Title VI Program & Limited English Proficiency Plan

September 10, 2026

Broward MPO
Metropolitan Planning Organization

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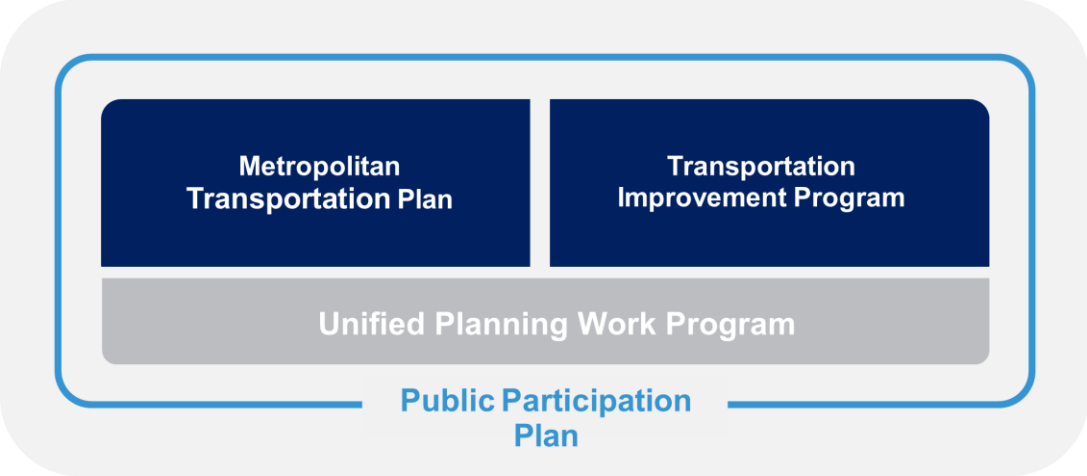
BrowardMPO.org

Safely Move People & Goods. Create Jobs. Foster Vibrant Communities.

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

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

Broward MPO Core Products



Acronyms

ACS	American Community Survey
ASL	American Sign Language
CAC	Citizens' Advisory Committee
CFR	Code of Federal Regulations
DAT	Demographic Analysis Tool
DBE	Disadvantaged Business Enterprise
DOT	U.S. Department of Transportation
FDOT	Florida Department of Transportation
FHWA	Federal Highway Administration
FR	Federal Register
FTA	Federal Transit Administration
FTAC	Freight Transportation Advisory Committee
LCB	Local Coordinating Board
LEP	Limited English Proficiency
MPO	Metropolitan Planning Organization
MTP	Metropolitan Transportation Plan
PPP	Public Participation Plan
REV	Roads for Economic Vitality
TAC	Technical Advisory Committee
TTY	Teletypewriter
TIP	Transportation Improvement Program
UPWP	Unified Planning Work Program
USDOT	United States Department of Transportation

Executive Summary

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

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

Guidance for preparing Title VI Programs is outlined in FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The MPO performs several activities to support its Title VI Program including:

- Utilize the latest Census data to create an updated demographic profile for Broward County (as well as for the MPO's committees);
- Identify minority populations and describe how the MPO considers their needs throughout the planning process;
- Prepare maps that show projects in the MPO's Transportation Improvement Program and where they are in relation to minority populations;
- Analyze investments being made to the transportation system and any impact they may be having on certain populations;
- Ensure complaint procedures and forms are available to the public online as well as physically in the MPO offices;
- Ensure FTA grant subrecipients are adhering to Title VI requirements;
- Coordinate closely with public involvement staff to maintain consistency with the agency's Public Participation Plan.

In addition, the MPO's Title VI Program contains the agency's Limited English Proficiency (LEP) Plan which helps determine the extent to which services in languages other than English should be provided by the MPO. This includes an analysis that looks at what LEP populations are present in the County, the frequency that the Broward MPO encounters folks with other language needs, the importance of the materials being considered for potential translation, and the cost of translation.

For 2026, the LEP population that is both the most prevalent and encountered by the MPO remains Spanish speakers. As such, important materials and legal advertisements for core products are produced in Spanish as well as in English. For other languages, the MPO relies on its website translation function or staff translators/interpreters, with additional support being provided on a case-by-case basis.

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

The Broward MPO is aware of the United States Department of Transportation (USDOT) final rule that went into effect on June 11, 2026, which eliminates disparate-impact liability when implementing Title VI. While this document contains at least one subsection that pertains to disparate impacts, the MPO continues to monitor the situation and will await further guidance from the FTA in response to the final rule that was issued by USDOT. Should it be deemed necessary, updates will be made to this document to ensure compliance with the most recent Federal requirements.

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Section 1 Introduction

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

1.1 About the Broward MPO

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

MPO Executive Director

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

Title VI Coordinator

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

In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the Broward MPO. Any individual may exercise their right to file a complaint with the Broward MPO if that person believes that they or any other program beneficiaries have been subjected to discrimination in their receipt of benefits/services or on the grounds of race, color, national origin, sex, age, disability, family or religious 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.
- Maintain knowledge of Federal Title VI requirements, attend training when needed, and provide information/training to the MPO staff, Board, and committees and the public if they have questions.

- Periodically review the Broward MPO Title VI Program to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff involved with consultant contracts and any subrecipients found to be non-compliant to resolve the deficiency status and write a remedial action if necessary, as described in the Subrecipient Compliance & Monitoring section of this document.
- Review important issues related to nondiscrimination 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 nondiscrimination 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 nondiscrimination.

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

1.2 Title VI Program Checklist

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

Table 1: Federal Title VI Program Requirements

Requirement	Section
General Requirements	
Requirement to provide Title VI assurances	2.1
Title VI Notice to the public, including list of locations where notice is posted	2.2
Title VI complaint procedures	2.3, Appendix A
Title VI complaint form	2.3, Appendix A
List of Title VI investigations, complaints, and lawsuits	2.4
Public Participation Plan and summary of outreach efforts	2.6
Meaningful access to Limited English Proficiency persons	2.7
Non-elected committee racial composition	2.8
Subrecipient compliance and monitoring procedures	2.9
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
Board approval of Title VI Program	Section 4, Appendix B

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 Chapter III of Federal Transit Administration (FTA) Circular 4702.1B.

2.1 Requirement to Provide Title VI Assurances

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

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

2.2 Title VI Notice to the Public

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

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

Figure 1: Broward MPO Title VI Webpage

Figure 2: Broward MPO Title VI Notice

Broward MPO
Metropolitan Planning Organization

Notifying the Public of Rights Under Title VI

- The Broward Metropolitan Planning Organization (MPO) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who 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 the Broward MPO at (954) 876-0033 (Florida Relay Service 711), by e-mail at emac@browardmpo.org, or visit our office at 100 West Cypress Creek Road, 6th Floor, Suite 650, Fort Lauderdale, FL 33309. For more information, please visit BrowardMPO.org.
- A complainant may file a complaint directly with the Federal Transit Administration by filing with the Office of Civil Rights no later than 180 days after the incident.
- If information is needed in another language, contact the Broward MPO using one of the methods listed above.

Notificación de los Derechos Públicos Bajo el Titulo VI

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

Trade Centre South | 100 West Cypress Creek Road, Suite 650 | Fort Lauderdale, FL 33309-2122 | BrowardMPO.org

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

2.3 Title VI Complaint Procedure & Form

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

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

2.4 Title VI Investigations, Complaints & Lawsuits

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

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

2.5 Demographic Analysis Tool

The Broward MPO has created a standardized process to use in evaluating its plans, programs, and projects and to make informed decisions in Broward County's communities. Using its Demographic Analysis Tool (DAT), the MPO seeks to ensure that the benefits and impacts of plans, programs, and projects undertaken by the agency and its partners are understood and that populations protected under Federal non-discrimination laws and other authorities, including Title VI, are not disproportionately burdened during the planning process. It is the Broward MPO's goal that the DAT, 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 DAT 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. The DAT refers to these areas as "economic opportunity areas." This methodology used by the DAT is not intended to definitively identify areas of concern or satisfy Title VI 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.

2.6 Public Participation Plan

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

Broward MPO Public Participation Plan Goals

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

The goals of the Broward MPO's PPP are:

- **Goal 1: Inform the Public.** Inform the public, to the maximum extent possible, about opportunities to participate in the transportation decision-making process.
- **Goal 2: Involve the Public.** Engage the public early and often throughout the transportation planning process.
- **Goal 3: Include the Public.** Ensure MPO materials, meetings, and activities are accessible and distributed widely throughout the county.
- **Goal 4: Improve the Public Participation Processes.** Continuously identify, evaluate, and adopt strategies to improve the effectiveness and inclusivity of public participation.

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 countywide accessibility and involvement, 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, their frequency, and which measures are most appropriate for the planning activity being undertaken.

The Broward MPO's PPP includes a range of outreach techniques to ensure that the four public participation goals are achieved, thereby maximizing public input from interested parties and those traditionally underserved by existing transportation systems, such as minority and limited-English-proficiency (LEP) persons.

Goal 1: Inform the Public

Policy: Inform the public, to the maximum extent possible, about opportunities to participate in the transportation decision-making process.

Techniques:

- Post meeting agendas at least one week in advance and on the MPO website.
- Create and distribute flyers for workshops, pop-ups, or special events.
- Include the MPO website address on all materials for easy access to current information.
- Provide options to submit input by U.S. Mail, phone, or email.
- Partner with local media to promote meetings, events, and educational segments.
- Set up displays at community events, especially in traditionally underrepresented areas.
- Participate in civic group meetings as well as school and business events.
- Conduct TV, radio, or podcast interviews to educate residents about transportation planning.

Goal 2: Involve the Public

Policy: Engage the public early and often throughout the transportation planning process.

Techniques:

- Maintain active advisory and technical committees (Citizens' Advisory Committee [CAC], Freight Transportation Advisory Committee, Technical Advisory Committee [TAC]) to provide continuous opportunities for resident input.
- Use hybrid and virtual meeting formats to broaden accessibility.
- Review CAC membership regularly to ensure equitable representation.
- Include a direct email feature on the MPO website for questions or comments.
- Conduct surveys during meetings, events, and via the MPO website.
- Personally greet attendees at meetings, provide agendas, and encourage participation.
- Incorporate interactive activities (e.g., workshops, visioning sessions) into plan development.
- Respond promptly to inquiries, providing interim updates as needed.
- Present committee recommendations to the MPO Board and report trends from public feedback.
- Allocate dedicated agenda time for public comment at every MPO meeting.

Goal 3: Include the Public

Policy: Ensure MPO materials, meetings, and activities are accessible and distributed widely throughout the county.

Techniques:

- Make key documents available at the public library locations and online at browardmpo.org/core-products/public-participation-plan-ppp.
- Provide copies to local planning departments and agencies through TAC.

- Participate in community events, festivals, and cultural gatherings to better understand and connect with diverse communities.
- Use the MPO's DAT to identify traditionally underrepresented areas and tailor outreach.
- Coordinate with local governments, nonprofits, and community-based organizations to reach established networks.
- Ensure that all public notices include information on requesting accessibility or language accommodations.

Goal 4: Improving the Public Participation Process

Policy: Continuously identify, evaluate, and adopt strategies to improve the effectiveness and inclusivity of public participation.

Techniques:

- Assess the effectiveness of participation methods and adjust strategies accordingly.
- Expand outreach tools to reach broader and more diverse populations.
- Strengthen regional coordination with Miami-Dade Transportation Planning Organization and Palm Beach MPO on joint outreach activities.
- Leverage analytics to track engagement through online and digital platforms.
- Document lessons learned and incorporate them into future PPP updates.

Public Participation Evaluations

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

Public Participation Activities

The Broward MPO continues to host or participate in both in-person and virtual events focused on the following topics:

- Community Outreach
- Roads for Families/Safety
- Meetings/Presentations
- *Commitment 2050* Metropolitan Transportation Plan (MTP) Update
- Community Networking Events
- Partner Agency Events
- School/Educational Activities

Within these categories, public outreach activities in which the MPO hosts and participates in are diverse in terms of topic area, with some focusing on specific projects and others focusing on more general MPO services and coordination with partner agencies. In conducting outreach, the MPO references the demographics of the area in which a project or study is located to identify the most appropriate resources to engage the Title VI community. For example, during the *Commitment 2050* MTP update, Broward MPO staff ensured that the appropriate translated

materials and translation services were available at in-person events conducted in areas of the county with a higher percentage of LEP persons. This process will continue for future MTPs.

The Broward MPO also tracks in-person outreach activities to ensure geographic diversity and opportunities in areas with higher Title VI populations compared to the rest of the county. Using the Demographic Analysis Tool identified in Section 2.5, the MPO is able to identify minority, LEP, and other Title VI populations that should be engaged as part of the planning process. Previously Pompano Beach, Hollywood, Miramar (east of I-75), and Lauderhill (east of Florida's Turnpike, west of I-95, and north of I-595) were evaluated for future outreach opportunities. In recent years, the MPO has also taken advantage of large events to further get the word out about its various plans, programs, and projects.

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 multimodal transportation system. Speak Up Broward has launched several successful campaigns including the following:

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

Figure 3: Broward MPO Podcast Series

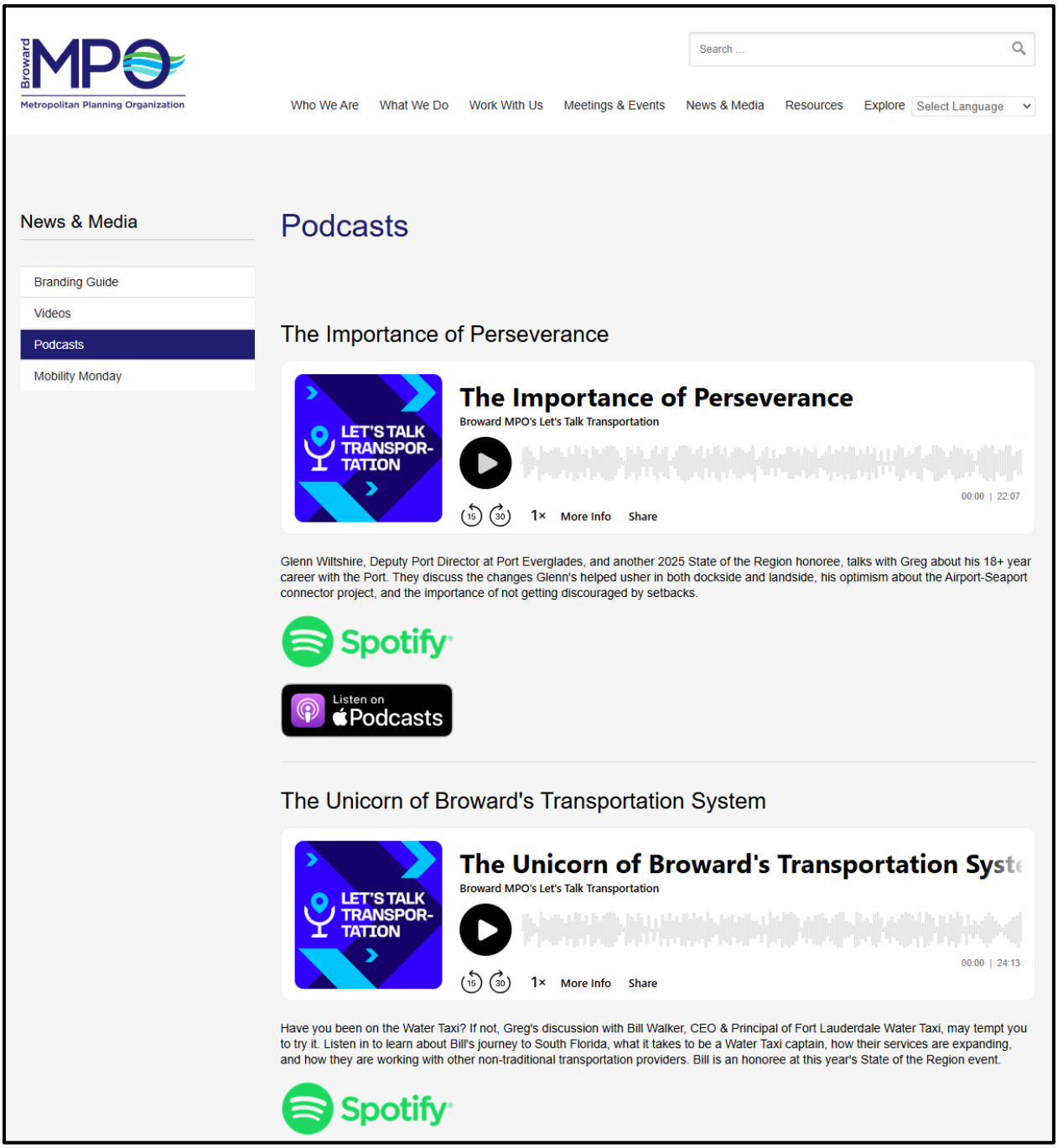


Figure 4: Mobility Monday Newsletter

Mobility Monday

November 3, 2025 Edition

At the Broward MPO, community is at the core of everything we do. Our work goes beyond planning transportation projects; it's about improving lives, strengthening connections, and building a brighter future for all in Broward County. We are truly grateful for the community we serve. Your voices, ideas, and participation guide our mission every step of the way. Whether through public meetings, surveys, or everyday conversations, your input helps us understand what matters most: safer roads, reliable transit, and opportunities that bring people together.

As an MPO, we're proud to serve the people who make this region so special. Every project, from bike lanes to bus routes, is designed to make daily life better, helping parents get their children to school safely, ensuring seniors can reach essential services, and giving everyone more ways to move through our communities with confidence. Together, we are shaping a transportation network that reflects our shared values and aspirations. We are creating a transportation system that connects people, supports economic development, and enhances the quality of life for all who call Broward County home.

Gregory Stuart
Executive Director, Broward MPO

Shape the Future of Transportation in Lauderhill: Join Us November 5

Advisory Committees

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

"Think Like a Planner" Workshops

Over the past several years, the Broward MPO has worked with the Broward County Public Schools' Career, Technical, Adult, Community Education Department to increase awareness of the Broward MPO and introduce students to the field of transportation. Each year, the MPO hosts high school students to participate in unique and innovative "Think Like a Planner" workshops. The idea for these workshops came out of the MPO's Strategic Business Plan, where MPO Board Members requested the agency engage and reach out to the younger generation and embrace students from all backgrounds throughout Broward County. Students benefit by learning about career opportunities and basics of transportation planning, and the MPO educates students about the work the agency does and helps to increase awareness of the MPO's vision, mission, and purpose. In 2019, the program was expanded to include a middle school workshop. Although the program was paused during the COVID-19 pandemic, the MPO has since restarted these events, most recently hosting a workshop with students from the Hallandale High School in November 2025.

2.7 Meaningful Access to Persons with Limited English Proficiency

Consistent with Title VI of the Civil Rights Act of 1964 and DOT's implementing regulations in 49 CFR Part 21, recipients must take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals with limited English proficiency (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 Plan (also referred to as a Language Assistance Plan).

Four-Factor Analysis

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

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

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

Table 2 was developed from the U.S. Census Bureau's 2024 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, 16.9% of LEP persons live in Broward County; of this, 11.4% 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 2.7%, followed by other Indo-European languages, at 1.3% collectively.

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

Language Spoken	Speak English Less Than "Very Well"	% LEP Population	% Broward County Population
Spanish	213,977	67.6%	11.4%
French, Haitian, or Creole	51,322	16.2%	2.7%
Other Indo-European	24,026	7.6%	1.3%
Chinese (incl. Mandarin, Cantonese)	5,052	1.6%	0.3%
Russian, Polish, or other Slavic	9,514	3%	0.5%
Vietnamese	3,450	1.1%	0.2%
Other Asian and Pacific Island	2,377	.8%	0.1%
Arabic	1,516	.5%	0.08%
Tagalog (incl. Filipino)	1,119	.4%	0.06%
German or other West Germanic	680	.2%	0.04%
Korean	982	.3%	0.05%
Other and unspecified	2,720	.9%	0.1%
Total			**16.9%**

Source: ACS 2024 5-Year Estimates, Table C16001

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 2023 (and based on 2020 ACS data), the LEP population has increased 1.1%. The size of the LEP population in the South Florida region is expected to continue to increase, as will the probability of increased future contact with the Broward MPO. To date, the number of requests for Spanish language assistance services made by LEP individuals or groups remains low; however, the MPO is proactive in translating into Spanish critical materials and outreach materials for major planning projects and other programs when determined to be necessary. Staff will continue to monitor the requests for language assistance to gauge outreach effectiveness to these populations.

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

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

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

- Unified Planning Work Program (UPWP)
- Transportation Improvement Plan (TIP)

- Metropolitan Transportation Plan (MTP)

Comprehensive 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 made to ensure the planning process is as comprehensive as possible.

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 would translation services cost?
- Which documents currently are or should be translated?

Staff Translators

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

Translation Cost Analysis

Based on the word count of the most recent core products prepared by the MPO and translation costs (obtained from 2026 internet research), the approximate cost range of translating major reports are shown in Table 3. Due to the varying price estimates for translation services depending on the language, type of document, the level of expertise needed, etc., a range is provided to encompass potential translation scenarios.

Table 3: Estimated Document Translation Cost

	Cost Per Document			
Cost Per Word	**UPWP**	**TIP**	**MTP**	**PPP**
$0.08 - $0.30	$1,008 - $3,888	$5,218 - $19,569	$4,854 - $18,201	$785 - $2,943

Source: Various based on internet market research

LEP Plan

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

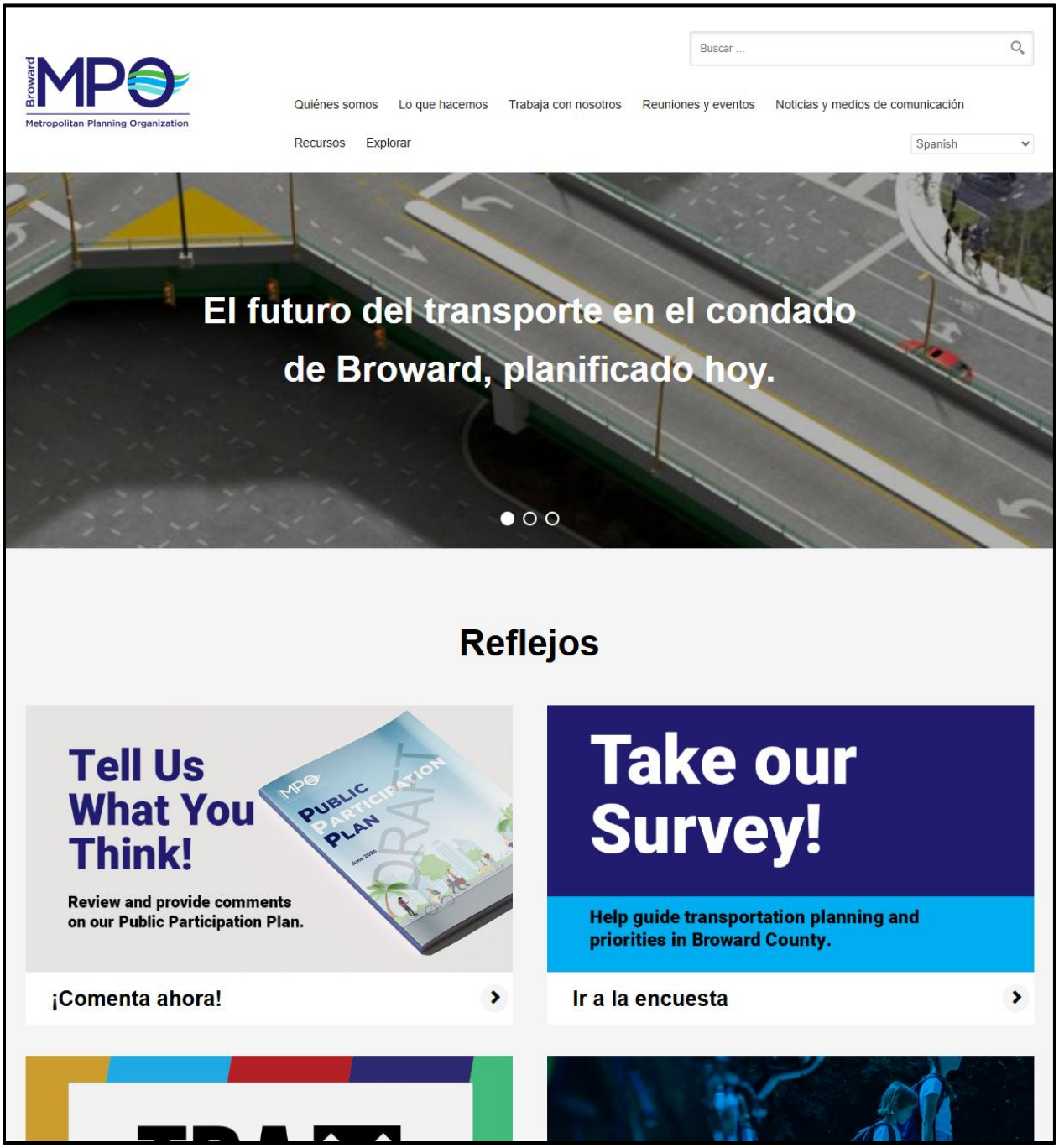
Component 1: Describe how the recipient provides language assistance services by language.

As noted in the four-factor analysis, given the size of the LEP population in the Broward MPO area (just under 17%), the frequency of requested translation, and current financial constraints,

full-language translations of complete transportation plan documents and maps were not determined to be warranted or cost-feasible at this time. However, the Broward MPO currently undertakes the following to ensure that LEP persons have access to important information prepared by the MPO:

- **Advertisements in Spanish**– Advertising notices in major local print media (e.g., *Sun Sentinel*) are provided in Spanish as well as English.
- **Website translation function** – The Broward MPO has a translation drop-down function on its homepage that can translate its website content to 77 different languages (Figure 5 provides an example).
- **Phone line Spanish translation** – The Broward MPO's main phone number, (954) 876-0033, includes an option to hear the phone directory/menu in Spanish. Specific bilingual staff are identified to aid these callers.
- **Telecommunications Device for the Deaf/Teletypewriter capabilities** – The Broward MPO uses the 711 relay service for deaf and hard-of-hearing individuals. Anyone with teletypewriter (TTY) equipment or who calls 711 has nationwide access to non-internet-based relay services such as TTY relay services, speech-to-speech relay services, voice carry-over TTY, and hearing carry-over TTY relay services. Users also have the option to call Florida's direct toll-free number (1-800-955-8771) that serves as a relay service between the caller and Broward MPO. This information is listed on the MPO's website and in notices.
- **American Sign Language (ASL) interpreter services** – The Broward MPO can provide ASL interpretation services at meetings or other events as needed.
- **Translation of project/plan-specific events, materials, and deliverables** – As part of the scoping and contracting process for plans and studies, Broward MPO staff work with consultants and other organizations to determine if translation at meetings or of project materials and deliverables are appropriate.
- **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 5: Broward MPO Website Translated to Spanish



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, sex, age, disability, family or religious status. Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services (free of charge) should contact Carl Ema at (954) 876-0033 or emac@browardmpo.org at least seven days prior to the meeting. Individuals who are deaf, hard of hearing, or have speech/communication limitations may call 711 or 1-800-955-8771 (TTY) to connect to and communicate with the Broward MPO via a telecommunications operator.*
>
> *Se solicitala participación del público, sin importar la raza, color, nacionalidad, sexo, edad, incapacidad, estado familiar o religión. Personas que requieran facilidades especiales bajo el Acta de Americanos con Discapacidad (Americans with Disabilities Act) o personas que requieren servicios de traducción (sin cargo alguno) deben contactar a Carl Ema al teléfono (954) 876-0033 o emac@browardmpo.org por lo menos siete días antes de la reunión. Las personas sordas, con dificultades auditivas, o que tienen alguna limitacion de expresión o comunicación pueden llamar al teléfono 711 o 1-800-273-7545 (TTY) 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.
- 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, the Federal Highway Administration, and the Federal Transit Administration to seek opportunities to provide training in the Southeast Florida region.

Contact Information

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

Carl Ema, Title VI Coordinator
Phone: (954) 876-0033, TTY: 711 or 1-800-955-8771, Fax: (954) 876-0062
emac@browardmpo.org

2.8 Minority Representation on Planning & Advisory Bodies

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

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

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

Table 4 summarizes the racial composition and Table 5 summarizes the ethnic composition of these three non-elected advisory committees, as required by FTA Circular 4702.1B. As indicated in the committee descriptions, the processes used for appointing members to the Broward MPO's advisory committees vary.

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

Race Category	TAC	CAC	LCB
White	38%	21%	33%
Black or African American	11%	0%	12%
American Indian and/or Native Alaskan	0%	0%	0%
Asian	2%	0%	3%
Native Hawaiian/Other Pacific Islander	0%	0%	0%
Other	4%	2%	0%
Two or More	7%	0%	0%
Information Not Provided	38%	77%	52%
Total	**100%**	**100%**	**100%**

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

Ethnicity	TAC	CAC	LCB
Hispanic or Latino	9%	6%	6%
Not Hispanic or Latino	53%	17%	42%
Information Not Provided	38%	77%	52%
Total	**100%**	**100%**	**100%**

2.9 Subrecipient Compliance & Monitoring

Title 49 CFR Section 21.9(b) states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." The primary recipient has a responsibility to both aid and monitor subrecipients for compliance with 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 are made available to all subrecipients, as needed:

- Sample notices to the public informing beneficiaries of their rights under Title VI regulations, procedures on how to file a Title VI complaint, and the 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. In these cases, an agreement is executed by the Broward MPO and the Direct Recipient that absolves the Broward MPO of responsibility to monitor its Title VI Program.

When subrecipients are not Direct Recipients, the Broward MPO monitors the subrecipient and requests documentation of the subrecipient's Title VI Program to demonstrate compliance with requirements outlined in the FTA Circular 4702.1B that apply based on the type of agency and/or public transit provider.

Consultant Contracts

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

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

Section 3 Requirements of MPOs

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

3.1 Demographic Profile

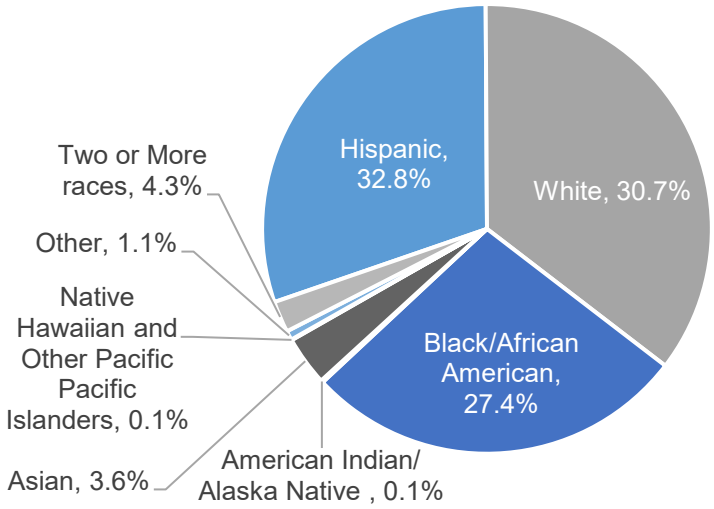
All MPO recipients must provide a demographic profile of the metropolitan area within their Title VI Program that includes identification of the locations of minority populations in the aggregate.

Data from the 2024 American Community Survey (ACS) were used to evaluate the representation of minority populations and the extent of benefits received from improvements.

Minority Population

The racial distribution in Broward County for 2024 is shown in Figure 6. Broward County is a minority-majority county, with 30.7% of the population identifying as White non-Hispanic and 69.3% identifying as a minority. Of this, approximately 33% identify as Hispanic.

Figure 6: Racial Composition of Broward County, 2024



Source: ACS 2024 5-Year Estimates, Table B03002

A comparison of ACS data from 2010, 2020, and 2024, as presented in Table 6, shows that the racial and ethnic composition of Broward County is changing. Since 2010, the total population increased by 14% and the minority population increased by 45.1%. The White non-Hispanic population declined by 23.1%, the Black/African American population increased by 24.1%, and the Hispanic population increased by 55.9%.

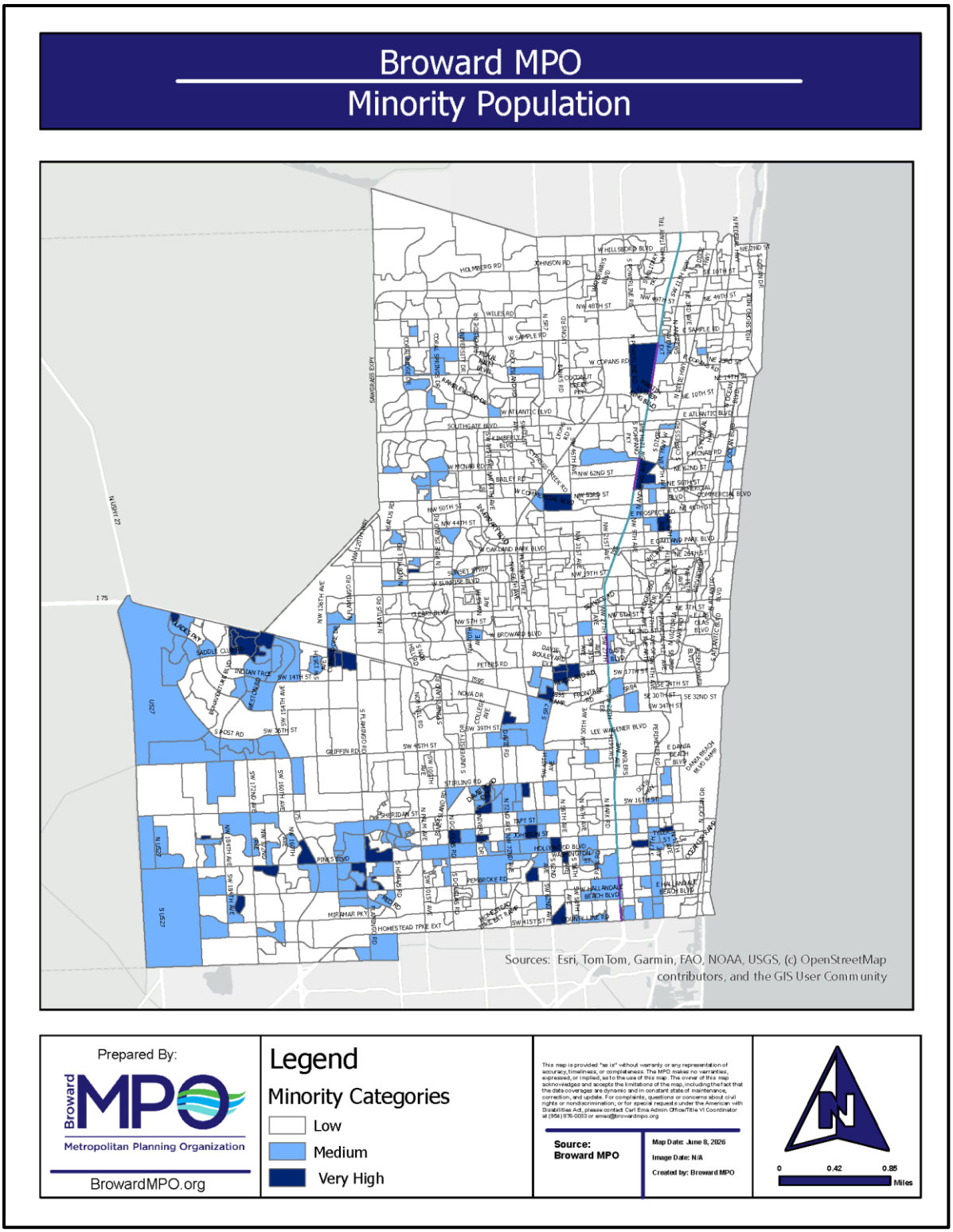
Map 1 shows minority populations by block group for Broward County further categorized by the MPO's Demographic Analysis Tool into low, medium, high, and very high categories in an effort to identify the heaviest concentrations of minority populations in the majority-minority county of Broward.

Table 6: Broward County Minority Population Trends, 2010-2024

Category	2010		2020		2024		% Change 2010-2024
	Pop.	%	Pop.	%	Pop.	%	
Total Population	**1,734,139**	**100%**	**1,942,273**	**100%**	**1,977,129**	**100%**	**14.0%**
White	790,073	45.6%	689,773	35.5%	607,366	30.7%	-23.1%
Black/African American	436,318	25.2%	536,564	27.6%	541,305	27.4%	+24.1%
American Indian/Alaska Native	2,677	0.2%	3,208	0.2%	2,305	0.1%	-13.9%
Asian	54,259	3.1%	68,917	3.5%	71,862	3.6%	+32.4%
Native Hawaiian, Other Pacific Islander	402	0.02%	985	0.1%	1,009	0.1%	+151.0%
Other	7,001	0.4%	12,860	0.7%	21,073	1.1%	+201.0%
Two or more races	27,782	1.6%	43,730	2.3%	84,124	4.3%	+202.8%
Hispanic	415,627	24.0%	586,236	30.2%	648,085	32.8%	+55.9%
Total Minority	**944,066**	**54.4%**	**1,252,500**	**64.5%**	**1,369,763**	**69.4%**	**+45.1%**

Source: ACS 2024, 2020 and 2010 5-Year Estimates, Table B03002

Map 1: Broward County Minority Population



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 Public Participation Plan 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 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 Roads for Economic Vitality Program (REV) provides funding for small, local transportation projects that improve the safety and mobility for all transportation users in Broward. One evaluation criterion for selecting REV projects is the average of total Census indicators, one of which includes minority and populations within a ½-mile buffer of a proposed project.

The MPO's 2050 MTP, *Route to 2050*, included a detailed evaluation of potential impacts on economic opportunity areas identified by the Demographic Analysis Tool (DAT) described in Section 2.5, including Title VI populations. The DAT was applied at key stages of the Plan's development to ensure that disproportional impacts to minorities and other protected populations did not occur. Ongoing assessment of project outcomes from the 2050 MTP will be addressed using the DAT process as projects are further refined so that any potential impacts can be identified early and addressed well before funding and implementation. This evaluation process will be repeated in future MTP updates.

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 American Community Survey data at tract or block group levels and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a Designated Recipient.

Table 7 summarizes the mileage and associated funding levels for transit projects funded in Broward MPO's FY 2026-2030 Transportation Improvement Program (TIP) that intersect "minority block groups" defined as block groups with a higher percentage of minority populations compared to the countywide average. As shown, approximately 15% of transit project miles and 4% of total transit funding are distributed within minority Block Groups. It should be noted that the transit section of the TIP is managed by Broward County Transit, which is required to prepare its own Title VI Program. Additionally, this analysis only captures projects with a specific location that can be analyzed. Transit operations or other system-wide projects that do not have a specific project location are not included in the determination of project miles or funding within minority block groups, as summarized in the table.

Table 7: Distribution of Federal and State Funds for Public Transportation in Broward County, 2026

Miles of Transit-Funded Projects In Minority Block Groups[1]	% Total Funded Transit Project Miles in Minority Block Groups[2]	Transit Funded Projects in Minority Block Groups[3]	% of Total Transit Funded Projects in Minority Block Groups[4]
11	15%	$29,209,355	4%

[1]Block groups with higher percentage of minority population than county average.
[2, 3, 4] Source: Broward MPO FY 2026-2030 Transportation Improvement Program

3.4 Analysis of Disparate Impacts

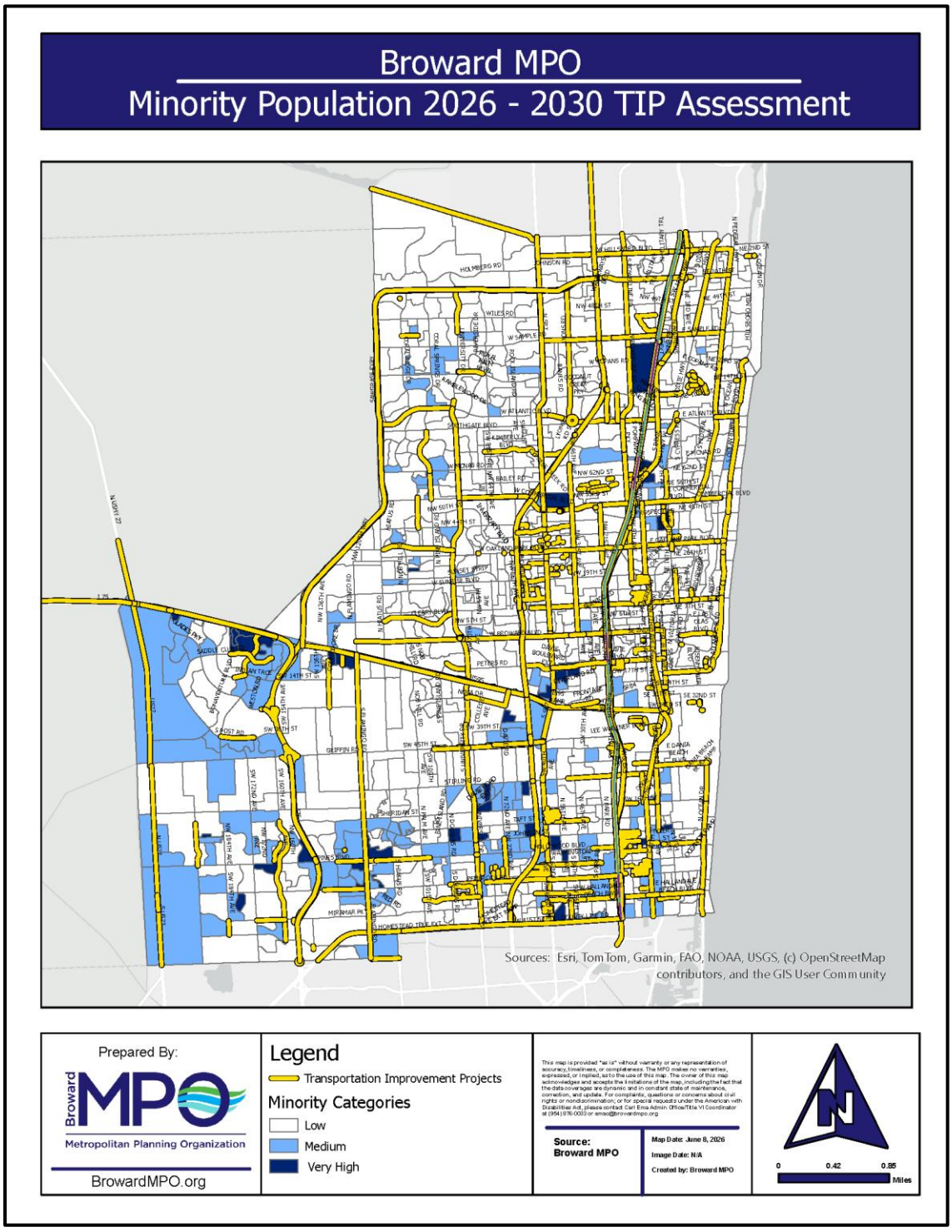
MPO recipients are required to determine, based on the information provided in Section 3.3, if there are any disparate impacts based on race, color, or national origin.

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

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

As part of its TIP update process, the Broward MPO assesses Title VI by understanding the geographic distribution of funding relative to the economic opportunity areas identified by the DAT. Map 2 provides the assessment map from the FY 2026-2030 TIP; while Broward County remains a majority-minority county with a high countywide average of minority populations, it is evident that the heaviest concentrations generally cluster throughout the southern portion of the County and within the vicinity of interstate highways such as I-95 and I-595. This input is paired with public participation feedback on specific projects to evaluate potential impacts to specific communities.

Map 2: FY 2026-2030 TIP Assessment



3.5 Program Administration

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

a. A record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to aid predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding.

b. A description of how Broward MPO develops its competitive selection process or annual program of projects submitted to FTA as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations, including Native American tribes, where present. Equitable distribution can be achieved by engaging in outreach to stakeholders regarding the availability of funds, and ensuring the competitive process is not itself a barrier to selection of minority applicants.

c. A description of Broward MPO's criteria for selecting entities to participate in an FTA grant program.

Section 4 Board Approval of Title VI Program

Recipients are required to provide a copy of Board meeting minutes, resolution or other appropriate documentation showing the Governing Board or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

The Broward MPO Board adopted the 2026 Title VI Program on September 10, 2026, as required by the Federal Transit Administration. Official documentation of approval is provided in Appendix B.

Appendix A: Title VI Complaint Procedures & Complaint Form

BROWARD METROPOLITAN PLANNING ORGANIZATION

TITLE VI DISCRIMINATION COMPLAINT PROCEDURES

The Broward Metropolitan Planning Organization (Broward MPO) values diversity and both welcomes and actively seeks input from all interested parties, regardless of cultural identity, background or income level. Moreover, the Broward MPO does not tolerate discrimination in any of its programs, services or activities. The Broward MPO will not exclude participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, or national origin. 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, as amended as well as other related federal and state statutes and regulations. These procedures have been adopted to conform to Federal Transit Administration (FTA) 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.

3. Complaints should be in writing, signed by the complainant or his/her representative(s), and must include the complainant(s) name, address, and telephone number. Allegations of discrimination received via facsimile or e-mail will be acknowledged and processed. Allegations received by telephone will be documented in writing and provided to the complainant(s) for review before processing. The complaint form can be accessed on the website: www.browardmpo.org or you may call Carl Ema at (954) 876-0033, if hearing impaired call Florida Relay Service 711 or 1-800-955-78771 or e-mail emac@browardmpo.org.

Signed complaint forms should be submitted to:

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

A complaint may also be filed directly with FTA at:

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

B. Complaint Investigation

1. Upon receipt of a signed complaint, the Broward MPO Executive Director or his/her designee will, within five (5) working days, provide the complaint or his/her representative with a written acknowledgement of the complaint.

2. Broward MPO staff will conduct a preliminary inquiry into the complaint to determine whether the complaint has sufficient merit to warrant an investigation. Should Broward MPO staff determine that the evidence presented is not sufficient to proceed, the complaint will be closed and the complainant or his/her representative will be notified in writing of the decision within fifteen (15) working days. This notification shall specifically state the reason(s) for the decision.

3. Should Broward MPO staff determine that a full investigation is necessary, the complainant or his/her representative will be notified that an investigation will take place and additional information will be requested, if necessary. The investigation should last no more that forty-five (45) working days.

4. Should a complainant fail to provide additional information within the prescribed timeframe, this may be considered as a failure to cooperate with the investigation, and the complaint will be administratively closed.

C. Disposition

1. Upon completion of the investigation, a written notification of disposition will be sent by certified mail to the complainant or his/her representative within sixty (60) working days of filing the complaint.

2. If the complainant disagrees with the decision rendered by the Broward MPO, he/she will be notified of the right to request reconsideration with thirty (30)

days, or to file a complaint with the FTA, as applicable, at the following addresses:

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

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 polity 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.

LIMITED ENGLISH PROFICIENCY (LEP)

Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and US Department of Transportation (DOT) require Federal aid recipients to take reasonable steps to ensure meaningful access to programs, services and activities by those who do not speak English proficiently. To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

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

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

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

ORGANIZACIÓN DE PLANIFICACIÓN METROPOLITANA DE BROWARD

TÍTULO VI PROCEDIMIENTOS DE RECLAMACIÓN DE DISCRIMINACIÓN

La Organización de Planificación Metropolitana de Broward (Broward MPO) valora la diversidad y recibe con beneplácito y busca activamente el aporte de todas las partes interesadas, independientemente de su identidad cultural, antecedentes o nivel de ingresos. Además, 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, o nacionalidad. 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, con sus enmiendas, 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), 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.
3. Las quejas deben presentarse por escrito, firmadas por el demandante o sus representantes, y deben incluir el nombre, la dirección y el número de teléfono del demandante. Las denuncias de discriminación recibidas por fax o correo electrónico serán reconocidas y procesadas. Las denuncias recibidas por teléfono se documentarán por escrito y se proporcionarán a los reclamantes para su revisión antes del procesamiento. Puede acceder al formulario de queja en el sitio web: www.browardmpo.org o puede llamar a Carl Ema al (954) 876-0033, si tiene problemas de audición, llame al Servicio de Retransmisión de Florida al 711 o al 1-800-955-78771 o envíe un correo electrónico a emac@browardmpo.org.

Los formularios de queja firmados deben enviarse a:

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

También se puede presentar una queja directamente con FTA a la siguiente dirección:

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

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, como aplicable, en las siguientes direcciones:

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

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.

COMPETENCIA LIMITADA EN INGLÉS (CLI)

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

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

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

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

BROWARD METROPOLITAN PLANNING ORGANIZATION
Organización de Planificación Metropolitana de Broward

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

The Broward Metropolitan Planning Organization (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 que el servicio de transporte público y sus servicios relacionados son distribuidos de una manera consistente con el Titulo VI del Acta de Derechos Civiles del 1964, con sus enmiendas.

Si usted cree que, individualmente o como parte de una clase especifica de personas, ha sido discriminado bajo el Titulo 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_____ No_____
Sí *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_____ No_____
   Sí *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 Court_____
   Federal *La corte federal*

   State_____ State Court_____
   Estatal *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
Carl Ema, 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 2026 Title VI Program

Broward MPO
Metropolitan Planning Organization

September 10, 2026

FTA Civil Rights Office Region 4,

This letter is to confirm that the following item was unanimously approved by the Broward MPO Board at their September 10, 2026 meeting:

MOTION TO APPROVE Updates to the Broward MPO's Title VI Program & Limited English Proficiency Plan.

This update is required as the Broward MPO, as a recipient of Federal funds, must submit a Title VI Program to the FTA every three years. This update will go into effect February 1, 2027 and last until January 31, 2030.

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

Sincerely,

Yvette Colbourne, Broward MPO Chair

Gregory Stuart, Broward MPO Executive Director

Cc: Broward MPO Board

Chair
Yvette Colbourne

Vice Chair
Joy Cooper

Deputy Vice Chair
Byron Jaffe

Members | Alternates
Antonio V. Arserio
Samson Borgelin
Felicia M. Brunson
Tycie Causwell
Yvette Colbourne
Joy Cooper
Kicia Daniel
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Richard DeNapoli
Todd Drosky
Melissa Dunn
Tim Fadgen
Lamar Fisher
Beam Furr
Thomas Good Jr
Rex Hardin
Bob Hartmann
William "Bill" Hodgkins
Byron Jaffe
Lori Lewellen
Tim Lonergan
Lisa Mallozzi
Jane Reiser
Hazelle Rogers
Paul Rolli
Joseph A. Scuotto
Caryl S. Shuham
Joshua Simmons
Ben Sorensen
Rebecca Thompson
Dean J. Trantalis
Michael Udine
Kyle Van Buskirk
Rich Walker
Sandra L. Welch
Michelle Whitman

Executive Director
Gregory Stuart

General Counsel
Alan Gabriel

Broward Metropolitan Planning Organization
Trade Centre South
100 West Cypress Creek Road, Suite 650, 6th Floor
Fort Lauderdale, FL 33309
info@browardmpo.org
(954) 876-0033 Office
(954) 876-0062 Fax
Florida Relay Service 711

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

For complaints, questions or concerns about civil rights or nondiscrimination or for special requests under the Americans with Disabilities Act, please contact:
Carl Ema, Title VI Coordinator, (954) 876-0033 or emac@browardmpo.org

For more information, please contact:
Carl Ema, Title VI Coordinator
Broward Metropolitan Planning Organization - Trade Centre South
100 West Cypress Creek Road, Suite 650, Fort Lauderdale, Florida 33309
Phone: (954) 876-0033 I Email: emac@browardmpo.org