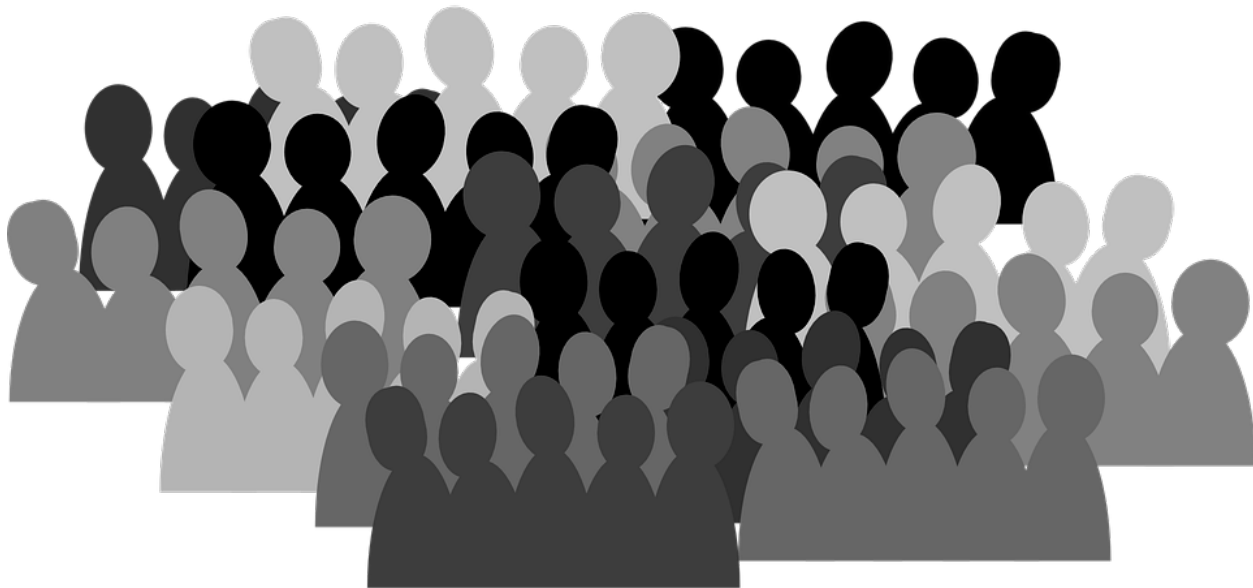




**St. Lucie** Transportation  
Planning  
Organization

Coco Vista Centre  
466 SW Port St. Lucie Blvd, Suite 111  
Port St. Lucie, Florida 34953  
772-462-1593 [www.stlucietpo.org](http://www.stlucietpo.org)

# TITLE VI PROGRAM



**Adopted October 7, 2020**

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St. Lucie TPO  
466 SW Port St. Lucie Boulevard, Suite 111  
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Hearing/Speech Impaired:  
711 Florida Relay System

## Title VI Program Activity Log

Date	Activity (Review/Update/ Addendum/ Adoption/Distribution)	Responsible Person	Remarks
October 7, 2020	Adoption		



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## 1.0 TITLE VI /NONDISCRIMINATION POLICY STATEMENT AND MANAGEMENT COMMITMENT TO TITLE VI PROGRAM

The St. Lucie Transportation Planning Organization (TPO) assures the Federal Highway Administration, Federal Transit Administration and the Florida Department of Transportation that no person shall, on the basis of race, color, national origin, 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, and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the TPO.

The St. Lucie TPO further agrees to the following responsibilities with respect to its programs and activities to comply with the above-mentioned laws and regulations:

1. Designate a Title VI Coordinator that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, 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 a nondiscrimination clause into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against the St. Lucie TPO.
5. Participate in training offered on Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the 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 TPO.

Signature

---

Peter Buchwald  
Executive Director, St. Lucie TPO  
Date: October 7, 2020



## 2.0 INTRODUCTION AND DESCRIPTION OF SERVICES

The St. Lucie TPO submits this Title VI Program in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FHWA and FTA.

The St. Lucie TPO is a “metropolitan planning organization,” a federally-funded local agency tasked with planning, project selection, and prioritizing of State and Federal funding for transportation improvements. The St. Lucie TPO is governed by a Board which is comprised of elected officials from St. Lucie County, City of Fort Pierce, City of Port St. Lucie, and the St. Lucie County School Board as well as a public transportation representative. Three Advisory Committees provide direction and recommendations to the TPO Board. These are the Technical Advisory Committee (TAC), the Citizens Advisory Committee (CAC), and the Bicycle-Pedestrian Advisory Committee (BPAC). The TPO also is the designated official planning agency to receive Florida Transportation Disadvantaged Trust Funds for planning for the transportation disadvantaged population in the urbanized area through the Local Coordinating Board (LCB) for the Transportation Disadvantaged.



The St. Lucie TPO must designate a Coordinator for Title VI issues and complaints within the organization. The Coordinator is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Coordinator include:

- Maintain knowledge of Title VI requirements.
- Attend training, as appropriate, on Title VI and other nondiscrimination authorities when offered by FHWA, FTA, FDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender, and national origin of the service area population to ensure low income, minorities, and other traditionally underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.
- Maintain direct and easy access to the TPO Executive Director.

Title VI Coordinator: Marceia Lathou  
Title VI-ADA Coordinator, St. Lucie TPO  
466 SW Port St. Lucie Blvd, Suite 111  
Port St. Lucie, FL 34953  
772-462-1593, lathoum@stlucieco.org  
Hearing/Speech Impaired:  
711 Florida Relay System

## **2.1 ANNUAL CERTIFICATES AND ASSURANCES**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FHWA and FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances.

The St. Lucie TPO will remain in compliance with this requirement by annual submission of certifications and assurances to FDOT as part of the annual joint certification process.

## **2.2. TITLE VI PROGRAM ADOPTION**

This Title VI Program was approved and adopted by the St. Lucie TPO's Board at a meeting held on October 7, 2020.

## 3.0 TITLE VI NOTICE TO THE PUBLIC

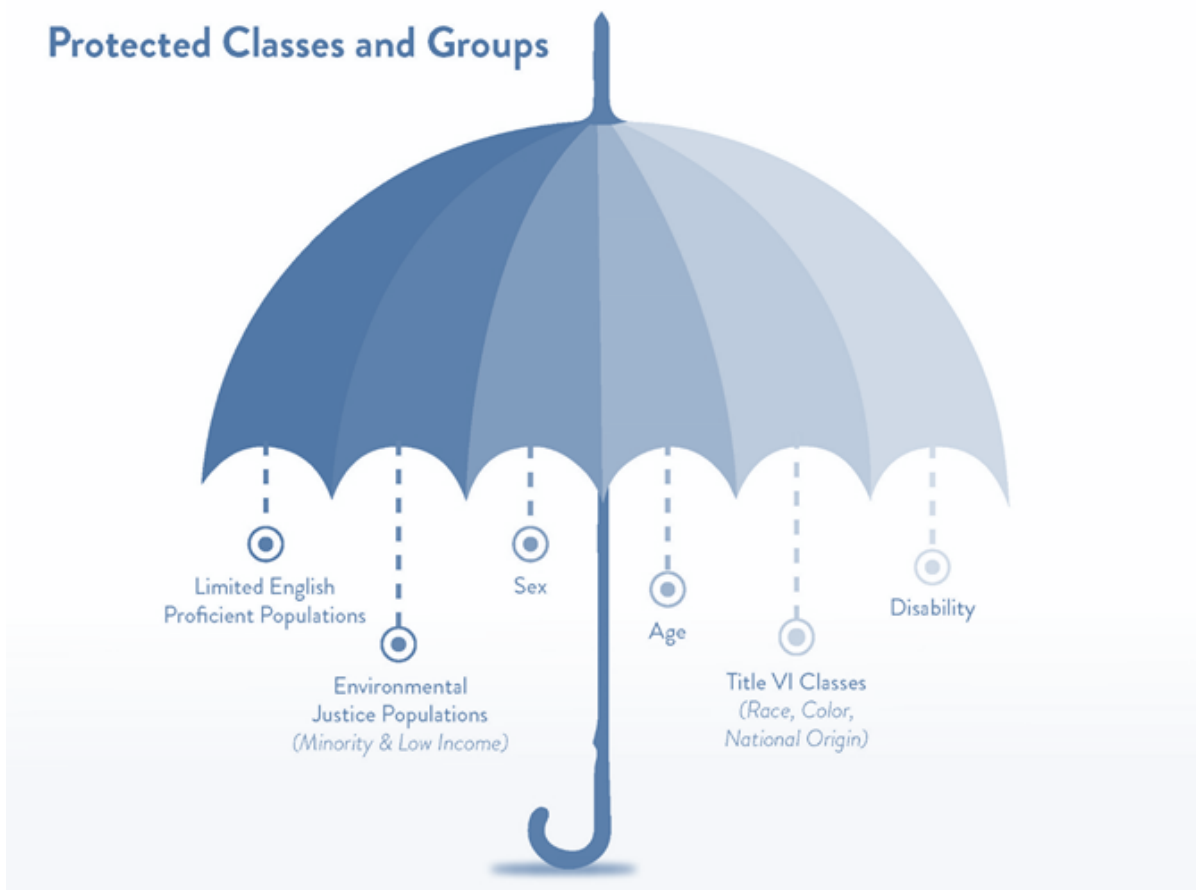
### 3.1 NOTICE TO THE PUBLIC

Recipients of federal funds must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Program. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin.
- A description of the procedures members of the public should follow in order to request additional information on the agency's nondiscrimination obligations.
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the agency.

The TPO's Title VI notice to the public appears on the following pages.

### Protected Classes and Groups





**Notice to the Public:**

The St. Lucie TPO operates its transportation programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the St. Lucie TPO.

For more information on the St. Lucie TPO civil rights program, and the procedures to file a complaint about the transportation program, contact Marceia Lathou, Title VI Coordinator, at (772) 462-1593 [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org) or at our administrative office at 466 SW Port St. Lucie Boulevard, Suite 111, Port St. Lucie, Florida 34953 or our website at [www.stlucietpo.org](http://www.stlucietpo.org).

Alternatively, a complainant may file a complaint directly with the Florida Department of Transportation by filing a complaint with the Florida Dept. of Transportation, District 4 Title VI Coordinator, Sharon Singh Hagyan, 3400 W. Commercial Blvd, Fort Lauderdale, FL 33309, [Sharon.SinghHagyan@dot.state.fl.us](mailto:Sharon.SinghHagyan@dot.state.fl.us).

In addition, a complainant may also file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact Marceia Lathou at (772) 462-1593; [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org).

Kreyol Ayisyen: Si ou ta renmen resevwa enfòmasyon sa a nan lang Kreyòl Aysiyen, tanpri rele nimewo (772) 462-1593.

Español: Si usted desea recibir esta información en Español, por favor llame al 772-462-1593.

**El título VI aviso de St. Lucie TPO al público:**

St. Lucie TPO opera sus programas de transporte y servicios, sin importar la raza, color, origen nacional y de conformidad con lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que ella o él ha sido agraviada por cualquier práctica discriminatoria ilegal en virtud del Título VI puede presentar una queja con St. Lucie TPO.

Para obtener más información sobre el St. Lucie TPO programa de derechos civiles, y los procedimientos para presentar una queja sobre el programa de transporte, contactar con Marceia Lathou, Título VI Enlace, a (772) 462-1593, [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org) o en nuestra oficina administrativa 466 SW Port St. Lucie Boulevard, Suite 111, Port St. Lucie, Florida 34953, o nuestro sitio web en [www.stlucietpo.org](http://www.stlucietpo.org).

El demandante puede presentar una queja directamente con el Departamento de Transporte de la Florida mediante la presentación de una queja ante el Distrito 4 Título VI Coordinador (Sharon Singh Hagyan, [Sharon.SinghHagyan@dot.state.fl.us](mailto:Sharon.SinghHagyan@dot.state.fl.us)).

Un demandante también puede presentar una queja directamente con la Administración Federal de Transporte mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Queja Team, East Building , 5th Floor - TCR , 1200 New Jersey Ave., SE, Washington, DC 20590.

Si necesita información en otro idioma, contactar a Marceia Lathou al (772) 462-1593; [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org).



**TPO's Tit VI St. Lucie bay piblik la:**

TPO St. Lucie a opere pwogram ak sèvis transpò li yo san konsiderasyon ba ras, koulè, ak orijin nasyonal dapre Tit VI nan Lwa sou Dwa Sivil 1964 (Title VI of the Civil Rights Act of 1964). Nenpòt moun ki kwè li te leze poutèt nenpòt pratik diskriminasyon ilegal selon Tit VI kapab pote yon plent avèk TPO St. Lucie a.

Pou jwenn plis enfòmasyon sou pwogram dwa sivil TPO St. Lucie a, ak pwosedi yo pou pote yon plent kont pwogram transpò a, kontakte Marceia Lathou, Koòdonatè Tit VI, nan nimewo (772) 462-1593 lathoum@stlucieco.org oswa nan biwo administratif nou ki chita nan 466 SW Port St. Lucie Boulevard, Suite 111, Port St. Lucie, Florida 34953 oswa nan sitwèb nou lè ou ale nan [www.stlucietpo.org](http://www.stlucietpo.org).

Yon pleyan kapab pote yon plent avèk Depatman Transpò nan Eta Florida (Florida Department of Transportation) dirèkteman lè yo pote yon plent avèk Koòdonatè Tit VI Distri 4 la (Sharon Singh Hagyan, Sharon.SinghHagyan@dot.state.fl.us).

Epitou yon pleyan kapab pote yon plent dirèkteman avèk Administrasyon Federal Transpò Piblik (Federal Transit Administration) la lè yo pote yon plent avèk Biwo sou Dwa Sivil la (Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590).

Si yo bezwen jwenn enfòmasyon nan yon lòt lang, kontakte Marceia Lathou nan nimewo (772) 462-1593; lathoum@stlucieco.org.



### 3.2 NOTICE POSTING LOCATIONS

The Notice to the Public will be posted at strategic locations to apprise the public of the St. Lucie TPO's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of the St. Lucie TPO office.

The Notice to the Public will be posted in the following public areas of the St. Lucie TPO office:

Location Name	Address	City
<b>St. Lucie TPO Office Reception Area</b>	466 SW Port St. Lucie Boulevard, Suite 111	Port St. Lucie, FL 34953
<b>St. Lucie TPO Office Boardroom</b>	466 SW Port St. Lucie Boulevard, Suite 111	Port St. Lucie, FL 34953

The Title VI notice and program information will also be provided on the St. Lucie TPO's website at [stlucietpo.org](http://stlucietpo.org).





## 4.0 TITLE VI PROCEDURES AND COMPLIANCE



### 4.1 COMPLAINT PROCEDURE

Any person who believes that he or she has been subjected to discrimination based upon race, color, national origin, sex, religion, age, disability, family or income status initially files a complaint with the TPO's Title VI Coordinator, Marceia Lathou, at [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org) or by mail to 466 SW Port St. Lucie Boulevard, Suite 111, Port St. Lucie, Florida 34953. The St. Lucie TPO investigates complaints received no more than 180 days after the alleged incident. If possible, the complaint should be submitted in writing and contain the identity of the complainant; the basis for the allegations (e.g., race, color, national origin, sex, religion, age, disability, family or income status); and a description of the alleged discrimination with the date of occurrence. If the complaint cannot be submitted in writing, the complainant should contact the TPO's Title VI Coordinator for assistance: Marceia Lathou, St. Lucie TPO, 466 SW Port St. Lucie Blvd, Suite 111, Port St. Lucie, Florida 34953, 772-462-1593, [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org).

The Title VI Coordinator will respond to the complaint within thirty (30) days and will take reasonable steps to resolve the matter. Reasonable steps could include coordinating multiple agency response, facilitating access to information, etc. The Florida Department of Transportation (FDOT), Equal Opportunity Office, Statewide Title VI Coordinator shall be notified of the complaint. Should the TPO be unable to satisfactorily resolve the complaint, the Title VI Coordinator will forward the complaint, along with a record of its disposition, to the FDOT Statewide Title VI Coordinator. FDOT will assume jurisdiction over the complaint for continued processing.

The complaint procedures and forms, examples of which are provided in Section 4.2, will be made available to the public on the St. Lucie TPO's website ([stlucietpo.org](http://stlucietpo.org)). The forms are also available in other formats and languages upon request.

**4.2 COMPLAINT FORM**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age				
<input type="checkbox"/> Disability <input type="checkbox"/> Family or Religious Status <input type="checkbox"/> Other (explain)				
_____				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____				
_____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: \_\_\_\_\_

☐ Federal Court \_\_\_\_\_ ☐ State Agency \_\_\_\_\_

☐ State Court \_\_\_\_\_ ☐ Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date required below.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to:

Marceia Lathou, Title VI Coordinator  
St. Lucie TPO  
466 SW Port St. Lucie Boulevard, Suite 111  
Port St. Lucie, Florida 34953

## Forma De Queja

<b>Seccion I: Escribir en forma legible</b>				
Nombre:				
Direccion:				
Telefono:		Telefono secundario(opcional):		
Direccion de correo electronico::				
Reuistos de forma accesible?	Impresion grande		Cinta de audio	
	TDD		Otros	
<b>Section II:</b>				
Esta presentando esta queja en su propio nombre?		Si*	No	
Si usted contesto "Si", vaya a la Seccion III				
Si usted contesto "No", Nombre(s) del Individuo(s) Quien(es) Usted Allega Discrimino (naron) Contra Usted Si lo(s) Conoce:				
Cual es su relacion con este individuo:				
Por favor, explique por que han presentado para una tercera parte:				
Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre..		Si	No	
<b>Section III:</b>				
Creo que la discriminacion que he experimentado fue basado en (marqu todas las que correspondan):				
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origin Nacional <input type="checkbox"/> Edad <input type="checkbox"/> Impedimento <input type="checkbox"/> Familia o Estatus Religioso <input type="checkbox"/> Otro (explicar)				
Fecha de supuesta discriminacion: (mm/dd/aaaa)_____				
Explica lo mas claramente posible lo que ocurrio y por que usted cree que son objeto discriminacion. Describir todas las personas que han participado. Incluir el nombre y la informacion de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), asi como los nombres y la informacion de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.				
<b>Section IV</b>				
Anteriormente ha presentado un Titulo VI denuncia con esta agencia?		Si	No	



**Section V**

Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado??

☐ Si ☐ No

Si la respuesta es si, Marque todo lo que aplica

☐ Agencia Federal: \_\_\_\_\_

☐ Federal Tribunal \_\_\_\_\_ ☐ Agencia Estatal \_\_\_\_\_

☐ Tribunal Estatal \_\_\_\_\_ ☐ Agencia Local \_\_\_\_\_

Proporcionan informacion acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia

Nombre:

Titulo:

Organismo:

Direccion:

Telefono:

Correo electronico:

**Section VI**

Nombre de organismo Transito denuncia es contra:

Persona de contacto:

Título: :

Telefono:

Usted puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamación.

Firma y fecha son necesarios para completar la forma siguiente:

Firma: \_\_\_\_\_

Fecha: \_\_\_\_\_

Por favor, envíe este formulario en persona o por correo este formulario a la siguiente dirección:

Marceia Lathou, Título VI Coordinador  
St. Lucie TPO  
466 SW Port St. Lucie Boulevard, Suite 111  
Port St. Lucie, Florida 34953

## Fòmilè pou Pote Plent

<b>Seksyon I :</b>			
Non:			
Adrès:			
Nimewo Telefòn (Lakay):		Nimewo Telefòn (Travay):	
Adrès Imèl:			
Egzijans pou Fòma Aksèsib?	Gwo Lèt		Kasèt Odyo
	TDD		Lèt
<b>Seksyon II :</b>			
Èske ou ap pote plent sa a sou non pwòp tèt ou?		Wi*	No
*Si ou te bay yon repons "wi" pou kesyon sa a, ale nan Seksyon III.			
Si se non, tanpri bay non ak relasyon moun an sou non ou ap pote plent la:			
Tanpri eksplike rezon an poutèt ou ap pote yon plent sou non yon twazyèm pati:			
Tanpri konfime ke ou te jwenn pèmisyon leze pati a si ou ap pote plent la sou non yon twazyèm pati.		Wi	Non
<b>Seksyon III :</b>			
Mwen kwè ke diskriminasyon an mwen te eksperyans te baze sou (tcheke ti kare a pou tout rezon yo ki aplikab):			
<input type="checkbox"/> Ras <input type="checkbox"/> Koulè <input type="checkbox"/> Orijin Nasyonal <input type="checkbox"/> Laj <input type="checkbox"/> Enfimite <input type="checkbox"/> Kondisyon Familyal oswa Relijye <input type="checkbox"/> Lòt (eksplike)			
_____			
Dat Diskriminasyon Swadizan an te Rive (Mwa, Jou, Ane): _____			
Eksplike nan fason pi klè ke posib kisa ki te rive ak rezon poutèt ou kwè ou te eksperyans diskriminasyon. Dekri tout moun yo ki te enplike. Enkli non ak enfòmasyon kontak moun an (yo) ki te fè diskriminasyon kont ou (si ou konnen yo), osi byenke non ak enfòmasyon kontak nenpòt temwen. Si ou bezwen plis espas pou ekri, tanpri sèvi avèk do fòmilè sa a.			
_____			
_____			
<b>Seksyon IV</b>			
Èske ou te pote yon plent Tit VI avèk ajans sa a deja?		Wi	Non

**Seksyon V**

Èske ou te pote yon plent avèk nenpòt lòt ajans Federal, Leta, oswa ajans lokal, oswa avèk nenpòt lòt tribinal Federal oswa Leta?

☐ Wi ☐ Non

Si se wi, tcheke ti kare tout ki aplikab:

☐ Ajans Federal: \_\_\_\_\_

☐ Tribinal Federal \_\_\_\_\_ ☐ Ajans Leta \_\_\_\_\_

☐ Tribinal Leta \_\_\_\_\_ ☐ Ajans Lokal \_\_\_\_\_

Tanpri bay enfòmasyon sou yon moun yo kapab kontakte nan ajans / tribinal la kote yo te pote plent.

Non:

Tit:

Ajans:

Adrès:

Nimewo Telefòn:

**Seksyon VI**

Non ajans la kont ki yo pote plent la:

Non moun yo kapab kontakte:

Tit:

Nimewo Telefòn:

Ou kapab kole nenpòt materyel alekri oswa lòt enfòmasyon ou panse ki enpòtan konsènan plent ou nan dokiman sa a. Yo egzije siyati ak dat la anba a

\_\_\_\_\_  
Siyati

\_\_\_\_\_  
Dat

Tanpri soumèt fòmilè sa a nan adrès anba a, oswa voye li pa lapòs nan:

Marceia Lathou, Title VI Coordinator  
St. Lucie TPO  
466 SW Port St. Lucie Boulevard, Suite 111  
Port St. Lucie, Florida 34953

#### **4.3 RECORD RETENTION AND REPORTING POLICY**

The St. Lucie TPO will submit Title VI Program information to FDOT as requested as part of the annual certification process or any time a major change in the Program occurs. Compliance records and all Title VI related documents will be retained for a minimum of three (3) years.

### **5.0 TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

In accordance with 49 CFR 21.9(b), the St. Lucie TPO must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; actions taken by the St. Lucie TPO in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Program when it is submitted to FDOT.

The St. Lucie TPO has had no investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years.



## 6.0 PUBLIC PARTICIPATION PLAN

The [Public Participation Plan](#) (PPP) for the St. Lucie TPO was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for the St. Lucie TPO. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about the St. Lucie TPO plans, programs, and services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to plans, programs, and services. The St. Lucie TPO also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, community based organizations, major employers, and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Traditionally-underserved populations, also known as Environmental Justice (EJ) or Title VI populations, are identified by the federal government as low-income and minority populations. As part of its planning process, the TPO is required to evaluate the impact its projects have on these populations. The essence of effective environmental justice practice is summarized in three fundamental principles:

- Avoid, minimize, and lessen negative effects
- Ensure full and fair participation by all potentially affected communities
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

The TPO is committed to ensuring the full and fair participation of all potentially affected communities by striving for continuous, cooperative, and comprehensive public involvement in transportation decision-making. The TPO uses various data tools and maps to assist in identifying and building better relationships with the community. The composition of the TPO's boards and committees reflects the demographics of the community which enhances the TPO's community relations.

The TPO's outreach includes persons with disabilities and their service groups. The Local Coordinating Board for the Transportation Disadvantaged (LCB) includes persons with disabilities and disability group representatives. Several TPO advisory committee members also identify as persons with disabilities. In addition, a disability service group hosted the TPO's SmartMoves 2045 Long Range Transportation Plan Transportation Equity Focus Group. TPO staff often provides technical assistance to local agencies on ADA and Title VI matters.

Some TPO workshops are specifically designed to attract racial/ethnic minority and low-income populations and are thus held at times and locations that are most convenient for the communities served. In addition, members of these communities are recruited to participate in community-wide events.

In response to the current Covid-19 pandemic, the TPO's in-person workshops have been replaced by virtual workshops. The TPO collects demographic data on participation in its online events and social media sites via surveys. Because the U.S. Census estimates that 18 percent of St. Lucie households lack broadband Internet subscriptions, telephone-only access is provided for all TPO online meetings and workshops.

## 7.0 ADA/504 STATEMENT

Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA), and related Federal and State laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate disabled persons and ensure that their needs are equitably represented in transportation programs, services, and activities.

The St. Lucie TPO will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. The TPO will make every effort to ensure that its Advisory Committees, public involvement activities and all other programs, services, and activities include representation by the disabled community and disability service groups.

The TPO encourages the public to report any facility, program, service or activity that appears inaccessible to disabled persons. Furthermore, the TPO will provide reasonable accommodation to disabled persons who wish to participate in public involvement events or who require special assistance to access facilities, programs, services, or activities. Because providing reasonable accommodation may require outside assistance, organizations, or resources, the TPO asks that requests be made at least five (5) business days prior to the need for accommodation. Questions, concerns, comments or requests for accommodation should be made to the St. Lucie TPO ADA Officer: Marceia Lathou, Title VI-ADA Coordinator, St. Lucie TPO, 466 SW Port St. Lucie Blvd, Suite 111 Port St. Lucie, FL 34953; 772-462-1593; [lathoum@stlucieco.org](mailto:lathoum@stlucieco.org); Hearing/Speech Impaired: 711 Florida Relay System.

## 8.0 LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### 8.1 OVERVIEW

The first part of this section describes the purpose of the Limited English Proficiency (LEP) Plan. The second part of this section provides the four-factor LEP analysis used to identify LEP needs and assistance measures.

**Title VI of the Civil Rights Act of 1964** prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that LEP persons face with respect to accessing information and service. Government agencies must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

**Executive Order 13166**, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids grant funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from using "criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."



**Safe Harbor Provision**, The U.S. Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. This guidance includes a Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes **five percent (5%) or 1,000 persons**, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.





## 8.2 FOUR FACTOR ANALYSIS

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1	The number or proportion of LEP persons in the service area who may be served or are likely to encounter the St. Lucie TPO's programs, activities or services.
2	The frequency with which LEP persons come in contact with the St. Lucie TPO's programs, activities or services.
3	The nature and importance of programs, activities or services provided by the St. Lucie TPO to the LEP population.
4	The resources available to the St. Lucie TPO and overall cost to provide LEP assistance.

**1. Number and Proportion of LEP Persons Serviced or Encountered:** According to the U.S. Census 2018 American Community Survey (ACS) 5-Year Estimates of Limited English Speaking Households, the Spanish-speaking population exceeds the threshold for the Safe Harbor Provision in the St. Lucie TPO area. The ACS analyzes the following categories of limited English speaking households:

- Spanish
- Other Indo-European Languages
- Asian and Pacific Islander Languages
- Other Languages

Table B16003 "Age by Language Spoken at Home for the Population 5 Years and Over in Limited English Speaking Households" estimates that approximately 6,900 persons aged 18 years and older speak Spanish in LEP households in St. Lucie County.

Although the Census data concludes that Spanish is the only LEP population of significance in St. Lucie County, local knowledge indicates the presence of a sizeable Haitian-Creole LEP population as well.

## **2. Frequency with which LEP Individuals Come into Contact with Programs, Activities, and Services:**

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

The TPO Board, committees, and staff are most likely to encounter LEP individuals through office visits, phone conversations, and attendance at Board and Advisory Committee meetings. TPO staff reviewed the frequency with which Board, committee members, and staff have had contact with LEP persons. This includes documenting phone inquiries or office visits.

The TPO frequency of contact with LEP populations is somewhat limited especially when compared to providers of government social services which have higher instances of contact. These providers include the St. Lucie County Community Services Department and the County's contracted public transportation provider. Also, most of the TPO Board and committee meetings occur every other month or quarterly, and project-specific public input meetings occur on an as-needed basis.

## **3. Nature and Importance of the Program, Activity, or Service Provided:**

The TPO undertakes a variety of planning and policy initiatives to encourage a more sustainable region now and in the future. The transportation improvements resulting from these initiatives have an impact on all residents of the metropolitan planning area.

The impact of proposed transportation investments on under-served and under-represented populations is part of the evaluation process in the development of the Long Range Transportation Plan (LRTP), the Unified Planning Work Program (UPWP), and the Transportation Improvement Program (TIP). Because the TPO must ensure that all segments of the population, including LEP persons, have been involved or have the opportunity to be involved in the transportation decision-making process, the TPO will provide translation of vital documents — including meeting agendas, brochures, and portions of the LRTP, UPWP, and TIP into other languages as requested.

In general, the TPO's planning process affects residents in the long-term and not in an immediate manner. Therefore, there has not been a significant demand from LEP residents to participate in TPO planning and policy-oriented discussions compared with the demand from LEP residents for social and community services provided by other government agencies.



**4. Resources Available and Costs:** The TPO assessed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. The TPO currently provides materials in Spanish and Haitian-Creole such as factsheets, web content through an online language translator, and certain advertising notices.

The TPO has contacted various agencies to secure language translation as needed. St. Lucie County staff will provide voluntary Spanish and Haitian-Creole translation if needed and if notified within a reasonable timeframe. Other language assistance, if needed, will be provided through private sector translators and telephone interpreter lines for which the TPO would pay costs that are not considered to be exorbitant or onerous. The TPO has contracted with ALTA Language Services, Inc., a company which provides document translation and telephone interpretation services.

Persons requiring language assistance would be self-identified, meaning they would initiate contact with the TPO for assistance. All TPO board and committee agendas include a concise statement in Spanish and Haitian Creole notifying readers about the existence of language assistance. All TPO staff have access to "I Speak" cards to assist in identifying the type of language interpretation needed if the occasion arises.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

### 8.3 LIMITED ENGLISH PROFICIENCY (LEP) PLAN

In developing a Limited English Proficiency (LEP) Plan, federal guidance recommends the analysis of the following five elements, which are addressed below:

- 1 { • Identifying LEP individuals who need language assistance
- 2 { • Providing language assistance measures
- 3 { • Training staff
- 4 { • Providing notice to LEP persons
- 5 { • Monitoring and updating the plan

#### 1. Identifying LEP Individuals Who Need Language Assistance:

The Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

Using Census data, the TPO has identified the number and proportion of LEP individuals within its service area who need language assistance. As presented earlier, the largest non-English spoken language in the service area is Spanish. Other residents whose primary language is not English or Spanish are divided into a wide variety of language groups throughout the service area population. However, the TPO has determined, based on local knowledge, that a more significant number of Haitian-Creole speakers may also be present. The TPO may identify specific language assistance needed for an LEP group by examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.

**2. Providing Language Assistance Measures:** Federal guidance suggests that an effective Language Assistance Plan should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information. For this task, Federal guidance recommends that agencies consider developing strategies that train staff as to how to effectively serve LEP individuals when they either call agency offices or otherwise interact with the agency.

The St. Lucie TPO has undertaken the following actions to improve access to information and services for LEP individuals:

- Provide bilingual staff at community events, public meetings and committee meetings, where appropriate.
- Survey front-line staff on their experience concerning any contacts with LEP persons during the previous year.
- Provide Language Identification Flashcards ("I speak" cards) in the St. Lucie TPO office.
- When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. The TPO has contracted with ALTA Language Services, Inc., a company which provides document translation and telephone interpretation services.

The TPO will use demographic maps and other tools in order to better understand and serve the LEP community.

**3. Training Staff:** Federal guidance states that staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

The following training will be provided for all TPO staff:

- Information on Title VI procedures and LEP responsibilities
- Use of language identification flashcards and online resources
- Documentation of language assistance requests
- Procedures for handling a potential Title VI/LEP complaint

**4. Providing Notice to LEP Persons:** The St. Lucie TPO will make Title VI information available in English, Spanish and Haitian Creole on the TPO website. Key documents are written in English, Spanish and Haitian Creole upon request. Notices are also posted at the reception desk and in the Boardroom at the St. Lucie TPO office. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include a significant number of LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

**5. Monitoring and Updating the Plan:** The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determination as to whether the TPO's financial resources are sufficient to fund language assistance resources needed





The St. Lucie TPO understands the value that its programs, activities, or services play in the lives of individuals who rely on them, and the importance of enhancing public participation. The TPO is open to suggestions from all sources, including partner agencies, TPO staff, other agencies with similar experiences with LEP communities, and the general public regarding additional methods to improve accessibility for LEP communities.

## 9.0 PLANNING AND ADVISORY BODIES

The St. Lucie TPO is governed by a Board which is composed of elected officials from the three jurisdictions and representatives from the St. Lucie County School Board and the public transportation provider. There are twelve (12) voting members on the TPO Board. The TPO also maintains three committees and one other board: the Technical Advisory Committee (TAC), the Citizens Advisory Committee (CAC), the Bicycle-Pedestrian Advisory Committee (BPAC), and the Local Coordinating Board for the Transportation Disadvantaged (LCB) to provide opportunities for additional public involvement in the transportation planning process.

The St. Lucie TPO will make efforts to encourage minority participation on its boards and committees. These efforts are made by distributing information about participation on the committee at public meetings and through the website and social media. The TPO will use minority population demographic maps and other tools in order to focus on the areas in which board/committee participation information should be distributed.

**Racial Composition of TPO Board**

Position	Race	Gender
<b>Chair</b>	African American	Male
<b>Vice Chair</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	Hispanic/Latino	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	White	Female
<b>Member</b>	White	Male

**Racial Composition of CAC**

Position	Race	Gender
<b>Chair</b>	White	Female
<b>Vice Chair</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	African-American	Female
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	African-American	Male
<b>Member</b>	African-American	Male
<b>Member</b>	African-American	Female
<b>Member</b>	White	Male



**Racial Composition of TAC**

Position	Race	Gender
<b>Chair</b>	White	Female
<b>Vice Chair</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	Hispanic/Latino	Male
<b>Member</b>	White	Female
<b>Member</b>	Hispanic/Latino	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Female

**Racial Composition of LCB**

Position	Race	Gender
<b>Chair</b>	White	Female
<b>Vice Chair</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	African-American	Female
<b>Member</b>	African-American	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	Hispanic/Latino	Male
<b>Member</b>	White	Female
<b>Member</b>	Hispanic/Latino	Male
<b>Member</b>	African-American	Female
<b>Member</b>	White	Female
<b>Member</b>	African-American	Male
<b>Member</b>	African-American	Female
<b>Member</b>	Hispanic/Latino	Male
<b>Member</b>	White	Male

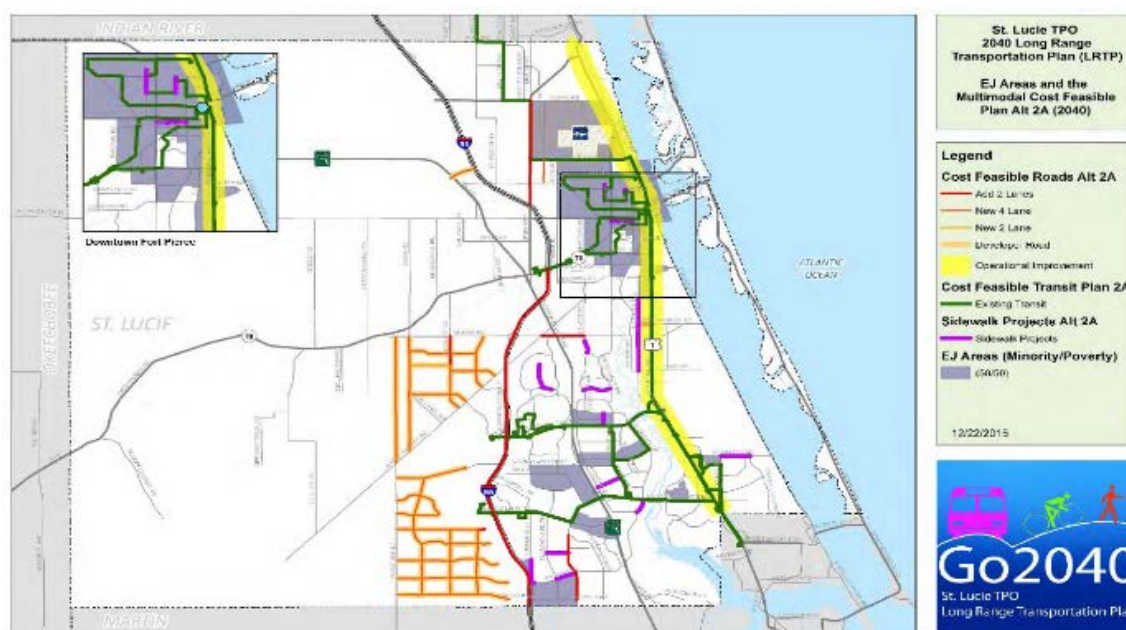
**Racial Composition of BPAC**

Position	Race	Gender
<b>Chair</b>	African-American	Male
<b>Vice Chair</b>	White	Female
<b>Member</b>	White	Female
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Male
<b>Member</b>	White	Male

## 10.0 TITLE VI/ENVIRONMENTAL JUSTICE ANALYSIS

Outreach to Title VI/Environmental Justice (EJ) communities was conducted during the development of the Go2040 Long Range Transportation Plan (LRTP) and an EJ analysis was conducted. The EJ analysis sought to determine the existence of disproportionately high and adverse effects on these communities as well as the equitable distribution of benefits to these communities. It was determined that disproportionately high and adverse effects were not present and that EJ communities benefitted from many of the transportation improvements in the LRTP. The SmartMoves 2045 LRTP, currently in development, will likewise include a Title VI/EJ analysis.

The following map taken from the Go2040 LRTP shows the EJ areas overlaid with the 2040 Cost Feasible Plan for roadways, transit and sidewalks. This map shows that the existing transit routes provide service to the EJ areas. The existing transit routes connect almost all of the TPO area today, and the Cost Feasible Plan includes more frequent headways and extended hours for several of the routes. Several of the candidate sidewalk gap projects shown on the map will provide improved access from EJ areas throughout the TPO area. Finally, Cost Feasible roadway projects shown on the map will enhance accessibility throughout EJ areas.





## 11.0 DATA COLLECTION

Federal aid recipients are required to collect and analyze racial, ethnic, and other similar demographic data on beneficiaries of or those affected by transportation programs, services and activities. The TPO accomplishes this through the use of Census data, Environmental Screening Tools (EST), driver and ridership surveys, and other methods. TPO staff has developed community profiles using current Census data. To supplement the Census data, the TPO uses demographic data from its transportation and social services partners. Demographic analysis is also conducted during the development of major planning documents such as the Long Range Transportation Plan (LRTP) and the Transportation Disadvantaged Service Plan (TDSP).

From time to time, the TPO may find it necessary to request voluntary identification of certain racial, ethnic or other data from those who participate in its public involvement events. This information assists the TPO with improving its targeted outreach and measures of effectiveness. Self-identification of personal data to the TPO will always be voluntary and anonymous. Moreover, the TPO will not release or otherwise use this data in any manner inconsistent with federal regulations.

## 12.0 TITLE VI ACCOMPLISHMENTS – FISCAL YEAR 2019/20

This section shall be revised annually to provide an update on the status of the previous fiscal year's goals and work plan. During Fiscal Year 2019/20, the St. Lucie TPO completed:

Accomplishment	Completion Date
Title VI training for Title VI Coordinator	June 26, 2020
Title VI training for TPO staff	June 30, 2020
Public Participation Plan adoption	February 5, 2020
Comprehensive review of current Title VI Plan and ADA policies and practices	June 30, 2020
Finalization of community engagement dashboard for use in all major plans and studies	June 30, 2020
Title VI Work Plan development	Ongoing
Conduct of virtual board/committee meetings in response to the Covid-19 pandemic	Beginning April 2020
Posting of information on website/social media	Ongoing
Collection and analysis of public involvement data	Ongoing
Participation in continuing education opportunities related to Title VI and public involvement	Various



## 13.0 TITLE VI ANNUAL WORK PLAN – FISCAL YEAR 2020/21

This section outlines annual goals set forth by the TPO to comply with Title VI requirements and statutes. This list will be monitored continually for updates and additions.

Goal	Completion Date
Title VI Implementation Plan Major Update Adoption	October 7, 2020
SmartMoves 2045 Long Range Transportation Plan Environmental Justice Analysis	February 2021
Federal Certification Review	April 2021
Title VI Training for Title VI Coordinator	TBD
Title VI Training for TPO staff	TBD
Comprehensive review of current Title VI Plan and ADA policies and practices	TBD
Presentation of 3D animation	June 2021
Completion of community engagement dashboards	As needed
Title VI Work Plan development	Ongoing
Posting of information on website and social media	Ongoing
Collection and analysis of public involvement data	Ongoing
Alignment of public involvement strategies with Covid-19 pandemic guidance from local and state governments	Ongoing
Annual PPP Evaluation of Effectiveness and Update	February 2021
Participation in continuing education opportunities related to Title VI and public involvement	Various