

Title VI Program & Limited English Proficiency Plan

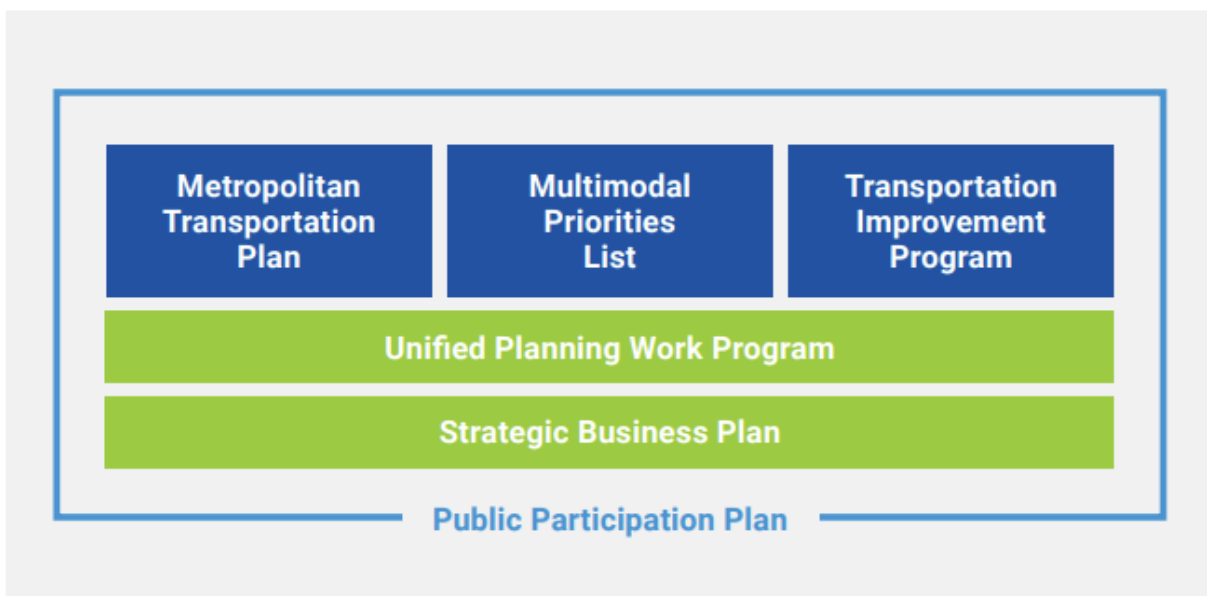
June 8, 2023



Move People & Goods. Create Jobs.
Strengthen Communities.

Our Mission: To collaboratively plan, prioritize and fund the delivery of diverse transportation options.

Our Vision: Our work will have measurable positive impact by ensuring transportation projects are well selected, funded and delivered.



Acronyms

ACS	American Community Survey
ASL	American Sign Language
BCT	Broward County Transit
CAC	Citizens' Advisory Committee
CFR	Code of Federal Regulations
CSAC	Complete Streets Advisory Committee
CSLIP	Complete Streets and Other Localized Initiatives Program
CSMP	Complete Streets Master Plan
DBE	Disadvantaged Business Enterprise
DOT	U.S. Department of Transportation
FDOT	Florida Department of Transportation
FHWA	Federal Highway Administration
FR	Federal Register
FTA	Federal Transit Administration
FTAC	Freight Transportation Advisory Committee
LCB	Local Coordinating Board
LEP	Limited English Proficiency
MPO	Metropolitan Planning Organization
MTP	Metropolitan Transportation Plan
PPP	Public Participation Plan
TAC	Technical Advisory Committee
TDD	Telecommunications Device for the Deaf
TTY	Teletypewriter
TIP	Transportation Improvement Program
UPWP	Unified Planning Work Program



Executive Summary

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs or activities that receive Federal assistance. As a direct recipient of Federal Transit Administration (FTA) funds, the Broward Metropolitan Planning Organization (MPO) is required to submit to FTA an update of its Title VI Program every three years, demonstrating compliance with Federal Title VI requirements. The objectives of FTA's Title VI program are to:

- Ensure that the level and quality of public transportation service is provided in a non-discriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Guidance for preparing Title VI Programs is outlined in FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. The Broward MPO's Title VI Program must address the requirements in Section III, General Requirements and Guidelines, and Section VI, Requirements for Metropolitan Transportation Planning Organizations. The Broward MPO is not a transit operator and, therefore, is not required to address Title VI requirements specific to transit service providers. Consistent with FTA Circular 4702.1B, the Broward MPO's Title VI Program for the three-year period of February 1, 2024–January 31, 2027 contains the following elements, as required by FTA:

Section III—General Requirements and Guidelines:

- Notice of rights/non-discrimination under Title VI
- Process to file a Title VI complaint and copy of complaint form
- List of Title VI investigations, complaints, and lawsuits
- Integration of Title VI in the MPO's Public Participation Plan (PPP) activities
- Limited English Proficiency (LEP) Plan
- Racial breakdown of non-elected advisory boards/committees
- Narrative describing sub-recipient monitoring process
- Demonstration of MPO Board approval of Title VI Program

Section VI—Requirements for Metropolitan Transportation Planning Organizations:

- Demographic profile of service area
- Description of how mobility needs of minority population are identified and considered within the planning process
- Demographic maps that show impacts of the distribution of State and Federal funds in aggregate for public transportation projects
- Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts

The Broward MPO also receives federal funding assistance from the Federal Highway Administration (FHWA) through the Florida Department of Transportation (FDOT) and is required, as a subrecipient of FHWA funds, to maintain an approved Title VI Program and to effectively implement Title VI.



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Section 1 Introduction

As a direct recipient of Federal transit funds, the Broward Metropolitan Planning Organization (MPO) is required to submit to the Federal Transit Administration (FTA) an update of its Title VI Program every three years. This report demonstrates the Broward MPO's compliance with Federal Title VI requirements that prohibit discrimination and assures that no person, on the grounds of race, color, or national origin, is excluded from participating in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance from FTA.

1.1 About the Broward MPO

The Broward MPO is a transportation policy-making board comprising 25 voting members, including representatives of the South Florida Regional Transportation Authority/Tri-Rail, the Broward County School Board, and four Broward County Commissioners. A total of 13 alternate Board members have voting rights when others are absent. The MPO is responsible for transportation planning and funding allocations in Broward County and works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans.

MPO Executive Director

The Broward MPO Executive Director is responsible for ensuring implementation of the MPO's Title VI Program. The MPO Title VI Coordinator, under supervision of the Executive Director, is responsible for coordinating the overall administration of the Title VI Program, plan, and FTA assurances discussed under Section 2.1.

Title VI Coordinator

The Broward MPO Title VI Coordinator is responsible for overseeing compliance with applicable non-discrimination authorities in each planning and programming area. Other staff are expected to provide information and support to assist the Title VI Coordinator in performing tasks that pertain to non-discrimination regulations and procedures detailed in Federal guidance and the Broward MPO Title VI Program.

In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the Broward MPO. Any individual may exercise their right to file a complaint with the Broward MPO if that person believes that they or any other program beneficiaries have been subjected to discrimination in their receipt of benefits/services or on the grounds of race, color, national origin, sex, handicap, age, or income status.
- Make a concerted effort to resolve complaints in accordance with the MPO's established complaint procedures.
- Meet with appropriate staff to monitor and discuss progress, implementation, and compliance issues related to the Broward MPO Title VI Program.



- Keep current with Federal Title VI requirements, attend training when needed, and provide information/training to the MPO staff, Board, and committees and the public if they have questions.
- Periodically review the Broward MPO Title VI Program to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff involved with consultant contracts and any subrecipients found to be non-compliant to resolve the deficiency status and write a remedial action if necessary, as described in the Subrecipient Compliance and Monitoring section of this document.
- Review important issues related to non-discrimination with the Executive Director, as needed.
- Maintain a list of interpretation or translation service providers, including MPO staff.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the non-discrimination authorities. The Broward MPO Title VI Program is made available to MPO employees, contractors and subrecipients, and the general public.
- Coordinate with appropriate Federal, State, and regional entities to periodically provide Broward MPO employees with training opportunities regarding non-discrimination.

The Title VI Coordinator, with staff support, is responsible for ensuring that all elements of the Program are appropriately implemented and maintained. If information produced by the Broward MPO is needed in another language or if there are questions about the information contained within this document, please contact Carl Ema, Title VI Coordinator at (954) 876-0033 or at emac@browardmpo.org.

1.2 Title VI Program Checklist

Table 1 lists the Title VI reporting requirements as described in FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. The first section of the checklist includes the general requirements that apply to all recipients of Federal funding assistance. The second section refers to requirements specific to MPOs. Since the Broward MPO is not a transit service provider, requirements for MPOs that provide transit service are not included.



Table 1: Federal Title VI Program Requirements

Requirement	Section
General Requirements	
Requirement to provide Title VI assurances	2.1
Title VI Notice to the public, including list of locations where notice is posted	2.2
Title VI complaint procedures	2.3, Appendix A
Title VI complaint form	2.3, Appendix A
List of Title VI investigations, complaints, and lawsuits	2.4
Public Participation Plan (PPP) and summary of outreach efforts	2.6
Meaningful access to Limited English Proficiency (LEP) persons	2.7
Non-elected committee racial composition	2.8
Subrecipient compliance & monitoring procedures	2.9
Board approval of Title VI Program	Section 4, Appendix B
Requirements for Metropolitan Planning Organizations	
Demographic profile	3.1
Description of procedures by which mobility needs of minority population are identified and considered within the planning process	3.2
Demographic maps that show impacts of the distribution of State and Federal funds in aggregate for public transportation projects	3.3
Analysis of the MPO’s transportation system investments that identifies and addresses any disparate impacts	3.4

Source: FTA Circular 4702.1B



Section 2 General Requirements

The information provided in this section addresses Federal Title VI general reporting requirements as described in Section III of FTA Circular 4702.1B.

2.1 Requirement to Provide Title VI Assurances

In accordance with Title 49 of the Code of Federal Regulations (CFR), Section 21.7(a), every application for FTA financial assistance must be accompanied by an assurance that the applicant will carry out the program in compliance with the U.S. Department of Transportation’s (DOT) Title VI regulations.

This requirement is fulfilled by the Broward MPO when it submits its annual Certifications and Assurances to FTA. As part of this process, the Broward MPO, as a primary recipient, collects Title VI assurances from subrecipients prior to passing through FTA funds. The text of FTA’s annual Certifications & Assurances is available on FTA’s website at <https://www.transit.dot.gov/funding/grantee-resources/certifications-and-assurances/certifications-assurances>.

2.2 Title VI Notice to the Public

A Title VI Notice to the Public must be displayed to inform a recipient’s customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency’s website and in public areas of the agency’s office(s).

The Broward MPO’s Title VI/nondiscrimination notice to the public, provided in English and Spanish, is posted in the lobby of its office at 100 West Cypress Creek Road, 6th Floor, Suite 650, Fort Lauderdale, FL 33309 and on its website under the “Work With Us” section at <https://www.browardmpo.org/title-vi-dbe1> (Figure 1). The notice (Figure 2) is also posted at the eight regional Broward County libraries illustrated on Map 1.

Figure 1: Broward MPO Title VI Webpage

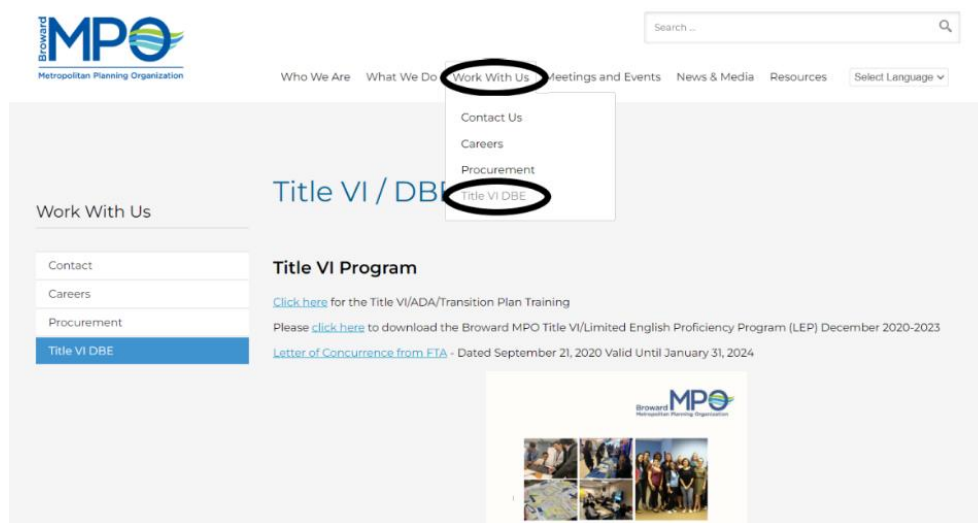



Figure 2: Broward MPO Title VI Notice



Broward MPO
Metropolitan Planning Organization
Move People & Goods | Create Jobs | Strengthen Communities

Notifying the Public of Rights Under Title VI

- The Broward Metropolitan Planning Organization (MPO) 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 believe she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Broward MPO. Complaints must be filed within 180 days after the incident.
- For more information on the Broward MPO's Civil Rights Program, and the procedures to file a complaint, please contact the Broward MPO at (954) 876-0033 (Florida Relay Service 711), by e-mail at emac@browardmpo.org, or visit our office at 100 West Cypress Creek Road, 6th Floor, Suite 650, Fort Lauderdale, FL 33309. For more information, please visit BrowardMPO.org.
- A complainant may file a complaint directly with the Federal Transit Administration by filing with the [Office of Civil Rights](#) no later than 180 days after the incident.
- If information is needed in another language, contact the Broward MPO using one of the methods listed above.

Notificación de los Derechos Públicos Bajo el Título VI

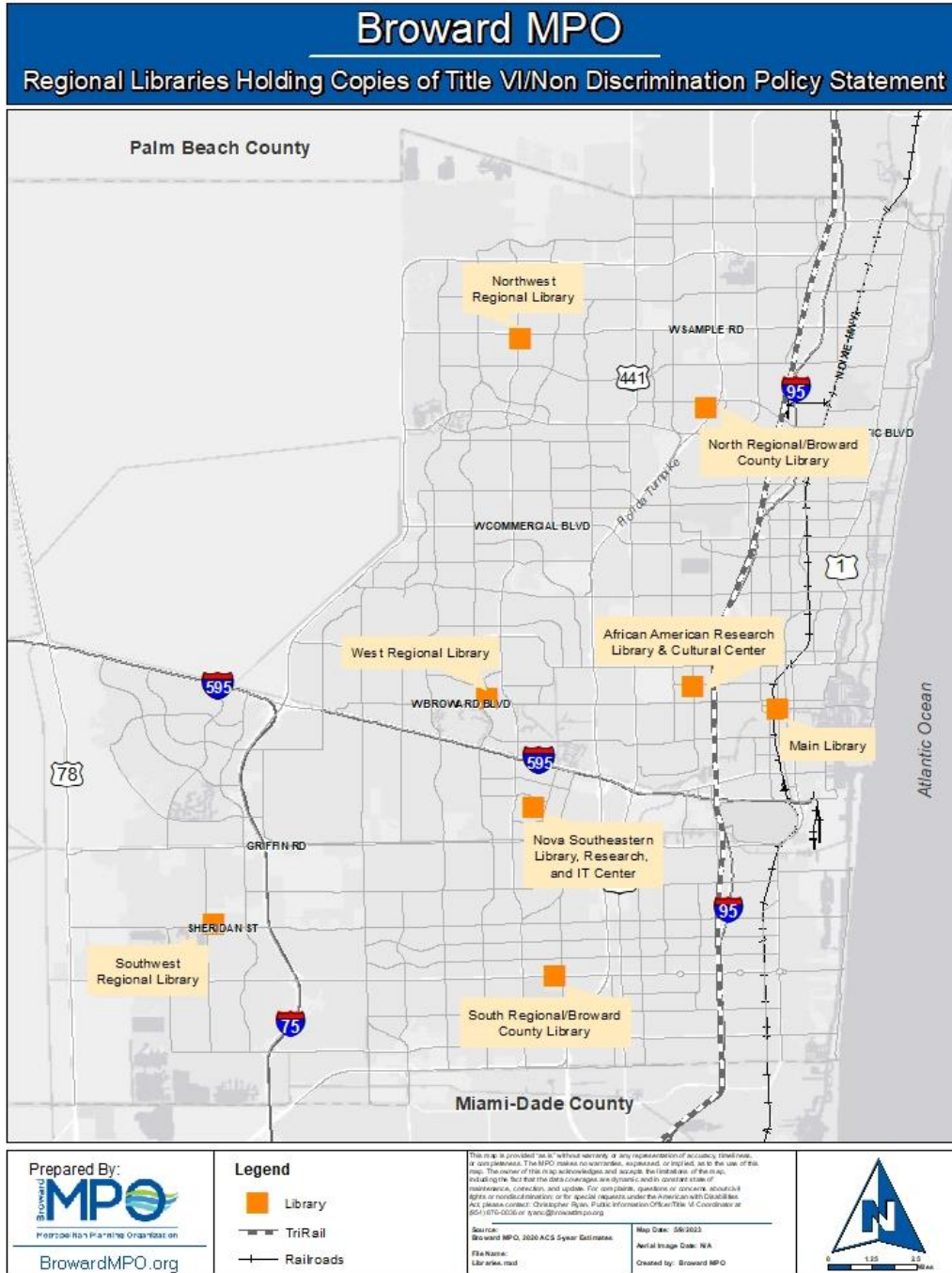
- La Organización de Planificación Metropolitana de Broward (MPO) opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que él o ella ha sido agraviada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el MPO. Las quejas deben presentarse dentro de los 180 días posteriores al incidente.
- Para obtener más información sobre el Programa de Derechos Civiles del MPO y los procedimientos para presentar una queja, comuníquese al (954) 876-0033 (Servicio de Retransmisión de Florida 711), envíe un correo electrónico a emac@browardmpo.org, o visite nuestra oficina administrativa en 100 West Cypress Creek Road, 6th Floor, Suite 650, Fort Lauderdale, FL 33309. Para obtener más información, visite BrowardMPO.org.
- Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito mediante la presentación ante la [Oficina de Derechos Civiles](#) a más tardar 180 días después del incidente.
- Si se necesita información en otro idioma, comuníquese a la MPO utilizando uno de los métodos anteriores.

Trade Center South | 100 West Cypress Creek Road, Suite 650 | Fort Lauderdale, FL 33309-2181 | BrowardMPO.org

For complaints, questions or concerns about civil rights or nondiscrimination; or for special requests under the Americans with Disabilities Act, please contact Carl Ema, Title VI Coordinator at (954) 876-0052 or emac@browardmpo.org



Map 1: Regional Broward County Libraries Holding Copies of Broward MPO's Title VI/Non-Discrimination Policy Statement



2.3 Title VI Complaint Procedure & Form

Title VI Programs must include a copy of the agency's Title VI complaint procedure and complaint form. The complaint procedure and complaint form must also be made available on the recipient's website.

English and Spanish copies of the Broward MPO's Title VI complaint procedure, which includes the form, can be found under "Important Links" on the MPO's Title VI/DBE (Disadvantaged Business Enterprise) webpage at <https://browardmpo.org/title-vi-dbe1> and is provided in Appendix A.

2.4 Title VI Investigations, Complaints & Lawsuits

Recipients must prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color, or national origin.

No lawsuits or complaints alleging that Broward MPO discriminates based on race, color, or national origin have been filed since submittal of the previous Title VI Program.

2.5 Equity Assessment

The Broward MPO has created a standardized process to use in evaluating its plans, programs, and projects and to make informed decisions regarding equity in Broward County's communities. The goal of equity implementation is to create an approach that is fair, inclusive, and proactive during all phases of the planning process. In this context, equity seeks to ensure that the benefits and impacts of plans, programs, and projects undertaken by the Broward MPO and its partner agencies are understood and that populations protected under Federal non-discrimination laws and other authorities, including Title VI and Environmental Justice, are not disproportionately burdened during the planning process. Collectively, this effort is referred to as the MPO's Equity Assessment process. It is the Broward MPO's goal that the Equity Assessment process, once applied at the various planning stages of project development and funding, will produce a systematic process that meets the following five objectives:

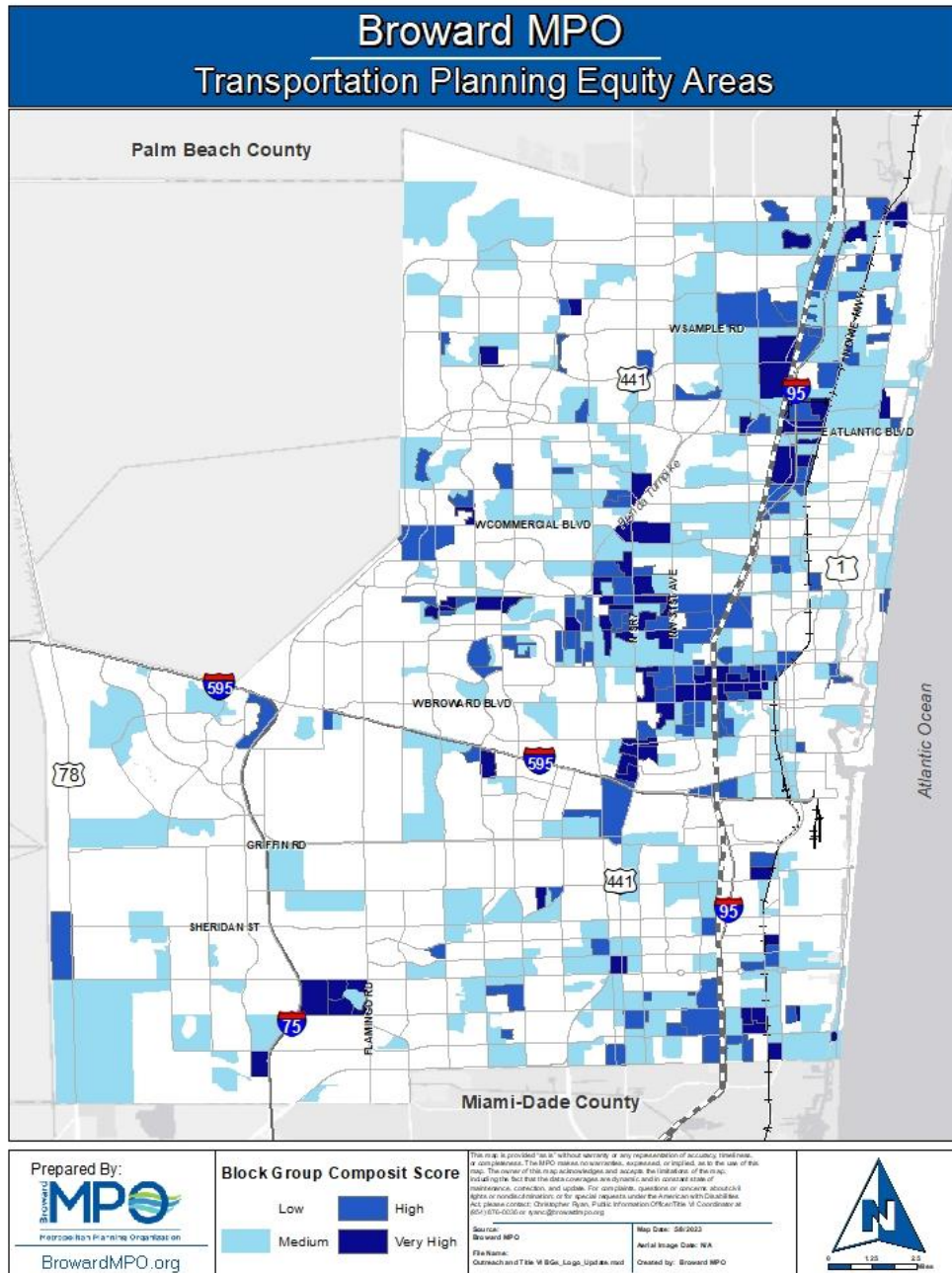
1. Consistently evaluates transportation plans and programs against Federal and State non-discrimination authorities.
2. Improves efficiency in planning processes and programs.
3. More effectively satisfies Federal requirements.
4. Produces meaningful outcomes for the community through MPO transportation planning programs, particularly for protected populations.
5. Identifies adverse impacts early at the planning level rather than later at the project funding and delivery level.

A key component of the Equity Assessment process is the development of a methodology that consistently identifies areas of Broward County that have a higher proportion of populations protected under Title VI and other Federal and State non-discrimination authorities. This methodology is not intended to definitively identify areas of concern or satisfy Title VI, Environmental Justice, or other similar Federal or State requirements; it is intended to be an initial method to identify such areas as part of a broader non-



discriminatory assessment process. Map 2 illustrates the current equity areas produced from this process using 2020 American Community Survey (ACS) 5-Year Data from the US Census Bureau.

Map 2: Broward MPO Equity Areas



2.6 Public Participation Plan

Recipients engaged in planning and other decision-making activities at the local level should consider the principles embodied in the planning regulations. Recipients should develop and use a documented public participation plan or process that provides adequate notice of public participation activities, including early and continuous opportunities for public review and comment at key decision points. A copy of the Broward MPO's Public Participation Plan (PPP) can be found under the "What We Do" section of the website at <https://www.browardmpo.org/core-products/public-participation-plan-ppp>.

Broward MPO Public Participation Plan Goals

Broward MPO's current PPP, approved by the MPO Board in February 2023, sets forth specific measures to heighten public education and responsiveness in the transportation planning process. The Broward MPO recognizes that optimum participation begins early in the planning process and continues throughout. The public participation strategies in the PPP seek to gather input from the public and partners to implement feasible suggestions and help to avoid, minimize, and mitigate project impacts by allowing the Broward MPO to identify issues while providing the best solutions.

The goals of the Broward MPO's PPP are:

- **Goal 1: Informing the Public.** Inform the public, to the maximum extent possible with available resources, of opportunities to participate in the transportation decision-making process.
- **Goal 2: Involving the Public.** Involve the public early and often in the transportation planning process.
- **Goal 3: Including the Public.** Cast the net wide to reach out to a broad geographical area, diverse populations and organizations that represent the MPO planning area to increase the opportunity to participate in developing transportation plans and services.
- **Goal 4: Improving Public Participation Processes.** Continually identify and implement ways to improve the public participation processes.

These four public participation goals collectively help the Broward MPO to meet the objectives of the Federal Title VI regulations. The third goal, focusing on inclusion of all persons, is particularly meaningful to the Title VI Program.

Broward MPO Public Participation Goals, Policies & Techniques

As specified in FTA Circular 4702.1B, recipients have wide latitude to determine how and when specific public participation activities should take place and their frequency, and which specific measures are most appropriate depending on the planning activity being undertaken.

The Broward MPO's PPP includes a range of outreach techniques to ensure that each of the four public participation goals is achieved to maximize the input received from the public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons.



Goal 1: Informing the Public

Policy: Inform the public, to the maximum extent possible with available resources, of opportunities to participate in the transportation decision-making process.

Techniques:

- Provide meeting agendas to MPO members, committee members, and interested parties at least one week in advance and by posting on the website.
- Create and distribute flyers for special events such as workshops.
- Include the website address on all MPO documents, including brochures and flyers, so that the public can easily access meeting information.
- Include provisions in meeting announcements for interested persons to respond in writing, by phone, or by email.
- Establish a relationship with local media for coverage of events and airing of other mediums such as videos or podcasts.
- Set up educational displays at public events, including those in traditionally underserved communities.
- Speak at local civic group meetings, schools, business events, and conferences about transportation planning.
- Give interviews on local TV/radio news programs and talk shows to educate the public regarding transportation issues and the roles of residents.

Goal 2: Involving the Public

Policy: Involve the public early and often in the transportation planning process.

Techniques:

- Maintain active, standing committees such as the Citizens' Advisory Committee (CAC), Local Coordinating Board (LCB), Complete Streets Advisory Committee (CSAC), Freight Transportation Advisory Committee (FTAC), and Technical Advisory Committee (TAC) so residents have an opportunity to participate in the continuous planning process.
- Ensuring the broadest participation, meetings are hybrid or partially virtual going forward. The hybrid method enables Board members and committee members to participate virtually as long as a physical quorum is in the MPO Board Room. The public has the option to attend in person or via Zoom.
- Review the CAC composition to ensure that equitable representation is maintained to the maximum extent within our control.
- Include a feature on the MPO's website allowing the public to email staff with questions or comments.
- Create surveys to be administered at MPO meetings, workshops, events, etc.
- Encourage public participation by greeting residents who attend MPO meetings and providing them with an agenda.



- Include a variety of public participation techniques in the development of plans or services. For example, workshops and visioning.
- Respond to all inquiries, providing interim responses while a question is being researched.
- Inform MPO members of recommendations from the TAC, CAC, and LCB and inform MPO members of trends indicated from other contacts with the public.
- Allocate time for public input on each board or committee's agenda.

Goal 3: Including the Public

Policy: Cast the net wide to reach out to a broad geographical area, diverse populations and organizations that represent the MPO planning area to increase the opportunity to participate in developing transportation plans and services.

Techniques:

- Participate in community outreach events, maintaining a focus to include traditionally underserved communities.
Distribute copies of the public notice (including links) for the Transportation Improvement Program, Metropolitan Transportation Plan, Unified Planning Work Program, PPP as well as the Title VI and Disadvantaged Business Enterprise Programs to the eight regional public libraries. For a list of the eight libraries, please see the "Important Links" section at <https://browardmpo.org/core-products/public-participation-plan-ppp> or call (954) 876-0076 or (954) 876-0033.
- Provide documents to local planning departments and other participating agencies through the TAC.
- Take advantage of training opportunities and learn from experiences of other MPOs and departments of transportation.
- Learn about communities that make up the Broward Urbanized Area by attending festivals, special events, lectures, etc. that highlight the diversity of the area. Add contact names to mailing lists.
- Utilize the MPO's Equity Assessment to produce maps to understand the demographics in Broward County and help focus public participation efforts. The MPO analyzes ZIP code data to identify communities requiring more extensive public participation outreach efforts, including press releases to media that focus on populations that are traditionally underrepresented including the Seminole Tribal Government.
- Coordinate with local government agencies, non-profit agencies, business groups and others who have already developed community contacts.
- Include in public notices posted by the MPO that upon request and adequate notice, assistance will be provided to the hearing and visually impaired, those with limited English proficiency, the transportation disadvantaged, and others requiring special assistance.



Goal 4: Improving the Public Participation Process

Policy: Continually identify and implement ways to improve the public participation processes.

Techniques:

- Look for opportunities to add and create strategies that will reach greater numbers and more diverse populations.
- Conduct assessments of the effectiveness of public participation techniques and discuss with staff.
- Seek to improve community outreach activities.
- Continue expansion of regional inter-MPO coordination of public participation activities, particularly when projects may directly involve residents from adjacent counties.
- Utilize analytics tools to track the performance of online public outreach strategies.

Public Participation Evaluations

It is standard practice for the Broward MPO to assess the public participation techniques used in all projects and initiatives. This assessment is developed and applied on a case-by-case basis. Evaluation needs should be considered in the context in which the project is being undertaken as well as the communities involved. All PPPs developed for projects and initiatives undertaken by the Broward MPO require an evaluation section to allow the project team to make as-needed mid-course corrections in its public participation approach. The evaluation process includes a review of public participation activities to ensure effective engagement with Title VI populations identified within the study area.

Public Participation Activities

Between April 2019 and March 8, 2023, the Broward MPO conducted 169 in-person outreach activities. Due to the COVID-19 pandemic that began in March 2020, the MPO pivoted to provide more virtual outreach events for greater accessibility, safety, and comfortability of the participants. Both in-person and virtual events focused on the following topics:

- Community Outreach
- Complete Streets/Safety
- Meetings/Presentations
- *Commitment 2045* Metropolitan Transportation Plan (MTP) Update
- Community Networking Events
- Partner Agency Events
- School/Educational Activities

Within these categories, public outreach activities in which the MPO hosts and participates in are diverse in terms of topic area, with some focusing on specific projects and others focusing on more general MPO services and coordination with partner agencies. In conducting outreach, the MPO references the demographics of the area in which a project or study is located to identify the most appropriate resources to engage the Title VI community. For example, during the *Commitment 2045* MTP update, Broward MPO staff ensured that the appropriate translated materials and translation services were available at in-



person events conducted in areas of the county with a higher percentage of LEP persons. This process will also be undertaken for the 2050 MTP update, which is currently ongoing.

The Broward MPO also tracks in-person outreach activities to ensure geographic diversity and opportunities in areas with higher Title VI populations compared to the rest of the county. In FY 2015, the Broward MPO began mapping its public outreach activities to include in its annual report. Map 3 illustrates the aggregate public participation activities conducted since the last Title VI Program update was prepared (April 2019) compared to block groups with higher concentrations of Title VI populations (e.g., minorities and LEP persons) using data and calculation processes documented in the Equity Assessment tool. Map 4 compares locations of the public outreach activities to the equity areas during this period.

As illustrated by Map 3, public outreach activities conducted by the Broward MPO since April 2019 are geographically far-reaching, having been conducted within or in proximity to block groups with high or very high composite scores or areas with statistically higher concentrations of minority and/or LEP populations protected under Title VI. The geographic span of this coverage increases, as shown in Map 4, when comparing the location of public outreach activities to equity areas. As previously noted, to accommodate the shifting conditions of the COVID-19 pandemic, the Broward MPO now has a mix of virtual and in-person outreach events. Both Maps 3 and 4 do not reflect the virtual outreach activities hosted by the MPO, as attendees may join from anywhere with internet access.

In examining outreach activities conducted relative to areas with high or very high composite Title VI scores on Map 3, the following areas should be further evaluated for future outreach opportunities:

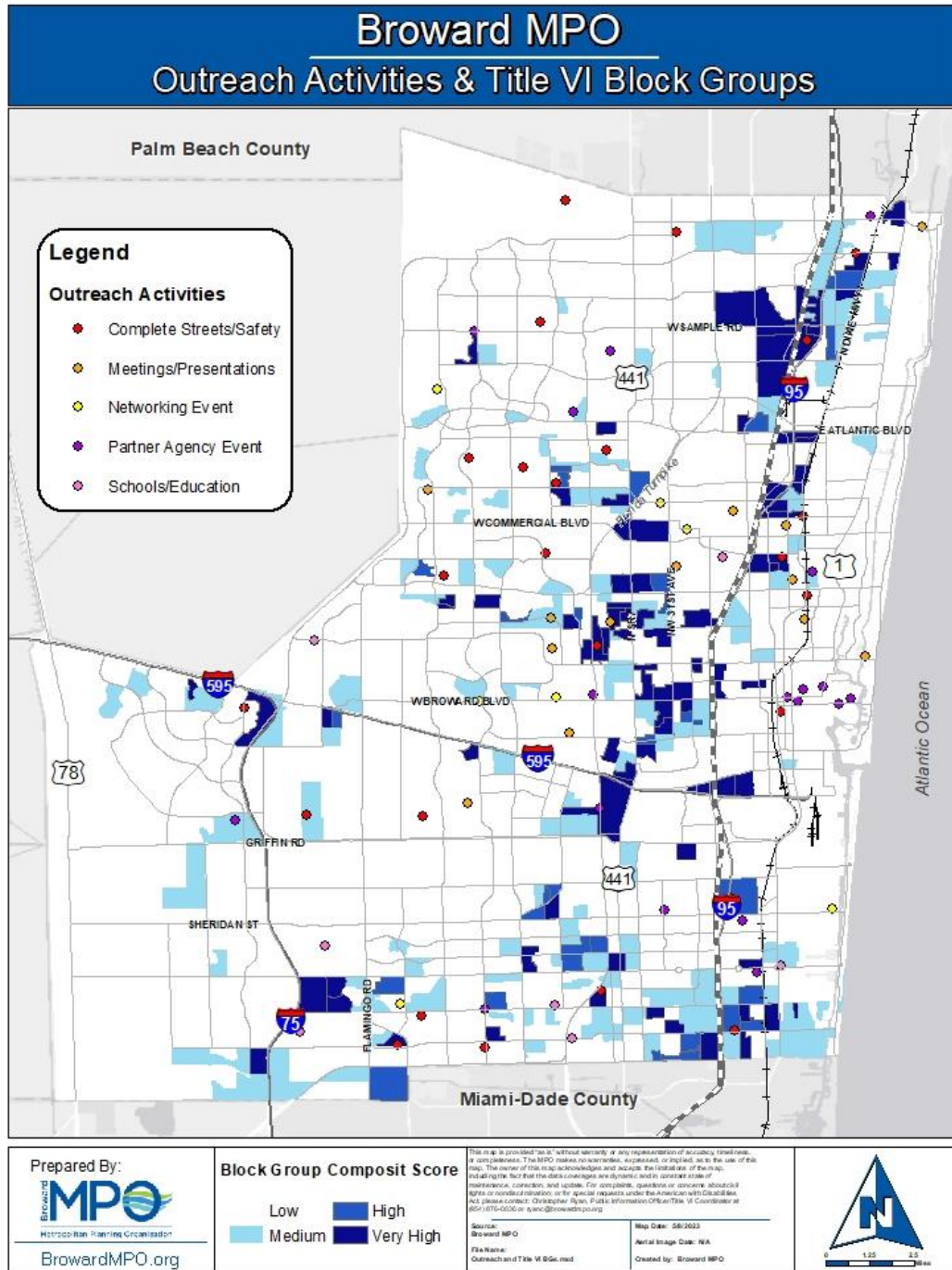
- Pompano Beach
- Hollywood
- Miramar east of I-75
- Lauderhill east of Florida's Turnpike, west of I-95, and north of I-595

In addition to the above areas, the 2020 Title VI Program identified Coral Springs, North Lauderdale, and areas of Plantation and southwest Fort Lauderdale to be further evaluated for future outreach opportunities. Activities held since the prior Title VI Program update have made progress in closing this gap.

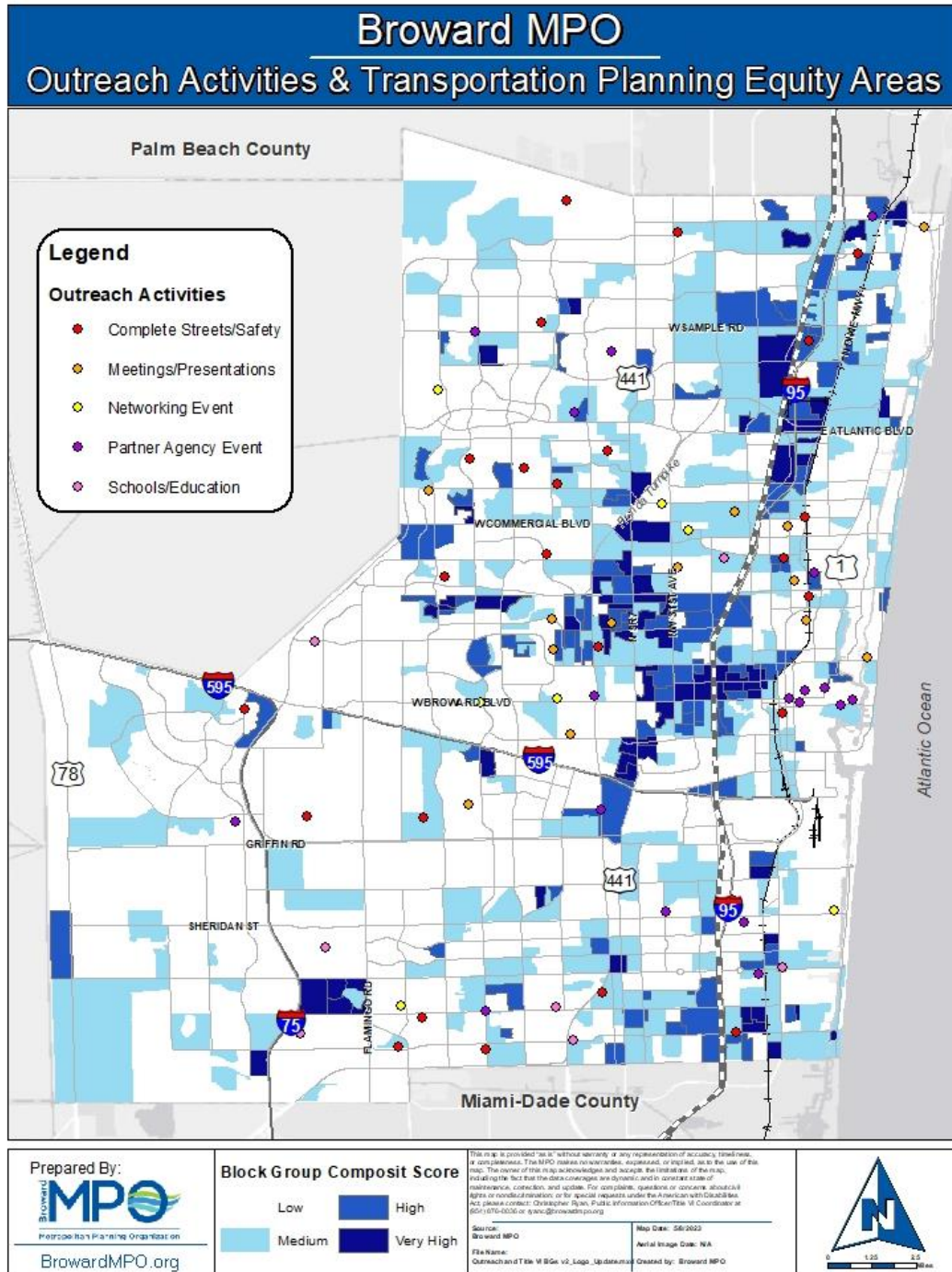
In addition to project- or plan-specific outreach activities, highlights of major public participation efforts completed by the Broward MPO over the past three years are summarized below.



Map 3: Public Participation Activities by Title VI Block Group (April 2019 – March 8, 2023)



Map 4: Public Participation Activities by Equity Area (April 2019 – March 8, 2023)



Speak Up Broward

Initiated in February 2013, Speak Up Broward is the Broward MPO's grassroots public awareness initiative designed to promote awareness about regional transportation planning projects, engage the community to become more involved in the planning process, and solicit feedback that will help improve efforts toward providing Broward County residents with a safe, convenient, and efficient multimodal transportation system. Speak Up Broward has launched several successful campaigns including the following:

- ***E-townhall series*** – A live televised panel featuring experts who answered the public's questions about transportation topics that matter most to them. Translations for Spanish participants are often provided.
- ***Speakers Bureau Program*** – Program committed to recruiting, organizing, and training a diverse set of "transportation ambassadors" who identify and educate organizations and individuals throughout Broward County about the benefits of a multimodal transportation system.
- ***Updated MPO website*** – Designed for better organization and including the latest technological updates, translation functions, and Americans with Disabilities Act-compliant content.
- ***Podcast*** – A downloadable podcast series titled "Let's Talk Transportation" which aims to further engage and educate stakeholders about transportation related subjects in Broward (Figure 3). The podcast highlights a variety of topics such as general information about the MPO, its purpose, and project-specific discussions. The podcast has been downloaded approximately 150 times over the past year.
- ***Mobility Monday Newsletter*** – The MPO has started a weekly newsletter featuring current events in transportation projects, community activities, public feedback opportunities, and general countywide updates and information (Figure 4). The newsletter is posted on the Broward MPO's homepage and is sent out via an email through a free subscription, with 1,434 subscribers thus far.



Speak Up Broward outreach has been extensive and has reached many different segments of the Broward community. As of April 2023, there are 14,000+ followers on the various Speak Up Broward social media platforms.

Figure 3: Broward MPO Podcast Series

The screenshot shows the Broward MPO website's Podcasts page. At the top left is the Broward MPO logo. A search bar is located at the top right. A navigation menu includes 'Who We Are', 'What We Do', 'Work With Us', 'Meetings and Events', 'News & Media', 'Resources', and 'Select Language'. The 'Podcasts' section is active, showing a list of episodes. The first episode is 'Meet "The Instigators"', with a duration of 21:49. The second is 'The Long Game', with a duration of 28:26. The third is 'The ABC's of Hollywood: Adaptation, Bikes and Commuting'. Each episode card features a 'Let's Talk Transportation' logo, a play button, a waveform, and a duration. Below each episode are Spotify and Apple Podcasts listening options.



Figure 4: Mobility Monday Newsletter



Message From Executive Director, Greg Stuart



Happy Monday! Later this month, I will be presenting at the ITS America Conference & Expo in Texas. The conference will bring together experts from the intelligent transportation community around the world. This is a major event for thought-provoking education, networking, and real-time demonstrations of the latest technologies and solutions for the future. The shift to electric vehicles (EVs) is gaining strong support as people look for greener and more sustainable transportation options. EVs offer zero emissions during operation and greater energy-efficiency compared to traditional vehicles. Major automakers are now investing in the development of EV technology, while governments are providing incentives to spur consumer adoption. With the bipartisan

infrastructure bill passed by the US Congress, there is a substantial investment in EV infrastructure such as charging stations and battery technology research. I'm looking forward to discovering what's new in ITS technologies, uncovering innovative solutions, networking with leading practitioners, and bringing best practices and lessons learned back to our region! To learn more, please visit the MPO's EV [webpage](#).



Broward MPO Closes Out Florida Bike Month With Many Miles Under Our Helmets! 🚲



Advisory Committees

MPO staff continue to update its Citizens' Advisory Committee (CAC) membership to ensure that it represents Broward County's demographics. Several agencies on the CAC represent persons with disabilities and traditionally underserved communities, including minorities and LEP persons. The CAC provides community feedback on major MPO planning efforts and projects. In addition, major MPO projects and efforts are presented for input and feedback to the MPO's Transportation Disadvantaged Local Coordinating Board (LCB), of which many members represent persons with disabilities.

"Think Like a Planner" Workshops

Over the past three years, the Broward MPO has worked with the Broward County Public Schools' Career, Technical, Adult, Community Education Department to increase awareness of the Broward MPO and introduce students to the field of transportation. Each year, the MPO hosts high school students to participate in unique and innovative "Think Like a Planner" workshops. The idea for these workshops came out of the MPO's Strategic Business Plan, where MPO Board members requested the agency engage and reach out to the younger generation and embrace a diverse set of students from all backgrounds throughout Broward County. Students benefit by learning about career opportunities and basics of transportation planning, and the MPO educates students about the work the agency does and helps to increase awareness of the MPO's vision, mission, and purpose. In 2019, the program was expanded to include a middle school workshop. Although the program was paused during the COVID-19 pandemic, the MPO has since restarted these events, most recently hosting a workshop with students from the New Renaissance Middle School in October 2022.



Think Like a Planner workshop activities conducted with local high school students out in the community (left) and at the Broward MPO offices (right).

2.7 Meaningful Access to LEP Persons

Consistent 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 Federal Register [FR 50121, Aug. 11, 2000), recipients must take reasonable steps to ensure meaningful access to benefits,



services, information, and other important portions of their programs and activities for individuals with limited English proficiency. This includes conducting a “Four-Factor Analysis” to determine the specific language services that are appropriate to provide as part of the recipient’s LEP Plan (also referred to as a Language Assistance Plan).

Four-Factor Analysis

The analysis is based on the four-factor framework provided in Section V of the DOT’s Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Broward MPO’s programs, services, or activities.

The first step is to collect demographic data on the number of LEP persons in Broward County who are eligible to be served, likely to be served, or likely to be encountered by the MPO through participation in the transportation planning process. It should be noted that for MPO planning purposes, people that speak English “less than very well” (as defined by Census) are included in the analysis.

Table 2 was developed from the U.S. Census Bureau’s 2020 American Community Survey (ACS) 5-Year Estimates and shows the number and percentage of LEP persons age 5 and older, in total and by language spoken in Broward County. As shown, 15.8% of LEP persons live in Broward County; of this, 10.4% speak Spanish, making it the most significant language group as a percentage of population. The second most common language of the area’s LEP population is French Creole, at 2.6%, followed by other Indo-European languages, at 1.3% collectively.



Table 2: LEP Persons in Broward Urbanized Area by Language Spoken

Language Spoken	Speak English Less Than “Very Well”	% LEP Population	% Broward County Population
Spanish	190,797	66.3%	10.4%
French, Haitian, or Creole	47,534	16.5%	2.6%
Other Indo-European	23,650	8.2%	1.3%
Chinese (incl. Mandarin, Cantonese)	5,166	1.8%	0.3%
Russian, Polish, or other Slavic	6,215	2.2%	0.3%
Vietnamese	3,694	1.3%	0.3%
Other Asian and Pacific Island	2,680	.9%	0.1%
Arabic	1,592	.6%	0.09%
Tagalog (incl. Filipino)	1,067	.4%	0.06%
German or other West Germanic	718	.2%	0.04%
Korean	1,465	.5 %	0.08%
Other and unspecified	2,987	1%	0.2%
Total			15.8%

Source: ACS 2020 5-Year Estimates, Table C16001;

Map 5 shows the spatial locations of households in Broward County that speak English “less than very well” using the 2020 ACS 5-Year Estimates.

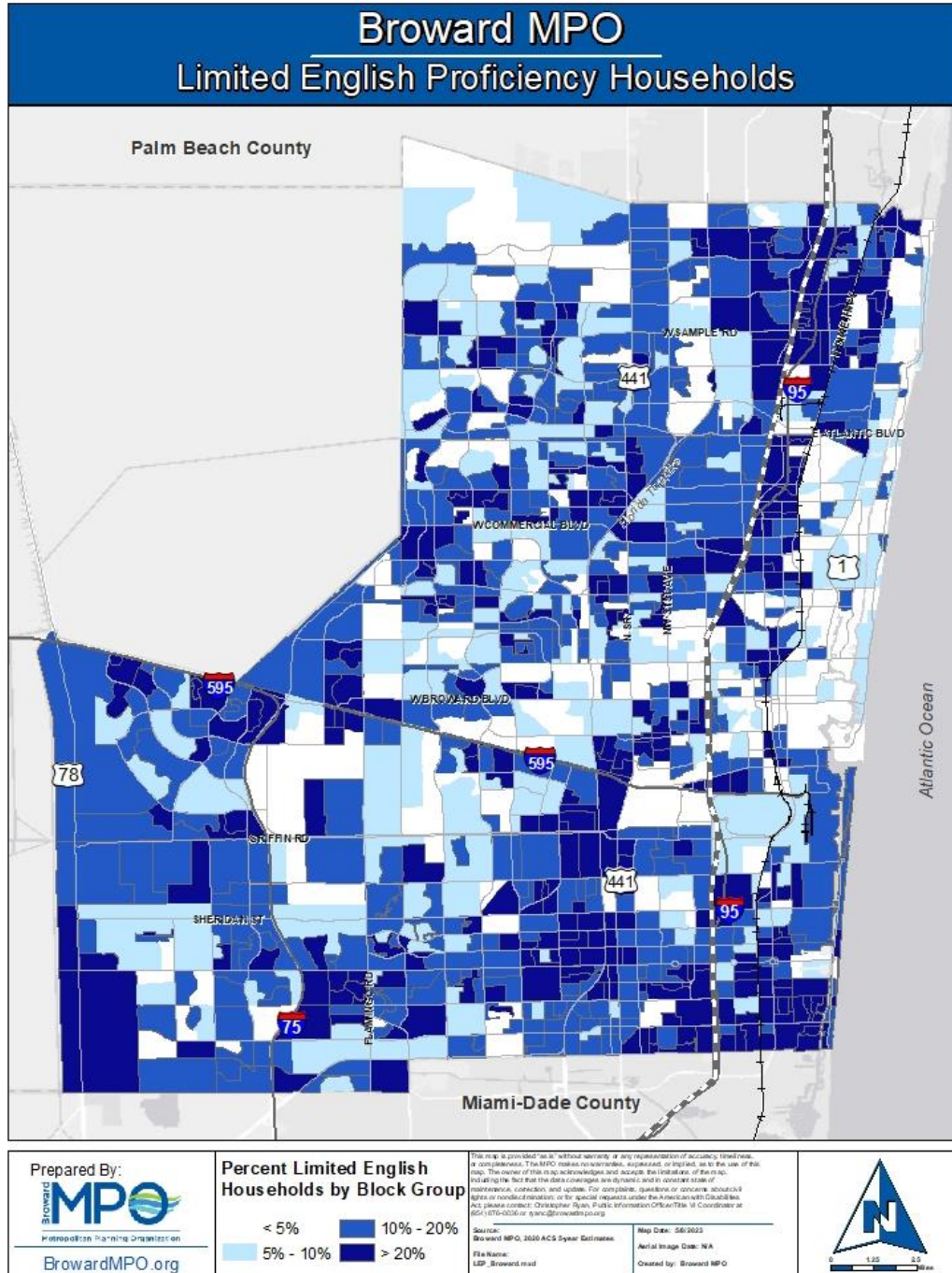
Factor 2: The frequency with which LEP individuals come into contact with these programs, services, or activities.

The four-factor analysis confirmed that Spanish remains the most significant language spoken by the LEP population in Broward County. Since the previous LEP Plan was completed in 2020 (and based on 2018 ACS data), the LEP population has increased 9.1%. The size of the LEP population in the South Florida region is expected to continue to increase, as will the probability of increased future contact with the Broward MPO. To date, the number of requests for Spanish language assistance services made by LEP individuals or groups remains low; however, the MPO is proactive in translating into Spanish critical materials and outreach materials for major planning projects and other programs as determined necessary. As the Broward MPO expands its LEP program, staff will continue to monitor the requests for language assistance to gauge outreach effectiveness to these populations.

The Broward MPO’s Equity Assessment also provides the ability to review and monitor LEP populations by language spoken at the block group level. During specific planning studies or other activities, special care can be given to ensure that resources are being considered to engage populations within specific areas of the county.



Map 5: Percent of LEP Households, 2020



Factor 3: The nature and importance of the program, service, or activity to people's lives.

The Broward MPO programs use Federal funds to plan for future transportation improvements and projects and, therefore, do not include any direct service or program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs (like food or shelter). Further, the Broward MPO does not conduct required activities such as applications, interviews, or other activities prior to participation in its programs or events. Involvement by any citizen with the Broward MPO or its committees is voluntary.

However, consistent with Federal policy, the Broward MPO must ensure that all segments of the population (including LEP persons) have had the opportunity to be involved in the transportation planning process. The impact of proposed transportation investments on underserved and underrepresented populations is part of the evaluation process for using Federal funds in three major areas for the Broward MPO:

- Biennial Budget or Unified Planning Work Program (UPWP)
- Five-year Transportation Improvement Plan (TIP)
- Metropolitan Transportation Plan (MTP)

Inclusive public participation also is a priority consideration in other MPO plans, studies, and programs. Transportation improvements from these planning activities have an impact on all residents. The Broward MPO will place emphasis on language assistance for educational materials and public input related to the three major areas identified above. These materials often are helpful with outreach related to other Broward MPO projects and studies.

Understanding and continued public participation are encouraged throughout the process. The Broward MPO desires input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible. The use of the Equity Assessment allows MPO staff to identify concentrations of LEP populations.

Factor 4: Available resources and the overall cost to the Broward MPO.

The Broward MPO assessed the following available resources that could be used for providing LEP assistance:

- What staff and volunteer language interpreters are readily available?
- How much translation services would cost?
- Which documents currently are or should be translated?

Staff Translators

The Broward MPO uses staff and volunteer language interpreters and/or translators as needed. A complete list of staff members who are willing to provide written translations or act as an interpreter is maintained by the Broward MPO's Title VI Coordinator. At the time of this Program's development, Broward MPO staff are able to translate or interpret Spanish, German, Mandarin, and American Sign Language.



Translation Cost Analysis

Based on the word count of the most recent core products prepared by the MPO and translation costs (obtained from 2023 internet research), the approximate cost range of translating major reports are shown in Table 3. Due to the varying price estimates for translation services depending on the language, type of document, the level of expertise needed, etc., a range is provided to encompass potential translation scenarios.

Table 3: Estimated Document Translation Cost

Cost Per Word	UPWP	Cost Per Document		
		TIP	2045 MTP	PPP
\$0.10 -	\$2,095	\$10,492 - \$31,476	\$3,805 -	\$980 - \$2,940
\$0.30	-		\$11,415	
	\$6,285			

Source: Various based on internet market research

LEP Plan

Building on the results of the four-factor analysis, the LEP Plan includes the following four components.

Component 1: Describe how the recipient provides language assistance services by language.

As noted in the four-factor analysis, given the size of the LEP population in the Broward MPO area (just under 16%), the frequency of requested translation, and current financial constraints, full-language translations of complete transportation plan documents and maps were not determined to be warranted or cost-feasible at this time. However, the Broward MPO currently undertakes the following to ensure that LEP persons have access to important information prepared by the MPO:

- **Advertisements in Spanish newspapers** – In addition to advertising notices in major local print media (e.g., *Sun Sentinel*, *South Florida Times*), notices are advertised in Spanish in the *WSCV-TV Telemundo Digital Platform newspapers*.
- **Website translation function** – The Broward MPO has a translation drop-down function on its homepage that can translate its website content to five different languages: Croatian, French, Haitian Creole, Portuguese, and Spanish (Figure 5).
- **Phone line Spanish translation** – The Broward MPO’s main phone number, (954) 876-0033, includes an option to hear the phone directory/menu in Spanish. Specific bilingual staff are identified to aid these callers.
- **Telecommunications Device for the Deaf (TDD)/ Teletypewriter (TTY) capabilities** – The Broward MPO uses the 711 relay service for deaf and hard-of-hearing individuals. Anyone with TTY equipment or who calls 711 has nationwide access to non-internet-based relay services such as TTY relay services, speech-to-speech relay services, voice carry-over TTY, and hearing carry-over TTY relay services. Users also have the option to call Florida’s direct toll-free number (1-800-955-8771) that serves as a relay service between the caller and Broward MPO. This information is listed on the MPO’s website and in notices.



Figure 5: Broward MPO Website Translated to Spanish

Quiénes somos

Acerca de la MPO

Normas

Política de transporte

Nuestra Junta

Nuestro equipo

Nuestros Comités

Acerca de la MPO

Bienvenido a la Organización de Planificación Metropolitana de Broward.

La MPO de Broward es una agencia pública dinámica con mandato federal que sirve como catalizador para el cambio en el transporte. Con la coordinación de 31 gobiernos locales y municipios, más de 1,8 millones de residentes y más de 13 millones de visitantes cada año, la MPO de Broward permite el transporte y la reurbanización sin interrupciones en el condado de Broward, lo que brinda una oportunidad para que las personas y las comunidades crezcan y prosperen.

La MPO de Broward es responsable de formular políticas sobre problemas de transporte local y decidir cómo gastar dinero federal en colaboración en proyectos de transporte importantes que brinden soluciones, ayuden a mantener el condado de Broward en movimiento y mejoren la calidad de vida de todos.

Los miembros votantes de la Junta de la MPO son funcionarios electos que representan a la Junta de Comisionados del Condado de Broward, los 31 municipios de Broward, la Autoridad de Transporte Regional del Sur de Florida (SFRTA/Tri-Rail) y la Junta Escolar del Condado de Broward. La MPO trabaja con las partes interesadas en el transporte que representan todos los segmentos de las áreas de planificación de la MPO: miembros individuales del público, grupos cívicos y comunitarios, agencias gubernamentales y organizaciones de planificación a nivel local, del condado, estatal y federal.

Misión y visión de la MPO

- **Misión:** planificar, priorizar y financiar en colaboración la entrega de diversas opciones de transporte.
- **Visión:** Nuestro trabajo tendrá un impacto positivo medible al garantizar que los proyectos de transporte sean bien seleccionados, financiados y entregados.

Los miembros votantes de la Junta de la MPO son funcionarios electos que representan a la Junta de Comisionados del Condado de Broward, los 31 municipios de Broward, la Autoridad de Transporte Regional del Sur de Florida (SFRTA/Tri-Rail) y la Junta Escolar del Condado de Broward. La MPO trabaja con las partes interesadas en el transporte que representan todos los segmentos de las áreas de planificación de la MPO: miembros individuales del público, grupos cívicos y comunitarios, agencias gubernamentales y organizaciones de planificación a nivel local, de condado, estatal y federal.

Distritos MPO

Los distritos de la MPO se desarrollaron para equilibrar los poderes de voto de la Junta de la MPO. Las ciudades con características similares (como desafíos relacionados con el transporte) se agruparon para formar estos distritos. La cantidad de votos que recibió cada distrito se derivó del tamaño de la población general, la población con empleo, así como una variedad de otros factores. El mapa en el enlace a continuación mostrará la estructura de votación y los límites de cada distrito de la MPO.

[Mapa de Distritos MPO 2022](#)

Planificación de la Continuidad de las Operaciones (COOP)

[Plan de Continuidad de Operaciones \(COOP\)](#) -- Este Plan de Continuidad de Operaciones (COOP) fue preparado por la Organización de Planificación Metropolitana de Broward (MPO) para desarrollar, implementar y mantener una capacidad COOP viable. Este COOP cumple con la política interna de la agencia aplicable, las regulaciones locales y estatales, y respalda las recomendaciones proporcionadas en la Circular Federal de Preparación 65 de la Agencia Federal para el Manejo de Emergencias (FEMA). Este COOP se ha distribuido internamente dentro de la MPO de Broward y con agencias externas que pueden verse afectadas por su implementación.



- **American Sign Language (ASL) interpreter services** – The Broward MPO can provide ASL interpretation services at meetings or other events as needed.
- **Translation of project/plan-specific events, materials, and deliverables** – As part of the scoping and contracting process for plans and studies, Broward MPO staff work with consultants and other organizations to determine if translation at meetings or of project materials and deliverables are appropriate. For example, a Spanish version of the introductory video for *Commitment 2045*, the Broward MPO’s 2045 MTP, along with translated MTP rack cards/palm cards, and other materials was prepared. Similar efforts are planned for the 2050 MTP update.
- **Case-by-case translation requests** – Broward MPO staff will continue to work with individual and/or group requests for translation services, as needed.
- **Coordination with other local and regional agencies** – The Broward MPO will continue efforts to collaborate with State and local agencies to provide language translation and interpretation services. Spanish language outreach materials from organizations such as Federal, State, and local transportation agencies will be used when possible.

Safe Harbor Stipulation

Federal law provides a “safe harbor” stipulation so recipients of Federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A “safe harbor” means that as long as a recipient (the Broward MPO) has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is non-compliance, but rather provides recipients with a guide for greater certainty of compliance in accordance with the four-factor analysis. Evidence of compliance with the recipient’s written translation obligations under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of eligible persons served or likely to be affected. Translation also can be provided orally.

The “safe harbor” provision applies to the translation of written documents only; it does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

Component 2: Describe how the recipient provides notice to LEP persons about the availability of language assistance.

It is important to notify LEP persons of services available free of charge in a language the LEP persons would understand. The Broward MPO will include the following language in English and Spanish (where appropriate) on meeting notifications and other informational materials.

Public participation is solicited without regard to race, color, national origin, age, sex, religion, disability or family status. Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services (free of charge) should contact Carl Ema at (954) 876-0033 or emac@browardmpo.org at least seven days prior to the meeting. Individuals who are deaf, hard of hearing, or have speech/communication limitations may call 711 or 1-800-955-8771 to connect to and communicate with the Broward MPO via a telecommunications operator.



Se solicita la participación del público, sin importar la raza, color, nacionalidad, edad, sexo, religión, incapacidad o estado familiar. Personas que requieran facilidades especiales bajo el Acta de Americanos con Discapacidad (Americans with Disabilities Act) o personas que requieren servicios de traducción (sin cargo alguno) deben contactar a Carl Ema al teléfono (954) 876-0033 o emac@browardmpo.org por lo menos siete días antes de la reunión. Las personas sordas, con dificultades auditivas, o que tienen alguna limitación de expresión o comunicación pueden llamar al teléfono 1-800-273-7545 (TDD) para comunicarse con la Oficina Metropolitana de Planeamiento de Broward (MPO) a través de un operador de retransmisión de telecomunicaciones.

Component 3: Describe how the recipient monitors, evaluates, and updates the language access plan.

The Broward MPO provides continuing needs assessment to determine how best to communicate with LEP persons in Broward County and improve ongoing efforts. To ensure that the intent of the LEP Plan remains current, MPO staff will:

- Continue to monitor and update the Plan and report progress every three years as part of its Title VI Program update.
- Monitor current LEP populations in the service area and in emerging populations affected or encountered.
- Document and monitor frequency of encounters with LEP language groups.
- Assess the effectiveness of public outreach programs for projects/plans targeting LEP populations through different evaluation mechanisms.
- Assess the availability of resources, including technological advances and sources of additional resources and the cost imposed.
- Assess its success in meeting the needs of the LEP persons.
- Communicate the goals and objectives of the LEP Plan and evaluate the opportunity for community involvement and planning.
- Strive to identify sources of assistance and opportunities to implement LEP goals.

Component 4: Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

To establish meaningful access to information and services for LEP individuals, the Broward MPO ensures that staff are able to assist in person and/or by telephone LEP individuals who request assistance.

The Broward MPO actively seeks additional Title VI training opportunities for both MPO staff and transportation partner agencies and municipalities. The MPO works closely with its representatives at the Florida Department of Transportation (FDOT), the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA) to seek opportunities to provide training in the Southeast Florida region.



Contact Information

The Broward MPO does not intend that its LEP Plan exclude anyone requiring language assistance and will try to accommodate requests. Anyone who requires special language services should contact the Broward MPO's Title VI Coordinator:

Carl Ema, Title VI Coordinator

Phone: (954) 876-0033, TTD: 711 or 1-800-955-8771, Fax: (954) 876-0062

emac@browardmpo.org

2.8 Minority Representation on Planning & Advisory Bodies

Recipients with transit-related, non-elected planning boards, advisory councils or committees, or similar bodies where membership is selected by the recipient, must provide a table showing the membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

The Broward MPO has five advisory committees comprising non-elected volunteers. Three committees provide direction and advice to the Broward MPO Board on a wide range of planning topics, including transit:

- **Technical Advisory Committee (TAC)** – Established to advise and provide expertise for the MPO's decision-making process and to provide valuable assessment of MPO plans and programs. The TAC comprises primarily engineers, planners, and other professionals who represent local governments and transportation agencies who serve in an advisory capacity by providing recommendations to the Broward MPO Board based on current scientific information, technical sufficiency, accuracy and completeness of studies, plans, and programs.
- **Citizens' Advisory Committee (CAC)** – Comprising representatives and members of the public interested in participating in the transportation planning process. Members represent a broad cross-section of Broward's population, such as cities, towns, and community organizations who provide the MPO Board with valuable insight into local communities and help to form the urban landscape by acting as a voice for public opinion relating to general transportation issues. The CAC reviews and provides recommendations to the MPO Board on transportation plans and programs, taking into consideration the impacts these plans and programs have on their local communities.
- **Transportation Disadvantaged Local Coordinating Board (LCB)** – Provides direction and advice on transportation disadvantaged services in Broward County as provided by Broward County Transit (BCT).

Table 4 summarizes the racial composition and Table 5 summarizes the ethnic composition of these three non-elected advisory committees, as required by FTA Circular 4702.1B. As indicated in the committee descriptions, the processes used for appointing members to the Broward MPO's advisory committees vary. When considering appointments to each advisory committee, maintaining a diverse group of individuals is a priority of the MPO.



Table 4: Racial Composition of Broward MPO Non-elected Advisory Committees

Race Category	TAC	CAC	LCB
White	33%	48%	53%
Black or African American	6%	16%	17%
American Indian and/or Native Alaskan	0%	0%	0%
Asian	3%	0%	0%
Native Hawaiian/Other Pacific Islander	0%	0%	0%
Other	0%	0%	0%
Two or More	0%	12%	6%
Information Not Provided	58%	24%	24%
Total	100%	100%	100%

Table 5: Ethnic Composition of Broward MPO Non-elected Advisory Committees

Ethnicity	TAC	CAC	LCB
Hispanic or Latino	11%	8%	24%
Not Hispanic or Latino	31%	68%	53%
Information Not Provided	58%	24%	23%
Total	100%	100%	100%

2.9 Subrecipient Compliance & Monitoring

Title 49 CFR Section 21.9(b) states that if “a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.” The primary recipient has a responsibility to both aid and monitor subrecipients for compliance with DOT’s Title VI regulations. If the subrecipient is not in compliance, then the primary recipient (Broward MPO) is also not in compliance.

Providing Assistance to Subrecipients

The Broward MPO will make available to its subrecipients information and resources regarding its Title VI Program to assist them in achieving and maintaining compliance. This assistance most likely will be needed when the subrecipient is a first-time grantee or is not also a direct recipient; however, the following information and resources is made available to all subrecipients, as needed:

- Sample notices to the public informing beneficiaries of their rights under DOT’s Title VI regulations, procedures on how to file a Title VI complaint, and the recipients Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.



- Demographic information on the race and limited English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.
- Any other available information or data that will assist subrecipients in complying with Title VI.

Monitoring Subrecipient Compliance

Monitoring subrecipients is a critical aspect of the Broward MPO's Title VI Program, as all subrecipients must be in compliance. When a subrecipient is *also* a Direct Recipient of FTA funds—that is, applies for funds directly from FTA in addition to receiving funds from the Broward MPO—the subrecipient (as a Direct Recipient) reports directly to FTA, and the Broward MPO is not responsible for monitoring compliance of that subrecipient.

Two of the current subrecipients of FTA funds through the Broward MPO also are Direct Recipients. For applicable subrecipients, a supplemental agreement signed by the Broward MPO and the Direct Recipient absolves the Broward MPO of responsibility to monitor its Title VI Program.

One current subrecipient is not a Direct Recipient. The Broward MPO monitors the subrecipient and requests documentation of the subrecipient's Title VI Program to demonstrate compliance with requirements outlined in the FTA Circular 4702.1B that apply based on the type of agency and/or public transit provider.

Consultant Contracts

The Broward MPO is responsible for the solicitation, negotiation, selection, , and administration of its consultant contracts. The Broward MPO operates under its internal contract procedures and all relevant Federal and State laws.

Broward MPO's Procurement Rules are made available under the "Work With Us" section of the MPO's website at <https://browardmpo.org/procurement/procurement-code>. The Broward MPO verifies Title VI compliance by consultants in the contracting process. Signature of the terms of the contract is used to verify compliance by the consultant. In addition, Title VI text is included in all Broward MPO solicitations.



Section 3 Requirements of MPOs

The following information addresses Title VI reporting requirements for MPOs as described in FTA Circular 4702.1B. The Broward MPO is not a provider of fixed-route public transportation service; therefore, requirements specific to MPOs serving as transit providers are not included in this section.

3.1 Demographic Profile

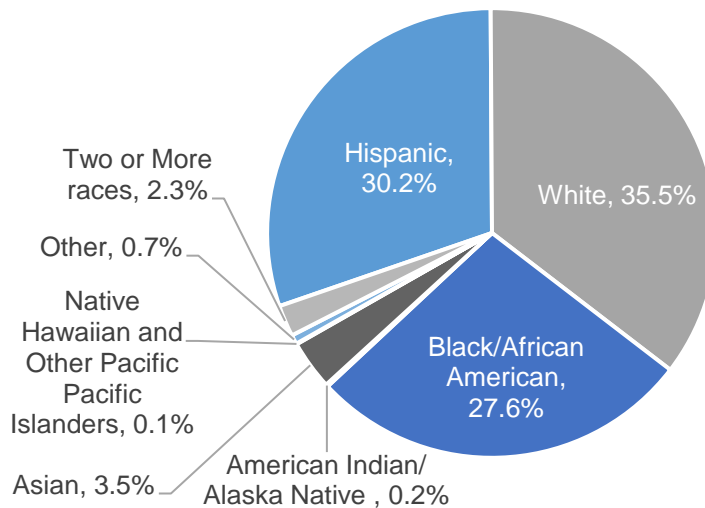
All MPO recipients must provide a demographic profile of the metropolitan area within their Title VI Program that includes identification of the locations of minority populations in the aggregate.

Data from the 2020 ACS were used to evaluate the representation of minority populations, LEP households, low-income households, zero vehicle households, and the older adult population in Broward County. The representation for each of these groups as a percentage of the total population was used to compare with the extent of benefits received from improvements.

Minority Population

The racial distribution in Broward County for 2020 is shown in Figure 6. Broward County is a minority-majority county, with 35.5% of the population identifying as White non-Hispanic and 64.5% identifying as a minority. Of this, approximately 30% identify as Hispanic.

Figure 6: Racial Composition of Broward County, 2020



Source: ACS 2020 5-Year Estimates

A comparison of ACS data from 2000, 2010, and 2020, as presented in Table 6, shows that the racial and ethnic composition of Broward County is changing. Since 2000, the total population increased by 19.7% and the minority population increased by 83.6%. The White non-Hispanic population declined by 26.7%, the Black/African American population increased by 66.4%, and the Hispanic population increased by 115.9% in the 20-year time span.

Map 6 shows the percentage of minority populations by block group for Broward County. High concentrations of minority populations occur to the south in Miramar, in Plantation west of I-95, in central Broward County generally between the Turnpike and I-95 (North Lauderdale, Lauderhill, and Lauderdale Lakes), and in the Pompano Beach area.

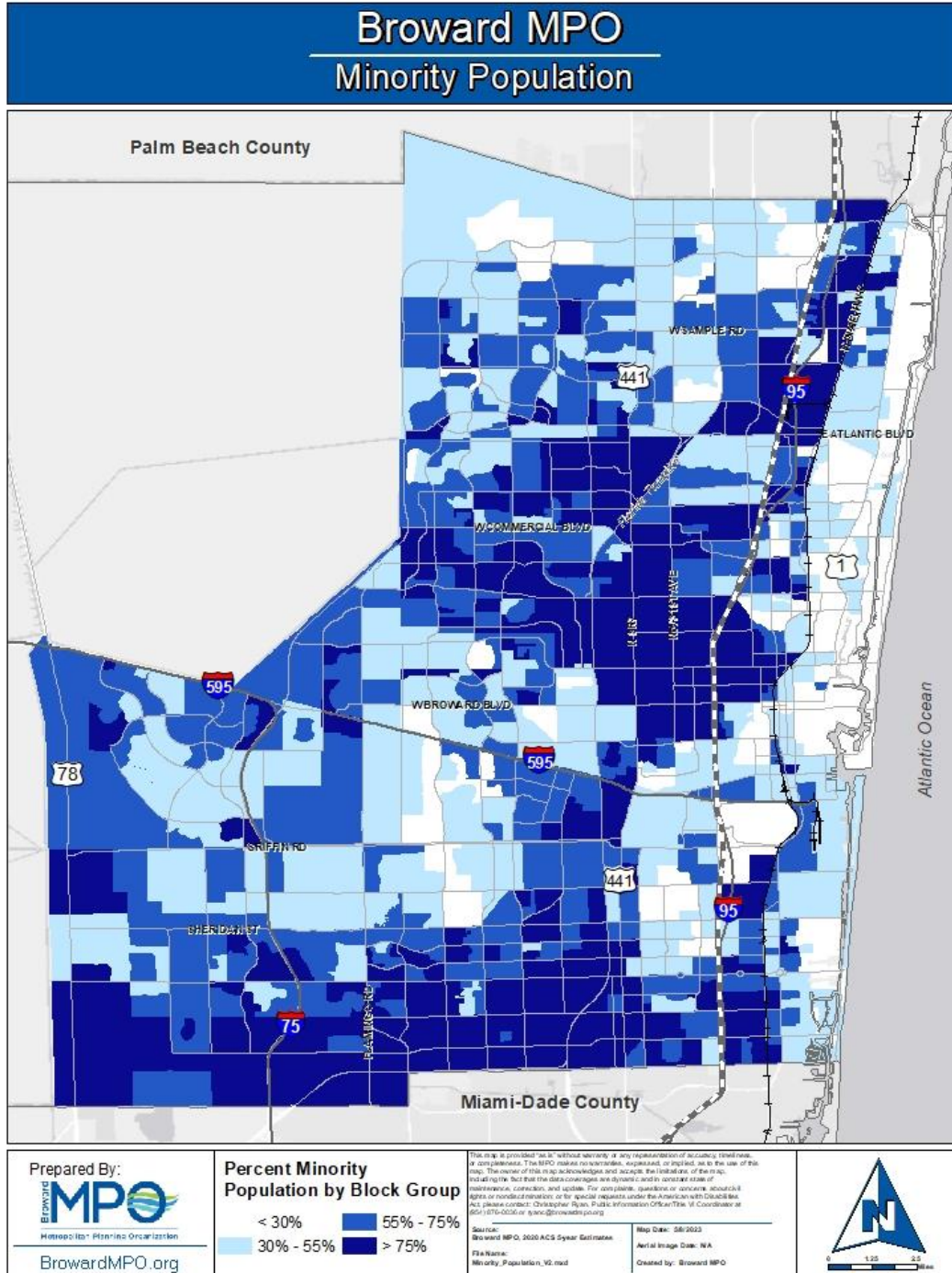
Table 6: Broward County Minority Population Trends, 2000-2020

Category	2000		2010		2020		% Change 2000-2020
	Pop.	%	Pop.	%	Pop.	%	
Total Population	1,623,018	100%	1,734,139	100%	1,942,273	100%	19.7%
White	940,692	58.0%	790,073	45.6%	689,773	35.5%	-26.7%
Black/African American	322,516	19.9%	436,318	25.2%	536,564	27.6%	+66.4%
American Indian/Alaska Native	2,912	0.2%	2,677	0.2%	3,208	0.2%	+10.2%
Asian	36,148	2.2%	54,259	3.1%	68,917	3.5%	+90.7%
Native Hawaiian, Other Pacific Islander	570	0.04%	402	0.02%	985	0.1%	+72.8%
Other	6,638	0.4%	7,001	0.4%	12,860	0.7%	+93.7%
Two or more races	42,019	2.6%	27,782	1.6%	43,730	2.3%	+4.1%
Hispanic	271,523	16.7%	415,627	24.0%	586,236	30.2%	+115.9%
Total Minority	682,326	42.0%	944,066	54.4%	1,252,500	64.5%	+83.6%

Source: ACS 2020 and 2010 5-Year Estimates, 2000 US Census



Map 6: Broward County Minority Population



LEP Population

Information included in the four-factor analysis provided under Section 2.7 provides information about the LEP population in Broward County, including a table showing English proficiency and a map of LEP households.

Low-Income Population

Approximately 12.7% of Broward County's population is living below the Federal poverty level. Some neighborhoods characterized by high populations of low-income households include the urban core of Fort Lauderdale and Pompano Beach, generally located west of US-1 and east of the Florida Turnpike. Parts of Hallandale Beach along Hallandale Boulevard and Dania Beach along US-1 show higher concentrations of low-income households. Map 7 illustrates concentrations of low-income households by block group.

Zero-Vehicle Households

Nearly 6.8% of Broward County households do not have access to a vehicle. Map 8 shows that parts of Fort Lauderdale and Pompano Beach west of US I-95 have the highest concentration of zero-vehicle households in the county.

Older Adult Population

Nearly 16.7% of Broward County's population is age 65 or older. Map 9 shows that high concentrations of older adult population exist along coastal areas. Several older adult communities and populations also exist throughout Broward County as transit-dependent households (determined as those with no car) and are considered an important factor in planning for transportation improvements, particularly the addition or expansion of transit.

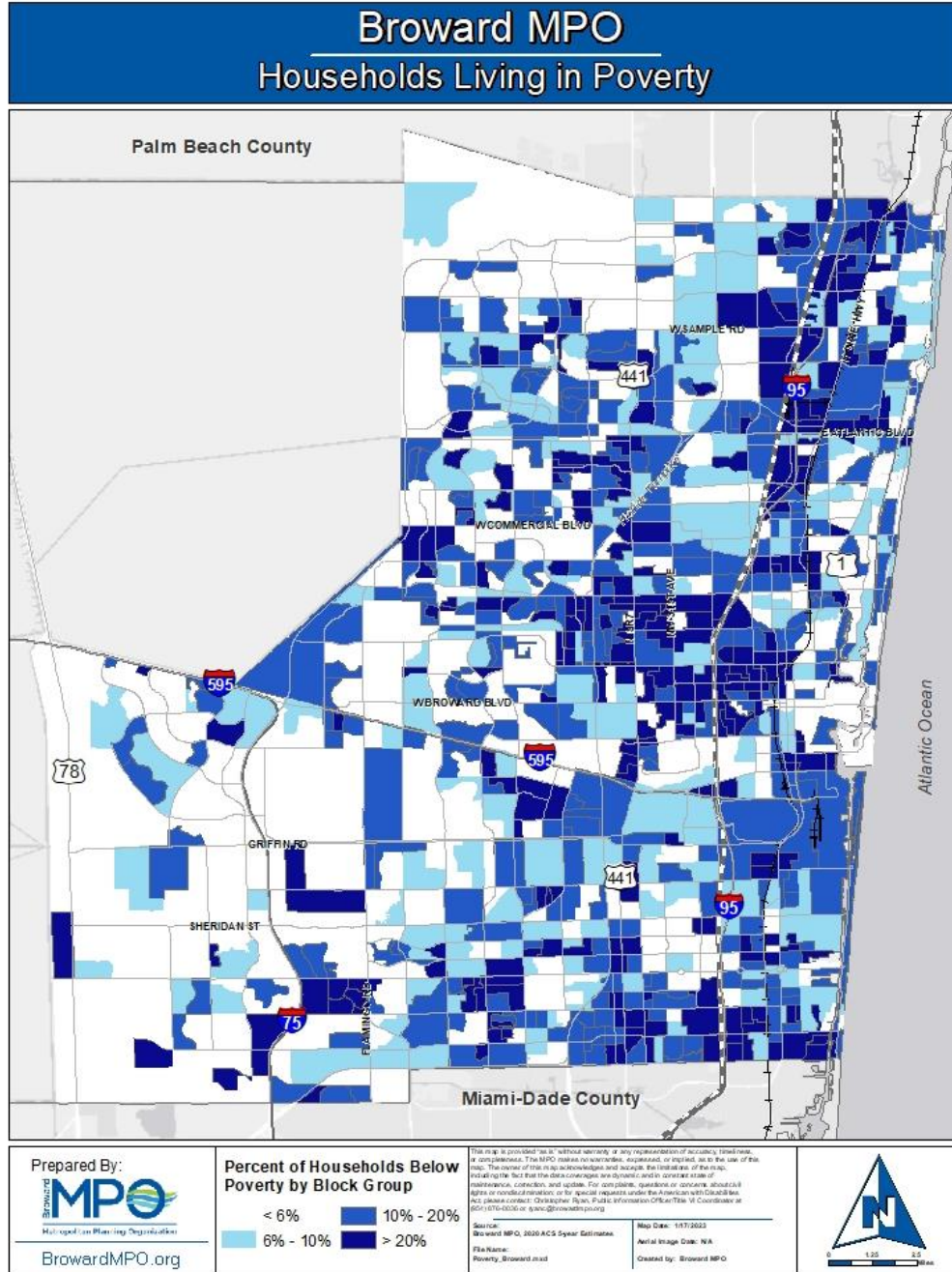
Tribal Coordination

Broward County is home to the Seminole Tribe of Florida's Hollywood Reservation, one of the Tribe's six reservations in Florida and serving as the Tribe's headquarters. The Tribe holds a permanent seat on the MPO's Technical Advisory Committee.

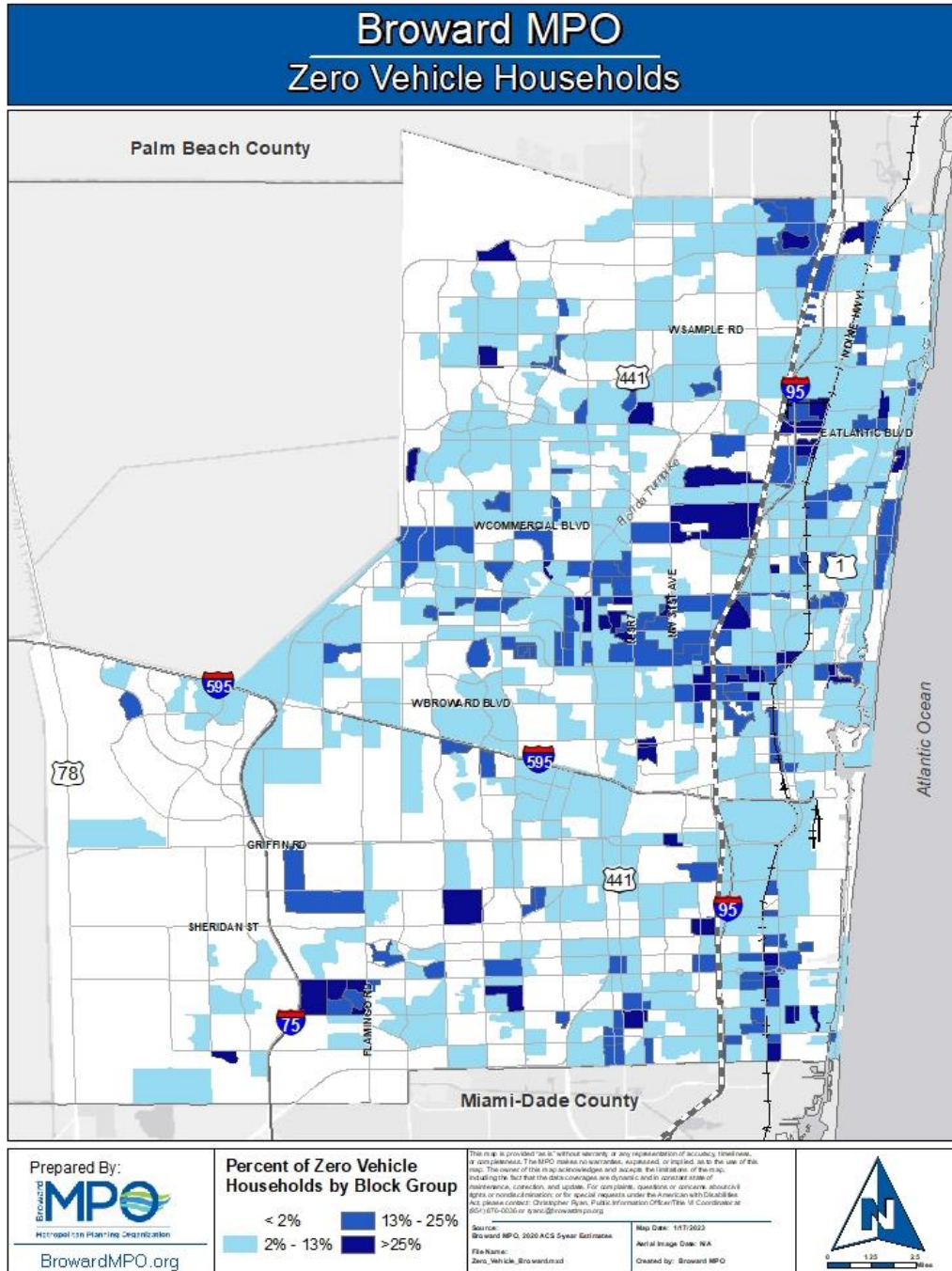
The Broward MPO's 2019 Joint State/MPO Certification Review acknowledged that the MPO has actively sought participation in the metropolitan planning process from the Seminole Tribe of Florida. Since then, Broward MPO staff has continued specific efforts to coordinate with the Tribe on plans and projects that abut or are in the area of Tribal lands. These include the Mobility Hub Master Plan in Coconut Creek and capital improvements in Hollywood that include lighting and multimodal improvements on SR-7. Broward MPO staff maintains a working relationship with Tribal staff through these processes. Materials to support these efforts are included in documentation submitted for the Broward MPO's 2023 Federal Certification Review.



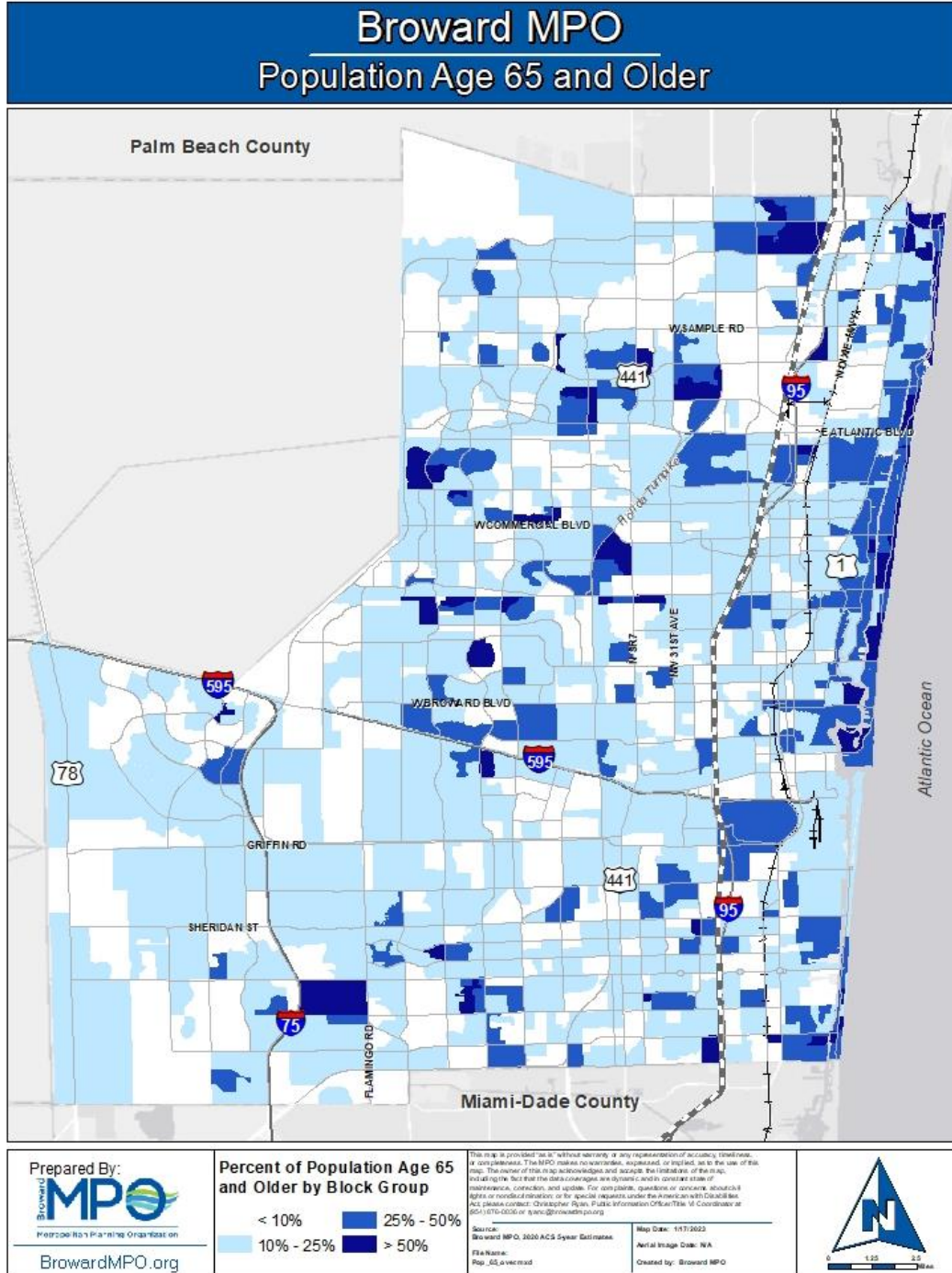
Map 7: Broward County Low-Income Households



Map 8: Broward County Zero-Vehicle Households



Map 9: Broward County Populations Age 65 and Older



3.2 Mobility Needs Assessment

MPO recipients are required to include in the Title VI Program a description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

In developing the Broward MPO's PPP and planning activities, the Broward MPO seeks out and considers the needs of those traditionally underserved by existing transportation systems, including minorities. The Broward MPO strives to include all stakeholders, including protected classes, in its planning activities. On several projects, the Broward MPO has expanded upon the minority population demographics to consider other factors to understand community needs such as income levels, car ownership, and age.

The MPO's Complete Streets and other Localized Initiatives Program (CSLIP) provides funding for small, local transportation projects that improve the safety and mobility for all transportation users in Broward. One evaluation criterion for selecting CSLIP projects is the average of total equity indicators, two of which are minority and LEP populations within a ½-mile buffer of a proposed project.

The Complete Streets Master Plan (CSMP), adopted by the Broward MPO Board on February 14, 2019, prioritized areas of investment utilizing national recognized equity indicators. By utilizing this approach, traditionally disenfranchised, underserved communities were undoubtedly included as the CSMP was developed. Equity indicators included age, income, LEP status, race, education, and households with zero vehicles. Furthermore, ranking criteria included additional points for projects identified within higher concentration of vulnerable populations.

The MPO's 2045 MTP, *Commitment 2045*, included a detailed evaluation of potential impacts on equity areas, including Environment Justice and Title VI populations. The Equity Assessment was applied at key stages of the Plan's development to ensure that disproportional impacts to minorities, LEP persons, and other protected populations did not occur. Ongoing assessment of project outcomes from the 2045 MTP will be addressed using the Equity Assessment process as projects are further refined so that any potential impacts can be identified early and addressed well before funding and implementation. This evaluation process will be repeated in the 2050 MTP update, which is ongoing and planned for adoption by the MPO Board by December 2024.

3.3 Distribution of State and Federal Funds

MPO recipients are required to provide demographic maps that overlay the percent of minority and non-minority populations as identified by Census or ACS data at tract or block group levels and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a Designated Recipient.

Table 7 summarizes the mileage and associated funding levels for transit projects funded in Broward MPO's FY 2023-2027 Transportation Improvement Program (TIP) that intersect "minority block groups" defined as Block Groups with a higher percentage of minority populations compared to the countywide average. As shown, approximately 45% of transit project miles and 2% of total transit funding are distributed within minority Block Groups. It should be noted that the transit section of the TIP is managed by Broward County Transit, which is required to prepare its own Title VI Program. Additionally, this analysis only captures projects with a specific location that can be analyzed. Transit operations or other



system-wide projects that do not have a specific project location are not included in the determination of project miles or funding within minority block groups, as summarized in the table.

Table 7: Distribution of Federal and State Funds for Public Transportation in Broward County, 2023

Miles of Transit-Funded Projects In Minority Block Groups ¹	% Total Funded Transit Project Miles ²	Transit Funded Projects in Minority Block Groups ³	% of Total Transit Funded Projects in Minority Block Groups ⁴
12.15	45%	\$16,406,343	1.9%

¹Block groups with higher percentage of minority population than county average.

^{2, 3, 4} Source: Broward MPO FY 2023-2027 Transportation Improvement Program

3.4 Analysis of Disparate Impacts

MPO recipients are required to determine, based on the information provided in Section 3.3, if there are any disparate impacts based on race, color, or national origin.

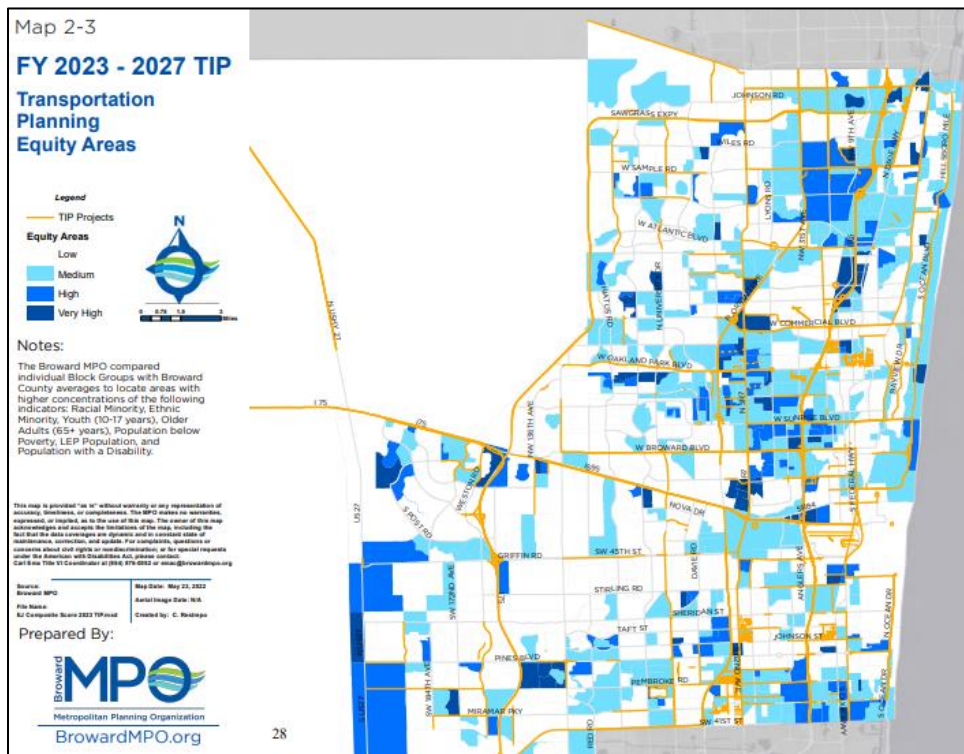
Taken as a whole, the transportation planning services provided by the Broward MPO do not pose disproportionate or adverse impacts on minority populations. The Broward MPO’s comprehensive Equity Assessment process, described in Section 2.5, is designed to evaluate potential disproportionate impacts throughout different project phases prior to being incorporated into the TIP for funding and implementation. This process includes:

- Creating maps using GIS to analyze the most current Census data and identify low-income and minority populations, among other protected population groups, within the project’s study area.
- Incorporating income information from the Census into the travel-demand forecasting model to assess the impacts of existing and planned transportation system investments on low-income populations and minority populations.
- Using mapping and data analysis to strengthen outreach efforts in the communities most directly impacted by transportation projects.

As part of its TIP update process, the Broward MPO assesses Title VI and Environmental Justice by understanding the geographic distribution of funding relative to equity areas. Figure 7 provides the Environmental Justice assessment map from the FY 2023-2027 TIP; it is evident that the predominant concentrations of equity indicators generally cluster in the southwest, central, and north/northeast portions of the county. This input is paired with public participation feedback on specific projects to evaluate potential impacts to specific communities.



Figure 7: FY 2023-2027 TIP Assessment



3.5 Program Administration

Broward MPO reviews its Title VI Program on a regular basis prior to signing its annual certification agreement with FDOT. Regarding its subrecipient agencies, Broward MPO ensures FTA funds allocated to them are utilized in a manner that is compliant with Title VI and assures that minority populations are not being denied the benefits of or excluded from participation in FTA-funded programs. Broward MPO will provide the following information upon request:

- a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to aid predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.
- b. A description of how Broward MPO develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to diverse stakeholders regarding the availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.
- c. A description of Broward MPO’s criteria for selecting entities to participate in an FTA grant program.



Section 4 Board Approval of Title VI Program

Recipients are required to provide 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.

The Broward MPO Board adopted the 2023 Title VI Program on June 8, 2023, as required by FTA. Official documentation of approval is provided in Appendix B.



Appendix A: Title VI Complaint Procedures & Complaint Form



BROWARD METROPOLITAN PLANNING ORGANIZATION

TITLE VI DISCRIMINATION COMPLAINT PROCEDURES

The Broward Metropolitan Planning Organization (Broward MPO) values diversity and both welcomes and actively seeks input from all interested parties, regardless of cultural identity, background or income level. Moreover, the Broward MPO does not tolerate discrimination in any of its programs, services or activities. The Broward MPO will not exclude 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. The Broward MPO will actively work to ensure inclusion of everyone in our community so that Broward MPO programs, services and activities represent the diversity we enjoy.

The purpose of the Broward MPO Title VI program is to establish and implement procedures that comply with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990 (ADA), as well as other related federal and state statutes and regulations. These procedures have been adopted to conform to Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) regulations, as well to Florida Department of Transportation (FDOT) guidelines.

COMPLAINT PROCEDURE

A. Filing of Title VI Complaints of Discrimination

1. Any person who feels that he/she has been subjected to race, color, or national origin discrimination under Title VI of the Civil Rights Act of 1964, or other forms of discrimination based upon sex, age, disability, religion, family or income status discrimination under related nondiscrimination laws and regulations may file a complaint with the MPO.
2. A complaint must be filed within one hundred eighty (180) days after the date of the alleged discrimination, unless the time for filing is extended by the FTA, FHWA or other federal authorities.
3. Complaints should be in writing, signed by the complainant or his/her representative(s), and must include the complainant(s) name, address, and telephone number. Allegations of discrimination received via facsimile or e-mail will be acknowledged and processed. Allegations received by telephone will be documented in writing and provided to the complainant(s) for review before processing. The complaint form can be accessed on the website: www.browardmpo.org or you may call Carl Ema at (954) 876-0033, if hearing impaired call Florida Relay Service 711 or 1-800-955-78771 or e-mail emac@browardmpo.org.

Signed complaint forms should be submitted to:

Attention: Broward Metropolitan Planning Organization
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309

B. Complaint Investigation

1. Upon receipt of a signed complaint, the Broward MPO Executive Director or his/her designee will, within five (5) working days, provide the complaint or his/her representative with a written acknowledgement of the complaint.
2. Broward MPO Staff will conduct a preliminary inquiry into the complaint to determine whether the complaint has sufficient merit to warrant an investigation. Should Broward MPO Staff determine that the evidence presented is not sufficient to proceed, the complaint will be closed and the complainant or his/her representative will be notified in writing of the decision within fifteen (15) working days. This notification shall specifically state the reason(s) for the decision.
3. Should Broward MPO Staff determine that a full investigation is necessary, the complainant or his/her representative will be notified that an investigation will take place and additional information will be requested, if necessary. The investigation should last no more that forty-five (45) working days.
4. Should a complainant fail to provide additional information within the prescribed timeframe, this may be considered as a failure to cooperate with the investigation, and the complaint will be administratively closed.

C. Disposition

1. Upon completion of the investigation, a written notification of disposition will be sent by certified mail to the complainant or his/her representative within sixty (60) working days of filing the complaint.
2. If the complainant disagrees with the decision rendered by the Broward MPO, he/she will be notified of the right to request reconsideration with thirty (30) days, or may file a complaint directly with the FTA or FHWA Offices of Civil Rights at the following addresses:

Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Federal Highway Administration
Office of Civil Rights - Investigations and Adjudications
HCR-40, Room E81-328
1200 New Jersey Avenue, SE
Washington, DC 20590

D. Retaliation

Retaliation is prohibited under Title VI of the Civil Rights Act of 1964 and related federal and state nondiscrimination authorities. It is the policy of the Broward MPO that persons filing a complaint of discrimination should have the right to do so without interference, intimidation, coercion, or fear of reprisal. Anyone who feels he/she has been subjected to retaliation should report such incident to the Executive Director.

ADA/504 STATEMENT

Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their needs are equitably represented in the transportation planning process.

The Broward MPO will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. The Broward MPO will make every effort to ensure that its advisory committees and public involvement activities include representation by the disabled community and disability service groups.

The Broward MPO encourages the public to report any facility, program, service or activity that appears inaccessible to the disabled. Furthermore, the Broward MPO will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access Broward MPO facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, the Broward MPO asks that requests be made at least seven (7) days prior to the need for accommodation.

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Questions, concerns, comments or requests for accommodation should be made to:

Broward MPO
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
emac@browardmpo.org
Florida Relay Service 711 or 1-800-955-8771

LIMITED ENGLISH PROFICIENCY (LEP)

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

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by the Broward MPO's programs, services or activities.
- **Factor 2:** The frequency with which LEP individuals come in contact with these programs, services or activities.
- **Factor 3:** The nature and importance of the program, service, or activity to people's lives.
- **Factor 4:** The resources available and the overall cost to the Broward MPO.

Persons requiring a copy of the Broward MPO's Limited English Proficiency Plan or special language assistance should contact:

Broward MPO
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
emac@browardmpo.org
Florida Relay Service 711 or 1-800-955-8771

ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA DE BROWARD

TÍTULO VI PROCEDIMIENTOS DE RECLAMACIÓN DE DISCRIMINACIÓN

La Organización de Planificación Metropolitana de Broward (Broward MPO) valora la diversidad y recibe con beneplácito y busca activamente el aporte de todas las partes interesadas, independientemente de su identidad cultural, antecedentes o nivel de ingresos. Además, la Broward MPO no tolera la discriminación en ninguno de sus programas, servicios o actividades. La Broward MPO no excluirá la participación, negará los beneficios o estará sujeto a discriminación por cualquier persona por motivos de raza, color, nacionalidad, sexo, edad, discapacidad, religión, ingresos o estado familiar. El Broward MPO trabajará activamente para garantizar la inclusión de todos en nuestra comunidad para que los programas, servicios y actividades del Broward MPO representen la diversidad que disfrutamos.

El propósito del programa del Broward MPO Título VI es establecer e implementar procedimientos que cumplan con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, la Ley de Estadounidenses con Discapacidades de 1990 (ADA), así como otros estatutos y reglamentos federales y estatales relacionados. Estos procedimientos se han adoptado para cumplir con las regulaciones de la Administración Federal de Tránsito (FTA) y la Administración Federal de Carreteras (FHWA), así como con las pautas del Departamento de Transporte de la Florida (FDOT).

PROCEDIMIENTO DE QUEJA

E. Presentación de quejas de discriminación del Título VI

1. Cualquier persona que sienta que ha sido objeto de discriminación racial, de color o de origen nacional según el Título VI de la Ley de Derechos Civiles de 1964, u otras formas de discriminación basadas en sexo, edad, discapacidad, religión, familia o nivel de puede presentar una queja ante la Broward MPO.
2. Una queja debe presentarse dentro de los ciento ochenta (180) días posteriores a la fecha de la supuesta discriminación, a menos que el FTA, la FHWA u otras autoridades federales extiendan el plazo de presentación.
3. Las quejas deben presentarse por escrito, firmadas por el demandante o sus representantes, y deben incluir el nombre, la dirección y el número de teléfono del demandante. Las denuncias de discriminación recibidas por fax o correo electrónico serán reconocidas y procesadas. Las denuncias recibidas por teléfono se documentarán por escrito y se proporcionarán a los reclamantes para su revisión antes del procesamiento. Puede acceder al formulario de queja en el sitio web: www.browardmpo.org o puede llamar a Carl Ema al (954) 876-0033, si tiene problemas de audición, llame al Servicio de Retransmisión de Florida al 711 o al 1-800-955-78771 o envíe un correo electrónico a emac@browardmpo.org.

Los formularios de queja firmados deben enviarse a:

Attention: Broward Metropolitan Planning Organization
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309

F. Investigación de queja

1. Al recibir una queja firmada, el Director Ejecutivo del Broward MPO o su designado, dentro de cinco (5) días hábiles, proporcionaran un reconocimiento escrito de la queja.
2. El personal del Broward MPO llevará a cabo una investigación preliminar sobre la queja para determinar si la queja tiene mérito suficiente para justificar una investigación. Si el personal del Broward MPO determina que la evidencia presentada no es suficiente para proceder, la queja se cerrará y el demandante o su representante será notificado por escrito de la decisión dentro de los quince (15) días hábiles. Esta notificación deberá especificar detalladamente los motivos de la decisión.
3. Si el personal del Broward MPO determina que es necesaria una investigación completa, se notificará al demandante o su representante que se realizará una investigación y se solicitará información adicional, si es necesario. La investigación no debe durar más de cuarenta y cinco (45) días hábiles.
4. Si un demandante no proporciona información adicional dentro del plazo prescrito, esto puede considerarse como una falta de cooperación con la investigación, y la queja se cerrará administrativamente.

G. Disposición

1. Una vez completada la investigación, se enviará una notificación por escrito de la disposición por correo certificado al demandante o su representante dentro de los sesenta (60) días hábiles posteriores a la presentación de la queja.
2. Si el demandante no está de acuerdo con la decisión tomada por la Broward MPO, se le notificará el derecho de solicitar una reconsideración dentro de treinta (30) días, o de presentar una queja ante la Oficinas de Derechos Civiles de FTA o de FHWA, como aplicable, a las siguientes direcciones:
Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Federal Highway Administration
Office of Civil Rights - Investigations and Adjudications
HCR-40, Room E81-328
1200 New Jersey Avenue, SE
Washington, DC 20590

H. Represalias

Las represalias están prohibidas en virtud del Título VI de la Ley de Derechos Civiles de 1964 y las autoridades federales y estatales de no discriminación relacionadas. La política del Broward MPO es que las personas que presenten una queja de discriminación deben tener el derecho de hacerlo sin interferencia, intimidación, coerción o temor a represalias. Cualquier persona que sienta que ha sido objeto de represalias debe informar dicho incidente al Director Ejecutivo.

DECLARACION ADA/504

La Sección 504 de la Ley de Rehabilitación de 1973 (Sección 504), la Ley de Estadounidenses con Discapacidades de 1990 (ADA) y las leyes y regulaciones federales y estatales relacionadas prohíben la discriminación contra las personas con discapacidades. Además, estas leyes requieren que los beneficiarios de ayuda federal y otras entidades gubernamentales tomen medidas afirmativas para acomodar razonablemente a los discapacitados y garantizar que sus necesidades estén representadas equitativamente en el proceso de planificación del transporte.

La Broward MPO hará todo lo posible para garantizar que sus instalaciones, programas, servicios y actividades sean accesibles para las personas con discapacidad. La Broward MPO hará todo lo posible para garantizar que sus comités asesores y actividades de participación pública incluyan la representación de la comunidad de discapacitados y los grupos de servicios de discapacidad.

La Broward MPO alienta al público a informar cualquier instalación, programa, servicio o actividad que parezca inaccesible para los discapacitados. Además, la Broward MPO proporcionará asistencia a las personas con discapacidad que deseen participar en eventos de participación pública o que requieran asistencia especial para acceder a las instalaciones, programas, servicios o actividades del Broward MPO. Debido a que proporcionar asistencia especial puede requerir asistencia externa, organización o recursos, la Broward MPO requiere que las solicitudes se realicen al menos siete (7) días antes de la necesidad de asistencia.

Las preguntas, inquietudes, comentarios o solicitudes de asistencia deben hacerse a:

Broward MPO
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
emac@browardmpo.org
Servicio de Retransmisión de Florida 711 o 1-800-955-8771

COMPETENCIA LIMITADA EN INGLÉS (CLI)

El Título VI de la Ley de Derechos Civiles de 1964, Orden Ejecutiva 13166 y varias directivas del Departamento de Justicia de los Estados Unidos (DOJ) y el Departamento de Transporte de los Estados Unidos (DOT) requieren que los beneficiarios de ayuda federal tomen medidas razonables para garantizar el acceso a los programas, servicios y actividades de aquellos que no hablan inglés con dominio. Para determinar en qué medida se requieren los servicios CLI y en qué idiomas, la ley requiere el análisis de cuatro factores:

- **Factor 1:** El número o la proporción de personas CLI elegibles para ser atendidas o que puedan ser encontradas por los programas, servicios o actividades del Broward MPO.
- **Factor 2:** La frecuencia con la que las personas con CLI entran en contacto con estos programas, servicios o actividades.
- **Factor 3:** La naturaleza e importancia del programa, servicio o actividad para la vida de las personas.
- **Factor 4:** los recursos disponibles y el costo total para el Broward MPO.

Las personas que requieran una copia del Plan de Dominio Limitado del Inglés del Broward MPO o asistencia especial en idiomas deben comunicarse con:

Broward MPO
Carl Ema, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
emac@browardmpo.org
Servicio de Retransmisión de Florida 711 o 1-800-955-8771

Appendix B: Broward MPO Board Approval of 2023 Title VI Program





June 8, 2023

FTA Civil Rights Office Region 4,

This letter is to confirm that the following item was unanimously approved by the Broward MPO Board at their June 8, 2023 meeting:

MOTION TO APPROVE Updates to the Broward MPO's Title VI Program and Limited English Proficiency (LEP) Plan.

This update is required as the Broward MPO, as a recipient of Federal funds, must submit a Title VI Program to the FTA every three years. This update will cover years 2023-2026.

If you have any questions, please contact Carl Ema, Title VI Coordinator at emac@browardmpo.org or (954) 876-0052.

Sincerely,

Sandy Johnson, Broward MPO Vice Chair

for
Frank Ortis, Broward MPO Chair

Gregory Stuart, Broward MPO Executive Director

Cc: Broward MPO Board

Chair

Frank C. Ortis

Vice Chair

Sandy Johnson

Deputy Vice Chair

Yvette Colbourne

Members | Alternates

Torey Alston
Antonio V. Arserio
Felicia M. Brunson
Chris Caputo
Tycie Causwell
Yvette Colbourne
Joy Cooper
Tim Fadgen
Lamar Fisher
Beam Furr
Bill Ganz
Aisha Gordon
Bob Hartmann
Caryl Hattan
William "Bill" Hodgkins
Byron Jaffe
Sandy Johnson
Irene Kirdahy
Lori Lewellen
Lisa Mallozzi
Andrea McGee
Lawrence "Jabbow" Martin
Buz Oldaker
Frank Ortis
Tim Ryan
Joseph A. Scutto
Caryl S. Shuham
Joshua Simmons
Dean J. Trantalis
Michael Udine
Rich Walker
Sandra L. Welch

Executive Director

Gregory Stuart

General Counsel

Alan Gabriel



Broward Metropolitan Planning Organization

Trade Centre South
100 West Cypress Creek Road, Suite 650, 6th Floor
Fort Lauderdale, FL 33309

info@browardmpo.org
(954) 876-0033 Office
(954) 876-0062 Fax
Florida Relay Service 711

For more information on activities and projects of the Broward MPO, please visit:

BrowardMPO.org

For complaints, questions or concerns about civil rights or nondiscrimination or for special requests under the Americans with Disabilities Act, please contact:

Carl Ema, Title VI Coordinator, (954) 876-0036 or emac@browardmpo.org

For more information, please contact:

Carl Ema, Title VI Coordinator

Broward Metropolitan Planning Organization - Trade Centre South
100 West Cypress Creek Road, Suite 650, Fort Lauderdale, Florida 33309

Phone: (954) 876-0033 | Email: emac@browardmpo.org