



Title VI Program & Limited English Proficiency Plan

December 1, 2020-November 30, 2023

Title VI Program & Limited English Proficiency Plan

June 22, 2020

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.

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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 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 47021B, "Title VI Requirements and Guidelines for Federal Transit Recipients." The Broward MPO's Title VI Program must address the requirements in Section III, General Requirements, and Section VI, Requirements for Metropolitan 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 47021B, the Broward MPO's Title VI Program for the three-year period of February 1, 2021–January 31, 2024 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 Board approval of Title VI Program

Section VI—Requirements for Metropolitan 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

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 persons, 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 (SFRTA)/Tri-Rail and the Broward County School Board, and 4 Broward County Commissioners. A total of 13 alternate members of the Board 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 assurances. The Executive Director is responsible for ensuring that his/her staff understand and adhere to Title VI requirements and produce an annual report that documents compliance and is provided to Federal agencies from which the MPO receives financial assistance.

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 to perform his or her 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 his or her right to file a complaint with the Broward MPO if that person believes that he or she 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 not 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 plan 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 Erica Lychak, Title VI Coordinator at (954) 876-0033 or at lychake@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 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 (USDOT) Title VI regulations.

This requirement is fulfilled by the Broward MPO when it submits its annual Certifications & 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 his/her 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, Suite 650, Fort Lauderdale, FL 33309 and on its website under the "Working with the MPO" section, <http://www.browardmpo.org/index.php/title-vi-dbe> (Figure 1). The notice (Figure 2) is also posted at eight regional Broward County libraries, which are illustrated on Map 1.

Figure 1: Broward MPO Title VI Webpage

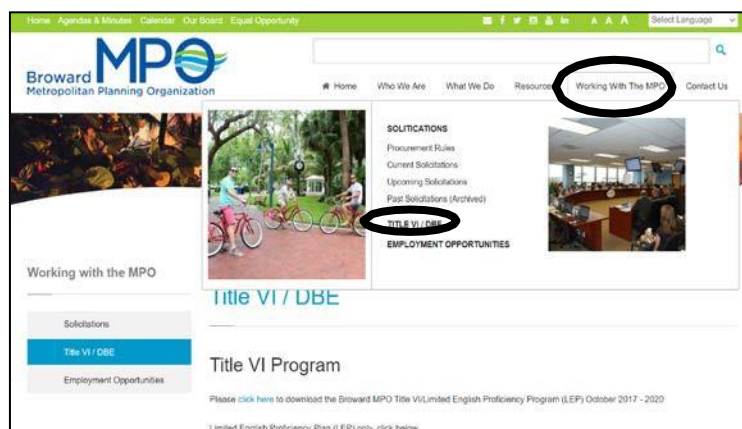


Figure 2: Broward MPO Title VI Notice

Notifying the Public of Rights Under Title VI

Broward Metropolitan Planning Organization

- 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 believes 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 (954) 876-0033, Florida Relay Service 711; email lychake@browardmpo.org or visit our administrative office at 100 West Cypress Creek Road, Fort Lauderdale, FL 33309. For more information, visit www.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. Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE Washington DC 20590
- If information is needed in another language, contact (954) 876-0033.

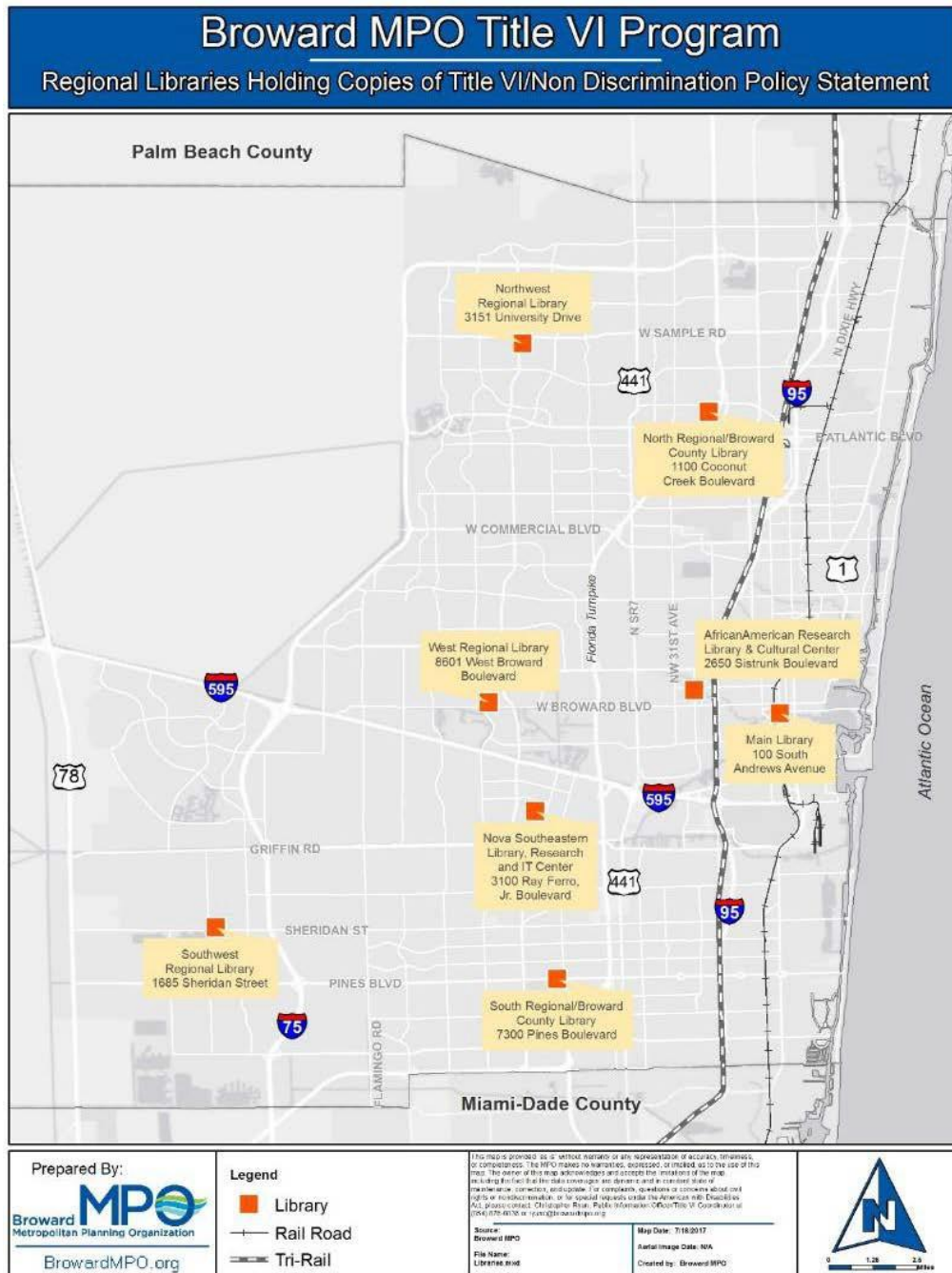
Notificación de los Derechos Públicos Bajo el Título VI

Organización de Planificación Metropolitana de Broward (MPO)

- 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 lychake@browardmpo.org o visite nuestra oficina administrativa en 100 West Cypress Creek Road, Fort Lauderdale, FL 33309. Para obtener más información, visite www.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. Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave, SE Washington DC, 20590
- Si se necesita información en otro idioma, comuníquese al (954) 876-0033.

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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 on the MPO's Title VI/DBE webpage, as noted in Section 2.2 and 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 equity areas produced from this process.

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 can be found under the "What We Do" section of the website <http://browardmpo.org/core-products>.

Broward MPO Public Participation Plan Goals

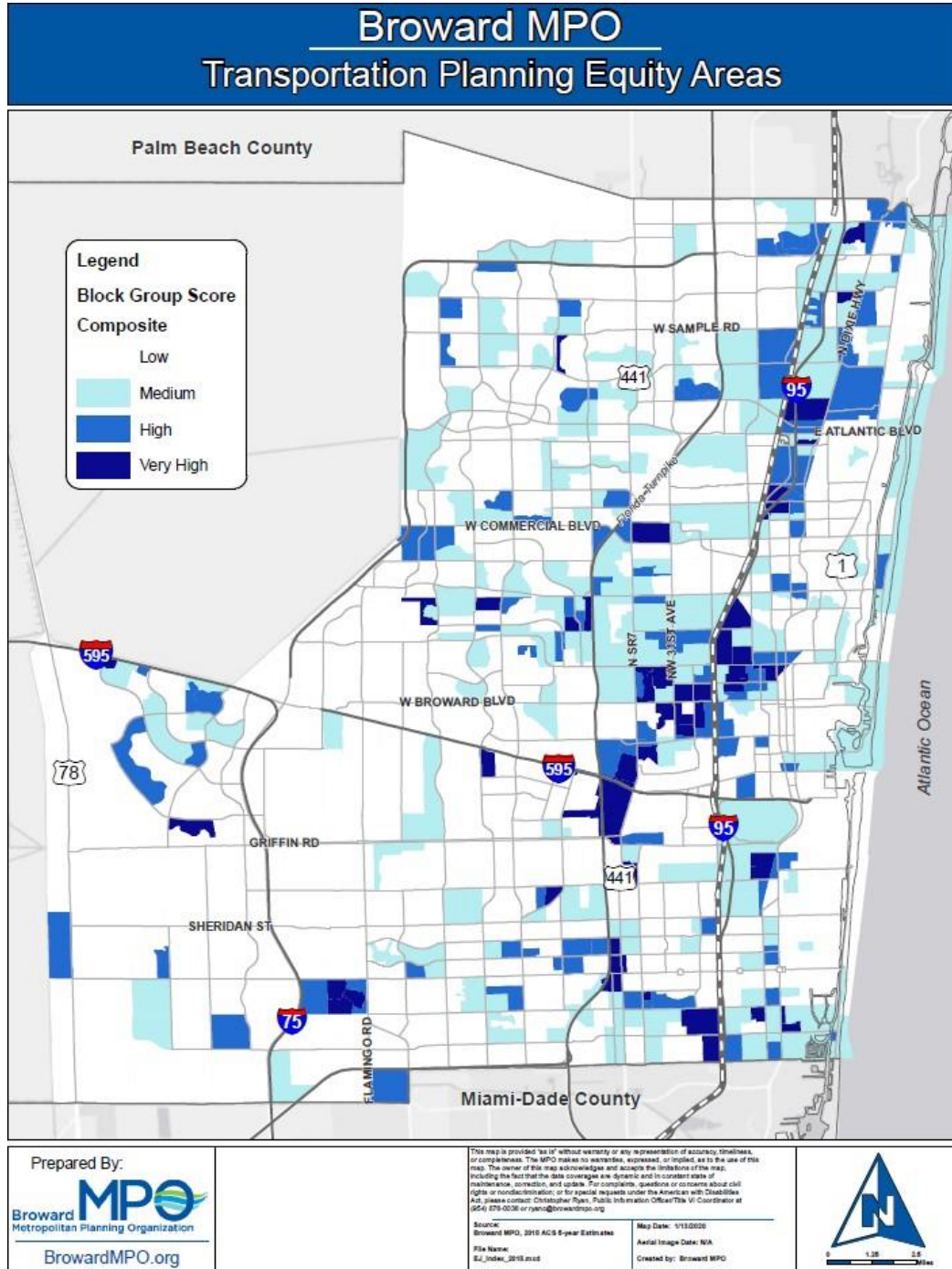
The Broward MPO has an adopted Public Participation Plan (PPP) that sets forth specific measures to heighten public education and responsiveness in the transportation planning process.¹ The Broward MPO recognizes that optimum participation begins early in the planning process and continues throughout. The public participation strategies in the PPP 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 Public Participation Plan are to:

- **Inform** the public of transportation planning meetings, issues, and other relevant events. The public needs to be aware of their role in the transportation planning and decision-making process.
- **Involve** the public by providing opportunities throughout the transportation planning and decision-making process.
- **Include** all communities in the planning area to inform and involve, with special emphasis on those communities with people who have been underrepresented and/or underserved.
- **Improve** the public participation process by identifying and incorporating new tools and strategies.

¹ Broward MPO Public Participation Plan (adopted February 14, 2019), <http://www.browardmpo.org/index.php/core-products/public-participation-plan-ppp>.

Map 2: Broward MPO Equity Areas



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 general 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. Email notification will be sent at least one week in advance and posted on the MPO webpage.
- Create and distribute flyers for special events such as workshops.
- Write newsletter articles to announce upcoming events, review results of recent activities, and highlight newsworthy MPO programs.
- Include the MPO webpage address on all MPO documents, including brochures and flyers, so the public can easily access meeting information.
- Include information in meeting announcements so interested persons have the option to respond in writing, by phone, or by email.
- Establish a relationship with local media for coverage of public participation events and airing of Public Service Announcements (PSAs).
- Set up educational displays at public events, including those in traditionally underserved communities.
- Speak about transportation planning at local civic group meetings, schools, leadership courses, 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.
- Publish a report in the MPO newsletter to inform the public of accomplishments and invite public participation. Post the MPO newsletter online, distribute to libraries, send to media and share on social media.

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), Technical Advisory Committee (TAC), Transportation Disadvantaged (TD) Local Coordinating Board (LCB), Complete Streets Advisory Committee (CSAC), and Freight Transportation Advisory Committee (FTAC) so residents and community stakeholders have ongoing opportunities to participate in the planning process.
- Review the composition of advisory committees to ensure that equitable representation is maintained to the maximum extent of the MPO's control.
- Include a feature on the MPO's webpage 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 and services.
- Respond to all inquiries, providing interim responses while a question is being researched.
- Inform MPO Board members of recommendations from its advisory committees and inform MPO Board and committee members of trends indicated from other contacts with the public.
- Allocate time for public input on each item on the Board and committee's agenda.

Goal 3: Including the Public

Policy: Reach out to the organizations and demographic communities comprising the MPO planning area to increase opportunities to participate in developing transportation plans and services.

Techniques:

- Participate in community outreach events and maintain a focus to include traditionally underserved communities.
- Distribute copies of the Transportation Improvement Program (TIP), Long Range Transportation Plan (LRTP), Unified Planning Work Program (UPWP), Title VI Program and Disadvantaged Business Enterprise Program (DBE) to the public libraries shown on Map 1 or call the Broward MPO offices at (954) 876-0033 to arrange viewing a copy.

- Provide documents to local planning departments and other participating agencies through the TAC.
- Take advantage of training opportunities and apply best practices learned through the experience of other MPOs.
- Learn about communities that make up the Broward Urbanized Area by attending festivals, special events, lectures, etc., that highlight the diversity of the area. Follow up by adding contact names to mailing lists.
- Coordinate with local government redevelopment agencies, non-profit agencies, and others who have already developed community contacts to disseminate information and resources.
- Include in public notices prepared by the MPO that, upon request and with adequate notice, assistance will be provided as needed including but not limited to individuals who are deaf or hard of hearing, blind or visually limited, have speech/communication loss, have limited English proficiency, are 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:

- Seek 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 to expand regional inter-MPO coordination of public participation activities, particularly when projects may directly involve residents from adjacent counties.
- Use 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 public participation plans 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

Over the past three fiscal years, the Broward MPO has conducted nearly 300 outreach activities focusing on the following topics:

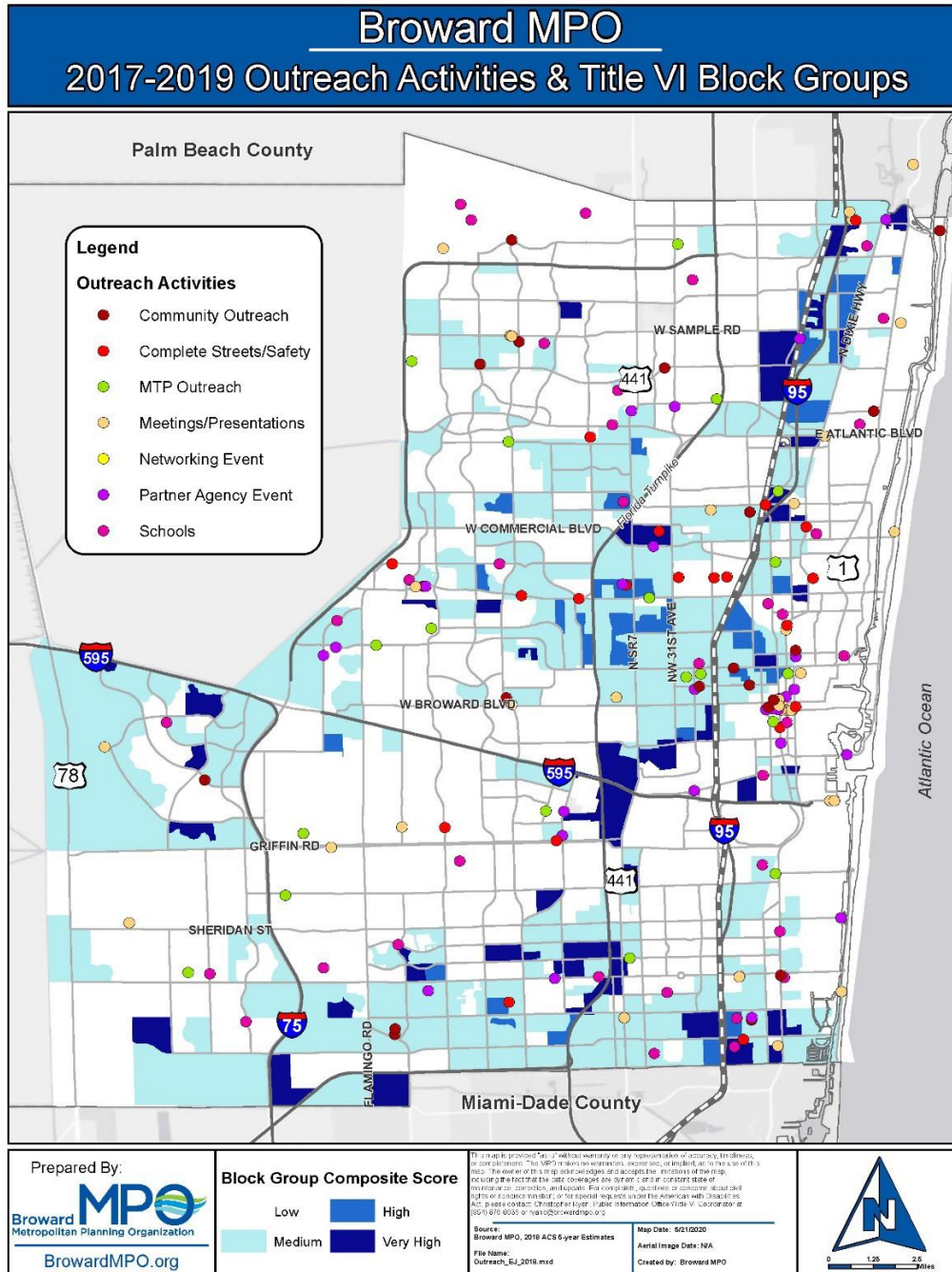
- Community Outreach
- Complete Streets/Safety
- Meetings/Presentations
- Metropolitan Transportation Plan (MTP) 2045 Update
- Community Networking Events
- Partner Agency Events
- School/Educational Activities

Within these categories, public outreach activities in which the MPO host and participates are diverse in terms of topic area, with some focusing on specific projects such as the 2045 Metropolitan Transportation Plan update 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 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. The Broward MPO also tracks all outreach activities to ensure geographic diversity and opportunities in areas with higher Title VI populations compared to the rest of the county.

Starting 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 over the last three years (since the last Title VI Program update) 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 over the past three years to the equity areas.

As illustrated by Map 3, public outreach activities conducted by the Broward MPO over the past three years are geographically far-reaching, having been conducted within or in proximity to Block Groups with high or very high composite scores areas 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.

Map 3: Public Participation Activities (FYs 2017-2019) by Title VI Block Group



Broward MPO

Outreach Activities & Transportation Planning Equity Areas

Legend

Outreach Activities

- Community Outreach
- Complete Streets/Safety
- MTP Outreach
- Meetings/Presentations
- Networking Event
- Partner Agency Event
- Schools

Block Group Composite Score

Low Medium High Very High

Prepared By: Broward MPO Metropolitan Planning Organization

BrowardMPO.org

Source: Broward MPO, 2016 ACS 5-year Estimates
File Name: Outreach_EJ_2016.mxd

Map Date: 9/20/2020
Aerial Image Date: N/A
Created by: Broward MPO

Map of Broward County, Florida, showing Outreach Activities and Transportation Planning Equity Areas. The map displays various colored dots representing different outreach activities across the county. Major roads and highways are labeled, including I-95, I-595, I-75, US-1, US-441, and US-78. The map also shows the Atlantic Ocean to the east and the borders of Palm Beach County to the north and Miami-Dade County to the south.

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
- Miramar
- Lauderdale east of Florida’s Turnpike, west of I-95, and north of I-595.

In addition to the above areas, the 2017 Title VI Plan identified Coral Springs, North Lauderdale, and areas of Plantation and southwest Fort Lauderdale to be further evaluated for future outreach opportunities. Activities held over the last three years 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.

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 transportation multimodal system. Speak Up Broward has launched a number of 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.
- ***Speak Up Broward’s Program for Empowering People (PEP)*** – mini-grants awarded to selected partner organizations with the goal of conducting outreach and soliciting feedback tailored to specific audiences, including traditionally under-represented communities and neighborhoods.
- ***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.
- ***New website*** – designed for better organization and including the latest technological updates; translation functions, and Americans with Disabilities Act (ADA) compliant.

Speak Up Broward outreach has been extensive and has reached many different segments of the Broward community. As of April 2020, there were 95,000+ unique visitors to the website launched in September 2013 and 12,000+ followers on Speak Up Broward social media platforms.

Advisory Committees

MPO staff continue to update its CAC membership to ensure that this 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 from the MPO's Transportation Disadvantaged (TD) 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 (CTACE) Department to increase awareness of the Broward MPO and introduce students to the field of transportation. Each year, the MPO hosts students from three high schools 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. 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 middle schools, and the MPO hosted its first middle school workshop that year. These workshops embrace a diverse set of students from all backgrounds throughout Broward County.



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

TRAC and RIDES Programs

The TRAC (Transportation and Civil Engineering) and RIDES (Roadways into Developing Elementary Schools) programs are hands-on educational outreach opportunities through the American Association of State Highway Transportation Officials (AASHTO). Broward MPO staff work with elementary school teachers through the RIDES program and

middle/high school teachers through the TRAC program to deliver educational outreach programs that connect students to the world of transportation and the work of MPOs. By working with Broward teachers, the MPO continues to inspire students to consider careers in transportation. Broward MPO staff also continue to work with the Broward County School Board's STEM (Science, Technology, Engineering, and Math) Department to accomplish these same goals. The MPO hosted its fifth two-day TRAC training for teachers in June 2019 and another is already planned for 2020.

2.7 Meaningful Access to LEP Persons

Consistent with Title VI of the Civil Rights Act of 1964, USDOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 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 who are LEP. 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 (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 USDOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (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 2018 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, 16.1% 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 2.9%, followed by other Indo-European languages, at 1.2% 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	187,252	64.7%	10.4%
French, Haitian, or Creole	52,620	18.2%	2.9%
Other Indo-European	22,043	7.6%	1.2%
Chinese (incl. Mandarin, Cantonese)	6,528	2.3%	0.4%
Russian, Polish, or other Slavic	5,974	2.1%	0.3%
Vietnamese	2,944	1.0%	0.2%
Other Asian and Pacific Island	2,637	0.9%	0.1%
Arabic	2,472	0.9%	0.1%
Tagalog (incl. Filipino)	1,410	0.5%	0.1%
German or other West Germanic	1,090	0.4%	0.1%
Korean	769	0.3%	0.04%
Other and unspecified	3,610	1.2%	0.2%
Total			16.1%

Source: ACS 2018 5-Year Estimates, Table C16001; languages greater than 0.5% of LEP population are reported above.

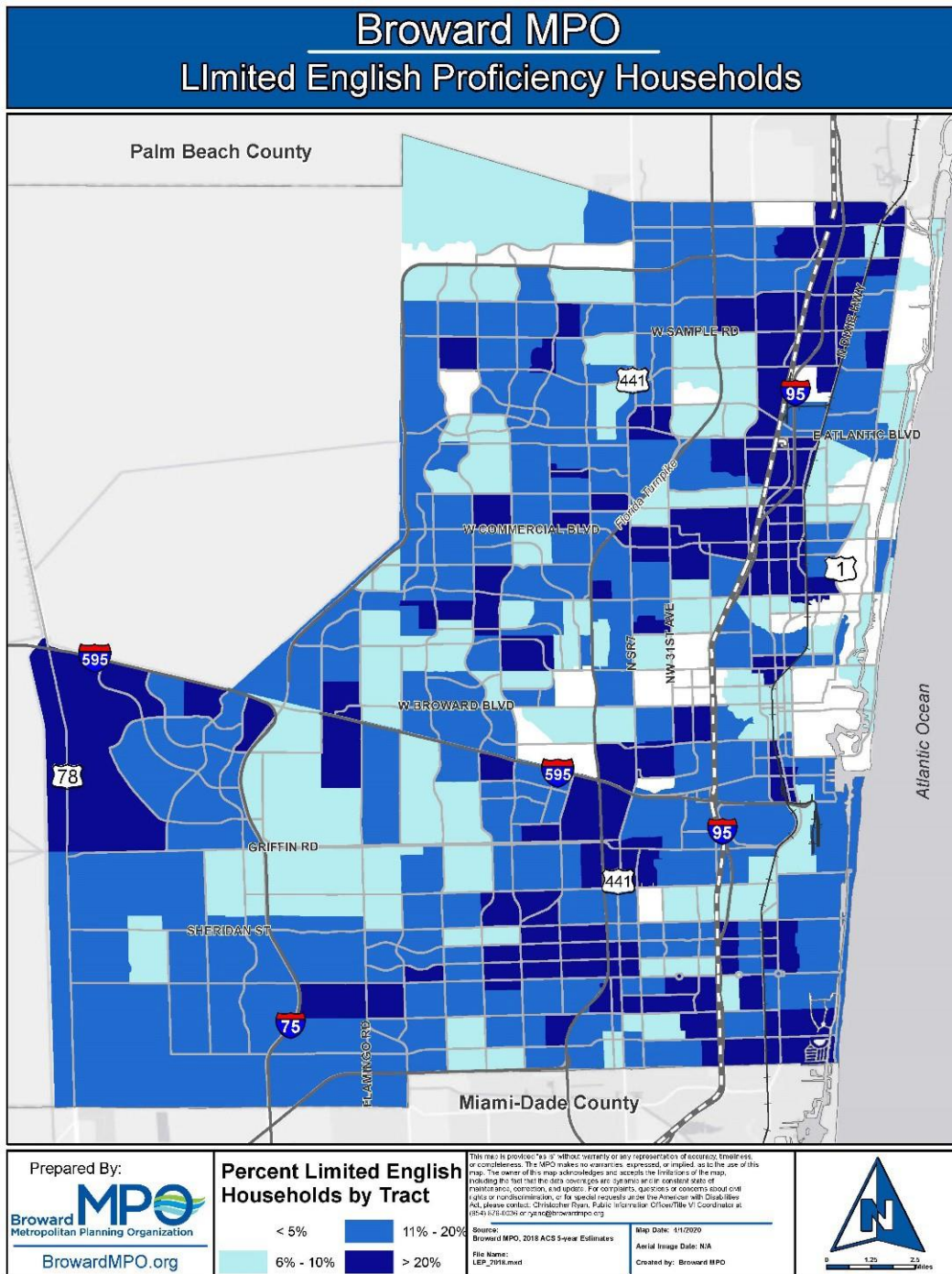
Map 5 shows the spatial locations of households in Broward County that speak English "less than very well" using the 2018 ACS Five-Year Estimates.

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 2017 (and based on 2015 ACS data), the LEP population has grown from 265,326 to 289,349 people, at 9.1%. The size of the LEP population in this 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 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 conducts regular board meetings, advisory committee meetings, and public hearings throughout the year. Community outreach and the MPO's website are the main sources of potential contact between the MPO and LEP persons. As a result, the frequency of contact is difficult to anticipate. The Broward MPO's PPP highlights the need for and specific mechanisms for conducting outreach opportunities that engage populations that are traditionally not involved in the transportation planning process.

Map 5: Percent of LEP Households, 2018



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.

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 been or had the opportunity to be involved in the transportation planning process. The impact of proposed transportation investments on underserved and under-represented 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)
- Long Range Transportation Plan (LRTP)

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 plan development, Broward MPO staff are able to translate Spanish, German, Creole, Mandarin, Hindi, Urdu, Greek, and American Sign Language.

Translation Cost Analysis

Based on the word count of recent core products prepared by the MPO and translation costs (obtained from local vendors in 2019–2020), the approximate cost of translating major reports into Spanish, Creole, French, and Portuguese are shown in Table 3.

Table 3: Estimated Document Translation Cost

Language	Cost Per Word	Cost per Document			
		UPWP	TIP	2045 MTP	PPP
Spanish	\$0.11	\$2,696	\$1,693	\$4,169	\$992
Creole	\$0.15	\$3,677	\$2,308	\$5,685	\$1,353
French	\$0.12	\$2,941	\$1,847	\$4,548	\$1,082
Portuguese	\$0.11	\$2,696	\$1,693	\$4,169	\$992

Source: Broward MPO

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 over 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:

- **Translation of key documents** – the Broward MPO currently makes summaries of key documents available in Spanish. To accommodate cost, these summaries may be presented in alternative formats such as fact sheets, flyers, or brochures. Examples of this are the Broward MPO's Core Products Fact Sheet and TIP Fact Sheet translated to Spanish (see Figures 3 and 4).
- **Translation of quarterly newsletters** – the Broward MPO publishes a quarterly newsletter in English, twice per year in Spanish, and twice per year in Creole (see Figure 5 for Spanish translation and Figure 6 for Creole translation).

- **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 *El Sentinel*.
- **Broward MPO website translation function** – the Broward MPO has a translation function on its homepage that can translate its website content to approximately 80 different languages. In 2017, MPO staff installed software to track the frequency of website translation requests by language. Over the past year, the MPO website has drawn 29,000 users logging 54,000 sessions.
- **Broward MPO 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.
- **Broward MPO TDD/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 (STS) relay services, voice carry-over (VCO) TTY, and hearing carry-over (HCO) TTY relay services. Users also have the option to call direct Florida's 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.
- **American Sign Language interpreter services** – the Broward MPO can provide ASL interpretation services at meetings or other events as needed. Interpreter services are provided by piggybacking on a Broward County contract.
- **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 is appropriate. For example, a Spanish version of the introductory video for *Commitment 2045*, the Broward MPO's 2045 Metropolitan Transportation Plan, along with translated MTP rack cards palm cards, and other materials was prepared.
- **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.

Figure 3: Core Products Fact Sheet Translated to Spanish



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

PRODUCTOS PRINCIPALES

Todas las MPOs deben producir y mantener los productos principales para continuar recibiendo los fondos federales y estatales.

PLAN DE TRANSPORTE DE LARGO PLAZO


El Plan de Transporte de Largo Plazo (**L RTP**) representa las necesidades de transporte más importantes en Broward. Es un plan "costo factible" basado en futuros fondos anticipados por los siguientes 20 años. **El L RTP se actualiza cada cinco años.**

LISTA DE PRIORIDADES MULTIMODALES

La Lista de Prioridades Multimodales (**MPL**) representa los proyectos del L RTP en el orden en que recibirán fondos. La lista se usa para asignar fondos, cinco años desde el presente, a los proyectos de alta prioridad. **La Lista se actualiza cada año.**

PROGRAMA DE MEJORA DEL TRANSPORTE

El Programa de Mejora del Transporte (**TIP**) representa proyectos que recibirán fondos en los próximos cinco años. Los proyectos en el TIP mueven de la L RTP hacia La Lista de Prioridades Multimodales. **El TIP se actualiza cada año.**



PROGRAMA UNIFICADO DE PLANIFICACIÓN DE TRABAJO

El Programa Unificado de Planificación de Trabajo (**UPWP**) especifica el trabajo de la MPO de Broward y sus agencias asociadas y contiene un presupuesto detallado de la administración de la organización. **El UPWP se produce cada dos años.**

PLAN DE NEGOCIOS ESTRATÉGICO*

El Plan de Negocios Estratégico (**SBP**) representa la visión de la Junta de la MPO para el futuro de la organización. El Plan contiene un proceso de implementación activo, lo cual es conectado al UPWP. **Se actualiza cada dos años.** **La SBP No es requerido por la Ley Federal*

PLAN DE PARTICIPACIÓN PÚBLICA


El Plan de Participación Pública (**PPP**) describe como las MPOs comparten información con la comunidad, solicitan realimentación en los productos principales, planes, y programas de la MPO, y solicitan participación significativa en el proceso de planificar. **El PPP se actualiza cada cuatro años.**

Para quejas, preguntas o asuntos acerca de los derechos civiles o la no discriminación; o para solicitudes especiales en virtud de los Americanos con Discapacidades, por favor póngase en contacto con: Christopher Ryan, Coordinador del Título VI al (954) 876-0036 o ryancc@browardmpo.org

BrowardMPO.org

Figure 4: Transportation Improvement Program Fact Sheet
Translated into Spanish

FACT SHEET



Comprendiendo el Programa de Mejora del Transporte (TIP)

¿Qué es la Organización de Planificación Metropolitana de Broward (Broward MPO)?

La MPO de Broward es una agencia responsable de la planificación del transporte, la coordinación intergubernamental y la asignación de fondos de transporte en el condado de Broward. La MPO de Broward trabaja con el público, organizaciones de planificación, agencias gubernamentales, funcionarios electos y grupos comunitarios para identificar las necesidades de transporte y desarrollar planes de transporte, tales como el Programa de Mejora del Transporte (TIP) y el Plan de Transporte a Largo Plazo (LRTP).

¿Qué es el Programa de Mejora del Transporte?

El TIP es un programa que prioriza y documenta los fondos de los proyectos de mejora del transporte en la región que se espera construir en los próximos cinco años. Incluye proyectos de transporte, carretera, aeropuerto y el puerto marítimo, así como bicicletas, peatones, y proyectos relacionados al transporte de mercancías. El TIP es una herramienta para avanzar proyectos del Plan de Transporte a Largo Plazo (LRTP) a un programa de corto alcance de cinco años. Todos los proyectos del TIP son evaluados para asegurar la coherencia con las metas y objetivos del LRTP. El TIP actual y LRTP se pueden encontrar en la página web BrowardMPO.org

¿Cómo se desarrolla el TIP?

El TIP es preparado por la MPO de Broward, en cooperación con las agencias de transporte locales, tales como el Departamento de Transporte de Florida (FDOT), la Autoridad de Transporte Regional del Sur de Florida (SFRTA), el Consejo de Transporte del Sudeste de la Florida, las municipalidades dentro del Condado de Broward, y proveedores de transporte del Condado Broward como las agencias de Tránsito del Condado Broward (BCT), Departamento de Aviación y el Puerto Everglades. La MPO de Broward y sus socios de la planificación desarrollan el TIP anualmente. Al final del proceso, el TIP significa un acuerdo entre funcionarios locales, estatales y regionales en cuanto a que mejoras de transporte se deben realizar.

¿Cómo se financia el TIP?

Los proyectos del TIP son financiados a través de una mezcla de fondos locales, estatales y fondos federales de transporte. Los fondos federales son administrados a través de la Administración Federal de Carreteras (FHWA) y la Administración Federal de Tránsito (FTA). Otros fondos provienen del estado, condado y las municipalidades a través de impuestos a los combustibles.



Note: Figure represents example page of newsletter for illustration purposes only.

Figure 5: Quarterly Newsletter Translated into Spanish

Auditorías Caminantes

Al transitar las calles y veredas de Broward, a pie o en bicicleta, podemos sorprendernos al observar las muchas áreas de preocupación fáciles de detectar que deben ser abordadas. Todos reconocemos cuando algo precisa ser rehabilitado o rediseñado por cuestiones de seguridad: ya sea un bache en el pavimento de la vereda que puede presentar un desafío cuando se camina con una silla de paseo o mascota con correa o el reacondicionamiento de un cruce peatonal para que sea más amigable para el transeúnte.

¡La MPO de Broward habla en serio cuando se trata de escucharlo! Hemos llevado el mensaje a nuestras ciudades y comunidades con nuestras auditorías caminantes. Comenzando en el 2017, como un componente del Plan Maestro de Calles Completas, estas auditorías caminantes se han convertido en una gran forma de crear un catalizador para el cambio, dado que involucramos al público, los líderes de la comunidad y el personal municipal en una caminata juntos para evaluar un área o corredor específico.

Puede sonar simple, pero a nivel de calle, será mucho más fácil identificar barreras y desafíos para crear un entorno donde sea más fácil caminar, andar en bicicleta y transitar. Estas auditorías caminantes además les permiten a nuestras comunidades locales tener una voz en las soluciones para una mejor seguridad y calidad de vida para todos.

La MPO de Broward tiene varias Auditorías Caminantes planificadas para más tarde este año en Pembroke Pines, Hallandale Beach y North Lauderdale/Margate.

[Haga clic aquí](#) para leer más acerca de nuestras auditorías caminantes.



Note: Figure represents example page of newsletter for illustration purposes only.

Figure 6: Quarterly Newsletter Translated into Creole

1) Rapò Anyèl 2018-19 nou an fenk enprime! Èske w konnen chak ane, Broward MPO a pwodui yon rapò pou enfòmè piblik la ak patnè planifikasyon yo osijè pwogrè ki fèt nan transpò moun ak machandiz nan Broward?

Nou fyè pou nou pataje fè ki pi enpòtan yo ak reyalizasyon dènye ane fiskal la nan Rapò Anyèl 2018-19 nou an! Nou konstwi rapò nou an otou twa objektif Plan Biznis Estratejik nou an ke Konsèy Administrasyon nou an te elabore. Mizajou sou pwodui debaz nou yo, pwogram nou yo, inisyativ aktyèl nou yo ak reyalizasyon nou yo enkli ladan.

Rapò anyèl nou an disponib kounye a an liye an vèsyon enprime!

[KLIKE LA A](#) pou vèsyon an liy lan.

Pou mande yon kopi enprime, tanpri kontakte Erica Lychak nan Lychake@browardmpo.org

Zòn Trankil (Quiet Zone)



Note: Figure represents example page of newsletter for illustration purposes only.

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 Erica Lychak at (954) 876-0033 or lychake@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 Erica Lychak al teléfono (954) 876-0033 o lychake@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. For example, the MPO is an active participant in the “Think Like a Planner” and TRAC and RIDES programs previously discussed in Section 2.6.

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:

Erica Lychak, Title VI Coordinator

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

lychake@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, membership of which 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 to provide direction and advice to the Broward MPO Board on a wide range of planning topics:

- **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.
- **Complete Streets Advisory Committee (CSAC)** – formed to provide a holistic approach to address bicycle/pedestrian needs of the region. This multidisciplinary group (comprising municipal and partner agency staff, representatives of non-profit groups, and advocacy groups) developed Complete Streets guidelines to facilitate and assist local governments in the implementation of Complete Streets. The CSAC also serves as a forum for exchanging new ideas and projects and allows members to showcase their individual Complete Streets efforts. More importantly, it is responsible for providing and guiding the Broward MPO Complete Streets Initiative.
- **Transportation Disadvantaged (TD) Local Coordinating Board (LCB)** – provides direction and advice on TD services in Broward County as provided by Broward County Transit (BCT).

- **Freight Transportation Advisory Committee (FTAC)** – comprises members that are directly involved in the movement, storage, and distribution of freight and represent a broad spectrum of the freight community, including warehouse owners, industrial realtors, shipping companies, trucking companies and organizations, railroads, freight forwarders, importer/exporters, truck parking, and distribution companies. The MPO Board established the FTAC to provide a forum for an open dialogue so the freight community can gain insight into the MPO's decisions and upcoming projects and provide much needed industry input to decision-makers regarding freight transportation priorities and expenditures.

Table 4 summarizes the racial composition and Table 5 summarizes the ethnic composition of the MPO's five 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 between committees. 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	CSAC	FTAC
White	36%	50%	28%	20%	29%
Black or African American	10%	7%	3%	7%	0%
American Indian and/or Native Alaskan	0%	0%	0%	0%	0%
Asian	2%	2%	0%	1%	0%
Native Hawaiian/Other Pacific Islander	0%	0%	0%	1%	0%
Other	6%	5%	0%	1%	0%
Information not provided	46%	36%	69%	70%	71%
Total	100%	100%	100%	100%	100%

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

Ethnicity	TAC	CAC	LCB	CSAC	FTAC
Hispanic or Latino	4%	7%	3%	4%	0%
Not Hispanic or Latino	46%	52%	28%	25%	29%
Information not provided	50%	40%	69%	71%	71%
Total	100%	100%	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 USDOT'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 USDOT'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.

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.

In the event that a future subrecipient is not a Direct Recipient and must be monitored, the MPO will request documentation of the subrecipient's Title VI Program to demonstrate compliance with requirements outlined in the FTA C 4702.1B and that apply to the subrecipient based on the type of agency and/or public transit provider.

Consultant Contracts

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

Broward MPO procurement procedures are made available under the “Working with the MPO” section of the MPO’s website. 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 Requests for Proposals.

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 2018 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 prioritized in the plan.

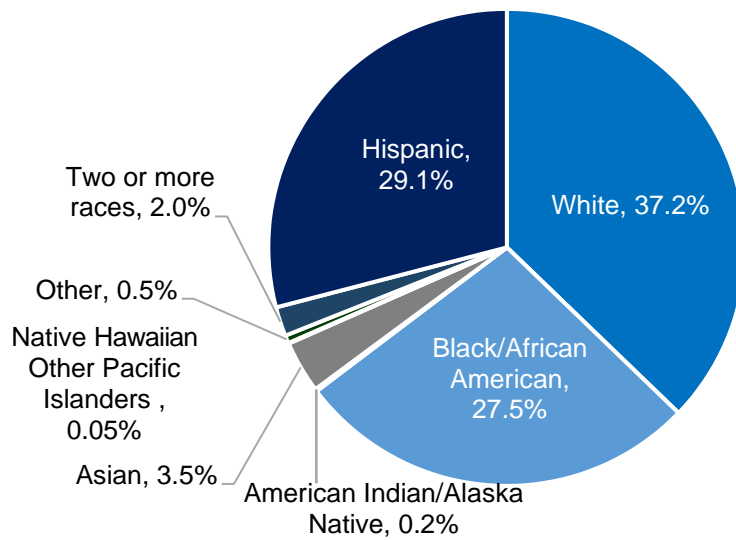
Minority Population

The racial distribution in Broward County for 2018 is shown in Figure 9. Broward County is a minority-majority county, with approximately 37% of the population identifying as White non-Hispanic and 63% identifying as a minority. Using ACS data, minority populations identify as persons of Hispanic/Latino descent, Black/African American, American Indian/Alaska Native, Asian, Native Hawaiian/Pacific Islander, or Other. Of the 60% minority, nearly 30% identify as Hispanic.

A comparison of ACS data from 2000, 2010, and 2018, as presented in Table 6, shows that the racial make-up of Broward County is changing. The total population increased by 286,133 (17.6%) between 2000 and 2018, and the minority population increased by 516,387 (75.7%). The White population declined by 24.5%, the Black/African American population increased by 62.7%, and the Hispanic population increased by 104.3% in the 18-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, and in the Pompano Beach area.

Figure 7: Racial Composition of Broward County, 2018



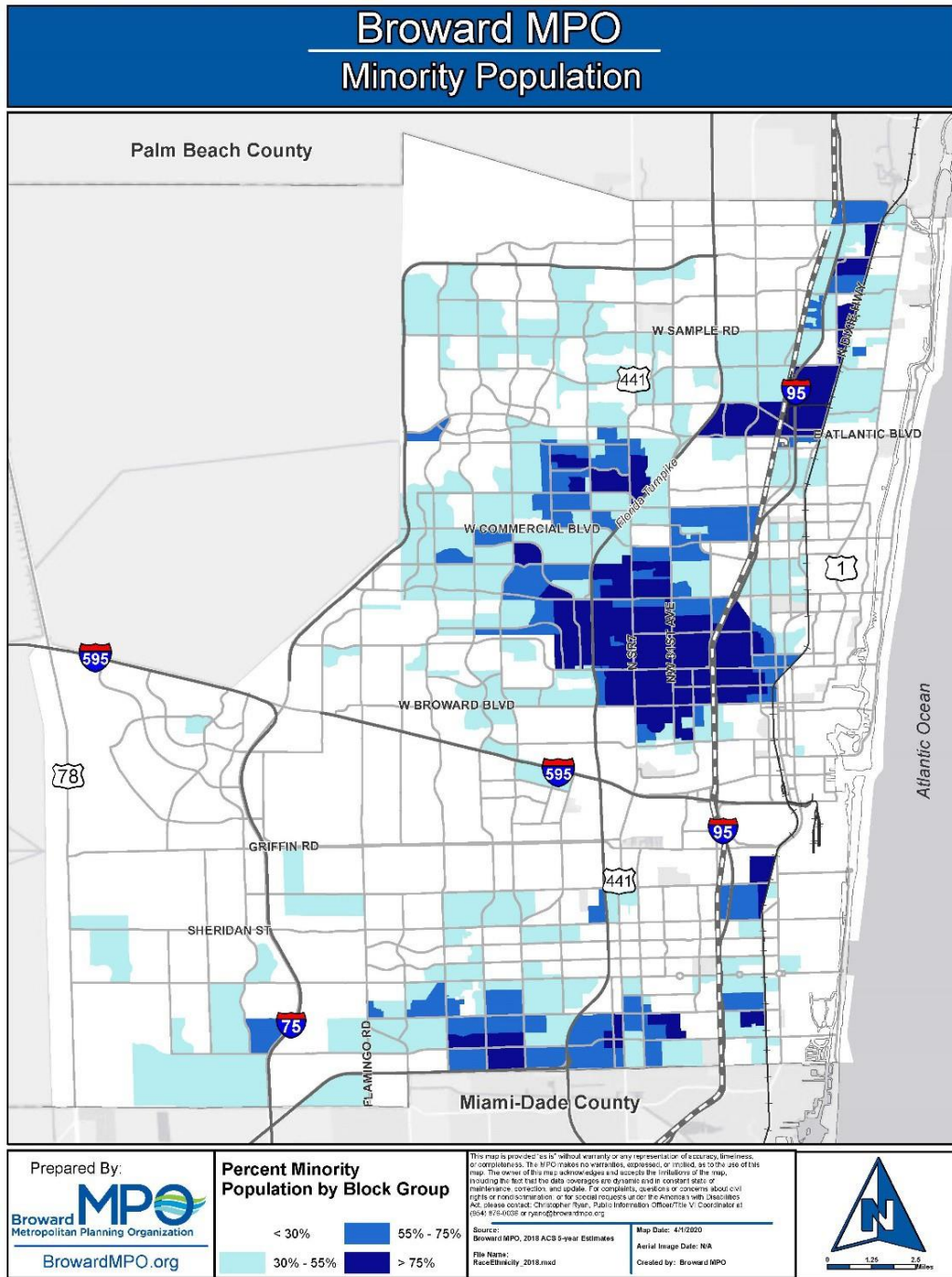
Source: ACS 2018 Five Year Estimates

Table 6: Broward County Minority Population Trends, 2000-2018

Category	2000		2010		2018		% Change 2018-2000
	Pop.	%	Pop.	%	Pop.	%	
Total Population	1,623,018	100%	1,734,139	100%	1,909,151	100%	17.6%
White	940,692	58.0%	790,073	45.6%	710,438	37.2%	-24.5%
Black/African American	322,516	19.9%	436,318	25.2%	524,739	27.5%	+62.7%
American Indian/Alaska Native	2,912	0.2%	2,677	0.2%	3,188	0.2%	-
Asian	36,148	2.2%	54,259	3.1%	67,313	3.5%	+86.2%
Native Hawaiian, Other Pacific Islander	570	0.04%	402	0.02%	946	0.05%	+66.0%
Other	6,638	0.4%	7,001	0.4%	10,121	0.5%	+52.5%
Two or more races	42,019	2.6%	27,782	1.6%	37,797	2.0%	-10.1%
Hispanic	271,523	16.7%	415,627	24.0%	554,609	29.1%	+104.3%
Total Minority	682,326	42.0%	944,066	54.4%	1,198,713	62.8%	+75.7%

Source: ACS 2018 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 2.6 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 13% of Broward County's population is living below the 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's 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 7% of Broward County households do not have access to a vehicle, consistent with the percentage since 2010. 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.

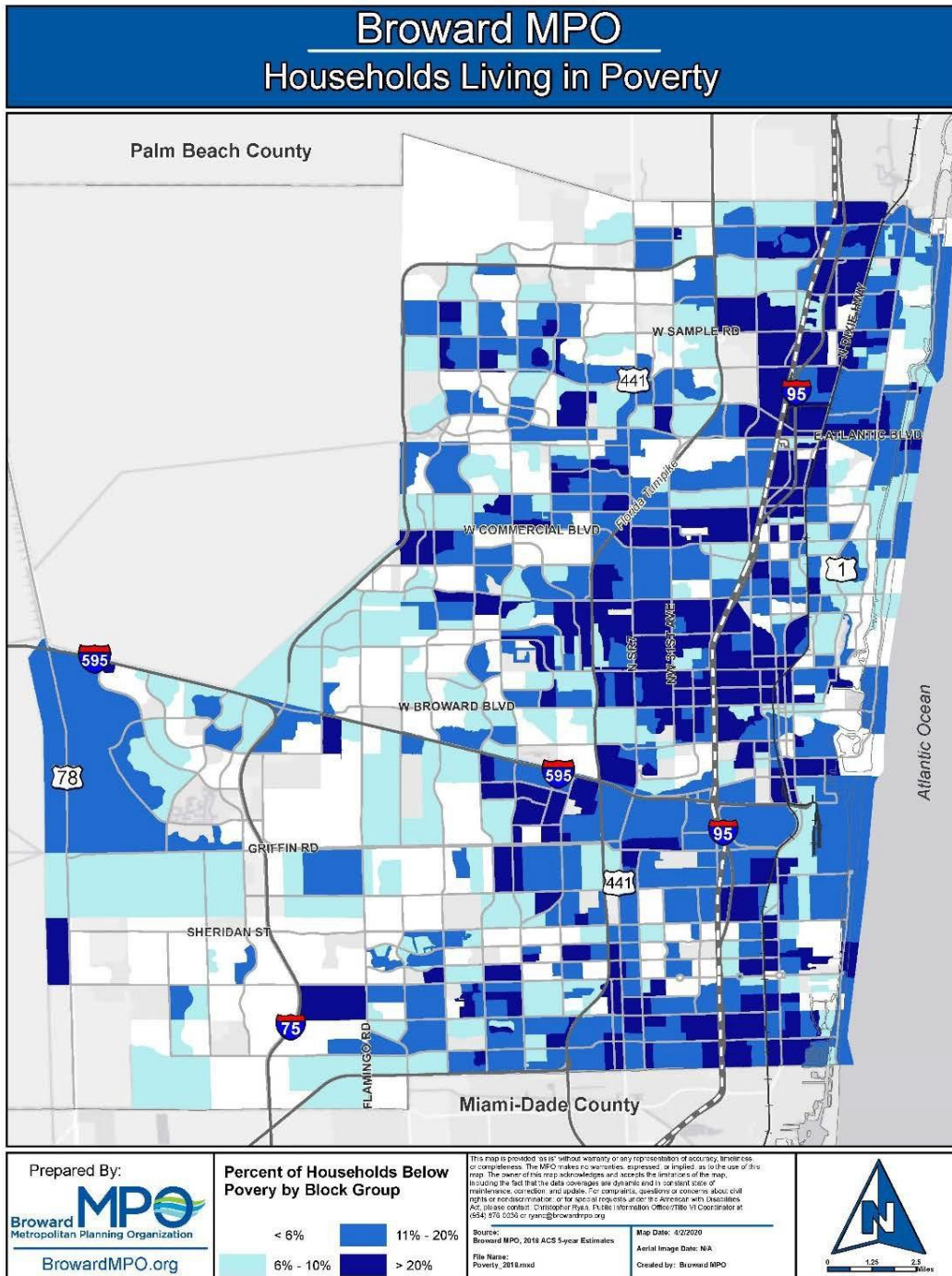
Older Adult Population

Nearly 17% 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.

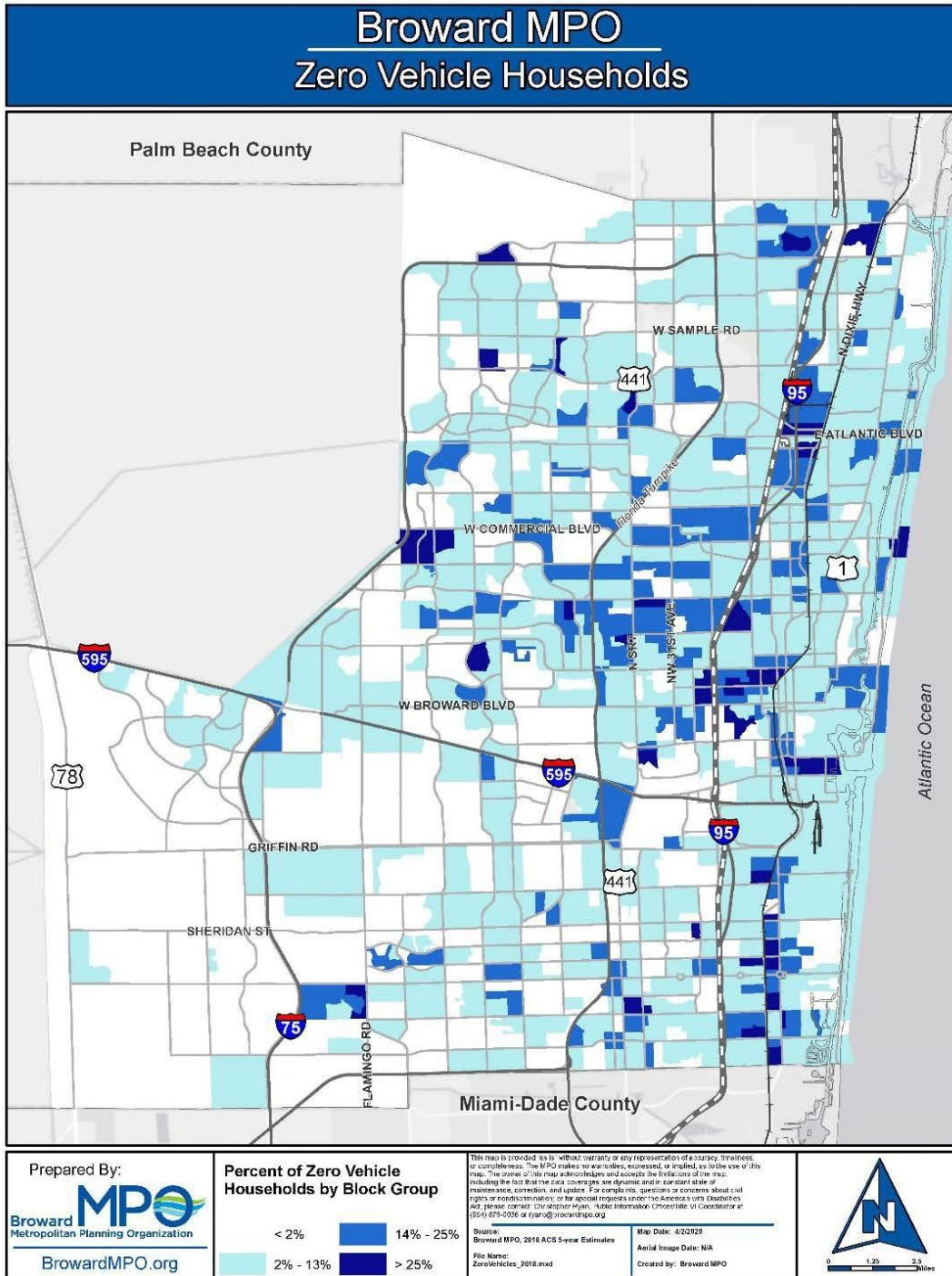
Tribal Coordination

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 Broward MPO's 2019 Joint State/MPO Certification Review acknowledges that the MPO has actively sought participation in the metropolitan planning process from the Seminole Tribe of Florida, and a representative of the Tribe serves as a voting member of the MPO's Technical Advisory Committee. The MPO's Executive Director also has been working with Tribal representatives on transportation and land use considerations for redevelopment occurring on Tribal properties within the MPO boundaries. Further, the Tribe participated in the *Commitment 2045* process.

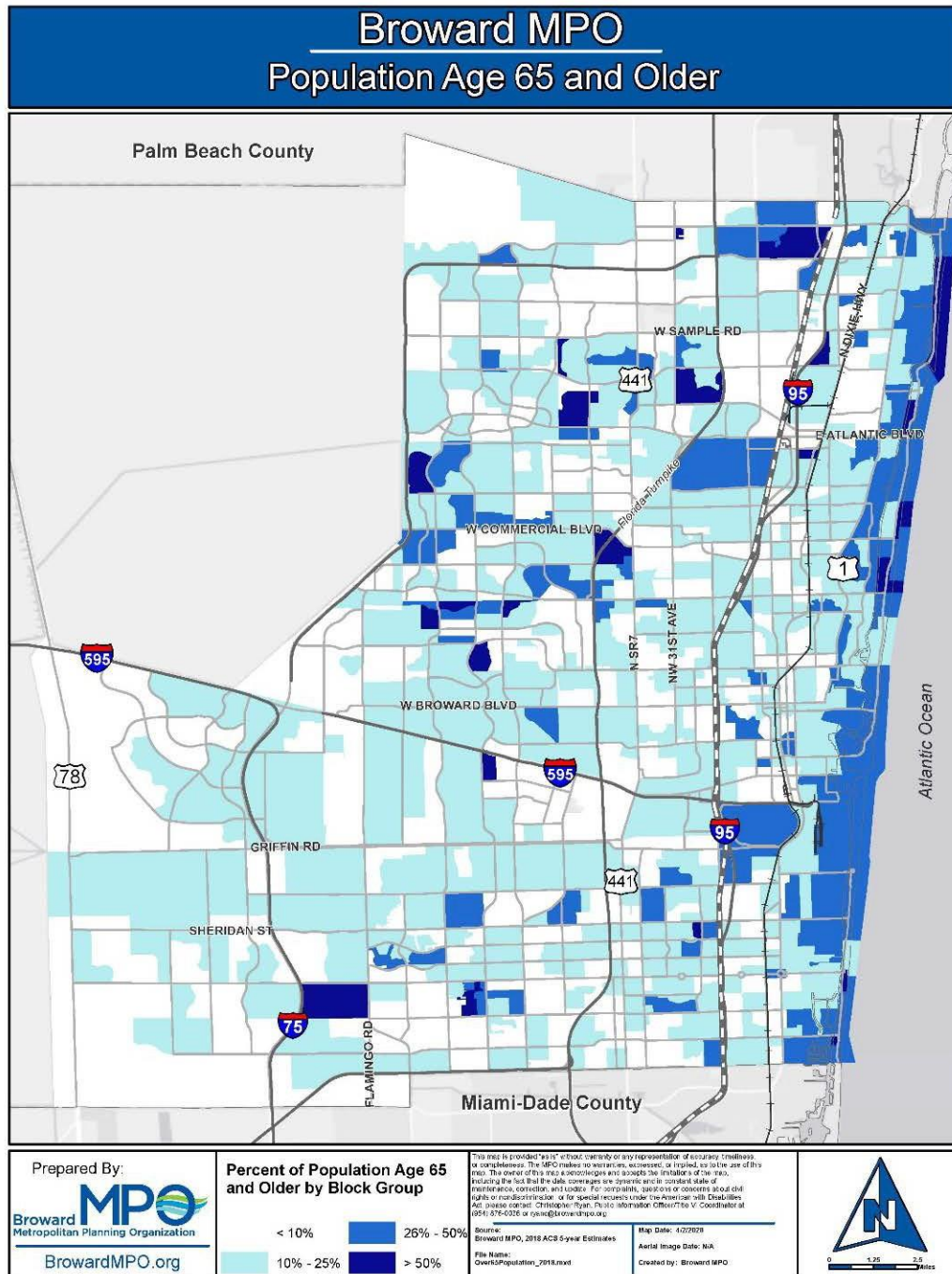
Map 7: Broward County Low-Income Households



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 Grant 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 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.

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 Census 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 2020 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, 63% of transit project miles and 12% 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.

Table 7: Distribution of Federal and State Funds for Public Transportation in Broward County, 2020

Miles of Transit Projects In Minority Block Groups ¹	% Total Funded Miles ²	Amount of Funding ³	% of Total Transit Funds ⁴
79.67	63%	\$51,667,357	12%

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

^{2, 3, 4} Source: Broward MPO FY 2020 Transportation Improvement Program

3.4 Analysis of Disparate Impacts

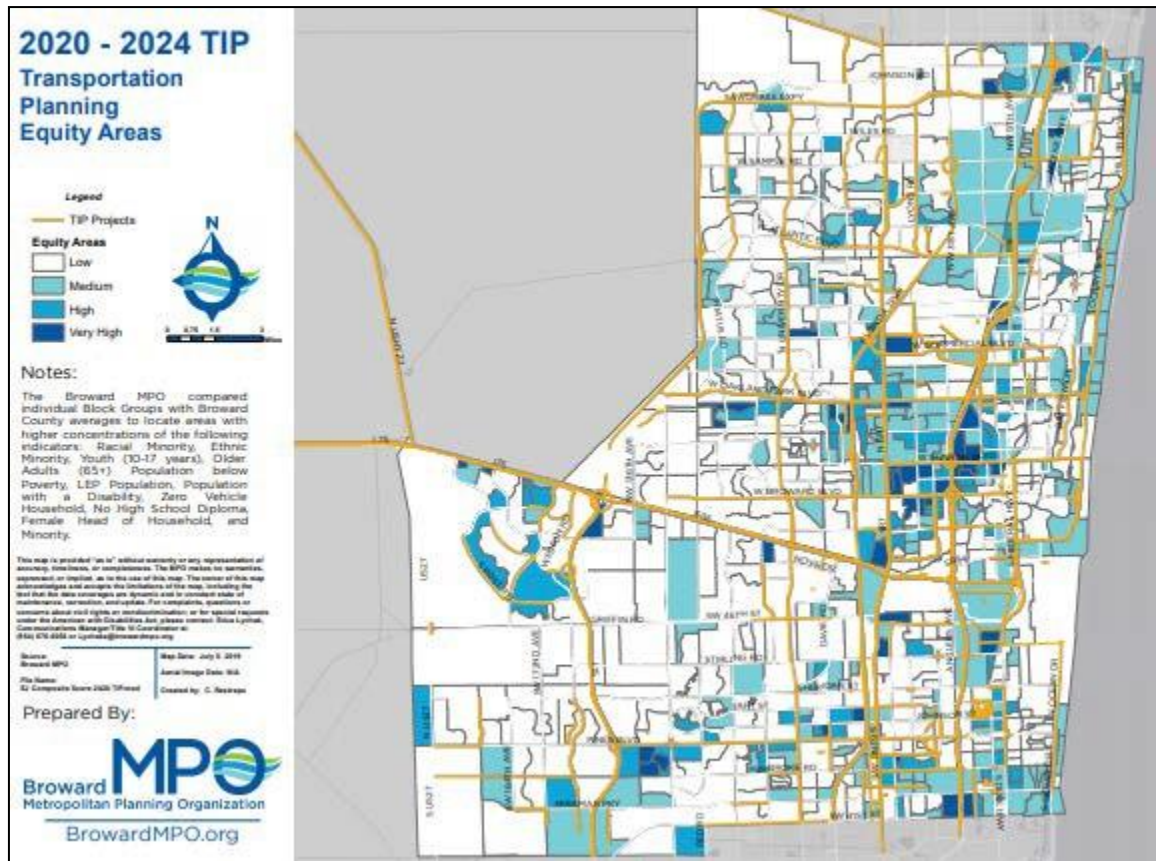
MPO recipients are required to determine, based on the information provided in Section 3.3, if there any disparate impacts based on race, color, or national origin.

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 has developed a comprehensive equity assessment process, described in Section 2.5, that 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 U.S. 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 U.S. 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 10 provides the Environmental Justice assessment map from the FY 2020 TIP; it is evident that the predominant concentrations of equity indicators generally cluster in the 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 8: FY 2017 TIP Title VI/Environmental Justice Assessment – Transportation Planning Equity Areas



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 for the Title VI Program.

The Broward MPO Board adopted the 2020 Title VI Program on July 9, 2020, as required by FTA. Official documentation of approval can be found 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 Erica Lychak at (954) 876-0033, if hearing impaired call Florida Relay Service 711 or 1-800-955-78771 or e-mail lychake@browardmpo.org

Signed complaint forms should be submitted to:

Attention: Broward Metropolitan Planning Organization
Erica Lychak, 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 than 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 to file a complaint with the FTA or FHWA Offices of Civil Rights, as applicable, at the following addresses:
Federal Transit Administration, Region IV
Office of Civil Rights
61 Forsyth Street, S.W.
Suite 17T50
Atlanta, GA 30303-8917 / Telephone: (404) 562-3500

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.

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

Broward MPO
Erica Lychak, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
lychake@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
Erica Lychak, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
ryanc@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, el Broward MPO no tolera la discriminación en ninguno de sus programas, servicios o actividades. El 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 el 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 Erica Lychak 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 lychake@browardmpo.org

Los formularios de queja firmados deben enviarse a:

Attention: Broward Metropolitan Planning Organization
Erica Lychak, 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 el Broward MPO, se le notificará el derecho de solicitar una reconsideración dentro de los treinta (30) días, o de presentar una queja ante las Oficinas de Derechos Civiles del FTA o FHWA, como aplicable, en las siguientes direcciones:

Federal Transit Administration, Region IV
Office of Civil Rights
61 Forsyth Street, S.W.
Suite 17T50
Atlanta, GA 30303-8917 / Teléfono: (404) 562-3500

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.

El Broward MPO hará todo lo posible para garantizar que sus instalaciones, programas, servicios y actividades sean accesibles para las personas con discapacidad. El 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.

El Broward MPO alienta al público a informar cualquier instalación, programa, servicio o actividad que parezca inaccesible para los discapacitados. Además, el 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, el 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
Erica Lychak, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
lychake@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
Erica Lychak, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
(954) 876-0033
ryanc@browardmpo.org
Servicio de Retransmisión de Florida 711 o 1-800-955-8771

BROWARD METROPOLITAN PLANNING ORGANIZATION
Organización de Planificación Metropolitana de Broward (MPO)

COMPLAINT OF TITLE VI DISCRIMINATION
Formulario de queja de discriminación por el Título VI

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

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

We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know.

La Organización de Planificación Metropolitana de Broward (MPO), como recipiente de ayuda financiera federal, es requerida a asegurar que el servicio de transporte público y sus servicios relacionados son distribuidos de una manera consistente con el Título VI del Acta de Derechos Civiles del 1964, con sus enmiendas.

Si usted cree que, individualmente o como parte de una clase específica de personas, ha sido discriminado bajo el Título VI, basado en su raza, color, o nacionalidad, puede presentar una queja por escrito al Broward MPO.

Le pedimos la siguiente información para poder tramitar su queja. Si necesita ayuda para llenar este formulario, póngase en contacto con el Broward MPO.

1. Complainant
Reclamante

Name: _____
Nombre:

Street Address: _____
Dirección:

City, State, Zip Code: _____
Ciudad, estado, código postal:

Telephone: _____
Nº de teléfono:

E-mail Address: _____
Dirección de Correo Electrónico:

2. Person discriminated against (if someone other than the complainant):

Persona que fue discriminada, si no es la misma que el reclamante:

Name: _____
Nombre:

Street Address: _____
Dirección:

City, State, Zip Code: _____
Ciudad, estado, código postal:

Tel. Home Number: _____ Bus. Number _____
Nº de teléfono: Domicilio: Trabajo:

E-mail Address: _____
Dirección de Correo Electrónico:

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

¿Tiene usted representación de un(a) abogado(a) con relación al asunto de su queja?

Yes _____
Sí

No _____
No

If yes, please complete the following:

Si tiene abogado(a), provea la siguiente información:

Attorney's Name: _____
Nombre del abogado(a):

Street Address: _____
Dirección:

City, State, Zip Code: _____
Ciudad, estado, código postal:

Telephone Number: _____
Nº de teléfono:

4. Which of the following best describes the reason you believe the discrimination took place:

Según lo que cree usted, ¿en qué se basaron esas acciones discriminatorias?

Race _____ Color _____ National Origin _____
Raza Color Nacionalidad

Sex _____ Disability _____ Sexual Orientation _____
Sexo _____ Incapacidad/impedimento _____ Orientación sexual _____

Political Affiliation _____ Marital Status _____
Afiliación política _____ Estado civil _____

5. Date of the alleged discrimination: _____
Fecha de la supuesta discriminación:

6. In the space below, please describe the alleged discrimination. Explain what happened and who you believe was responsible.
Por favor describa abajo el supuesto acto de discriminación. Explique lo más claro posible lo que pasó y quien usted piensa es el responsable por el supuesto acto.

7. Have you filed a complaint of the alleged discrimination with a federal, state or local agency; or with a state or federal court?
¿Ha presentado usted (o la persona que fue discriminada) la queja ante una agencia del gobierno federal, estatal o local? ¿O ante la corte estatal o federal?

Yes _____
Sí _____

No _____
No _____

If yes, check all that apply:

Si es así, indique a qué agencia, departamento o programa fue presentada la queja. Incluya todos los que apliquen:

Federal _____
Federal

Federal Court _____
La corte federal

State _____
Estatal

State Court _____
La corte estatal

Local _____
Local

Please provide the name of the Agency where you filed your complaint.
¿Ante qué agencia usted presentó la queja?

Name: _____
Nombre:

Contact Person: _____
Nombre del investigador o representante:

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

Por favor, firme el formulario. Adjunte cualquier información adicional usted cree que es pertinente con su queja.

Signature of Complainant

Firma del reclamante

Date

Fecha

Submit your signed complaint and any attachments to:

Entregue el formulario con su firma y páginas adicionales a:

Broward Metropolitan Planning Organization
Erica Lychak, Title VI Coordinator
100 West Cypress Creek Road, Suite 650
Fort Lauderdale, FL 33309
Telephone/Llame (954) 876-0033

Appendix B: Broward MPO Board Approval of 2020 Title VI Program

August 18, 2020

FTA Civil Rights Office Region 4,

This letter is to confirm that the following item was unanimously approved by the Broward MPO Board at the July 9, 2020 meeting:

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

This update is required as the Broward MPO, being a recipient of federal funds, must submit a Title VI Program to the Federal Transit Administration (FTA) every three years. This update covers years 2020-2023.

If you have any questions, please contact Erica Lychak, Title VI/DBE Coordinator at Lychake@browardmpo.org or (954) 876-0058.

Sincerely,



Frank Ortis, Broward MPO Chair



fr

Gregory Stuart, Broward MPO Executive Director

Cc: Broward MPO Board

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 Erica Lychak, Title VI Coordinator at (954) 876-0058 or Lychake@browardmpo.org

Chair

Frank C. Ortis

Vice Chair

Patricia Good

Deputy Vice Chair

Sandy Johnson

Members & Alternates

Margaret Bates
Richard Blattner
Bryan Caletka
Michael Carn
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Irene Kirdahy
Robert L. McKinzie
Barry Moss
Buz Oldaker
Judy Paul
Debra Placko
Max Pulcini
Tim Ryan
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Michael Udine
Sandra L. Welch
Beverly Williams
Ana M. Ziade

Executive Director

Gregory Stuart

General Counsel

Alan Gabriel



Move People & Goods | Create Jobs | Strengthen Communities

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](https://www.floridarelay.com)

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:
Erica Lychak, Title VI Coordinator, (954) 876-0036 or lychake@browardmpo.org

For more information, please contact:

Erica Lychak, Title VI Coordinator

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Phone: (954) 876-0033 I Email: lychake@browardmpo.org