



Lakewood
Colorado

MEMORANDUM

TO: Kathy Hodgson, City Manager

**THRU: Kit Newland, Director
Community Resources Department**

**FROM: Peggy Bocard, Recreation Manager
Community Resources Department**

DATE: May 25, 2016

SUBJECT: Title VI Compliance

In 2013, the City applied for and received a FTA 5310 grant for two 15 passenger para-transit buses and funding towards two part time variable staff to support those operations. The decision to apply for the grant was due to the steady increase in unfilled requests since 2010 and the sharp escalation in eligible citizens. For instance, in the first two quarters of 2013, we saw a 40% increase in unfilled requests.

The addition of these vehicles has allowed us to make great strides in reducing the waiting list for our resident's to access low cost transportation to doctor appointments, our VOA meal site, food shopping, etc.

One of the requirements of the grant was to ensure that the City adheres to Title VI of the Civil Rights Act of 1964, which provides protection against discrimination. After conferring with Greg Graham, Deputy City Attorney, we found we currently have the following non-discrimination Administrative Regulations in place:

- A policy regarding Limited English Proficient Speakers (AR I/J)
- A policy regarding Americans with Disabilities Act Title II Compliance (AR I/K)
- Non-Discrimination in hiring and employment Policy (AR IV/G)
- We require all City contractors to comply with equal opportunity employment and ADA requirements.

With this we also discovered that, while we practice and support non-discrimination, the City does not have a broad policy regarding non-discrimination in City programs, events, activities or when conducting City business. Once that information was known, staff again worked with the Deputy City Attorney to develop a draft policy for Lakewood to temporarily meet the grant's requirement. Staff also began to work on the broader policy needed for Lakewood Rides to comply. The attached is the policy that was reviewed and approved by the Deputy City Attorney, and, once signed, will allow us to fulfill the requirements of the grant.

While this policy is geared specifically towards the Lakewood Rides Program, it also provides a great foundation for the City to create a formal policy in other services we provide.

**CITY OF LAKEWOOD – LAKEWOOD RIDES PROGRAM
TITLE VI PLAN**

I. Introduction

The goal of the City of Lakewood's ("COL") Lakewood Rides Program ("Lakewood Rides") is to encourage continued independence and mobility in residents of Lakewood who are older adults and those with disabilities. The intent is to provide a safe, courteous, efficient, and supportive para-transit transportation service that assists these two populations in maintaining a quality of life. The function and criteria of the COL's Lakewood Rides Program is as follows:

- Door-through-Door assisted service to residents of the City of Lakewood who are age 60 and over, or those of any age with disabilities
- Demand response system para-transit transportation
- Purpose of trips includes medical appointments, grocery shopping, nutrition, wellness, employment, personal and social
- Destination boundaries include: East to University Blvd; West to Golden proper; North to 49th Avenue; South to Quincy Avenue.

II. Plan Overview

This plan is intended to comply with the Federal Transit Administration ("FTA") Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." The Lakewood Rides Non-Discrimination Policy is attached hereto as Appendix A.

Lakewood Rides is the City of Lakewood's People Service Transportation as described in 40-1.1-101, et seq., C.R.S., and subject to chapter III of FTA Circular 4702.1B.

III. Content

a. Requirement to Notify Beneficiaries of Protection under Title VI

In accordance with FTA Circular 4702.1B, Lakewood Rides seeks to apprise members of the public of the protection against discrimination afforded to them by Title VI of the Civil Rights Act of 1964 ("Title VI"). Lakewood Rides Title VI notice is available in English and Spanish and is posted on all Lakewood Rides vehicles, in the Lakewood Rides dispatch office, and on the Lakewood Website at: www.lakewood.org/LakewoodRides/. A copy of the notice in English is attached hereto as Appendix B and in Spanish as Appendix C. Limited English Proficient ("LEP") persons who speak a language other than Spanish will be accommodated upon request, which is outlined in the LEP Policy and is attached hereto as Appendix G.

b. Complaint Procedures and Complaint Form

In accordance with FTA Circular 4702.1B, Lakewood Rides has developed procedures for investigating and tracking Title VI complaints filed against the agency and any contract services. The complaint procedure and complaint form are written in English and Spanish

and are available from the Lakewood Rides Dispatch Office, from the Older Adult and Transportation Supervisor, and on the Lakewood Website at:
www.lakewood.org/LakewoodRides/.

The English version of the complaint procedure and form is attached hereto as Appendix D and the Spanish version is attached as Appendix E. These documents were drafted with the intention of serving as a universal complaint form and procedure for all external discrimination complaints. Complaints are screened by COL's Older Adult and Transportation Supervisor to determine if a complaint falls under Title VI or another civil rights law. The Older Adult and Transportation Supervisor and COL's Family Services Manager will review complaints.

c. Title VI Investigation, Complaints and Law suits

In accordance with FTA Circular 4702.1B, Lakewood Rides prepares and maintains a list of all complaints, investigations and lawsuits that allege discrimination on the grounds of race, color, or national origin. The form used is attached hereto as Appendix F. There are no complaints to list at this time.

d. Inclusive Public Participation/Outreach

COL's Lakewood Rides Program interacts with the public through the driving and dispatch staff. In addition, satisfaction and marketing surveys are conducted to obtain information on citizen needs. Information about Lakewood Rides can be found on the COL Website, links to brochures in English and Spanish, are mailed in registration packets upon request, available at informational booths at various community Wellness Fairs and Jefferson County's Aging Well conferences. In addition, COL has a Reach Out office whose staff contacts several community agencies to exchange information about services offered and to refer persons who inquire about services, some of which are LEP persons. Example agencies include: Developmental Disabilities Resource Center, Seniors Resource Center, the Action Center, Colorado Latino Age Wave, a project of the Latino Community Foundation of Colorado, El Centro De Las Familias, Servicios de La Raza, Denver Health - the West campus, and Audio Information Network of Colorado. COL's staff participate on committees within the community where other agencies attend, some of which focus on persons with disabilities, minorities, older adults or LEP persons. Further outreach will continue through methods listed above as well as exploring new organizations that primarily serve older adults and persons with disabilities who work with LEP persons.

e. Responsibility to Limited English Proficient Persons ("DOT LEP Guidance"), 70 FR 74087, (December 14, 2005).

In accordance with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), Lakewood Rides will take reasonable steps to ensure meaningful access to benefits and services for LEP individuals. Lakewood Rides' LEP plan is attached hereto as Appendix G.

IN WITNESS WHEREOF, the City of Lakewood hereby adopts this CITY OF LAKEWOOD – LAKEWOOD RIDES PROGRAM TITLE VI PLAN.



CITY OF LAKEWOOD

Kathleen E. Hodgson

Kathleen E. Hodgson, City Manager

ATTEST:

Margy Green
Margy Green, City Clerk

Approved as to form:

Gregory D. Graham
Gregory D. Graham, Deputy City Attorney

Recommended for approval:

Peggy Boccia
Peggy Boccia, Recreation Division Manager
Department of Community Resources

Appendix A

Policy on: Non-Discrimination	Procedure on:
Date Initiated: 11/09/15	Page <u>1</u> of <u>2</u>

Purpose: to ensure compliance with the following:

Statutory Authority: Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

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.

Regulatory Authority:

- U.S. Department of Justice (DOJ) Title VI found at 28 Code of Federal Regulations (CFR) 42.401 *et seq.*, and 28 CFR 50.3.
- U.S. Department of Transportation (DOT) Title VI found at 49 CFR part 21.

Guiding Document: U.S. Department of Transportation Federal Transit Administration Circular 4702.1B, October 1, 2012.

Policy Statement: City of Lakewood/Lakewood Rides Program ("Lakewood Rides"), including all contracting parties or anyone who acts on the behalf of Lakewood Rides, shall not refuse or deny transportation services, on the grounds of race, color, or national origin, to persons who potentially meet the service criteria. Persons meeting the program criteria shall not be excluded from participation in, denied the benefits of, or be subjected to discrimination in any operation of Lakewood Rides, as provided by Title VI of the Civil Rights Act of 1964 and related statutes. This policy also applies to the operations of any department or agency to which Lakewood Rides extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Guidelines:

1. Prohibit discrimination through intentional or unintentional acts.
2. Prohibit discrimination through seemingly neutral acts that have a disparate impact on individuals.
3. Prohibit harassment and retaliation.
4. Promote an atmosphere of respect and acceptance in all interactions both internally and externally.
5. The Lakewood Rides recognizes its citizens and employees have varied backgrounds, experiences and differences; therefore creating an atmosphere of inclusion.

Examples of prohibited types of discrimination based on race, color, national origin include: denial to an individual any service, financial aid, or other benefit; distinctions in the quality, quantity, or manner in which a benefit is provided; segregation or separate treatment; restriction in the enjoyment of any advantages, privileges, or other benefits provided;

discrimination in any activities related to transportation that is offered under the criteria of Lakewood Rides; and discrimination in employment.

Refer to: For additional information see also:

1. City of Lakewood Equal Employment Opportunity Policy 4.14.010 and Administrative Regulation (AR) IV/G
2. Limited English Proficient Speakers AR I/J
3. ADA Title II Compliance I/K
4. Limited English Proficient (LEP) Policy Lakewood Rides Program (LRP)-
City of Lakewood
5. City of Lakewood-Lakewood Rides Program Title VI Plan

Consequences:

Failure to comply with the terms of this policy may result in disciplinary action up to and including dismissal.

Management Responsibilities:

Title VI compliance is a condition of receipt of federal funds. The Older Adult and Transportation Supervisor is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, requirements of 28 CFR 42.401, *et seq.*, 28 CFR 50.3, and 49 CFR pt. 21.

APPENDIX B

NOTICE TO THE PUBLIC OF RIGHTS UNDER TITLE VI

**THE CITY OF LAKEWOOD
LAKEWOOD RIDES PROGRAM**

The City of Lakewood – Lakewood Rides Program operates the program 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 Lakewood Older Adult and Transportation Supervisor.

For more information on the City of Lakewood – Lakewood Rides Program’s civil rights plan and the procedures to file a complaint, please contact or visit:

City of Lakewood
Older Adult and Transportation Supervisor
1580 Yarrow Street
Lakewood, Colorado 80214
Contact: Dawn Sluder
Phone: 303-987-4832, (TTY: 303-987-4840);
Email: dawslu@lakewood.org;

A complainant may file a complaint directly with:

City of Lakewood
Risk Management
480 South Allison Pkwy
Lakewood, Colorado 80226
Contact: Seerie Southwick
303-987-7713
seesou@lakewood.org

Colorado Department of Transportation
Civil Rights & Business Resource Center
4201 East Arkansas Ave., Room 150
Denver, CO 80222
dot_civilrights@state.co.us
Phone: (800) 925-3427
Fax: (303) 952-7088
dot_civilrights@state.co.us

If information is needed in another language, contact 303-987-4832
Si información es necesaria en otro idioma, contacte 303-987-4832

LIST OF LOCATIONS WHERE NOTICE IS POSTED:

All Lakewood Rides Vehicles
Lakewood Rides Dispatch Office

APPENDIX C
AVISO AL PÚBLICO DE LOS DERECHOS BAJO EL TITLE VI

**PROGRAMA DE LAKEWOOD RIDES DE LA
CIUDAD DE LAKEWOOD**

La Ciudad de Lakewood – Programa de Lakewood Rides opera el programa y sus servicios sin consideración de la raza, color, y nacionalidad de acuerdo con el Title VI de la Ley de Derechos Civiles. Cualquier persona que crea que se le ha agraviado por una práctica discriminatoria ilegal bajo el Title VI puede hacer una denuncia con el Supervisor de Older Adult and Transportation.

Para más información acerca del plan de derechos civiles del Programa de Lakewood Rides, y los procedimientos para presentar una denuncia/queja favor de contactar o visitar a:

City of Lakewood
Older Adult and Transportation Supervisor
1580 Yarrow Street
Lakewood, Colorado 80214
Contact: Dawn Sluder
Phone: 303-987-4832, (TTY: 303-987-4840);
Email: dawslu@lakewood.org;

Se puede presentar una denuncia directamente con:

City of Lakewood
Risk Management
480 South Allison Pkwy
Lakewood, Colorado 80226
Contacto: Seerie Southwick
303-987-7713
seesou@lakewood.org

Colorado Department of Transportation
Civil Rights & Business Resource Center
4201 East Arkansas Ave., Room 150
Denver, CO 80222
dot_civilrights@state.co.us
Teléfono: (800) 925-3427
Fax: (303) 952-7088
dot_civilrights@state.co.us

Si información es necesaria en otro idioma, contacte 303-987-4832
If information is needed in another language, contact 303-987-4832

LISTA DE LUGARES DONDE EL AVISO ESTA DISPONIBLE:

Todos los vehículos de Lakewood Rides Vehicles
Oficina de Lakewood Rides Dispatch

APPENDIX D

Discrimination Complaint Procedure for City of Lakewood/Lakewood Rides Program

Any person who believes she or he has been discriminated against, based on race, color, or national origin, by the City of Lakewood's (COL) Lakewood Rides Program "Lakewood Rides") may file a Title VI complaint by completing and submitting the Title VI Complaint Form. Lakewood Rides investigates complaints received no more than one hundred and eighty (180) days after the alleged incident. Lakewood Rides will only process complaints that are complete.

Once the complaint is received, the COL Older Adult and Transportation Supervisor and the COL Family Services Manager will review the complaint to determine if the Lakewood Rides office has jurisdiction. The complainant will receive an acknowledgement of the letter informing the complainant whether the complaint will be investigated by Lakewood Rides.

The assigned investigator will investigate the complaint within ten (10) business days of receipt. If more information is needed to resolve the matter, the investigator will contact the complainant. The complainant has five (5) business days from the date of the contact to send requested information to the investigator. If the investigator is not contacted by the complainant or does not receive the additional information within five (5) business days, the investigator may administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue the matter.

After the investigator reviews the complaint, she/he will issue to the complainant either a closure letter or a letter of finding ("LOF"). A closure letter summarizes the allegations and states that a Title VI violation could not be sustained, and the case will be closed. An LOF summarizes the allegations and any interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the involved staff member or other action will occur. If the complainant wishes to appeal the investigator's decision, she/he has fifteen (15) business days after the date of the closure letter or LOF to do so.

Complaints may be submitted via mail, email, and fax or in person to:

City of Lakewood
Older Adult and Transportation Supervisor
1580 Yarrow Street
Lakewood, Colorado 80214
Phone: 303-987-4832, (TTY: 303-987-4840);
Contact: Dawn Sluder
Email: dawslu@lakewood.org;
Fax: 303-987-4841

Complaints may also be filed directly with the following:

City of Lakewood
Risk Management
480 South Allison Pkwy
Lakewood, Colorado 80226
Contact: Seerie Southwick
Phone: (303) 987-7713
Email: seesou@lakewood.org

Colorado Department of Transportation
Civil Rights & Business Resource Center
4201 East Arkansas Ave., Room 150
Denver, CO 80222
Email: dot_civilrights@state.co.us
Phone: (800) 925-3427
Fax: (303) 952-7088

Where did the discrimination occur?

Dates and times discrimination occurred?

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint number, if known _____

Do you have an attorney in this matter?

Name _____ Phone _____
Address _____ City _____ Zip _____
Signed _____ Date _____

APPENDIX E

Procedimiento de Denuncia/Quejas de Discriminación del Programa de Lakewood Rides/Ciudad de Lakewood

Cualquier persona que crea haya sido discriminada en base a su raza, color, origen nacional por el Programa de Lakewood Rides de la Ciudad de Lakewood puede presentar una denuncia de Title VI al llenar y entregar el Formulario Title VI Complaint. El Programa Lakewood Rides de la Ciudad de Lakewood investiga las quejas recibidas no más de ciento ochenta (180) días después del presunto incidente. El Programa de Lakewood Rides de la Ciudad de Lakewood procesará las quejas que estén completas.

Una vez que la queja haya sido recibida, el Supervisor de Older Adult and Transportation y el Administrador de Family Services hará una revisión de la queja para determinar si nuestra oficina tiene jurisdicción. La queja recibirá una carta de reconocimiento de recibo informandolo a él o a ella si la queja será investigada por nuestra oficina.

El personal asignado tiene diez (10) días para investigar la queja. Si más información es necesaria para resolver el caso, el demandante será contactado. El demandante tiene cinco (5) días hábiles de la fecha de contacto para mandar la información requerida al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional en cinco (5) días hábiles, el investigador puede administrativamente cerrar el caso. Un caso también puede ser administrativamente cerrado si el demandante ya no desea continuar su caso.

Después de que el investigador revise la queja, ella/el expedirá una de dos cartas al demandante: una carta de cierre o una carta de resultados (LOF). La carta de cierre hace un resumen de las alegaciones y menciona que no hubo una violación del Title VI y que el caso será cerrado. Una carta de resultados (LOF) hace un resumen de las alegaciones y de las entrevistas relacionadas con el supuesto incidente, y explica si algún tipo de acción disciplinaria, entrenamiento adicional del miembro del personal u otra acción ocurrirán. Si el demandante desea apelar la decisión, ella/el tiene 15 días después de la fecha de cierre o de la carta de resultados (LOF), para hacerlo.

Las denuncias/quejas se pueden entregar por medio de correo, email, y fax o en persona a:

City of Lakewood

Older Adult and Transportation Supervisor

1580 Yarrow Street

Lakewood, Colorado 80214

Teléfono: 303-987-4832, (TTY: 303-987-4840);

Contacto: Dawn Sluder

Email: dawslu@lakewood.org;

Fax: 303-987-4841

Las quejas también se pueden hacer directamente con los siguientes:

City of Lakewood

Risk Management

480 South Allison Pkwy

Lakewood, Colorado 80226

Contacto: Seerie Southwick

Teléfono: (303) 987-7713

Email: seesou@lakewood.org

Colorado Department of Transportation

Civil Rights & Business Resource Center

4201 East Arkansas Ave., Room 150

Denver, CO 80222

Email: dot_civilrights@state.co.us

Teléfono: (800) 925-3427

Fax: (303) 952-7088

¿Dónde ocurrió la discriminación?

Fechas y horas de la discriminación ocurrida

¿Hubieron otros testigos de esta discriminación?

Nombre	Organización/Título	Teléfono del Trabajo	Teléfono en Casa

¿Cómo le gustaría que se resolviera esta situación?

¿Ha presentado su queja, reclamo, o demanda con otra agencia o juzgado?

Quién _____ Cuándo _____
Estatus (pendiente, resuelto, etc.) _____ Resultado, si se sabe _____
Número de Queja, si se sabe _____

¿Tiene usted un abogado para este asunto?

Nombre _____ Teléfono _____
Dirección _____ Ciudad _____ CP _____
Firma _____ Fecha _____

APPENDIX F
List of Investigations, Lawsuits, and Complaints

Investigations. Include date, Summary (include basis of complaint: race, color, or national, origin), Status, Action(s) Taken

1.

2.

Lawsuits. Include date, Summary (include basis of complaint: race, color, or national, origin), Status, Action(s) Taken

1.

2.

Complaints. Include date, Summary (include basis of complaint: race, color, or national, origin), Status, Action(s) Taken

1.

2.

APPENDIX G

Policy on: Limited English Proficient (LEP)	Procedure on:
Date Initiated: 11/09/15	Page 1 of 4

Purpose: to ensure consistency with the following:

- Title VI of the Civil Rights Act of 1964
- DOT's implementing regulations
- Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000),
- Federal Transit Administration (FTA) U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087-74100, December 14, 2005).

Policy Statement: City of Lakewood's (COL) Lakewood Rides Program ("Lakewood Rides"), including all contracting parties or anyone who acts on the behalf of Lakewood Rides, shall ensure all services normally provided in English are accessible to Limited English Proficiency ("LEP") persons and will not discriminate on the basis of race, color, or national origin. Lakewood Rides will, to the maximum extent feasible in its official deliberations and communications, engage in community outreach and related notifications and provide appropriate, alternative non-English formats for LEP persons to access information and services provided.

Lakewood Rides has developed a Four-Factor Analysis to determine the number and percentage of LEP persons within the service area and the nature, frequency and importance of the contact with LEP persons in providing transportation services. Each of these elements is addressed below.

Factor 1. Number and Percentage of LEP persons in the service area according to the U.S. Census Bureau Selected Social Characteristics in the United States 2014.

	Number	Percentage
1. Population over five years of age:	137,082	
2. Population of Spanish speakers who speak English less than very well:	4,264	3.1%
3. Population of Indo-European language speakers who speak English less than very well:	785	.6%
4. Population of Asian and Islander languages who speak English less than very well:	1,130	.8%
5. Population of other languages spoken who speak English less than very well:	191	.1%

Note: The total population of persons who speak English less than very well:

6370

4.6%

LEP populations do exist within the Lakewood Rides service area. Given that these numbers reflect persons over the age of five, it is understood that there are LEP individuals who meet the qualifications of the Lakewood Rides Program. The greatest number of LEP residents is Spanish speaking at 3.1 percent, or over 4,000 persons. The next largest group is Asian and Islander persons at .8 percent, or just over 1,000 persons. The literacy level of LEP persons is not known at this time. Lakewood Rides services are offered to qualifying residents of the City of Lakewood throughout its parameters. Going forward, Lakewood Rides will consult with the Jefferson County School District, COL Head Start, Lakewood Municipal Court, other City programs and community organizations to help determine the literacy level of LEP persons within Lakewood. COL's "2010 Population and Housing Characteristics" by Census Tract identifies race and Hispanic origin. From this, it will be considered that there may be LEP persons who live within these tracts.

In addition, Lakewood Rides serves persons with disabilities. Some of these riders have a level of speech impairment, which results in limited English speaking ability.

Factor 2. The Frequency with which LEP persons come into contact with the program.

Currently, Lakewood Rides' total non-White ridership is approximately 12% of the total ridership. These are persons who have come in direct contact with Lakewood Rides, registered and actively utilize the service. Of the total non-White ridership, approximately 6% are LEP persons. When compared to the total ridership, the total number of LEP persons that use the service is a fraction of 1%. However, given that LEP persons reside within Lakewood, contact with LEP persons will occur with some frequency. In addition, Lakewood Rides is sensitive to persons with disabilities who are limited in English speaking ability. Those persons make up approximately 2.5% of the current total ridership.

Lakewood Rides' Dispatch has reported contact with an LEP person approximately once every 3 months, and most often the LEP person speaks Spanish. Dispatch has also reported contact with a person who is limited in English speaking ability as the result of a disability approximately once every 6 months. COL's Reach Out Office reports that contact with LEP persons and persons who are limited in English speaking ability due to a disability, combined, as approximately 25 out of 3526.

Going forward, Lakewood Rides and the Reach Out Office will continue monitoring and assisting all inquiries and registered riders.

Factor 3. The Nature and Importance of the service provided by Lakewood Rides to people's lives.

- a. Nature of the service: Lakewood Rides is a Specialized Para-transit Transportation Service, providing door-thru-door assistance to the rider. It serves residents of Lakewood who are sixty years of age and older, or those with disabilities of any age. The types of contact can be via phone, the City's Website, email, or in person.

- b. Importance of the service: The service Lakewood Rides offers is most often used by the more frail who may not: (i) be able to navigate the Public Transit System; (ii) have use of personal vehicles; (iii) cannot walk or bicycle; or (iv) do not have other supportive means. Therefore, the importance of Lakewood Rides is considered high to the qualifying population. Given that the total population of persons who speak English "less than very well" is 4.6% of the COL's total population who are over 5 years of age, there is a strong likelihood that Lakewood Rides will serve an LEP person. The same importance applies to those persons with limited English speaking ability due to a disability.

Factor 4. Resources Available for LEP Outreach.

There are numerous language assistance measures available to LEP persons, including both oral and written language services. Many of these services are provided by COL staff, which assist in maintaining a reasonable cost factor. Lakewood Rides staff responds to LEP persons and persons with limited English speaking ability due to a disability in person, by telephone, TTY, Operator assistance, in writing in various ways, or through email. Examples are listed below:

1. The COL Department of Employee Relations maintains a list of bilingual and multilingual employees. When the need arises for translation or interpretation, an appropriate employee will be called to assist.
2. Lakewood Rides has two staff that are bilingual/multilingual and read, write, and speak Spanish, French, and Arabic.
3. The COL Family Services Division has several bilingual staff that read, write, and speak Spanish.
4. The Lakewood Municipal Court retains a list of certified interpreters and translators who speak more than one language, including American Sign Language, and may assist in planned interactions anywhere within the COL.
5. COL provides TTY phone service for callers with hearing impairments
6. Lakewood Rides brochure is translated into Spanish, the most common non-English primary language in Lakewood, using qualified translators. All translated documents are available free of charge to personnel as well as the public.
7. Requests for translation of other documents may be made to Lakewood Rides Dispatch Office or with the COL Employee Relations office.
8. The COL Reach Out Office uses Google Translate to assist LEP persons with communication.

Lakewood Rides will continue to develop resources through staff training implementing methods listed below:

- Obtain copies of CDOT's 'Basic Spanish for transit employees' for English only speaking drivers
- Familiarize Lakewood Rides staff with language line services 'www.languageline.com', Google Translate and explore the use of Alta Vista Babel Fish.

Refer to: For additional information see also:

1. City of Lakewood Equal Employment Opportunity Policy 4.14.010 and Administrative Regulation (AR) IV/G
2. Limited English Proficient Speakers AR I/J
3. ADA Title II Compliance I/K
4. Lakewood Rides Non-Discrimination Policy

Consequences:

Failure to comply with the terms of this policy may result in disciplinary action up to and including dismissal.

Management Responsibilities:

Title VI compliance is a condition of receipt of federal funds. The Older Adult and Transportation Supervisor is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000).