

Title VI Program: Nondiscrimination & Language Plan



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A Commitment to Nondiscrimination

MetroPlan Orlando welcomes public participation in the transportation planning process regardless of race, color, national origin, age, sex, religion, disability, or family status.

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. We promote equity and fairness in our transportation planning work **because it's the right thing to do** – not just because discrimination is prohibited by law.

This Title VI Program: Nondiscrimination & Language Plan is our commitment to serving the public without discrimination and includes:

- How we will comply with federal and state requirements associated with nondiscrimination and the transportation planning process.
- Central Florida community characteristics data for Orange, Osceola, and Seminole counties to ensure that planning products analyze, mitigate, minimize or avoid disproportionate and adverse impacts on communities traditionally underserved in the planning process.
- A self-assessment with information on frequency of contact with limited English proficiency persons, vital programs or services, and cost of resources.
- A language assistance plan using results from the organization's self-assessment to identify potential needs in the three-county area and resources available to provide meaningful access to the organization's programs, services, and activities.
- A processing procedure for discrimination complaints.

This plan works in concert with the organization's Public Involvement Plan, which identifies specific tactics for outreach and involvement.

Staff Designation of Title VI Coordinator

MetroPlan Orlando designates Cynthia Lambert, public information manager, as the individual responsible for oversight and implementation of the Title VI Program. Cynthia Lambert can be reached at (407) 481-5672 x320 or info@metroplanorlando.org. Hearing impaired persons can call toll free via Florida Relay (dial 711).



Questions about our compliance with nondiscrimination requirements?

Please contact us:



Online at MetroPlanOrlando.org (Contact Us page)



Via email at info@metroplanorlando.org



By mail at 250 S. Orange Ave., Suite 200, Orlando, FL 32801



By phone at (407) 481-5672 or 711 Florida Relay for hearing impaired

The Title VI coordinator's responsibilities include delivering related services, staff training on the plan's policies and procedures, and ongoing monitoring and assessment of the plan's effectiveness. The Title VI coordinator has direct access to MetroPlan Orlando's executive director to quickly resolve any Title VI issues that may arise. (See latest organizational chart on our website's staff page showing dotted line reporting relationship.)

Plan Review & Staff Training

This plan will be updated every three years to: (1) ensure compliance with federal and state law, (2) update demographic statistics to accurately track Central Florida's population, (3) confirm the MetroPlan Orlando Board's commitment to nondiscrimination, and (4) provide an assessment of the plan's effectiveness in addressing Title VI nondiscrimination objectives. The plan will be reviewed annually by staff to ensure effectiveness. MetroPlan Orlando staff receives annual training to ensure awareness of and sensitivity to the needs of underserved individuals.

Title VI Notice Posting Locations

MetroPlan Orlando's Title VI nondiscrimination notice is posted in our office, on MetroPlanOrlando.org in the Nondiscrimination & Language Plan section, and at public meetings as needed.



Your Civil Rights

What Are Civil Rights?

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

Did You Know?

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. See page 24 for instructions on how to file a complaint.

Sus Derechos Civiles

¿Oué Son Los Derechos Civiles?

Las leyes y regulaciones de derechos civiles protegen a las personas de trato injusto o

¿Sabías?

Si cree que ha sufrido discriminación por motivos de raza, color, nacionalidad, edad, sexo, religión, discapacidad o presentar una queja por escrito o verbal con MetroPlan Orlando. Consulte la página 24 para obtener instrucciones sobre cómo presentar una queja.

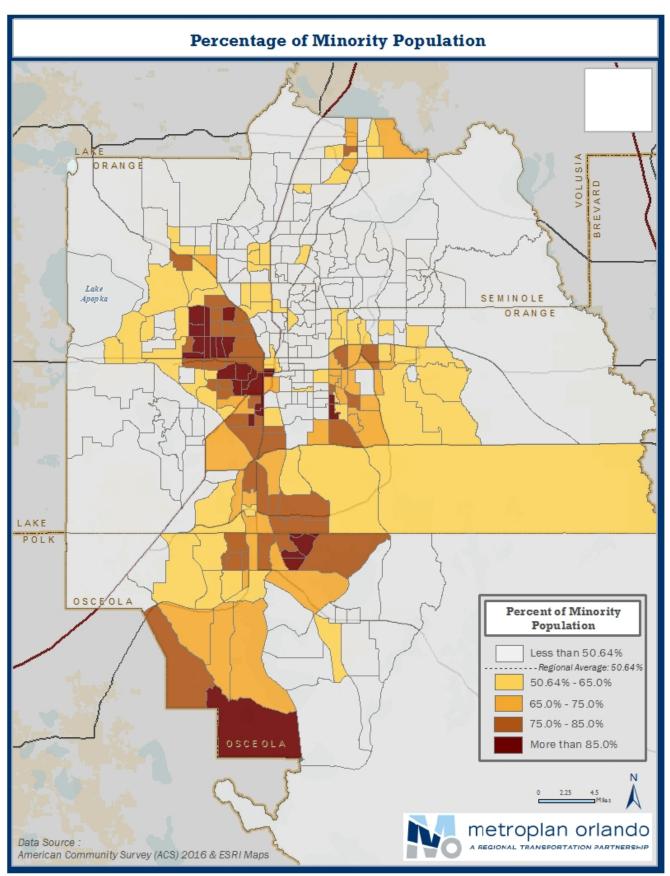
Central Florida Community Characteristics

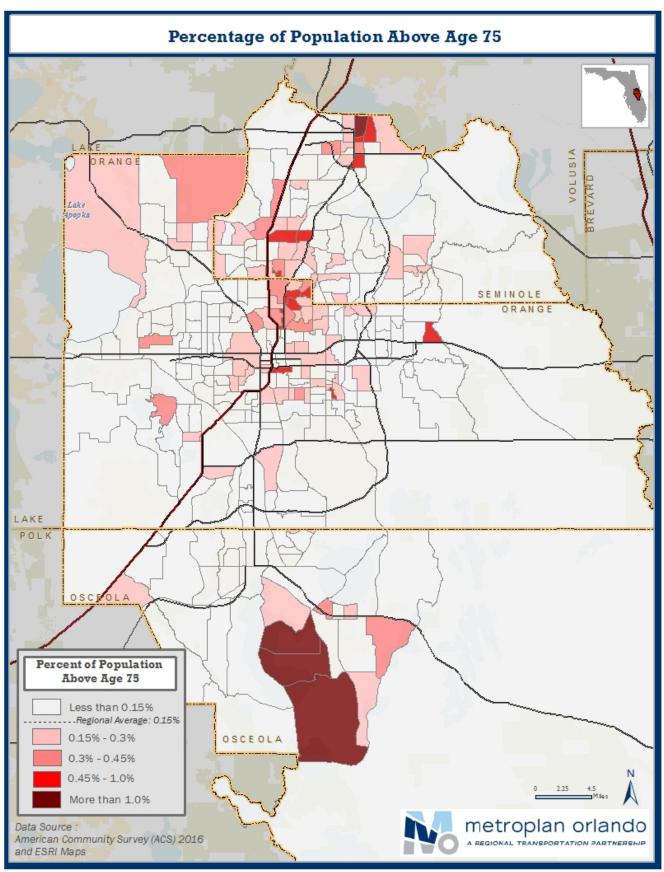
These statistics from the U.S. Census Bureau offer a county-by-county snapshot and regional view of Central Florida demographics and underserved populations.

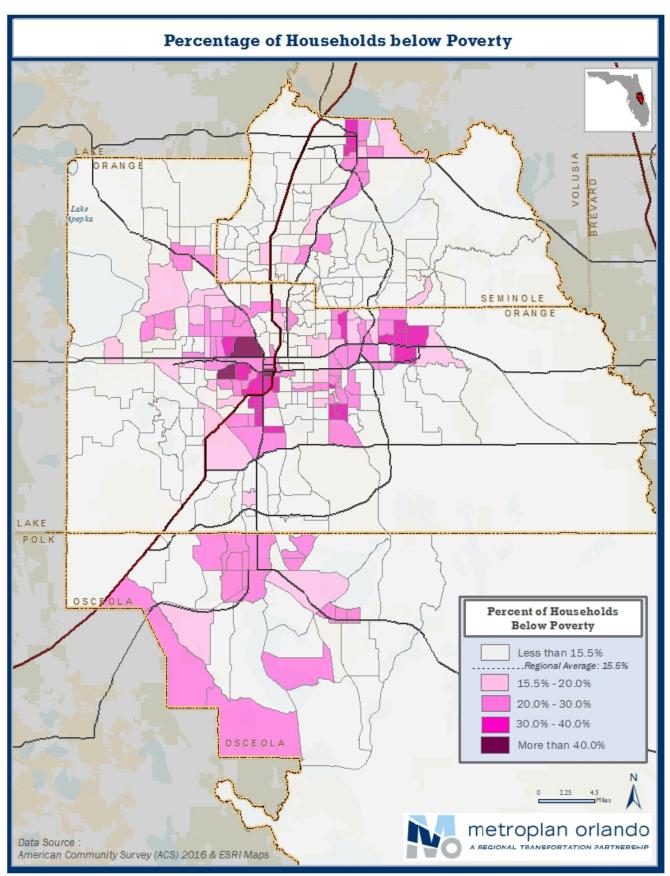
	Orange Co.		Osceola Co.		Seminole Co.		Region Total	
	#	%	#	%	#	%	#	%
TOTAL POPULATION	1,256,055	100.0%	311,962	100.0%	442,905	100.0%	2,010,922	100.0%
Households	444,852	100.0%	93,324	100.0%	156,216	100.0%	694,392	100.0%
RACE/ETHNICITY								
White*	535,795	42.7%	110,836	35.5%	280,711	63.4%	927,342	46.12%
Black*	250,975	20.0%	29,198	9.4%	46,854	10.6%	327,027	16.26%
Hispanic/Latino**	368,503	29.3%	156,730	50.2%	85,292	19.3%	610,525	30.36%
American Indian/ Alaskan Native*	1,341	0.1%	552	0.2%	603	0.1%	2,496	0.12%
Asian*	63,528	5.1%	7,778	2.5%	17,889	4.0%	89,195	4.44%
Native Hawaiian/ Pacific Islander*	287	0.0%	338	0.1%	232	0.1%	857	0.04%
Some other race*	7,000	0.6%	1,270	0.4%	2,133	0.5%	10,403	0.52%
2 or more races*	28,626	2.3%	5,260	1.7%	9,191	2.1%	43,077	2.14%
LANGUAGE								
English spoken "less than very well" (age 5+)	150,321	12.8%	53,303	18.3%	24,482	5.8%	228,106	12.08%
AGE								
Persons 65 years or older	134,914	10.7%	39,246	12.6%	63,306	14.3%	237,466	11.81%
Persons 75 years or older	55,443	4.4%	15,265	4.9%	26,606	6.0%	97,314	4.84%
ECONOMIC								
Households below poverty level	70,409	15.8%	16,652	17.8%	17,335	11.1%	104,396	15.03%
Households with no vehicle	29,096	6.5%	5,331	5.7%	5,686	3.6%	40,113	5.78%
Female head of household with child under 18	44,621	10.0%	10,340	11.1%	11,200	7.2%	66,161	9.53%
DISABILITY								
Persons with a disability * Not Hispanic or Latin	129,186	10.3%	44,990	14.4%	45,741	10.3%	179,862	8.9%

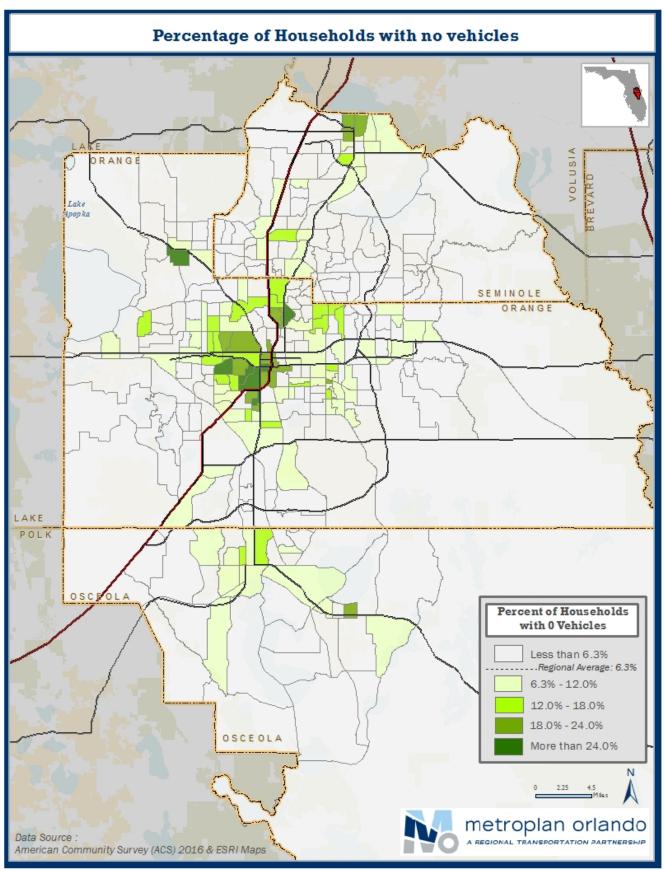
^{*} Not Hispanic or Latino | **Includes Hispanic of any race | Source: 2016 U.S. Census Bureau American Community Survey

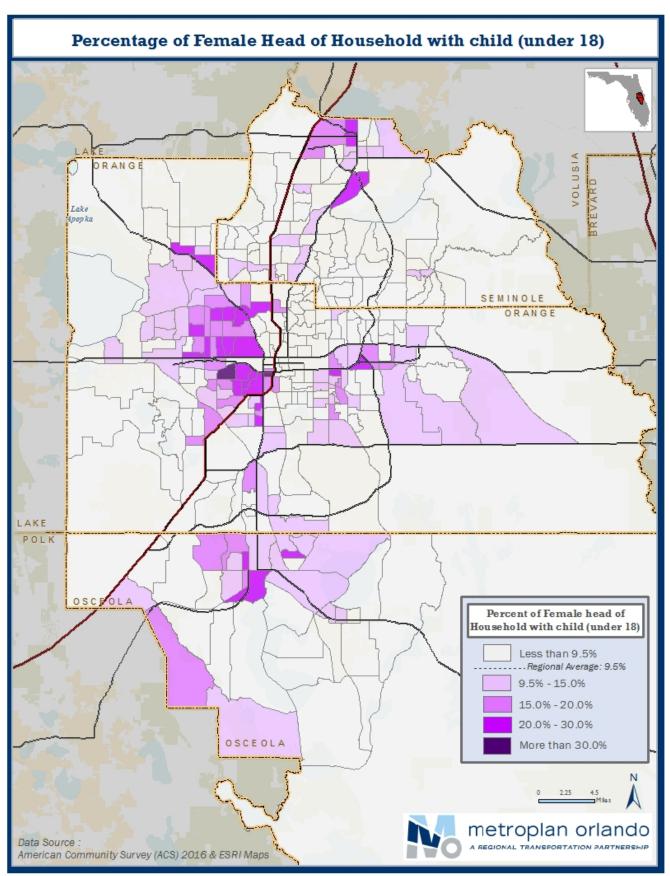
For more information on populations listed in the above table, see definitions on page 13 in Which Communities Are Traditionally Underserved? box.

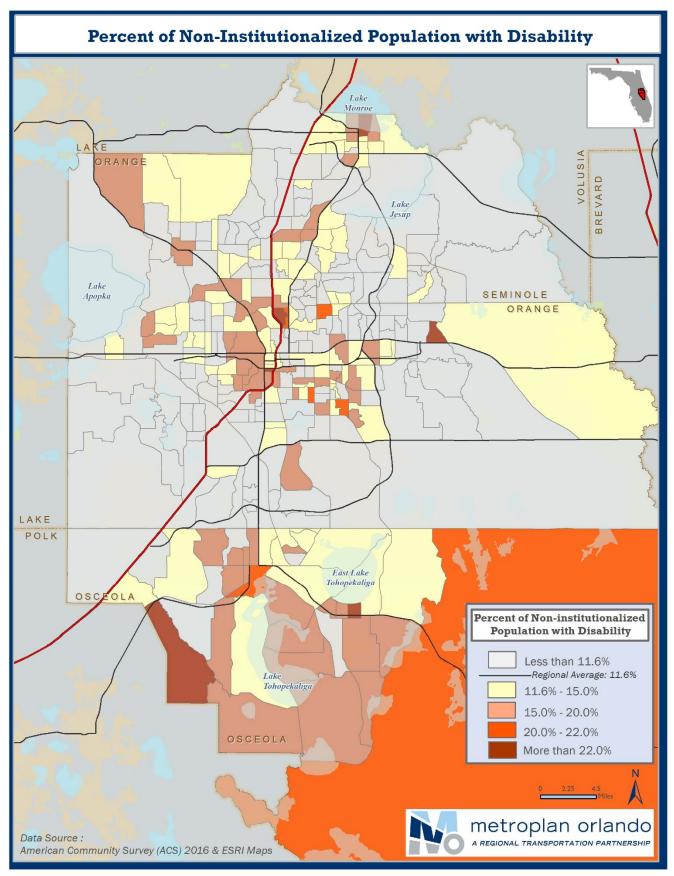










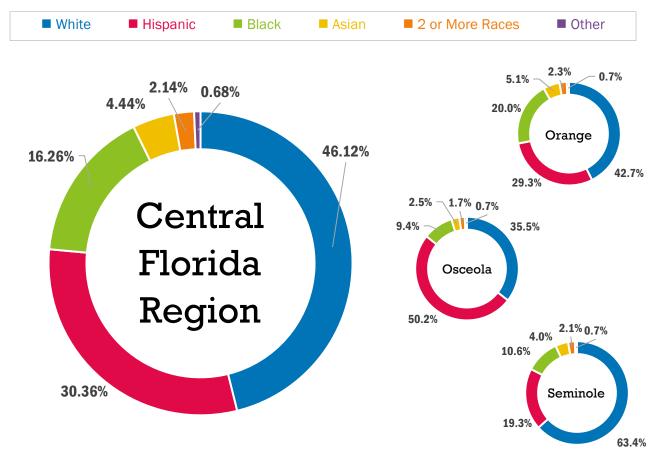


Reaching Underserved Communities

Central Florida is a majority-minority region - a beautiful multicultural melting pot. MetroPlan Orlando uses demographic information to locate underserved populations, allowing proactive community outreach efforts.

Analyzing the size and scope of underserved populations allows us to identify opportunities to minimize, mitigate, or avoid disparate impacts in transportation planning. Robust public involvement is also vital. We use demographics to guide our Public Involvement Plan, which includes: 1) objectives, strategies, and tactics to ensure effective participation and meaningful community representation, 2) methods to disseminate information and receive input, and 3) outreach activities providing affirmative measures to ensure nondiscrimination. MetroPlan Orlando also allocates specific spots on our Community Advisory Committee and Transportation Disadvantaged Local Coordinating Board to underserved communities so they have a strong, constant voice in the transportation planning process.

Central Florida is a diverse community racially, ethnically, and economically. In the past decade, the three-county area has become a majority-minority region, meaning that the percentage of Central Florida's non-Hispanic white population is under 50%. This demographic make-up varies significantly from county to county, as seen in the charts below. Since the last update of this plan, the economic situation has gotten slightly better for Central Florida families, with the percentage of households at or below the poverty level going down about 2%.



Which Communities Are Traditionally Underserved?

Low Income: A person or family whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

Minority Population: An individual belonging to any of the following groups:

- Black persons having origins in any of the black racial groups of Africa
- Hispanic or Latino persons of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race
- Asian American persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent
- American Indian and Alaskan Native persons having origins in any of the original people of North America, South America (including Central America), and who maintain cultural identification through tribal affiliation or community recognition
- Native Hawaiian and Other Pacific Islander persons having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

Aging Population: Because of the increasing number of persons age 65 and older, the aging population is increasingly being categorized as young-old (65-74), old (75-84), and oldest-old (85+).

People with Disabilities: Persons who have mobility and/or self-care limitations, as defined by the U.S. Census. The disability may be physical or mental.

Zero-Car Households: Households without automobiles or access to an automobile.

Limited English Proficiency Persons: Individuals who do not speak, read, write, or understand the English language at a level that permits effective interaction. (NOTE: See further discussion and analysis in next section Providing Meaningful Access to Limited English Proficiency Persons.)

Female Head of Household with Child: Households led by a single mother with children under age 18.

For more information on underserved communities, see demographic statistics in Central Florida Community Characteristics section on page 5.

MetroPlan Orlando's Environmental Justice Focus Areas

MetroPlan Orlando works to ensure that transportation decisions do not cause disproportionately high and adverse effects on low-income and minority populations - a concept known as environmental justice (EJ). USDOT's definition of environmental justice is included in the box to the right.

Executive Order 12898, issued in 1994, focused attention on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities. In other words, this order made Title VI actionable.

One way MetroPlan Orlando constantly evaluates projects is through performance measures for the transportation system. We have established environmental

"Environmental justice" is the fair treatment and meaningful involvement of all people, regardless of race, ethnicity, income, national origin, or educational level with respect to the development, implementation and enforcement of environmental laws, regulations and policies. For the purpose of this strategy, fair treatment means that no population, due to policy or economic disempowerment, is forced to bear a disproportionate burden of the negative human health and environmental impacts, including social and economic effects, resulting from transportation decisions, programs and policies made, implemented and enforced at the Federal, State, local or tribal level." [U.S. Department of Transportation]

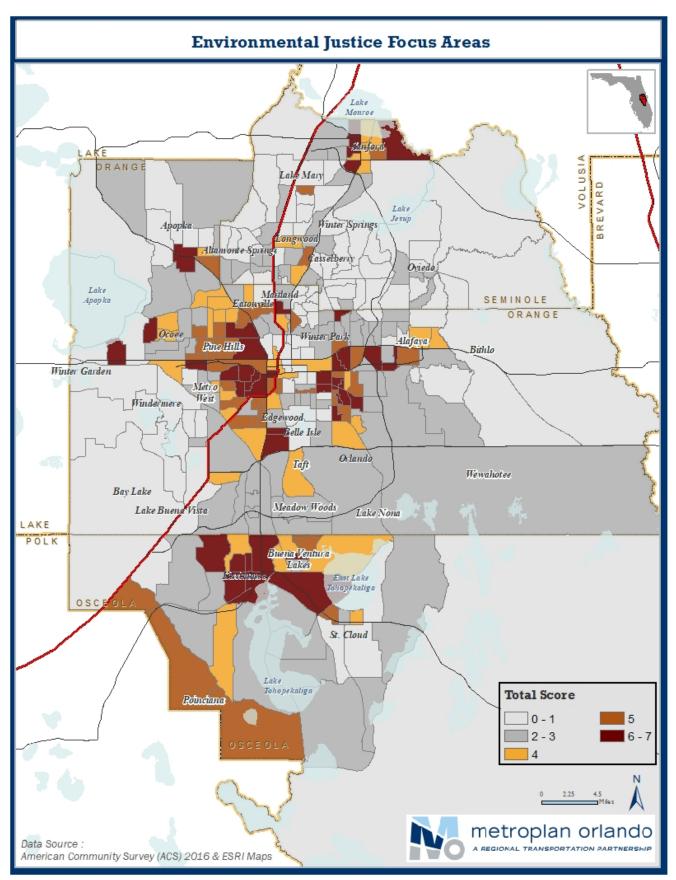
justice focus areas as a measure. If the transportation system within these EJ focus areas is under performing compared to the rest of the region, projects will be prioritized and programmed to meet established performance targets.

One example of how we use the EJ focus areas is in the compiling of Safe Routes to School applications. The Safe Routes to School program funds projects that make it safer and easier for students to walk and bike to school. MetroPlan Orlando coordinates with partners on the project applications. The process starts with MetroPlan Orlando generating a list of schools in the EJ focus areas, which is then evaluated by local governments for access needs.

We also use the EJ focus areas to guide proactive public involvement efforts to underserved communities, particularly while we are creating the region's Metropolitan Transportation Plan.

The focus areas were established by layering maps of the following seven populations to locate high concentrations of underserved communities throughout the region: 1) percent of population above 75; 2) percent of households below poverty level; 3) percent of female households with child under 18 years; 4) percent of population with disabilities (measured against non-institutionalized population); 5) percent of minority population (population other than non-Hispanic white only); 6) percent of population with limited English proficiency (includes all people who speak English "less than very well" and "not at all"); 7) percent of households with no vehicles.

For each of these communities, the regional average was determined and then a score of "1" was given if the percentage was above the regional average. Then, all the scores were added together. Areas with higher scores of 4-7 are established as environmental justice focus areas. All the data for this effort was compiled using the 5-year 2016 American Community Survey data at the census tract level.



Providing Meaningful Access to Limited English **Proficiency Persons**

This assessment evaluates how often MetroPlan Orlando comes in contact with persons speaking English "less than very well" and how we provide meaningful access to the transportation planning process.

Factor One: Demography

The first part of MetroPlan Orlando's self-assessment involves data on the number of Limited English Proficiency (LEP) persons eligible to be served, likely to be served, or likely to be encountered by the organization. MetroPlan Orlando collects data related to language from several sources, but the broadest data available is compiled by the U.S. Census Bureau in the American Community Survey.

Of persons who speak a language other than English, the percentage of individuals who also reported they speak English "less than very well" is of particular importance in identifying those likely to be encountered by the organization or eligible for language assistance. A map of limited English proficiency populations is included on the next page.

PERSONS SPEAKING ENGLISH "LESS THAN VERY WELL" (AGE 5+)

ORANGE COUNTY	OSCEOLA COUNTY	SEMINOLE COUNTY	3-COUNTY TOTAL
12.8%	18.3%	5.8%	12.1%
150,321 persons	53,303 persons	24,482 persons	228,106 persons

Source: 2016 U.S. Census Bureau American Community Survey, Selected Social Characteristics in the United States (Table DP02); Geographic Boundaries: Orange, Osceola, Seminole counties

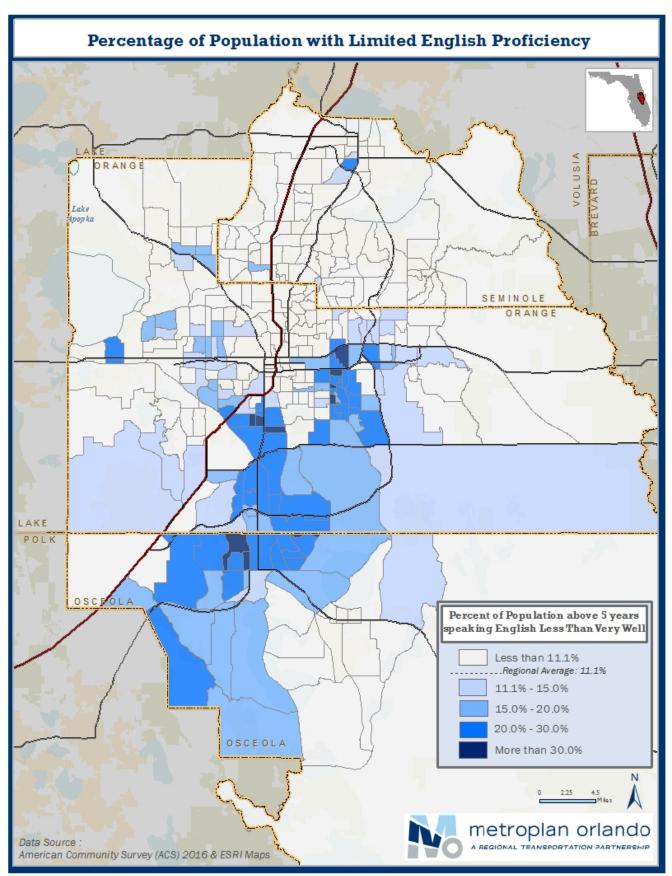
The community profile further identifies the most common languages spoken at home for respondents who reported they speak English "less than very well."

ENGLISH LANGUAGE PROFICIENCY FOR METRO AREA RESIDENTS

Language Spoken	Persons Speaking English Less Than Very Well	% of LEP Population	% of MetroPlan Orlando Region's Population
Spanish	169,798	74.44%	8.99%
Haitian	16,412	7.19%	0.87%
Vietnamese	6,196	2.72%	0.33%
Portuguese	5,553	2.43%	0.29%
Chinese	5,725	2.51%	0.30%
Other - Various	24,422	10.71%	1.29%
TOTAL	228,106	100.00%	12.08%

Source: 2016 American Community Survey, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Up (Table B16001); Geographic Boundary: Public Use Microdata Areas (PUMAs) covering entire Orange, Osceola and Seminole Counties of Florida

Based on the above analysis, MetroPlan Orlando provides select materials in Spanish on a regular basis. Translation into other languages is provided by request.



MetroPlan Orlando collects additional data to track limited English proficiency needs. Though results are not a formal survey, the information provides an overview of current requests and activities related to language assistance. As noted in the U.S. Census Bureau report and supported by data collected by the organization, Spanish is the most common language encountered at MetroPlan Orlando programs, services, and activities in the three-county area, especially in Osceola County.

ADDITIONAL DATA ON LIMITED ENGLISH PROFICIENCY NEEDS

Year	Category	Results
2017	Website: Visits received using Spanish-language browsers	170 (represents 0.5% of all visits)
2017	Website: Number of times Spanish language documents were accessed	5
2017	Community Events: Number of events where staff met a sizable number of limited English proficiency persons	6

Factor Two: Frequency of Contact

Though MetroPlan Orlando has regular meetings throughout the year, community outreach is the main source of contact (or potential contact) between the organization and Limited English Proficiency (LEP) persons. As a result, the frequency of contact is difficult to anticipate. Our Public <u>Involvement Plan</u> notes the special emphasis on outreach opportunities that engage traditionally underserved populations.

CONTACT INITIATED/ADMINISTERED BY METROPLAN ORLANDO

Program/Activity	Frequency	Resources Available
Board Meeting	8 meetings per year	Bilingual employees, special assistance notice in newspaper, LEP-specific notice on all agendas, case-by-case response, "I Speak" cards at front desk
Committee Meeting	Nearly Monthly	Bilingual employees, LEP-specific notice on all board agendas, case-by-case response, "I Speak" cards at front desk
Speakers Bureau	As Requested	Bilingual employees & staff at partner agencies, Spanish language brochures, Spanish language surveys
Community Events	Unpredictable	Bilingual employees, Spanish language brochures, Spanish language surveys, "I Speak" cards
Website	Unpredictable	Google Translate feature translating website text into 100+ languages, Spanish language brochures and Title VI nondiscrimination complaint form, LEP plan
Public Meetings	As Needed	Bilingual employees & staff at partner agencies, Spanish language brochures, Spanish language comment forms, notice in Spanish newspaper (if necessary)

Factor Three: Importance of Program

Metropolitan planning organizations receive federal funds to develop transportation plans for a designated urban area. The planning process is guided by federal and state law, including public involvement requirements to ensure diverse public outreach, notice, and opportunities for input.

The planning process does 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. MetroPlan Orlando also does not require documents, such as completed applications, for participation. However, when determining whether materials, information, and/or notification related to an action is "vital," the absence of direct services or application requirements is not the only consideration.

Future transportation projects and investments are shaped by three primary plans developed by MetroPlan Orlando: the Transportation Improvement Program, the Metropolitan Transportation Plan (formerly known as Long Range Transportation Plan), and the Unified Planning Work Program.

Given the impact of these plans on Central Florida's future transportation system, MetroPlan Orlando places a special emphasis on language assistance for educational materials and public input tools related to our primary plans. These tools are often helpful with outreach related to other MetroPlan Orlando programs and studies.

Additionally, as discussed on page 14, limited English proficiency persons are taken into account when establishing MetroPlan Orlando's environmental justice focus areas that show where underserved populations are located across the region. These areas are used as a performance measure in our planning process.

While meaningful access for all participants and Limited English Proficiency (LEP) persons is the intent

Definitions

Limited English Proficiency (LEP) Persons: Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or

Recipient of Federal Financial Assistance: Includes grants, training, use of equipment, donations of surplus property, and other assistance. Subrecipients are also covered, when federal funds are passed from one recipient to a sub-

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 persons of the availability of free language assistance. For many larger documents, translation of vital information contained within the document suffices.

Interpretation: The act of listening to spoken words in one language and orally translating it into another language.

Translation: The replacement of a written text from one language into an equivalent language.

behind services identified in the next section (Language Assistance Plan), the availability of resources may limit the language services in some areas.

Language assistance involving notification of services, translation of public input forms and/or surveys related to a formal public meetings, and maintenance of Spanish language materials on MetroPlanOrlando.org have high priority. Other activities, such as community events, optional meetings, and specialized speakers bureau programs have a lower priority if/when resources preclude the organization from executing all language assistance options.

Factor Four: Resources

In developing the Limited English Proficiency Plan, MetroPlan Orlando identified resources for potential recipients and associated costs. As noted above, the demand for Spanish language materials thus far has been limited. MetroPlan Orlando uses these resources, available for free or at minimal cost, for basic translation or interpretation needs:





- In-house bilingual staff (Spanish)
- Bilingual staff from partner organizations and consultants
- Maintenance of translation feature on MetroPlanOrlando.org
- "I Speak" language cards
- Google Translate mobile app with camera feature for on-the-spot translation into many languages. (A phone can be pointed at material written in English and see an instant translation on the screen. Though the translation is not perfect, this mobile app can help immediately meet translation needs at outreach events and public meetings.)

ESTIMATED TRANSLATION & INTERPRETATION COSTS

Service	Estimated Cost
Translation	\$0.12-\$0.25 per word
Interpretation	\$100+ per hour (2-hour minimum)

Language Assistance Plan

MetroPlan Orlando provides meaningful access to the transportation planning process in various ways for limited English proficiency persons.

We seek to provide language services to persons with limited English proficiency in a manner that achieves a balance between ensuring meaningful access to programs and services while not incurring undue burdens on our organization's resources. Though it is cost prohibitive to translate our primary plans and products in their entireties because they often include hundreds of pages, MetroPlan Orlando ensures that vital information about those plans is translated into Spanish, the primary translation need in Central Florida. Translation or interpretation into other languages is provided by request.

Current Language Services Provided

The table below outlines items that MetroPlan Orlando provides in Spanish so that limited English proficiency individuals receive 'vital communication' and have the opportunity to give input to the transportation planning process. (See examples of materials on page 23.)

Service	Description
Select MetroPlan Orlando outreach materials in Spanish	 MetroPlan Orlando's organizational brochure provides an overview of our mission, board and committees, primary plans, and how to get involved in the planning process Our Transportation Disadvantaged (TD) brochure discusses ACCESS LYNX, how to ride, and how to report concerns about the service. We use bilingual interactive boards at community events where we expect a large LEP presence. We evaluate LEP needs on a project-by-project basis for events, studies, and other materials.
Partner materials in Spanish	 We keep copies of non-English materials from partner organizations. Examples: ACCESS LYNX applications (Spanish) Best Foot Forward pedestrian safety laws handout (Spanish, Haitian Creole) U.S. Department of Justice's Right to Work poster in Spanish (on website Jobs page) U.S. Department of Homeland Security's E-Verify poster (on website Jobs page)
Phone access: Option for Spanish assistance 711 Florida Relay	Callers who dial the MetroPlan Orlando office number hear an option to get routed to Spanish-speaking staff member. For those who are deaf, hard of hearing, deaf/blind, or speech disabled, the Florida Relay Service (711) is available to connect those who use text telephones (TTYs) with people who use voice telephones. Specially trained operators facilitate communications between the two callers. Florida Relay also offers English-to-Spanish and Spanish-to-English translation 24/7, 365 days a year.

Surveys, comment cards, forms	Customized Spanish-language surveys available; public meeting comment cards; nondiscrimination complaint form available in Spanish; "I Speak" cards available to identify additional language needs
Website	The translate function on MetroPlan Orlando's website currently has the capability to translate into more than 100 languages.
Advertisements	Special assistance notice in newspaper, LEP-specific notice on agendas, targeted ads in Spanish publications (when vital)

Community Partners

MetroPlan Orlando's local funding partners also provide language assistance services. In an effort to provide meaningful access to the broadest population of those with limited English proficiency, the organization will seek assistance from local funding partners and community partners for notification and access to translation and interpretation resources that already exist.

Notification of Language Assistance

MetroPlan Orlando will publicize the availability of Spanish interpreter services, free of charge, prior to board and committee meetings, workshops, and public hearings. Notification will be provided on the organization's website, within meeting notices, and on each agenda. When appropriate, additional notification will be provided using the following outreach tools:

- Signage
- Public outreach materials
- Partner outreach materials
- Via community-based organizations
- Local Spanish newspapers/publications

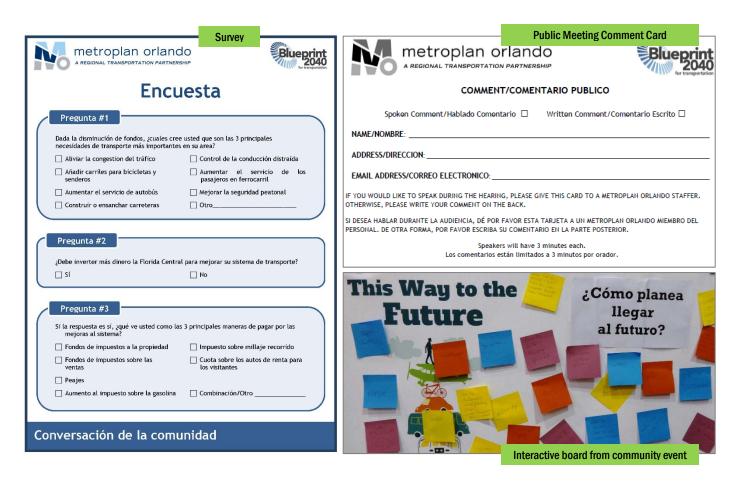
The need for additional notification will be determined, in part, by the nature of the meeting or event and the degree in which such assistance is anticipated.

Standard notification regarding language assistance will read:

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 info@metroplanorlando.org 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.org por lo menos tres días antes del evento.

EXAMPLES OF SPANISH LANGUAGE MATERIALS





Complaint Processing Procedure

This section explains how discrimination complaints are processed and investigated by MetroPlan Orlando.

Any person who believes they 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, may file a verbal or written complaint with MetroPlan Orlando.

The MetroPlan Orlando Title VI Discrimination Complaint Form is available in English and Spanish, online and by request. A copy of the form is available in the appendix of this plan. This form, whether completed by the individual filing the complaint or by staff when reducing elements of a verbal complaint to writing, also serves as: (1) standard written notification transmitted to the Florida Department of Transportation (FDOT) District Five Title VI Coordinator and (2) documentation filed in the official MetroPlan Orlando log of Title VI complaints.

If a complaint is received, MetroPlan Orlando's (MPO's) Title VI Coordinator will follow these steps:

- 1. Verbal and non-written complaints will initially be addressed informally by MetroPlan Orlando's Title VI Coordinator. If the issue has not been satisfactorily resolved through this informal means, 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 the 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 (5) calendar days of receipt of the allegations.
- 3. The following information will be included in every notification to FDOT's District Five Title VI Coordinator:
 - a. Name, address, and phone number of the Complainant
 - b. Name(s) and address(es) of Respondent
 - c. Basis of complaint (i.e., race, color, national origin, sex, age, disability, religion, familial status or retaliation)



How to File a **Discrimination Complaint**

If you would like to report your complaint verbally, call MetroPlan Orlando's Title VI Coordinator at 407-481-5672 x320. To file a written complaint, please fill out the MetroPlan Orlando Title VI Discrimination Complaint Form located in the appendix of this plan and email it to info@metroplanorlando.org 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. Ilame al Coordinador del Título VI de MetroPlan Orlando al 407-481-5672 x320. 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 info@metroplanorlando.org o envíelo por correo a MetroPlan Orlando, ATTN: Title VI Complaint, 250 S. Orange Avenue, Suite 200, Orlando, FL 32801.

- d. Date of alleged discriminatory act(s)
- e. Date of complaint received by the recipient
- 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 the MPO has taken or proposed to resolve the allegation(s) raised in the complaint
- 4. Within ten (10) calendar days, the MPO Title VI Coordinator will acknowledge receipt of the allegation(s), inform the Complainant of action taken or proposed action to process the allegation(s), and advise the Complainant of other avenues of redress available, such as the FDOT's Equal Opportunity Office (EOO).
- 5. Within sixty (60) calendar days, the MPO Title VI Coordinator will conduct and complete a review of the verbal or non-written allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to the head of the MPO.
- 6. Within ninety (90) calendar days of the verbal or non-written allegation(s) receipt, the MPO 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 his/her right to file a formal complaint with the FDOT's EOO, if they are dissatisfied with the final decision rendered by the MPO. The MPO Title VI Coordinator will also provide the FDOT's District Five Title VI Coordinator with a copy of this decision and summary of findings.
- 7. The MPO Title VI Coordinator will maintain a log of all verbal and non-written complaints received by the MPO. 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 the MPO
 - e. Date the MPO notified the FDOT's District Five Title VI Coordinator of the verbal or non-written complaint
 - f. Explanation of the actions the MPO has taken or proposed to resolve the issue raised in the complaint

Appendix

The following documents are included in the appendix to support MetroPlan Orlando's commitment to nondiscrimination.

- MetroPlan Orlando Title VI Complaint Form (English)
- MetroPlan Orlando Título VI Forma de Reclamo (Español)
- FDOT Unified Planning Work Program Statements & Assurances (Note: This is standardized language provided by the Florida Department of Transportation):
 - o Disadvantaged Business Enterprise Utilization SAMPLE
 - o Title VI / Nondiscrimination Assurance SAMPLE



MetroPlan Orlando Title VI Complaint Form

Name		Daytime Phone	(if available)	Evening Phone (if available)
Address (Street, P.	O. Box, etc.)		City, State, Zip) Code
Name of person(s)	who discriminated aga	inst you, position (if known):	
Please describe th	e event, occasion, place	e, etc. where the d	scrimination to	ok place:
Date of alleged inc	ident:			
Discrimination on t	the basis of (please che	ck):		
Race	Retaliation S	ex Fami	lial Status	Religion
Color	National Origin A	ge Disal	oility	
Please briefly explain the incident that triggered a Title VI violation, including the nature of the event, who was involved and any other details necessary for an investigation. (NOTE: You may use the other side of this paper and/or attach a separate document.) Signature Date				
Signature		Date		
Mail to: Cynthia Lambert, MetroPlan Orlando, 250 S. Orange Avenue, Suite 200, Orlando, Fl., 32801				
Email: clambert@metroplanorlando.org Fax: (407) 481-5680				



MetroPlan Orlando Título VI Forma de Reclamo

Nombre de la persona discr	iminada	Número de telé disponible)	fono diurno (si	Número de tele disponible)	éfono nocturne (si
Dirección de residencia (número y calle, número de departamento) Ciudad, estado, y código postal de residencia					l de residencia
Nombre de la persona que d	discriminó contra	usted, y la posici	ón de trabajo (si	conocido):	
Describa por favor el aconte	ecimiento, la ocas	sión, el lugar, etc.	donde la discrin	ninación sucedió	:
Fecha del incidente discrimi	inatorio:				
Causa de la discriminación	(marque por favo	r):			
Raza	Retaliación	Sexo	Estado	Civil	Religión
Color de Piel	Nacionalidad	Edad	Imped	limento Físico o	Mental
Por favor explique brevemente el incidente que provocó una infracción de Título VI, incluyendo quienes participaron y cualquier otros detalles necesarios para una investigación. (Puede utilizar el otro lado de este papel y/o conectar un documento adicional.)					
Firma		Fech	a		
Envíe por correo a: Cynthia Lambert, MetroPlan Orlando, 250 S. Orange Avenue, Suite 200, Orlando, Fl., 32801 Correo Electrónico: clambert@metroplanorlando.org Fax: (407) 481-5680					

FLORIDA DEPARTMENT OF TRANSPORTATION

525-010-08 POLICY PLANNING 05/18

UNIFIED PLANNING WORK PROGRAM (UPWP) STATEMENTS AND ASSURANCES

DISADVANTAGED BUSINESS ENTERPRISE UTILIZATION

It is the policy of the MetroPlan Orlando that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of MPO contracts in a nondiscriminatory environment. The objectives of the Disadvantaged Business Enterprise Program are to ensure non-discrimination in the award and administration of contracts, ensure firms fully meet eligibility standards, help remove barriers to participation, create a level playing field, assist in development of a firm so it can compete successfully outside of the program, provide flexibility, and ensure narrow tailoring of the program.

The MetroPlan Orlando, and its consultants shall take all necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of the MetroPlan Orlando, in a non-discriminatory environment.

The MetroPlan Orlando shall require its consultants to not discriminate on the basis of race, color, national origin and sex in the award and performance of its contracts. This policy covers in part the applicable federal regulations and the applicable statutory references contained therein for the Disadvantaged Business Enterprise Program Plan, Chapters 337 and 339, Florida Statutes, and Rule Chapter 14-78, Florida Administrative Code

	September 12, 2018
Name: Gary D. Huttmann	Date

Title: MPO Chairman (or designee)

FLORIDA DEPARTMENT OF TRANSPORTATION

525-010-08 POLICY PLANNING 05/18

UNIFIED PLANNING WORK PROGRAM (UPWP) STATEMENTS AND ASSURANCES

TITLE VI/ NONDISCRIMINATION ASSURANCE

Pursuant to Section 9 of US DOT Order 1050.2A, the MetroPlan Orlando assures the Florida Department of Transportation (FDOT) that no person shall on the basis of race, color, national origin, sex, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Florida Civil Rights Act of 1992 and other nondiscrimination authorities be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity.

The MetroPlan Orlando further assures FDOT that it will undertake the following with respect to its programs and activities:

- Designate a Title VI Liaison that has a responsible position within the organization and access to the Recipient's Chief Executive Officer.
- 2. Issue a policy statement signed by the Chief Executive Officer, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in languages other than English.
- 3. Insert the clauses of *Appendices A and E* of this agreement in every contract subject to the Acts and the Regulations
- 4. Develop a complaint process and attempt to resolve complaints of discrimination against sub-recipients. Complaints against the Recipient shall immediately be forwarded to the FDOT District Title VI Coordinator.
- 5. Participate in training offered on Title VI and other nondiscrimination requirements.
- 6. If reviewed by FDOT or USDOT, take affirmative action to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) calendar days.
- 7. Have a process to collect racial and ethnic data on persons impacted by your agency's programs.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the Recipient.

	September 12, 2018
Name: Gary D. Huttmann	Date
Title: MPO Chairman (or designee)	

UNIFIED PLANNING WORK PROGRAM (UPWP) STATEMENTS AND ASSURANCES

APPENDICES A and E

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") agrees as follows:

- (1) **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
- (2) Nondiscrimination: The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) Solicitations for Subcontractors, including Procurements of Materials and Equipment: In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
- (4) Information and Reports: The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate, and shall set forth what efforts it has made to obtain the information.
- (5) **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the *Florida Department of Transportation* shall impose such contract sanctions as it or the *Federal Highway Administration*, *Federal Transit Administration*, *Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* may determine to be appropriate, including, but not limited to:
 - a. Withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. Cancellation, termination or suspension of the contract, in whole or in part.

UNIFIED PLANNING WORK PROGRAM (UPWP) STATEMENTS AND ASSURANCES

- (6) Incorporation of Provisions: The Contractor shall include the provisions of paragraphs (1) through (7) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. In the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the Florida Department of Transportation toenter into such litigation to protect the interests of the Florida Department of Transportation, and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.
- Compliance with Nondiscrimination Statutes and Authorities: Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21; The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects); Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex); Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27; The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age); Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex); The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not); Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 -- 12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38; The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex); Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations; Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100); Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq)