



# Transportation for All

Title VI Program: Nondiscrimination and Language Plan

Prepared for MetroPlan Orlando by Kittelson & Associates, Inc.



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# **KEY TERMS**

**Interpretation** —The act of listening to spoken words in one language and verbally expressing it in another language.

**Limited English Proficiency (LEP)** — People who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. These people may be entitled to language assistance.

**Recipient of Federal Financial Assistance** — Agencies or organizations that are awarded funds for grants, training, equipment use, or surplus property donations. Includes subrecipients if federal funds are passed from the initial recipient to another agency or organization.

**Title VI** – Part of the 1964 Civil Rights Act, which prohibits discrimination in programs and activities that receive federal financial assistance.

**Translation** – The process of expressing words or text from one language into another, generally in written form.

**Transportation Equity** —Transportation that is available, accessible, and affordable for everyone, no matter their background, geographic location, or ability.

**Transportation Underserved Communities** – Places where people are likely to face challenges in accessing transportation, often because they face limited options, poor connections, unsafe conditions, and physical barriers.

**Vital Communication**—Any document containing information critical to benefits that are supported by Federal funds or required by law. Vital documents include, for example: consent and complaint forms; and notices advising LEP people of the availability of free language assistance. For many larger documents, translation of vital information contained within the document suffices.



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# We Are Committed to Nondiscrimination

MetroPlan Orlando welcomes public participation within our transportation planning processes regardless of a person's race, color, national origin, gender, age, religion, family status, or ability.

As the metropolitan planning organization (MPO) for Orange, Osceola, and Seminole counties, MetroPlan Orlando plays an important role in creating a regional transportation system that provides safe and equitable travel for everyone. We promote equity and fairness in our transportation planning work because it is required by law and, more importantly, because it is the right thing to do.

MetroPlan Orlando actively supports and follows nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 and other federal and state authorities. Title VI prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. (For a full list of statutes that MetroPlan Orlando must follow, see <a href="Appendix A: Federal and State Statutes">Appendix A: Federal and State Statutes and Codes</a>.)

In addition to demonstrating our compliance with Title VI, this document details how we will serve our communities without discrimination and outlines the ways in which we'll include traditionally underserved or underrepresented communities and people without strong English language skills in our planning processes.

### A TRANSPORTATION SYSTEM THAT SERVES EVERYONE

This plan is a key part of MetroPlan Orlando's effort to identify barriers and ensure Central Florida's transportation system serves everyone. We envision an equitable transportation system for Orange, Osceola, and Seminole counties that provides:

- Access to safe and reliable transportation.
- Access to employment, education, healthcare, and other essential services.
- Affordable transportation options.
- Infrastructure and services that are designed to be accessible for people with disabilities.
- Reduced air and noise pollution and lower greenhouse gas emissions.

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- Language resources and assistance.
- More access and mobility options for transportation-underserved communities.
- Social inclusion.

This Title VI Program: Nondiscrimination & Language Plan is an important step toward achieving this vision of a safe, equitable, healthy, and connected transportation system by ensuring nondiscrimination.



The chapters that follow outline our commitment to serve the public without discrimination. They cover:

- How our transportation planning process will comply with Federal and State nondiscrimination requirements.
- **Community data** that helps us analyze, mitigate, minimize, or avoid disproportionate and adverse impacts on traditionally underserved communities.
- A self-assessment of **how we engage speakers of other languages** as well as an assessment of our vital programs or services.
- A language assistance plan that identifies the region's language needs and lists what
  resources are available to provide meaningful access to our programs, services, and
  activities.
- Our processing procedure for discrimination complaints.

### YOUR CIVIL RIGHTS

Civil rights laws and regulations protect individuals from unfair treatment or discrimination.

If you believe you have experienced discrimination based on race, color, national origin, age, sex, religion, disability, or family status, **you have the right to file a written or verbal complaint** with MetroPlan Orlando.

### SUS DERECHOS CIVILES

Las leyes y regulaciones de derechos civiles protegen a las personas de recibir un trato injusto o discriminación.

Si cree que ha sufrido discriminación por motivos de raza, color, nacionalidad, edad, sexo, religión, discapacidad o estado familiar, tiene derecho a presentar una queja por escrito o verbal con MetroPlan Orlando.

### SUPPORTING FEDERAL EQUITY EFFORTS

Our Title VI program aligns with U.S. Department of Transportation (USDOT) efforts to institutionalize and advance equity across its policies and programs. USDOT efforts — and our efforts — aim to reduce inequities across our nation's transportation systems and in the communities they affect. Some key pieces of their program include:

- Equity Action Plan This document outlines how USDOT will expand access and opportunity
  for all communities, but especially for those that are underserved, overburdened, or
  disadvantaged. The plan has five focus areas: wealth creation; power of community;
  proactive intervention, planning, and capacity building; expanding access; and
  institutionalizing equity.
- <u>Justice40</u> This initiative aims to address historical lack of investment in underserved and disadvantaged communities. Justice40's goal is to see that at least 40% of many USDOT grants, benefits, and initiatives flow to underinvested communities and help bring resources to those most impacted by environmental change, pollution, and hazards.



#### TITLE VI ASSURANCES

MetroPlan Orlando's Title VI Nondiscrimination Assurances are signed by our executive director and are included in Appendix B of our Unified Planning Work Program (UPWP). The document is also available on our website. These assurances are our formal promises that we:

- Will not discriminate based on race, color, national origin, sex, age, disability, family or religious status in programs or activities funded by Federal dollars.
- Will take steps to ensure that everyone is treated fairly and equitably.
- Will provide equal access to services, facilities, and accommodations to all individuals.
- Will hear and take steps to address discrimination complaints.

#### WHO WE ARE



MetroPlan Orlando is a regional transportation partnership that covers Orange, Osceola, and Seminole counties. As an MPO, MetroPlan Orlando facilitates collaboration between local elected officials, transportation experts, and community members, providing a forum for them to work together to improve mobility for residents, visitors, and businesses.

We work hard to make transportation equitable in our three-county region. We believe that everyone — regardless of their economic situation, their physical abilities, or the language they speak — deserves to have easy and affordable access to transportation.

Get to know our staff and our values better by visiting the MetroPlan Orlando website.

## **OUR TITLE VI OFFICER**

Mary Ann Horne, our community outreach strategist, is responsible for supervising and implementing our Title VI Program.

Mary Ann can be reached at 407-481-5672 extension 305 or at <a href="mailto:info@MetroplanOrlando.gov">info@MetroplanOrlando.gov</a>. People with hearing disabilities can call 711 for toll-free calling with Florida Relay.



# We Represent Diverse Communities

Our region is growing and changing rapidly. We have a diverse and rapidly increasing population. Our <u>median age</u> and <u>poverty rates</u> are relatively low and close to the Florida average. The population in the three-county region has changed quite a bit since 2010. From 2010 to 2022:

- Our Hispanic population has increased by 11 percent.
- Our population of adults older than 65 has grown by more than 2 percent.
- Our total population has grown by more than 13 percent that's 313,928 new people who call our region home.

This is an exciting time for the three-county region. We are proud to be a diverse and desirable place to live. However, as populations change, so do equity needs.

For example, when areas that lag in infrastructure investment become home to more people, that community may need additional investment to catch up. Because of a long history of disinvestment in communities of color and neighborhoods with low incomes in the United States, people of color are more likely to rely on transit to get around. People with low incomes are more likely to lack reliable access to a vehicle and to have a greater need for safe walking and bicycling facilities to get where they need to go. Understanding who makes up our region helps us better plan projects in communities with the greatest need.





### **REGIONAL DEMOGRAPHICS**

The statistics presented as bullet points below as well as in Figure 1 and Table 1 below offer a county-by-county snapshot and regional view of Central Florida demographics and underserved populations.

#### **REGIONAL AREA**

- Higher rate of population that speaks English less than very well versus the national average 14 percent (three-county) to 8 percent (USA).
- Overall youth population for the region at 21 percent compared to the national average at 17 percent.
- Lower rates of 65+ population at 14 percent versus the national average at 17 percent.
- Similar rates of disability to the national average, 13 percent, with the region at 12 percent.

#### **ORANGE COUNTY**

- Largest population (1,400,000+).
- Most racially diverse (no race or ethnic group over 40 percent).
- Highest share of zero-vehicle households (7 percent).

### **OSCEOLA COUNTY**

- Smallest population (420,000+).
- Highest share of Hispanic population (57 percent).
- Highest percentage of residents with limited English language skills (22 percent).
- Lowest number of zero-vehicle households (6,612).

#### SEMINOLE COUNTY

- Second most population (478,000+).
- Highest share of White non-Hispanic population (55 percent).
- Highest share of residents 65 and older (17 percent).
- Lowest poverty rate (12 percent).





Figure 1. 2022 Regional Demographics

#### **REGION POPULATION** 2,354,043 **ORANGE OSCEOLA SEMINOLE** 1,452,726 422,545 478,772 **RACE** 4% 1% 16% 38% **REGION** 29% 36% SEMINOLE **ORANGE OSCEOLA** White Hispanic Black Asian Two or More Races Other **LANGUAGE AGE** English spoken "less than very well" (age 5+) UNDER **OVER** 8% 14% 14% 22% REGION **ORANGE OSCEOLA SEMINOLE** REGION 504,629 (21%) 328,193 (14%) 133,237 (6%) 320,952 198,091 86,305 36,556 ORANGE 306,365 (21%) 191,792 (13%) 76,848 (5%) OSCEOLA 100,418 (24%) 56,530 (13%) 22,855 (5%) **SEMINOLE** 97,846 (20%) 79,871 (17%) 33,534 (7%) **ECONOMY** DISABILITY Households below poverty level Persons with a disability (non-institutionalized population) 12% 13% 13% 13% 12% 11% REGION **ORANGE OSCEOLA SEMINOLE** 113,666 REGION **ORANGE** 280,169 Households with no vehicle 4% 13% 13% REGION **ORANGE OSCEOLA** SEMINOLE **OSCEOLA SEMINOLE**

Source: 2022 US Census American Community Survey (ACS)

Title VI Program: Nondiscrimination & Language Plan

Final

Table 1. Community Characteristics

	Orange Co		Osceola Co		Seminole Co		Region Total	
	#	%	#	%	#	%	#	%
Total population	1,452,726	100%	422,545	100%	478,772	100%	2,354,043	100%
Households	545,757	100%	151,618	100%	189,482	100%	886,857	100%
RACE/ETHNICITY								
White*	524,649	36%	113,438	27%	264,099	55%	902,186	38%
Black*	276,598	19%	42,096	10%	51,784	11%	370,478	16%
Hispanic/Latino**	484,612	33%	239,907	57%	114,005	24%	838,524	36%
American Indian/ Alaskan Native*	1,027	0%	128	0%	618	0%	1,773	0%
Asian*	79,204	6%	10,465	3%	26,399	6%	116,068	5%
Native Hawaiian/ Pacific Islander*	669	0%	0	0%	31	0%	700	0%
Some other race*	15,871	1%	2,542	1%	1,799	0%	20,212	1%
2 or more races*	70,096	5%	13,969	3%	20,037	4%	104,102	4%
LANGUAGE								
English spoken "less than very well" (age 5+)	198,091	14%	86,305	22%	36,556	8%	320,952	14%
AGE								
Persons <18 years	306,365	21%	100,418	24%	97,846	20%	504,629	21%
Persons 65 years or older	191,792	13%	56,530	13%	79,871	17%	328,193	14%
Persons 75 years or older	76,848	5%	22,855	5%	33,534	7%	133,237	6%
ECONOMIC								
Households below poverty level	71,498	13%	20,094	13%	22,074	12%	113,666	13%
Households with no vehicle	35,322	7%	6,612	4%	8,258	4%	50,192	6%
DISABILITY								
Persons with a disability not living in an institution	160,442	11%	56,134	13%	63,593	13%	280,169	12%

<sup>\*</sup> Not Hispanic | \*\*Includes Hispanics of any race

Source: 2022 US Census American Community Survey (ACS)

#### TRANSPORTATION UNDERSERVED COMMUNITIES

Transportation Underserved Communities (TUCs) are places where people are likely to face challenges to safe, reliable, convenient, and affordable transportation. These communities often have limited options, poor connectivity to essential services, higher-than-average rates of traffic crashes, and economic and physical barriers to all modes of transportation. As a result, residents in TUCs experience greater difficulties reaching employment, healthcare, education, and other critical services.

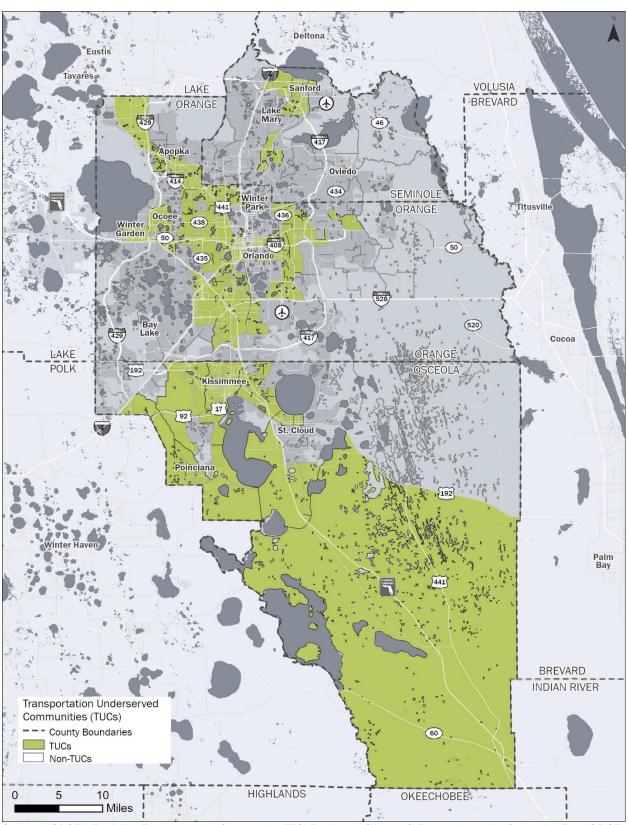
Many communities in the three-county region qualify as TUCs (see Figure 2). To qualify as a TUC, a community must be in disadvantaged areas identified by USDOT's <a href="Equitable Transportation">Equitable Transportation</a>
<a href="Community (ETC">Community (ETC)</a> <a href="Explorer">Explorer</a> and <a href="Explorer">its Climate and Economic Justice Screening Tool (CEJST)</a>. These tools offer data on metrics such as transportation insecurity, climate change and disaster risk, health, housing, wastewater, work opportunities, and pollution. (For more on how MetroPlan Orlando uses these two tools, see <a href="Equity Analysis Tools">Equity Analysis Tools</a> in this document.)

MetroPlan Orlando analyzes five goal areas identified by the 2050 Metropolitan Transportation Plan (MTP) for TUCs:

- Safety—Measures crash severity.
- Reliability—Looks at travel time and corridor speeds.
- **Connectivity**—Measures how close homes are to essential services, transit, and multimodal facilities.
- Community—Determines access to healthcare facilities and rates of chronic disease.
- **Prosperity**—Studies affordability, based on housing and transportation, and measures freight impact, which creates pollution and congestion within the region.



Figure 2. Transportation Underserved Communities



Source: USDOT's Equitable Transportation Community (ETC) Explorer + Climate & Economic Justice Screening Tool (CEJST)

# **We Listen to Community Members**

Inclusive public involvement is essential to the transportation planning process. Community collaboration improves decision-making, strengthens local partnerships, and creates space for traditionally underserved populations to meaningfully engage with transportation professionals. Hearing the different perspectives in our diverse, three-county region helps us develop safe, equitable transportation for everyone.

#### **OUR PUBLIC PARTICIPATION PLAN**

At MetroPlan Orlando, we are committed to accessible and equitable public participation. To fulfill that commitment, we have created a variety of ways for you to get involved in transportation planning. Our <u>Public Participation Plan</u> outlines how we will conduct public involvement. The plan is proactive and includes objectives, strategies, and measurement tools that we can use to shape and evaluate how we engage with the public.

The Public Participation Plan has two main goals:

- 1. Encourage two-way communication with the community by informing members of the public about relevant transportation issues and ensuring they have a voice in the transportation planning process.
- 2. Consistently reach out to and get input across the region from members of the public who are not easily engaged due to such things as transportation barriers, age, ability, language, and lack of financial resources or access to technology.

Our inclusive planning process — detailed in this Title VI Program Nondiscrimination and Language Plan — supports these goals.

### MAKING ALL COMMUNICATION ACCESSIBLE

MetroPlan Orlando meetings and events are open to the public and posted to our <u>online calendar</u>. We welcome community members with disabilities to these events. The following information on how to request a reasonable accommodation is included on both electronic and printed event listings:



Public participation is conducted without regard to race, color, national origin, sex, age, disability, religion, or family status. Persons wishing to express concerns, who require special assistance under the Americans with Disabilities Act, or who require language services (free of charge) should contact MetroPlan Orlando by phone or email at least three days prior to the event: (407) 481-5672 or Info@MetroPlanOrlando.gov.

La participación pública se lleva a cabo sin distinción de raza, color, origen nacional, sexo, edad, discapacidad, religión o estado familiar. Las personas que deseen expresar inquietudes, que requieran asistencia especial bajo la Ley de Americanos con Discapacidad (ADA) o que requieran servicios de traducción (sin cargo) deben ponerse en contacto con MetroPlan Orlando por teléfono o por correo electrónico por lo menos tres días antes del evento: (407) 481-5672 o Info@MetroPlanOrlando.gov.

# We Promote Transparency

#### SHARING TITLE VI INFORMATION

MetroPlan Orlando's Title VI information and complaint forms are posted online in English and Español on our <u>Nondiscrimination and Language Plan webpage</u> and in print in our office and at public meetings. Other related plans, such as the Public Participation Plan, link to our Title VI commitment.

# We Are Always Learning

### TRAINING AND COMMUNICATION

This Title VI Program Nondiscrimination and Language Plan is designed to grow with our three-county region. MetroPlan Orlando staff will review this plan each year, and the whole plan will be updated every five years to:

- Ensure compliance with Federal and State law.
- Update demographic statistics to accurately track Central Florida's population.
- Confirm the MetroPlan Orlando board's commitment to nondiscrimination.
- Assess the plan's effectiveness in addressing Title VI nondiscrimination objectives.

Our staff members also receive periodic training to help them grow their awareness of and sensitivity to the needs of underserved communities. This training also helps our staff stay on top of changing community trends and equity best practices.

#### **EQUITY ANALYSIS TOOLS**

To better serve our communities, we rely on several key sources to stay abreast of shifts in demographics:

- <u>Climate and Economic Justice Screen Tool (CEJST)</u>—This tool from USDOT maps communities in the United States by eight categories of burden: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development.
- Equitable Transportation Community (ETC) Explorer—Another USDOT tool, this explorer uses 2020 Census Tracts and data to quantify the challenges that transportation-disadvantaged communities face. The ETC Explorer examines five categories of burden: transportation insecurity, climate and disaster risk burden, environmental burden, health vulnerability, and social vulnerability.

Together, these data sources help MetroPlan Orlando identify and serve transportation-disadvantaged communities through our planning processes.





# We Provide Meaningful Access in Other Languages

En MetroPlan Orlando, sabemos que no todos hablan Inglés.

At MetroPlan Orlando, we know that not everyone speaks English. To make sure people whose primary language is not English (or who cannot read or understand English) have access to MetroPlan Orlando planning processes and planning information, we provide alternative language services.

Our language services must balance providing meaningful access to programs with responsible management of our available resources. For example, it would be cost prohibitive to translate all of our primary plans and products (many of which are hundreds of pages long) into all possible languages. Instead, to make the best use of MetroPlan Orlando resources, we provide alternative language services on an as-needed basis.

People who do not speak English or who have low English language skills are often referred to as having low English proficiency, abbreviated as LEP.

### UNDERSTANDING LANGUAGE NEEDS

To determine how and when to provide alternative language services, we consider four factors:

- 1. Demographics.
- 2. Contact frequency.
- 3. Program importance.
- 4. Resources.

### **FACTOR 1: DEMOGRAPHICS**

We first begin by using American Community Survey data, among other sources, to take stock of the number of people with Limited English Proficiency (LEP) in the MetroPlan Orlando service area. We pay particular attention to how many people reported speaking English "less than very well" and what other languages those people speak. **Table 2** and **Table 3** present the 2022 data for these groups.

Table 2. People Speaking English "Less Than Very Well" Age 5+

Orange County	Osceola County	Seminole County	Three-County Total
14.4%	21.7%	8.0%	14.4%
198,091 persons	86,305 persons	36,556 persons	320,952 persons

Source: 2022 US Census American Community Survey (ACS)

Central Florida also has a significant number of limited English-speaking households, defined by the Census Bureau as one in which no members older than 14 speak English very well. Of those households, most are Spanish speaking. The second-ranked category is Other Indo-European Languages, a compilation of many languages from Europe and the South Asia, including Portuguese, the language spoken by many in the growing Brazilian community in Central Florida. The third category is French, which includes Haitian Creole, spoken by many of the people who have immigrated from the island of Haiti.

Table 3. Top Languages Spoken by Limited English Proficiency (LEP) Households

Language Spoken	Households Speaking English Less Than Very Well	Percent of LEP Household Population	Percent of MetroPlan Orlando Region's Households
Spanish	47,787	78.35%	6.01%
Other Indo-European Languages	3,682	6.04%	0.46%
French, Haitian, or Cajun	3,103	5.09%	0.39%
Chinese (incl. Mandarin, Cantonese)	1,516	2.49%	0.19%
Vietnamese	1,482	2.43%	0.19%

Source: 2022 US Census American Community Survey (ACS), Census Table ID: B16002

More than 75 percent of residents in our region who have low English language skills speak Spanish as their primary language. To make sure these valued community members have access to the MetroPlan Orlando planning process, we provide key documents about transportation planning and public input mechanisms such as surveys and complaint forms in Spanish as well as English. Our website uses a Google Translate feature that automatically converts our website content into the language a user selects from a dropdown menu.

#### **FACTOR 2: CONTACT FREQUENCY**

MetroPlan Orlando staff are most likely to meet people with LEP at community outreach events. But it can be difficult to predict who from the community will attend an event. Thus, to support the various needs of community members, we provide a variety of language services to help people participate and learn from our different contact methods (see Table 4). The MetroPlan Orlando Public Participation Plan places a special emphasis on outreach opportunities that engage traditionally underserved populations.

Table 4. Contact Initiated or Administered by MetroPlan Orlando

Contact Opportunity	Occurrence	Available Language Resources
Board Meeting	8-12 meetings per year	Bilingual staff; special assistance and LEP-specific notices on all agendas; case-by-case response; "I Speak" cards at the front desk; free interpretation or alternative language service (must be requested at least three business days before the meeting)

Contact Opportunity	Occurrence	Available Language Resources
Committee Meetings	Nearly monthly	Bilingual staff; LEP-specific notice on all agendas; case-by- case response; "I Speak" cards at front desk; free interpretation or alternative language service (must be requested at least three business days before the meeting)
Speakers Bureau	Nearly monthly	Bilingual staff; "I Speak" cards at front desk; free interpretation or alternative language service (must be requested at least three business days before the meeting)
Community Events	Variable	Bilingual staff; "I Speak" cards at front desk; free interpretation or alternative language service (must be requested at least three business days before the meeting)
Website	Constant	Google Translate feature; Spanish language brochures and Title VI nondiscrimination complaint form
Public Meetings	Variable	Bilingual MetroPlan Orlando and partner agency staff; Spanish language brochures; Spanish language comment forms; free alternative language service (must be requested at least three business days before the meeting)

#### FACTOR 3: PROGRAM IMPORTANCE

MPOs are responsible for distributing federal funds to transportation projects within their jurisdictions. The planning process for these projects is guided by federal and state law, which includes public involvement requirements to ensure project teams conduct diverse public outreach, give sufficient notice, and provide enough opportunities for input.

The planning process does not include direct services or programs for vital, immediate, or emergency assistance (such as medical treatments) or basic needs (such as food or shelter). MetroPlan Orlando does not require documents, such as completed applications, for participation in our programs.

MetroPlan Orlando's work has a tremendous impact on Central Florida's transportation system. Our primary plans — such as the 2050 Metropolitan Transportation Plan, and others — play an especially large role in shaping the region's future transportation network and expanding opportunity for underserved or disadvantaged communities. As a result, we place a special emphasis on language assistance for educational materials and public input tools that are part of our primary planning work. Language assistance for service notification, the translation of public input forms and surveys related to formal public meetings, and the maintenance of our website's Spanish language materials also have high priority. Other activities — such as community events, optional meetings, and specialized speaker's bureau programs — may have lower priority when MetroPlan Orlando resources are limited.

#### **FACTOR 4: RESOURCES**

For people with limited English proficiency, MetroPlan Orlando offers the following alternative language resources for free or at minimal cost:

- In-house bilingual staff (typically English and Spanish speakers).
- Multilingual staff from partner organizations and consultants.
- American Sign Language interpretation firms.
- Google translate for the MetroPlan Orlando website.

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- "I Speak" language cards.
- Google Translate mobile app. (In the app, users point their mobile device camera at material
  written in English and can see an instant translation on the screen. Although the translation
  is imperfect, this app can help meet immediate translation needs at outreach events and
  public meetings.)

Table 5. Cost Estimates for Translation and Interpretation Services

Service	Estimated Cost
Translation	\$0.12-\$0.30 per word
Interpretation	\$50-\$145 per hour

### **OUR LANGUAGE SERVICES**

MetroPlan Orlando provides numerous alternate language services so that people with LEP can understand vital communications and so that they can have a voice in the transportation planning process. Vital communications are documents that contain information critical to the benefits that come from federal funds or that are otherwise required by law. Examples include complaint forms, notices, and other important documents.

We offer the following language services:

- Multilingual outreach materials—MetroPlan Orlando's organizational brochure is also presented in Spanish. This brochure describes our mission, our board and committee organization, our primary plans, and how to get involved in the planning process. Our Transportation Disadvantaged brochure explains in Spanish ACCESS LYNX, how to ride, and how to report concerns about the service. The 2050 Plan brochure, used for outreach on the Metropolitan Transportation Plan, is available in Spanish and Haitian Creole. We also use bilingual interactive boards at community events if many people with LEP are expected to attend. For events, studies, and other materials, we evaluate LEP needs on a project-by-project basis.
- Partner materials in other languages—We keep copies of non-English materials from partner organizations, such as ACCESS LYNX applications (in Spanish), the Best Foot Forward pedestrian safety laws handout (in Spanish and Haitian Creole), the U.S. Department of Justice's Right to Work poster (in Spanish and posted on MetroPlan Orlando jobs webpage), and the U.S. Department of Homeland Security's E-Verify poster (in Spanish and posted on the MetroPlan Orlando jobs webpage).
- Phone access through the Florida Relay Service— The Florida Relay Service (711) connects people who are deaf, hard of hearing, or speech disabled and who use text telephones (TTYs) with people who use voice telephones. Specially trained operators facilitate communication between the two callers. 711 also offers English-to-Spanish and Spanish-to-English translation 24 hours a day, 7 days a week, and 365 days a year.
- Surveys, comment cards, forms in other languages—Surveys are available as needed in Spanish and Haitian Creole. We also offer public meeting comment cards and nondiscrimination complaint forms in Spanish and use "I Speak" cards to identify additional language needs.

- Google Translate for web—The Google Translate function on the MetroPlan Orlando website can translate webpage content into more than 100 languages.
- Language services notice—Public meeting agendas will publicize the availability of Spanish interpreter services, free of charge, prior to board and committee meetings, workshops, and public hearings. Also, notification for ADA or language assistance for any language may be made 3 business days in advance to ensure equitable participation.

#### **COMMUNITY PARTNERS**

Our local funding partners also provide key language assistance services. To help provide meaningful access to people with LEP, MetroPlan Orlando will seek assistance from local funding and community partners for notification and access to translation and interpretation resources that already exist.

#### LANGUAGE ASSISTANCE NOTIFICATION

MetroPlan Orlando will publicize the availability of free interpreter services before board and committee meetings, workshops, and public hearings. We'll post notices on the MetroPlan Orlando website, in meeting notices, and on each agenda. Depending on the nature of the meeting or event and how much language assistance we expect to provide, we'll also send out additional notice via:

- Signage.
- Public outreach materials.
- Partner outreach materials.
- Community-based organizations.

We use the following standard notification for language assistance:

Public participation is conducted without regard to race, color, national origin, sex, age, disability, religion, or family status. Persons wishing to express concerns, who require special assistance under the Americans with Disabilities Act, or who require language services (free of charge) should contact MetroPlan Orlando by phone at (407) 481-5672 or by email at <a href="mailto:info@metroplanorlando.gov">info@metroplanorlando.gov</a> at least three business days prior to the event.

La participación pública se lleva a cabo sin distinción de raza, color, origen nacional, sexo, edad, discapacidad, religión o estado familiar. Las personas que deseen expresar inquietudes, que requieran asistencia especial bajo la Ley de Americanos con Discapacidad (ADA) o que requieran servicios de traducción (sin cargo) deben ponerse en contacto con MetroPlan Orlando por teléfono (407) 481-5672 (marcar 0) o por correo electrónico info@metroplanorlando.gov por lo menos tres días antes del evento.

# We Encourage Feedback

At MetroPlan Orlando, we welcome and encourage community members to provide feedback.



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#### HOW TO FILE A DISCRIMINATION COMPLAINT

If you believe that you or a specific class of people have experienced discrimination — as defined by Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities — you may file a verbal or written complaint with MetroPlan Orlando.

The MetroPlan Orlando <u>Title VI Discrimination Complaint Form</u> is available in English and Spanish on the MetroPlan website and by request. A copy is also available in Appendix C: Complaint Forms . This form, whether completed by the person filing the complaint or by a MetroPlan Orlando staff member recording a verbal complaint, serves both as standard written notification transmitted to the FDOT District Five Title VI Coordinator and as documentation filed in the official MetroPlan Orlando log of Title VI complaints.

To report your complaint verbally, call MetroPlan Orlando's Title VI Coordinator at 407-481-5672 extension 305. To file a written complaint, fill out the MetroPlan Orlando Title VI Discrimination Complaint Form located in Appendix C: Complaint Forms . Email it to <a href="mailto:info@MetroPlanOrlando.gov">info@MetroPlanOrlando.gov</a> or mail it to:

MetroPlan Orlando ATTN: Title VI Complaint 250 S Orange Avenue, Suite 200 Orlando, FL 32801

Cómo Presentar una Queja por Discriminación

Si desea informar su queja verbalmente, llame al Coordinador del Título VI de MetroPlan Orlando al 407-481-5672 extensión 305. Para presentar una queja por escrito, complete el formulario de queja de discriminación de MetroPlan Orlando Título VI ubicado en el apéndice de este plan y envíelo por correo electrónico a <u>info@MetroPlanOrlando.gov</u> o envíelo por correo a:

MetroPlan Orlando ATTN: Title VI Complaint 250 S Orange Avenue, Suite 200 Orlando, FL 32801

### **HOW WE PROCESS COMPLAINTS**

We use the following process if we receive a complaint:

- 1. MetroPlan Orlando's Title VI Coordinator will initially address verbal and other non-written complaints. If the issue has not been satisfactorily resolved at this time, or if at any time the person requests to file a formal written complaint, MetroPlan Orlando's Title VI Coordinator shall refer the complainant to FDOT's District Five Title VI Coordinator for processing in accordance with approved state procedures.
- 2. MetroPlan Orlando's Title VI Coordinator will advise FDOT's District Five Title VI Coordinator within five calendar days of receiving the complaint.
- 3. The following information will be included in every notification to FDOT's District Five Title VI Coordinator:



Title VI Program: Nondiscrimination & Language Plan Final

- a. Name, address, and phone number of the Complainant.
- **b.** Name(s) and address(es) of the Respondent.
- **c.** Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation).
- d. Date alleged discriminatory acts occurred.
- e. Date complaint was received.
- **f.** A statement of the complaint.
- g. Other agencies (state, local, or federal) where the complaint has been filed.
- **h.** An explanation of the actions MetroPlan Orlando has taken or proposed to resolve the allegations raised in the complaint.
- **4.** Within 10 calendar days, the MetroPlan Orlando Title VI Coordinator will acknowledge receipt of the allegations, inform the Complainant of action taken or proposed to process the allegations, and advise the Complainant of other avenues of redress available, such as the FDOT's Equal Opportunity Office (EOO).
- 5. Within 60 calendar days, the MetroPlan Orlando Title VI Coordinator will conduct and complete a review of the verbal or non-written allegations and, based on the information obtained, render a recommendation for action in a findings report to the head of MetroPlan Orlando.
- 6. Within 90 calendar days of receiving the verbal or non-written allegations, the MetroPlan Orlando Title VI Coordinator will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of their right to file a formal complaint with the FDOT's EOO if they are dissatisfied with MetroPlan Orlando's final decision. The MetroPlan Orlando Title VI Coordinator will also provide FDOT's District Five Title VI Coordinator with a copy of this decision and a findings summary.
- 7. The MetroPlan Orlando Title VI Coordinator will maintain a log of all verbal and non-written complaints received by MetroPlan Orlando. The log will include the following information:
  - a. Name of Complainant.
  - **b.** Name of Respondent.
  - **c.** Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status, or retaliation).
  - d. Date verbal or non-written complaint was received by MetroPlan Orlando.
  - **e.** Date MetroPlan Orlando notified the FDOT's District Five Title VI Coordinator of the verbal or non-written complaint.
  - **f.** An explanation of the actions MetroPlan Orlando has taken or proposed to resolve the issue raised in the complaint.

# **Program Area Review Procedures**

For program area review procedures, there is an annual certification of MetroPlan Orlando's Planning Process Consistency with Title VI of the Civil Rights Act of 1964, where we must review each program area to ensure nondiscrimination:

<u>Public Participation Plan (PPP)</u>—This plan includes objectives, strategies, and measurement
tools for MetroPlan Orlando's public participation program. This document provides a
proactive approach to education and input in the planning process and uses visualization
techniques to ensure content is clear, concise, and easy to understand.



- <u>Unified Planning Work Program (UPWP)</u>—The UPWP coordinates transportation and
  comprehensive planning in the three-county region. The UPWP serves as a management tool
  for each participating entity. The transportation planning projects in the UPWP respond to the
  metropolitan planning requirements in the Fixing America's Surface Transportation (FAST)
  Act.
- <u>Transportation Improvement Program (TIP)</u>—Updated annually, the TIP sets the schedule for improvements to the region's transportation system over the next five years. This short-term plan assigns available funding to specific projects and covers all modes of transportation.
- Metropolitan Transportation Plan (MTP)—The MTP establishes the vision of Central Florida's
  entire transportation system for the three-county region. Projects must be included in the
  plan to receive federal and state funding. The plan is updated every five years to reflect the
  region's changing dynamics.



# **Appendix A: Federal and State Statutes and Codes**

The FDOT MPO Management Handbook Chapter 5, Table 10.1 compiles a list of applicable statutes that the MPO should follow. For more information, please see <u>Table 10.1</u>.

# **Appendix B: Signed Title VI**

# **Nondiscrimination Assurance**

The Title VI/Nondiscrimination Assurance was signed by the MPO executive director (shown in <u>Appendix B in the Unified Planning Work Program (UPWP) document</u>)

**Appendix C: Complaint Forms (English & Spanish)** 





MetroPlanOrlando.gov 250 S. Orange Ave., Suite 200 **Orlando, FL 32801** 

info@MetroPlanOrlando.gov

(407) 481-5672

























