



LIMITED ENGLISH PROFICIENCY PLAN

August 14, 2014

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LIMITED ENGLISH PROFICIENCY (LEP) PLAN

I. INTRODUCTION

The Broward Metropolitan Planning Organization (Broward MPO) is a transportation policy-making board responsible for planning and prioritizing transportation projects and funding allocation in Broward County, Florida. The Broward MPO works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans and programs through a continuing, cooperative, and comprehensive (3-C) planning process. This planning process guides the use of federal and state dollars spent on existing and future transportation projects and programs. The **Limited English Proficiency (LEP) Plan** plays an important part in that process. It ensures individuals with limited English proficiency have meaningful access to the transportation planning process.

II. BACKGROUND

The Limited English Proficiency Plan addresses **Title VI of the Civil Rights Act of 1964**, which prohibits discrimination based on race, color or national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI (Federal-Aid Recipient Programs & Activities) regulations. Additionally, requirements are outlined in **Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency** signed on August 11, 2000. Its purpose is to ensure accessibility to programs and services to eligible persons who have limited proficiency in the English language.

Furthermore, the U.S. Department of Transportation (DOT) published **Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons** in the December 14, 2005 Federal Register **Volume 70; Number 239**. The guidance explicitly identifies Metropolitan Planning Organizations (MPOs) as organizations that must follow this guidance. The final Limited English Proficiency Plan must be consistent with the fundamental mission of the organization, though not unduly burdening the organization.

The Broward MPO serves as the MPO for Broward County and as such the LEP requirements extend to all the Broward MPO programs or activities, even if some activities are not funded by federal assistance. Sub-recipients are also covered in cases when Federal funds are passed through from a recipient to a sub-recipient.

Who is a Limited English Proficient Person?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." The U.S. Census Bureau does not define limited English proficiency or non-limited English proficient populations. It reports data based on the four categories of English-speaking ability: very well, well, not well, and not at all.

Determining the Need of Limited English Proficiency

As a recipient of federal funds, the Broward MPO must take reasonable steps to ensure meaningful access to the information and services it provides. As noted in the **Federal Register, Volume 70; Number 239 on Wednesday, December 14, 2005**, there are four factors to consider when determining “reasonable steps.” This is known as **“the four-factor analysis”** and is outlined below:

- **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.**
- **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 MPO.**

The Department of Transportation (DOT) policy guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. Below is a self-assessment of need in Broward County in relation to the four-factors and the transportation planning process.

III. LIMITED ENGLISH PROFICIENCY SELF ASSESSMENT FOR THE BROWARD MPO

The Broward MPO has assessed its programs and services using the following four (4) factor analysis.

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 was 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 our planning purposes, people that speak English **“less than very well”** are included in the analysis. Further, only the **top four language groups** are examined.

The table below is derived from the U.S. Census Bureau’s 2012 American Community Survey five year summary. It shows the number and percent of LEP persons 5 years and over, in total and by language in Broward County. (LEP Person: Person that speaks English “less than very well”)

Table 1: Languages Spoken in the Broward MPO for 2007-2012 and Level of Proficiency

Language Spoken	Speaks English Less than Very Well	%LEP Population	% MPO Population
Spanish	146,941	59.6%	8.9%
French Creole	45,395	18.4%	2.7%
Portuguese	11,299	4.6%	0.7%
French	9,380	3.8%	0.6%
Chinese	3,492	1.4%	0.2%
Vietnamese	3,225	1.3%	0.2%

Russian	3,066	1.2%	0.2%
Italian	2,434	1.0%	0.1%
Arabic	1,546	0.6%	0.1%
Korean	1,202	0.5%	0.1%
Greek	609	0.2%	0.0%
Japanese	382	0.2%	0.0%
Other Languages	17,506	7.1%	1.1%
Total	246,477	100.0%	14.9%

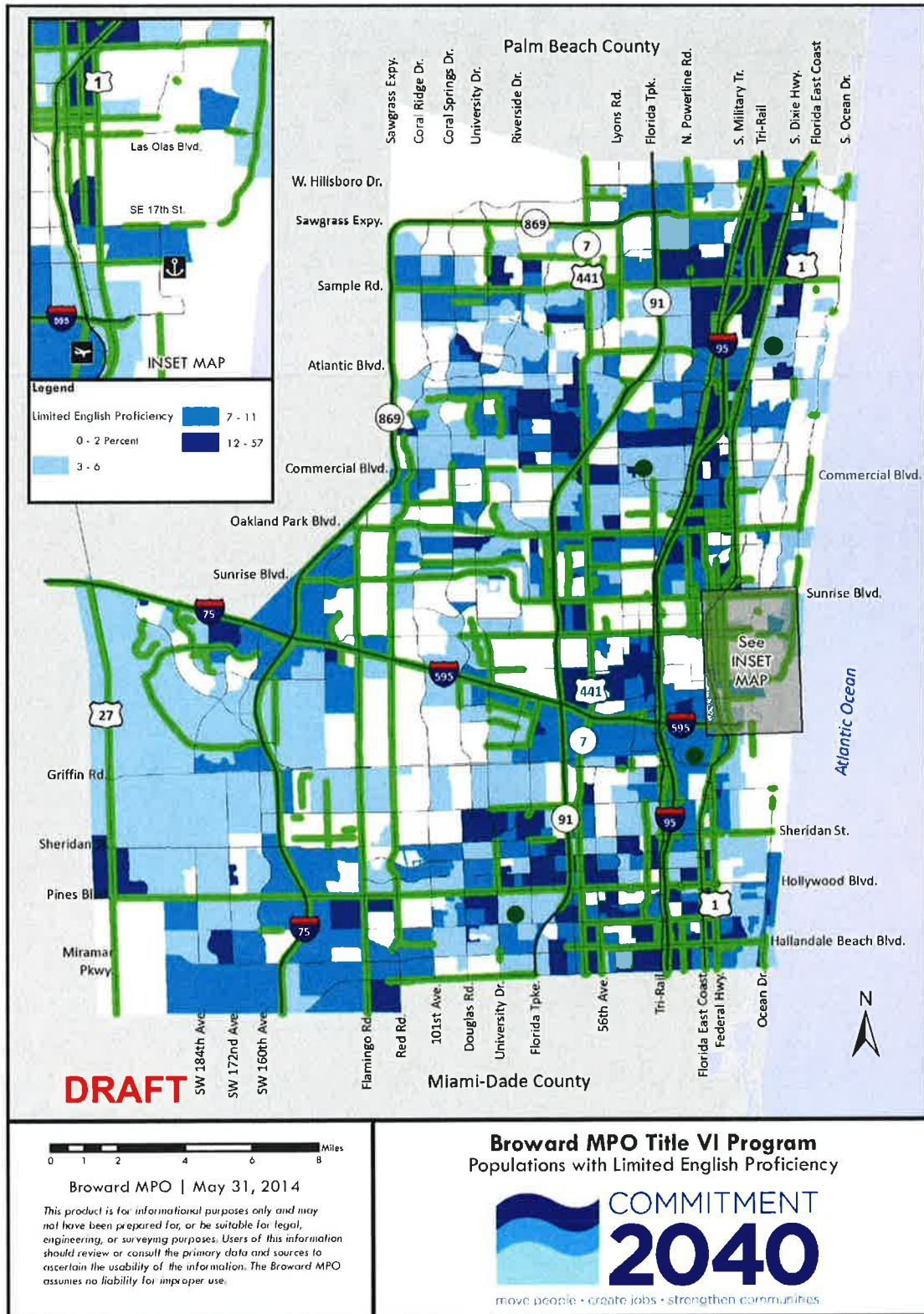
Source: ACS 2012 5Yr, Table 16001, languages greater than 0.1% of the LEP population is reported above.

Table 1 shows that of the LEP persons within the Broward MPO area, 8.9% speak Spanish less than very well, making this the most significant language group as a percentage of population. The next most common language of the area's LEP population is French Creole at 2.7% followed by Portuguese at 0.7% and French (including Patois, Cajun) at 0.6%. These four languages were the highest in 2011 as well and these four language groups experienced a slight increase in the proportion of the Broward MPO population that they represent.

Source: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older – Data Set 2012 American Community Survey (ACS) 5-Year Estimates.

Figure 1 identifies the locations of the LEP populations using the 2012 ACS 5-year estimates.

Figure 1: Map of LEP for Broward MPO 2007-2012



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

The four-factor analysis identified Spanish as the most significant language spoken by the LEP population in the area covered by the Broward MPO. The size of the LEP population in this region will likely continue to increase and, as a result, the probability of increased future contact with the Broward MPO. However, to date, only a small number of requests for Spanish language assistance services have been made by LEP individuals or groups. As we expand our LEP program, we 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 is the main source of potential contact between the MPO and LEP persons. As a result, the frequency of contact is difficult to anticipate. The Broward MPO's Public Involvement Plan highlights the need for outreach opportunities that engage the populations that are traditionally not involved in the transportation planning process.

The Broward MPO in partnership with the Palm Beach and Miami Dade MPO's has developed the Transportation Outreach Planner tool. The Transportation Outreach Planner [MPO transportationoutreachplanner.org](http://MPOtransportationoutreachplanner.org), previously called the Integrated Transportation Information System (ITIS), uses social, economic and geographic characteristics useful to identifying effective public involvement strategies. Users can produce Community Background Reports (CBRs) using the tool to help validate census data. Each of the Municipalities, who know their constituents best, was involved in developing the tool, therefore supplementing information collected from the Census.

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, the Broward MPO must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and policy.

The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process in use of federal funds in **three major areas** for the Broward MPO:

- The biennial **Business Plan or Unified Planning Work Program (UPWP)**
- The five-year **Transportation Improvement Program (TIP)**
- The **Long Range Transportation Plan (LRTP)**

Inclusive public participation is a priority consideration in other MPO plans, studies and programs as well. The impacts of transportation improvements resulting 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 are often helpful with outreach related to other Broward MPO projects and studies.

Understanding and continued involvement are encouraged throughout the process. The Broward MPO is concerned with input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible. The use of the ITIS tool, as described in the “Factor 2” above, will allow MPO staff to identify concentrations of particular populations based on language using the Community Background Reports.

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

Currently the Broward MPO spends \$550 per newsletter for translation into Spanish and \$650 for the Creole translation. The average cost (estimate provided by vendor) for translation in to Spanish is \$0.22 per word. The approximate cost of translating, in full, the major reports produced by the MPO are shown in Table 2.

Table 2: Estimated Document Translation Cost

Document	UPWP FY 14-16	TIP FY 14/15	LRTP 2035	PIP	Total
Number of words	25,717	22,743*	38,724	16,919	
Cost per word \$0.22	\$5,658	\$5,003	\$8,519	\$3,722	\$22,902

*Note: The majority of the TIP includes data tables.

Given the size of the LEP population in the Broward MPO area, less than 15%, and current financial constraints, full-language translations of complete transportation plan documents and maps is not considered warranted or cost feasible at this time. Broward MPO staff will work with individual and/or group requests for translation services as needed. However, the expected continued growth of the Broward MPO’s Spanish speaking population makes offering Spanish translations a sound community investment.

As a result, the Broward MPO intends to continue its efforts to make summaries of key documents available in Spanish. To accommodate the cost, these summaries may be presented in alternative formats, such as facts sheets, flyers or brochures. An example of this is shown on the next page in figure 2; a fact sheet was produced in both English and Spanish explaining the **Transportation Improvement Program (TIP)**. The MPO has similar materials for the UPWP, LRTP and Livability Planning efforts.

Figure 2: TIP Brochure Translated into Spanish

INVIRTIENDO SU \$ EN TRANSPORTE

COMPRENDIENDO EL PROGRAMA DE MEJORA DEL TRANSPORTE
TRANSPORTATION IMPROVEMENT PROGRAM (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).

¿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 (SRPTA), 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 Transito del Condado Broward (BCH), 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.

¿QUÉ ES EL PROGRAMA DE MEJORA DEL TRANSPORTE (TIP)?

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 www.browardMPO.org.

¿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 contribuyentes.

¿CÓMO PUEDE USTED PARTICIPAR EN EL DESARROLLO DEL TIP?

- Los principales métodos para la participación pública son las reuniones mensuales de la CIR, el TCC y la MPO de Broward. Visite <http://www.browardmpos.org/mipo/agenda.html> para la fecha y hora de las reuniones y agendas futuras.
- Visite la página web de Broward MPO a menudo www.browardMPO.org y haga clic en la sección "Transportation Improvement Plan."
- Mande un correo electrónico con sus comentarios y preguntas a ideas@browardmpos.org o llame al 954-876-0047.
- Envíe por fax sus comentarios y preguntas a 954-876-0062.
- Antes de la aprobación del TIP, la MPO patrocina una audiencia pública y un periodo de 30 días para comentarios públicos. Esto suele ocurrir en Mayo-Junio de cada año.

¿SE PUEDE MODIFICAR EL TIP?

Si los cambios son realizados regularmente en el TIP a través de enmiendas. El TIP puede ser modificado para agregar, cambiar o eliminar proyectos. Dichas modificaciones deben ser revisadas y aprobadas por la MPO y el FDOT. La revisión también incluye oportunidades para comentarios del público. Los principales métodos para la participación pública son las reuniones mensuales de la Mesa Redonda de Participación Comunitaria (CIR), el Comité de Coordinación Técnica (TCC) y la MPO de Broward que se congregan en la oficina del MPO. Visite <http://www.browardmpos.org/mipo/agenda.html> para la fecha y hora de las reuniones y agendas futuras.

¿POR QUÉ ES IMPORTANTE EL TIP?

El TIP identifica, tanto para los residentes y los contribuyentes de Broward, como se están utilizando los dólares federales, estatales y locales en proyectos de transporte. El TIP es un vehículo para mover los proyectos sin fondos del LRTP a una lista de prioridades con fondos disponibles que incluye un calendario previsto y el costo de cada proyecto.

Calendario Anual del TIP:

Enero-Abril:

- La MPO cuenta con proyectos del FDOT, agencias de transporte locales y las municipalidades para su inclusión en el TIP.

Mayo-Junio:

- La MPO de Broward lleva a cabo el periodo de revisión y comentarios públicos para el TIP preliminar.

Julio:

- El TIP es aprobado por el Consejo del Broward MPO.

El documento TIP se puede encontrar en la página web del MPO www.browardMPO.org. Haga clic en la sección "Transportation Improvement Program". Si necesita ayuda para ver este documento, por favor mande un correo electrónico a ideas@browardmpos.org o llame al 954-876-0038.

Ende Centre South 100 West Cypress Creek Road, Suite 850 Fort Lauderdale, FL 33309-2707 Phone 954-876-0038

www.browardMPO.org

Para obtener información y asistencia en español, llame al 954-876-0038 o visite www.browardmpos.org. Para obtener información en español, llame al 954-876-0038 o visite www.browardmpos.org.

The Broward MPO will continue efforts to collaborate with state and local agencies to provide language translation and interpretation services when The Broward MPO will continue efforts to collaborate with state and local agencies to provide language practical and in consideration of the funding available. Spanish language outreach materials from organizations such as federal, state, and local transportation agencies will be used when possible.

IV. MEETING THE REQUIREMENTS AND IMPLEMENTATION

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 noncompliance, but rather provides for recipients 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 can also be provided orally.

The “safe harbor” provision applies to the translation of written document 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.

Identifying LEP Individuals Who Need Language Assistance

Broward MPO staff will use language identification cards when first encountering a LEP individual. These cards, developed by the U.S. Census Bureau, have the phrase “Mark this box if you read or speak [name of language]” translated into 38 different languages. It was developed by the Census Bureau and is used by government and non-government agencies to identify the primary language of LEP individuals during face to face contacts. The Census Bureau’s Language Identification Flashcard can be downloaded for free at <http://www.lep.gov/ISpeakCards2004.pdf>. The Language Identification flashcards will be made available at public meetings and the front desk of the Broward MPO offices. Once a language is identified, the Title VI/LEP coordinator or relevant point of contact will be notified to assess feasible translation or oral interpretation assistance.

Language Assistance and Translation of Materials

- Language assistance will be provided for LEP individuals through the translation into Spanish of some key materials, as stated on page 4, upon request or as necessary, as well as through oral interpretation when necessary and possible.
- The Broward MPO also alternates the translation of its quarterly newsletter between Creole and Spanish.
- The Broward MPO is looking to install the Google Translate program <http://translate.google.com> on the website allowing users to view HTML content in other languages. It is understood this is not a perfect system but it should provide enough information for a potential LEP individual or group to make contact with the Broward MPO should they have comments or questions.
- A goal of the Broward MPO is to provide user-friendly materials that will be appealing and easy to understand. Staff often refer to “Broward MPO plain speak” when preparing materials/information for the public.
- A list of Broward MPO staff who speak and or/write a language other than English and who are willing and able to act as interpreters has been identified.
- Currently, the Broward MPO phone recording includes an option to speak to someone in Spanish.

Providing Notice to LEP Persons

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 Christopher Ryan at 954-876-0036 or ryanc@browardmpo.org at least seven days prior to the meeting. If hearing impaired, telephone 1-800-273-7545 (TDD).

Se solícitala 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 Christopher Ryan al teléfono 954-876-0036 o ryanc@browardmpo.org por lo menos siete días antes de la reunión. Si tiene problemas de audición, llamar al teléfono 1-800-273-7545 (TDD).

Staff Training

The Broward MPO has incorporated the LEP Plan into the Public Participation Plan as part of its LRTP update. In order to establish meaningful access to information and services for LEP individuals, the Broward MPO is training its employees to assist in person, and /or by telephone, LEP individuals who request assistance.

LEP Updates

The Broward MPO understands that its community profile is changing and that the four-factor analysis may reveal the need for more LEP services in the future. As such, the Broward MPO will annually examine its LEP plan to ensure that it remains reflective of the community's needs. The Transportation Outreach Planner Tool, as described in the "Factor 2" above, will also be used to validate the community profile of the Broward MPO region.

V. 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 Public Information Officer/Title VI Coordinator:

Name	Christopher Ryan
Phone	954 876 0036 for the hearing impaired TTD 1-800-273-7545
Fax	954 876 0062
Email	ryanc@browardmpo.org

Appendix F

Socio-Economic Data and Maps for Broward County

2008-2012 ACS Census Data

Location	Population, 2012 estimate	White alone, percent, 2012 (a)	Black or African American alone, percent, 2012 (a)	American Indian and Alaska Native alone, percent, 2012 (a)	Asian alone, percent, 2012 (a)	Native Hawaiian and Other Pacific Islander alone, percent, 2012 (a)	Two or More Races, percent, 2012
Florida	19,320,749	78.3%	16.6%	0.5%	2.7%	0.1%	1.9%
Broward County	1,814,813	66.1%	27.9%	0.4%	3.5%	0.1%	2.0%
Coconut Creek	55,001	75.3%	13.7%	0.1%	3.6%	Z	3.0%
Cooper City	32,345	85.1%	4.9%	0.3%	5.5%	Z	2.4%
Coral Springs	125,287	69.2%	17.9%	0.2%	5.1%	0.1%	3.3%
Dania Beach	30,574	69.6%	21.8%	0.3%	2.1%	0.1%	2.6%
Davie	95,489	80.1%	8.0%	0.3%	4.6%	0.1%	3.1%
Deerfield Beach	77,439	65.8%	25.6%	0.2%	1.5%	Z	2.7%
Fort Lauderdale	170,747	62.6%	31.0%	0.3%	1.5%	0.1%	2.1%
Hallandale Beach	38,327	73.7%	18.7%	0.2%	1.4%	Z	2.6%
Hillsboro Beach	na	na	na	na	na	na	na
Hollywood	145,236	72.7%	16.7%	0.4%	2.4%	0.1%	3.2%
Lauderdale-by-the-Sea	6,258	96.3%	1.2%	0.1%	0.8%	0.0%	0.9%
Lauderdale Lakes	33,772	14.2%	80.6%	0.2%	1.2%	Z	2.5%
Lauderhill	69,100	18.2%	75.9%	0.3%	1.6%	Z	2.5%
Lazy Lake	na	na	na	na	na	na	na
Lighthouse Point	10,714	94.0%	1.7%	0.3%	1.6%	Z	1.6%
Margate	55,026	62.0%	25.8%	0.4%	4.0%	0.1%	3.3%
Miramar	128,729	41.0%	45.7%	0.2%	5.2%	Z	3.7%
North Lauderdale	42,413	33.1%	53.4%	0.3%	2.9%	0.1%	3.8%
Oakland Park	42,832	62.6%	25.6%	0.3%	2.0%	0.1%	3.5%
Parkland	25,701	84.0%	6.5%	0.1%	5.9%	Z	1.9%
Pembroke Park	6,239	37.6%	55.3%	0.3%	1.3%	Z	3.1%
Pembroke Pines	160,306	67.3%	19.8%	0.3%	4.9%	Z	3.3%
Plantation	88,016	69.9%	20.3%	0.2%	3.9%	0.1%	2.9%
Pompano Beach	102,984	62.6%	28.9%	0.3%	1.3%	Z	2.4%
Sea Ranch Lakes	na	na	na	na	na	na	na
Southwest Ranches	7,601	85.9%	5.4%	0.6%	2.8%	Z	2.9%
Sunrise	88,843	58.4%	31.8%	0.3%	4.1%	0.1%	3.3%
Tamarac	62,557	67.2%	23.1%	0.2%	2.5%	Z	2.8%
Weston	67,641	85.8%	4.4%	0.1%	4.6%	Z	2.4%
West Park	14,609	32.6%	57.9%	0.4%	1.0%	Z	3.3%
Wilton Manors	11,995	80.8%	12.4%	0.3%	2.2%	Z	1.9%

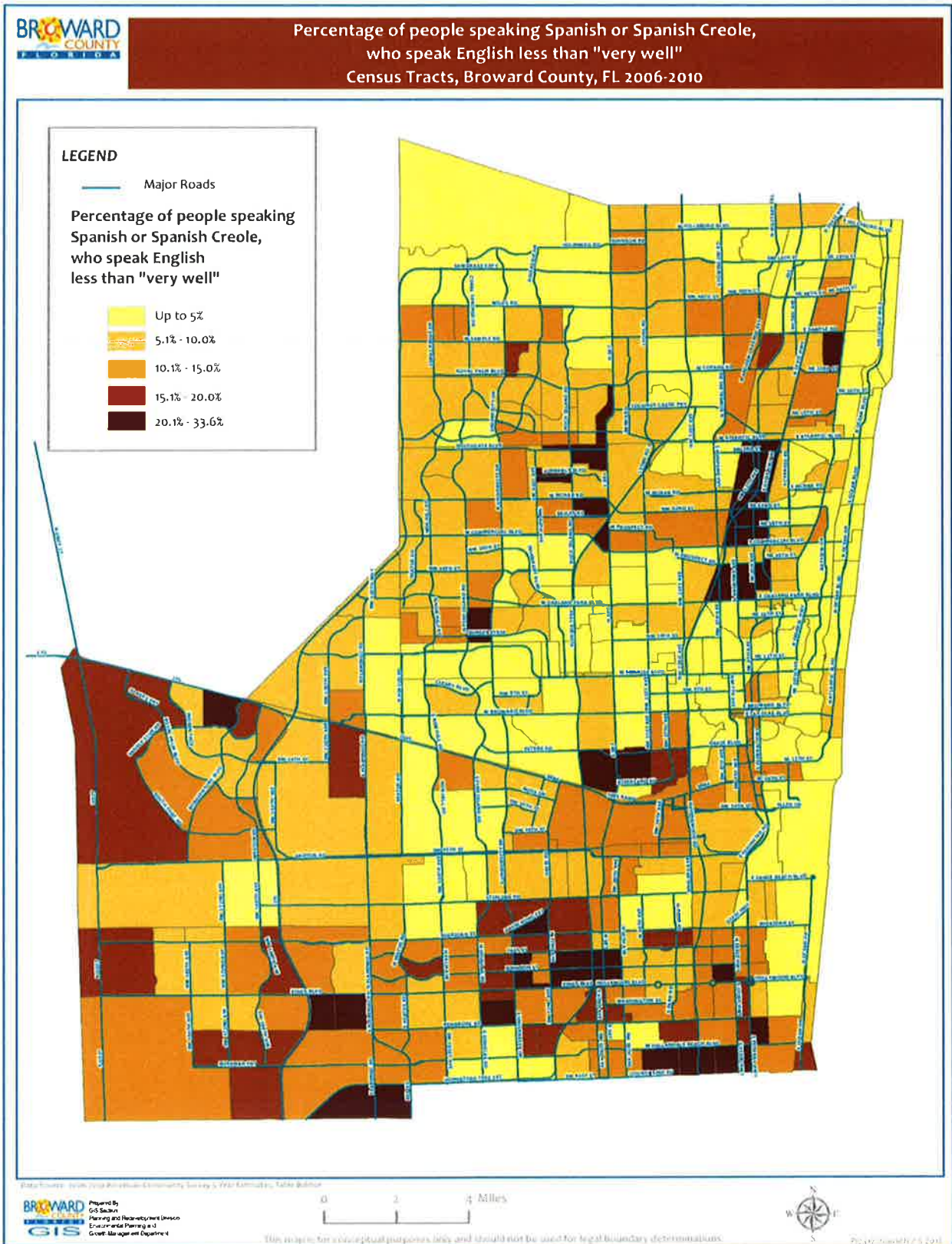
Census Data-Ethnicity, Raw Census Data

6/1/2014

Broward MPO

2008-2012 ACS Census Data

Location	Population, 2012 estimate	Persons 65 years and over, percent, 2012	Language other than English spoken at home, pct age 5+, 2008-	Median household income, 2008- 2012	Persons below poverty level, percent, 2008-
Florida	19,320,749	18.2%	27.3%	\$47,309	15.60%
Broward County	1,814,813	14.7%	37.5%	\$51,603	13.50%
Coconut Creek	55,001	18.4%	34.2%	\$52,371	8.8%
Cooper City	32,345	8.8%	28.8%	\$88,465	5.0%
Coral Springs	125,287	7.9%	33.7%	\$68,255	9.0%
Dania Beach	30,574	14.8%	33.2%	\$42,949	19.4%
Davis	95,489	10.6%	35.0%	\$59,362	11.4%
Deerfield Beach	77,439	21.5%	40.7%	\$39,100	17.7%
Fort Lauderdale	170,747	15.3%	28.0%	\$50,191	19.5%
Hallandale Beach	38,327	25.1%	51.7%	\$35,713	19.7%
Hillsboro Beach	na	na	na	na	na
Hollywood	145,236	15.1%	43.1%	\$45,942	14.5%
Lauderdale-by-the-Sea	6,258	39.8%	21.6%	\$54,425	11.2%
Lauderdale Lakes	33,772	15.6%	31.2%	\$35,667	21.9%
Lauderhill	69,100	12.9%	24.7%	\$37,149	22.6%
Lazy Lake	na	na	na	na	na
Lighthouse Point	10,714	22.1%	15.0%	\$73,625	7.9%
Margate	55,026	19.1%	35.9%	\$43,565	13.9%
Miramar	128,729	6.9%	51.2%	\$63,898	9.1%
North Lauderdale	42,413	6.5%	46.4%	\$41,784	21.8%
Oakland Park	42,832	9.7%	40.4%	\$44,686	15.8%
Parkland	25,701	7.7%	25.7%	\$119,732	8.5%
Pembroke Park	6,239	16.8%	33.8%	\$31,044	22.4%
Pembroke Pines	160,306	14.8%	49.1%	\$62,133	7.6%
Plantation	88,016	13.5%	27.7%	\$66,396	8.7%
Pompano Beach	102,984	18.9%	35.9%	\$39,656	21.2%
Sea Ranch Lakes	na	na	na	na	na
Southwest Ranches	7,601	11.6%	32.4%	\$105,230	4.7%
Sunrise	88,843	15.2%	37.4%	\$49,120	11.6%
Tamarac	62,557	27.9%	33.8%	\$41,972	11.7%
Weston	67,841	8.0%	51.9%	\$63,886	5.9%
West Park	14,609	10.3%	34.0%	\$42,847	15.0%
Wilton Manors	11,995	15.1%	22.8%	\$50,881	11.6%



Appendix G

Subgrantee Reporting

Subgrantee Reporting

All subrecipients are required to submit annual benchmark progress reports to the Broward MPO Title VI Coordinator if they are a subgrantee. Subgrantees will be made aware of this prior to funds being disbursed. These reports are due annually Sept. 1st and include information on project service delivery measures and Title VI Program compliance documentation. The Broward MPO Title VI Coordinator will review all subrecipient Title VI submittals for completeness and compliance with federal requirements. Specific submittal requirements are as noted below and as outlined in FTA Circular C4702.1B appendices.

- All subrecipients, except those who also are direct recipients of other FTA funds, must fulfill general Title VI program requirements and submit documentation to the Broward MPO of the following: Title VI Notice to the Public, including a list of locations for notice posting;
- Title VI complaint procedures;
- Title VI complaint form;
- List of transit-related Title VI investigations, complaints and lawsuits;
- Public Participation Plan including information about outreach methods used to engage minority and limited English populations;
- Language Assistance Plan;
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient broken down by race, and a description of the process the agency uses to encourage participation of minorities on such committees;
- A Title VI equity analysis if recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center etc.
- A copy of board meeting minutes, resolution or other appropriate documentation showing the board of directors or appropriate governing entity/official(s) responsible for policy decisions reviewed and approved the Title VI Program;

Subrecipients who are fixed route transit providers, in addition to documentation listed above, must also submit the following documentation:

- Service Standards
 - a. Vehicle Load for each mode;
 - b. Vehicle headway for each mode;
 - c. On time performance for each mode;
 - d. Service availability for each mode.
- Service Policies
 - a. Transit Amenities for each mode;
 - b. Vehicle Assignment for each mode.

Subrecipient transit providers operating 50 or more fixed route vehicles in peak service and located in the Broward MPO need to provide:

- Demographic and service profile maps and charts of the service area;
- Demographic ridership and travel patterns , collected by surveys;
- Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis;
- A description of the public engagement process for setting the “major service change policy”, disparate impact policy and disproportionate burden policy;
- Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.
- Broward MPO reserves the right to conduct field visits during the program year and check and verify compliance with the requirements stated above. Inspection reviews will include documentation of federal Title VI compliance requirements using the above checklists from FTA Circular. Broward MPO staff or a consulting contractor to be procured to assist with administrative oversight will review programs of the subrecipient agencies on an annual basis and schedule selected agencies each year for compliance monitoring and on-site visits.