program be able to communicate effectively with all of its riders. When City of Hollywood's Community Shuttle Program is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. The City of Hollywood's Community Shuttle Program is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that City of Hollywood's Community Shuttle Program undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying City of Hollywood's Community Shuttle Program staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use the City of Hollywood's Community Shuttle Program 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) Demography: identifying the number and/or proportion of LEP persons served or encountered, and languages spoken in service area.

- 2) Frequency: determining the rate of contact with programs, activities, and services.
- 3) Importance: gauging the nature and importance of programs, services, and activities to people's lives.
- 4) Resources: assessing current and available resources, including language assistance services.

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

Of the 143,230 residents in the City of Hollywood, 30,735 residents describe themselves as speaking English less than "very well". People of Spanish descent are the primary LEP persons likely to utilize the City of Hollywood's Community Shuttle Program. The 2021 American Community Survey of the U.S. Census Bureau shows that among the area's population 49.3% speak English "very well". For groups who speak English "less than very well", 44.4% speak Spanish.

Appendix F contains a table which lists the languages spoken at home by the ability to speak English for the population within the City of Hollywood which includes the City's Community Shuttle Program service area.

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

The City of Hollywood's Community Shuttle Program has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that there are two prominent LEP groups within the service area; namely, Spanish and French Creole speakers. Phone inquiries and staff survey feedback indicated that the City of Hollywood's Community Shuttle Program drivers interact frequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. The City of Hollywood Community Shuttle Program consists of a diverse certified professional staff. If translation services are needed, staff is capable of providing such services to our clients. Translation services provided includes oral and written translation pertaining to our programs and services. Over the past 3 years, The Hollywood Community Shuttle Program has had no requests for translated documents.

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

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

All transportation services will be performed in compliance with an additional contract with Broward County for Transportation Disadvantaged Services. The Program will comply with Chapter 427 of the Florida Statutes and Chapter 41-2 of the Florida Administrative Code.

Factor 4: The Resources Available to the Recipient and Costs

The City of Hollywood's Community Shuttle Program assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: 4 full time contracted drivers, and one part time mobility coordinator with the City of Hollywood. The City of Hollywood's Community Shuttle Program provides a reasonable degree of services for LEP populations in its service area.

III. 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

The City of Hollywood's Community Shuttle Program has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 49.3% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish, 38.1%. Of those whose primary spoken language is Spanish/Spanish Creole, approximately 16.8% identify themselves as speaking less than "very well". Of the remaining City residents, 10.8% reported speaking other Indo European languages, 0.8% reported speaking Asian and Pacific Islander languages, and 0.9% reported speaking "other languages".

The City of Hollywood's Community Shuttle Program 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. Having Census Bureau Language Identification Flashcards available at The City of Hollywood's Community Shuttle Program Meetings. This will assist the City of Hollywood's Community Shuttle Program in identifying language assistance needs for future events and meetings.
3. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to the City of Hollywood's Community Shuttle Program management to follow-up.
4. 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.

Element 2: Language Assistance Measures

The City of Hollywood's Community Shuttle Program 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. Provide Language Identification Flashcards onboard transit vehicles and in the City of Hollywood's Community Shuttle Program offices.

4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

The City of Hollywood's Community Shuttle Program will utilize the demographic maps provided in Appendix G in order to better provide the above efforts to the LEP persons within the service area.

b. Element 3: Training Staff

In the case of the City of Hollywood's Community Shuttle Program, the most important staff training is for Customer Service Representatives and contracted transit drivers. Several representatives are bilingual in English and Spanish.

The following training will be provided to Customer Service Representative:

- Information on Title VI Procedures and LEP responsibilities
- Use of Language Identification Flashcards
- Documentation of language assistance requests
- How to handle a potential Title VI/LEP complaint

Element 4: Providing Note to LEP Persons

The City of Hollywood's Community Shuttle Program 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 City of Hollywood's Main Office Lobby. Additionally, when the City of Hollywood's Community Shuttle Program 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 City of Hollywood's Community Shuttle Program's financial resources are sufficient to fund language assistance resources needed

The City of Hollywood's Community Shuttle Program 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 system easier. The City of Hollywood's Community Shuttle Program is open to suggestions from all sources, including customers. The City of Hollywood's Community Shuttle Program staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. 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 City of Hollywood does have LEP populations which qualify for the Safe Harbor Provision.

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. The City of Hollywood's Community Shuttle Program may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

**Appendix F: Operating Area Language Data: City of Hollywood's Community Shuttle
Program Transit Service Area**

LANGUAGE SPOKEN AT HOME ¹	Estimate	Percent
Population 5 years and over	143,230	143,230 (100%)
English only	70,588	49.3%
Language other than English	72,642	50.7%
- Speak English less than "very well"	30,735	21.5%
Spanish	54,604	38.1%
- Speak English less than "very well"	24,057	16.8%
Other Indo-European languages	15,481	10.8%
- Speak English less than "very well"	5,570	3.9%
Asian and Pacific Islander languages	1,198	0.8%
- Speak English less than "very well"	674	0.5%
Other languages	1,359	0.9%
- Speak English less than "very well"	434	0.3%

¹ <https://data.census.gov/table?g=160XX00US1232000&tid=ACST1Y2021.S1601&moe=false&tp=false>

Appendix G DEMOGRAPHIC MAP



