

County of Monroe

The Florida Keys



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Office of the County Administrator
Key West, Florida

MONROE COUNTY ADMINISTRATIVE INSTRUCTION 6004.1

Date: October 14, 2021

Subject: Title VI and Nondiscrimination Policy and Plan

Reference: Title VI of the Civil Rights Act of 1964
Section 504 of the Rehabilitation Act of 1973 (Section 504)
Americans with Disabilities Act of 1990, as amended
Resolution No. 086-2016
Administrative Instruction 4718.1, Americans with Disabilities Act Grievance Procedure
Administrative Instruction 4719.4, Americans with Disabilities Act Request for Accommodation

Enclosure: (1) Title VI Grievance Form

Effective Date: Immediately

(1) **Background:** Various departments and programs within Monroe County receive federal financial assistance in the form of contracts, grants and loans. As a condition of receipt of federal funds, Monroe County is required to have in place a formal policy of nondiscrimination in the delivery of all programs and activities receiving federal financial assistance, to assure compliance with Title VI of the Civil Rights Act of 1964.

(2) **Purpose:** To comply and carry out responsibilities under Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973 (Section 504); the Americans with Disabilities Act of 1990; and related federal and state laws and regulations which forbid discrimination.

(3) **Cancellation:** This instruction is to remain continuously in effect unless specifically revised or canceled.

(4) **Instructions:**

Enclosure (1) is to be utilized for those alleging discrimination, which includes exclusion of participation or denial of benefits on the basis of race, color, national origin, sex, age, disability, religion, income, sexual orientation, or family status.

(5) **Action:** This Grievance Procedure is established to meet one of the requirements of Title VI of the Civil Rights Act of 1964. It may be used by anyone who wishes to file a complaint alleging exclusion of participation or denial of benefits on the basis of race, color, national origin, sex, age, disability, religion, income, sexual orientation, or family status, regarding a program run by Monroe County that has received federal financial assistance, in the form of a contract, grant or loan.

If possible, the complaint should be submitted in writing and contain the identity of the complainant; the County program receiving federal financial assistance; the basis for the allegations (i.e., race, color, national origin, sex, religion, age, disability, sexual orientation, or family status); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, the complainant should contact the Title VI/Nondiscrimination Coordinator for assistance.

Alana Thurston
Human Resources Coordinator/EEO Officer
1100 Simonton Street, Suite 2-268, Key West, FL 33040
Telephone: 305-292-4461
Fax: 305-292-4454
Email: Thurston-Alana@monroecounty-fl.gov
Hearing impaired: Florida Relay 7-1-1

The Title VI/Nondiscrimination Coordinator will respond to the complaint within thirty (30) calendar days from receipt of the complaint and will take reasonable steps to resolve the matter. Should the county be unable to satisfactorily resolve a complaint, the title VI/Nondiscrimination Coordinator will forward the complaint, along with a record of its disposition, to the appropriate Federal and/or State agency for further processing.

The County's Title VI Coordinator has 'easy access' to the County Administrator and is not required to obtain management or other approval to discuss discrimination issues with the County Administrator. However, should the complainant be unable or unwilling to complain to the County, or if the complainant is dissatisfied with the County's handling of the complaint, the written complaint may be submitted directly to the United States Department of Justice at the address written below. DOJ will ensure that the matter is assigned to the correct federal or state authority for processing.

U.S. Department of Justice
Civil Rights Division
Federal Coordination and Compliance Section, NWB
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
Title VI Hotline: 1-888-TITLE-06 (1-888-848-5306)
(Voice/TTY)
[Http://www.justice.gov/crt/about/cor/coord/titlevi.php](http://www.justice.gov/crt/about/cor/coord/titlevi.php)

If the program involved has received federal funding through the Florida Department of Transportation, then the complaint may be lodged with the following agency:

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

ADA/504 Statement:

The County encourages the public to report any facility, program, service or activity that appears inaccessible to those who are disabled. Furthermore, the County will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, the County asks that requests be made at least five (5) calendar days prior to the need for accommodation.

Requests for accommodation should be directed to the Office of the County Administrator:

Ms. Lindsey Ballard
Office of Monroe County Administrator
1100 Simonton St., Key West, FL 33040
Tel: (305) 292-4443
Fax: (305) 292-4544
e-mail: ballard-lindsey@monroecounty-fl.gov
Hearing impaired: Florida Relay 7-1-1

Questions, concerns, or comments should be made to the County's Title VI/Nondiscrimination Coordinator:

Alana Thurston
Human Resources Coordinator/EEO Officer
1100 Simonton St., Suite 2-268, Key West, FL 33040
Tel: (305) 292-4461
Fax: (305) 292-4454
Email: Thurston-Alana@monroecounty-fl.gov
Hearing impaired: Florida Relay 7-1-1

See also Administrative Instruction 4718.1, Americans with Disabilities Act Grievance Procedure, and Administrative Instruction 4719.3, Americans with Disabilities Act Request for Accommodation.

Limited English Proficiency (LEP) Guidance:

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and US Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services and activities by those who do not speak English proficiently.

The County has determined that contact with members of the community who are LEP and therefore the level of LEP services required varies greatly by department. Currently, the County offers the following services. If a member of the public who is LEP approaches you and asks for language assistance, the following options are available at no charge:

- Most departments have at least one person who is bilingual Spanish-English speaking, who is available to translate if necessary.
- The County is in the process of distributing "I Speak" cards to employees. If a member of the public approaches who needs language assistance, and the employee does not speak that language, the card should be shown to the member of the public. Once the person identifies what language they speak, the employee can then place a call to a company providing real-time translation.
- Mr. Alex Diaz is available as a Spanish-English translator, for in person or over the telephone translations. Contact Alana Thurston, (305) 292-4461 for Mr. Diaz's contact information.
- The County is in the process of compiling a list of companies that provide real-time translation in Spanish and other languages. For more information or to obtain a copy of the list, contact Alana Thurston, (305) 292-4461.
- When a department's statistics indicate that it regularly interfaces with a population in which more than 5% of the population primarily speaks a language other than English, the department will take the responsibility for ensuring that key documents will be posted on the department's webpage in other languages.

The County's Title VI/Nondiscrimination Coordinator will examine its LEP plan at least annually to ensure that it remains reflective of the community's needs.

Persons requiring other special language services should contact the County's Title VI/Nondiscrimination Officer:

Alana Thurston
Human Resources Coordinator/EEO Officer
1100 Simonton St., Suite 2-268, Key West, FL 33040
Tel: (305) 292-4461
Fax: (305) 292-4454
Email: Thurston-Alana@monroecounty-fl.gov
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Public Involvement:

Persons wishing to request special presentations by the County, volunteer in any of its activities, or submit suggestions for improvement for public involvement in County activities may also contact the Title VI/Nondiscrimination Coordinator:

Alana Thurston
Human Resources Coordinator/EEO Officer
1100 Simonton St., Suite 2-268, Key West, FL 33040
Tel: (305) 292-4461
Fax: (305) 292-4461
Email: Thurston-Alana@monroecounty-fl.gov
Hearing impaired: Florida Relay 7-1-1

Assurances:

Every three years, the County's Roads and Bridges department will certify to the Federal Highway Administration (FHWA) and the Florida Department of Transportation (FDOT) that its programs, services and activities are being conducted in a nondiscriminatory manner. These certifications termed 'assurance's'. The public may view the current Title VI/Nondiscrimination Assurance document on the County's website in English and Spanish, or by visiting the County's offices, or by contacting the Title VI/Nondiscrimination Coordinator and requesting a copy.

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Kevin G. Wilson, P.E.
Assistant County Administrator

Distribution: List VI
Originator: MPW
Review: October 14, 2024

**Title VI of the Civil Rights Act of 1964
GRIEVANCE FORM**

Complete and Send To:
Alana Thurston
Monroe County Title VI/Nondiscrimination Coordinator
1100 Simonton St., Suite 2-268, Key West, FL 33040
Fax: (305) 292-4461
Email: Thurston-Alana@monroecounty-fl.gov

Date Received: _____

COMPLAINANT INFORMATION:

NAME: _____ DATE OF COMPLAINT: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

HOME PHONE: (____) _____ BUSINESS PHONE: (____) _____

PERSON ALLEGING VIOLATION (if other than complainant):

NAME: _____ DATE OF COMPLAINT: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

HOME PHONE: (____) _____ BUSINESS PHONE: (____) _____

DATE ALLEGED DISCRIMINATION OCCURRED: _____

BASIS FOR ALLEGATION OF DISCRIMINATION (i.e., race, color, national origin, sex, religion, age, disability, sexual orientation, or family status):

DESCRIPTION OF ALLEGED DISCRIMINATION (attach additional information or documentation if necessary):

Signature of Complainant: _____ Date: _____