

## **Title VI/Nondiscrimination and Limited English Proficiency Policies**

### **Title VI/Nondiscrimination Statement**

Pursuant to Title VI of the Civil Rights Act of 1964 and other federal and state authorities, Sarasota County will not, either directly or through contractual means, exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age, disability, religion, income, or family status.

#### **Background**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d). The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal-aid recipients, subrecipients, and contractors whether those programs and activities are federally funded or not.

On August 11, 2000, President Bill Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency ("LEP"), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

During the Obama Administration, the Federal Transit Administration ("FTA") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with LEP. Recipients of public transportation funding from FTA are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI. This document details how Sarasota County incorporates nondiscrimination policies and practices in providing transit and non-transit services to the public.

## Policy Statement

Sarasota County values equity, diversity, accessibility, and inclusion, and welcomes input from the whole community. Sarasota County does not practice, condone, or tolerate discrimination on the grounds of race, color, national origin, sex, age, disability, religion, income, or family status in any of its facilities, programs, services, or activities.

## Complaint Procedures

Sarasota County has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that they have been subjected to discrimination based upon race, color, national origin, sex, religion, age, disability, family, or income status in any of Sarasota County's programs, services or activities may file a complaint with the Sarasota County Title VI liaison:

ADA Coordinator & Title VI Liaison  
Sarasota County  
1660 Ringling Blvd.  
Sarasota, FL 34236  
Phone: 941-861-5000 or 311  
Fax: 941-861-5966

Whenever possible, the complaint should be submitted in writing and contain the identity of the complainant; the basis for the allegations (i.e., race, color, national origin, sex, religion, age, disability, or family status); and a description of the alleged discrimination with the date of occurrence.

If the complainant has difficulty submitting the complaint in writing, the complainant should contact the ADA coordinator & Title VI liaison for assistance.

The ADA coordinator & Title VI liaison will respond to the complaint within thirty calendar days and will take reasonable steps to resolve the matter. Should the county be unable to satisfactorily resolve the complaint, the county will forward transit related complaints, along with a record of its disposition, to District 1 of the Florida Department of Transportation (FDOT).

Sarasota County's ADA coordinator & Title VI liaison has direct access to the county administrator and is not required to obtain management or other approval to discuss discrimination issues with the county administrator.

If an individual has a transit related complaint and is unable or unwilling to complain to the county, a written complaint may be submitted directly to FDOT. FDOT will serve as a clearinghouse, forwarding the complaint to the appropriate state or federal agency:

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

### Limited English Proficiency (LEP) Policy

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and directives from various U.S. departments require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

- The number or proportion of persons who have limited English proficiency who reside in the county.
- The frequency with which individuals with limited English proficiency, including visitors, utilize the county's facilities, programs, services, or activities.
- The nature and importance of the program, service, or activity to people's lives.
- The resources available to the county and the likely costs of the LEP services.

### Local Demographic Data

Utilizing the five-year estimates for 2021 of the American Community Survey (ACS)(Table C16001), Sarasota County has determined that LEP individuals over age five (5) who speak English less than well represent approximately 19,926 individuals, or 4.806% of our community (414,582). The following is the allocation of LEP individuals using the above-described demographic data:

- Spanish speaking individuals 11,872 (2.86%)
- Russian, Polish, or other Slavic languages speaking individuals 2,369 (.5%)
- Other Indo-European language speaking individuals 1,507 (.3%)
- French, Haitian or Cajun speaking individuals 800 (.1%)
- German or other Germanic languages speaking individuals 667 (.1%)

- Chinese (including Mandarin & Cantonese) speaking individuals 640 (.1%)
- Other Asian and Pacific Island languages speaking individuals 584 (.1%)
- Other and unspecified language speaking individuals 504 (.1%)
- Vietnamese speaking individuals 489 (.1%)
- Tagalog (including Filipino) speaking individuals 268 (0%)
- Korean speaking individuals 119 (0%)
- Arabic speaking languages 107 (0%)

### Key County Services for Individuals with Limited English Proficiency

County services are of critical importance to the public. Therefore, the county advises the public how to access its nondiscrimination policies by posting notices in all public county buildings, noting information on published Sarasota County Board agendas, and other printed/online program materials.

To enhance access to county facilities, programs, and activities, the county engages in the following activities:

- Provides, through a service agreement, phone access to interpreter services, which is available to be used for 911 emergency calls and the county's call center.
- Provides translation/interpreter services for businesses that wish to conduct transactions or compete for contracts with the county.
- Utilizes county staff from many different departments and cultural backgrounds capable of translating written language or interpreting spoken language.
- Offers in all ten libraries within the system, Spanish and bilingual collections that feature children's books and popular adult titles as well as an adult reader development collection, that includes resources for adult literacy and English language learners focusing on career preparation, citizenship study materials, GED preparation, and high interest books. Russian and Ukrainian collections are available upon request.
- Maintains an ongoing partnership with the Literacy Council of Sarasota as well as the Council of Sarasota Literacy Volunteers of South Sarasota County. These partnerships serve to connect English language learners to tutors and conversation groups, in addition to providing critical community services. Whenever possible, the libraries make physical and virtual programming space available to both partners.
- Obtains grants to provide English language learning kits, online tutoring services, as well as other bilingual special events for the community.

Sarasota County understands that its community profile is continually changing. As such, the county will triennially reexamine its LEP plan to ensure that it remains reflective of the community's needs. Moreover, the county is committed to periodically engaging in

meaningful and targeted surveys to specifically determine the frequency with which individuals with limited English proficiency, including visitors, utilize the county's facilities, programs, services, or activities.

Any persons requiring special language services should contact the county's ADA coordinator & Title VI liaison:

ADA Coordinator & Title VI Liaison  
Sarasota County  
1660 Ringling Blvd.  
Sarasota, FL 34236  
Phone: 941-861-5000 or 311  
Fax: 941-861-5966

Approved on March 1, 2024



Jonathan Lewis  
County Administrator

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