



# Title VI Nondiscrimination Plan

Lake~Sumter Metropolitan Planning Organization

*Draft for Advisory Committee & Board Review  
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## Contents

Introduction .....	1
Purpose.....	1
Policy Statement & Responsibilities .....	2
Program Administration & Title VI Responsibilities .....	5
Socioeconomic Profile of Lake~Sumter MPO Area.....	10

## Tables

Table 1   Lake~Sumter MPO Population Group Changes Over Time .....	11
Table 2   Lake County Population Group Changes Over Time .....	12
Table 3   Sumter County Population Group Changes Over Time.....	12
Table 4   Lake~Sumter MPO LEP Populations, 2015 .....	13

## Figures

Figure 1   Ethnic Make Up of Lake~Sumter MPO Region .....	10
Figure 2   Lake~Sumter MPO Region Hispanic or Latino Population.....	11
Figure 3   Limited English Proficiency (LEP) Populations.....	14
Figure 4   Populations Living in Poverty .....	15
Figure 5   Minority Group Populations .....	16

## Appendices

APPENDIX A: Policy Statement.....	17
APPENDIX B: Title VI Assurances.....	18
APPENDIX C: Title VI Complaint Procedure.....	20
APPENDIX D: FTA Civil Rights Assurance .....	22
APPENDIX E: Federal Handicap Assurance.....	23
APPENDIX F: Title VI Complaint Forms.....	24

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# INTRODUCTION

Representatives of Lake County and Sumter County governments, the 14 municipalities of Lake County, the five municipalities of Sumter County, the Florida Department of Transportation (FDOT), Florida Central Railroad, Lake County Schools, Sumter District Schools and the U.S. Department of Transportation (USDOT) are involved in the transportation planning process facilitated by the Lake~Sumter Metropolitan Planning Organization (LSMPO). The MPO's purpose is to provide effective leadership in the initiation and development of transportation plans, programs and strategies.

As the governmental body, most directly responsible for the guidance of the transportation planning process, the MPO strives to ensure that the recommendations are in keeping with the goals and standards of the Federal Government, the State, Lake County, Sumter County, and the 19 incorporated jurisdictions. The MPO functions include, but are not limited to, the preparation of the tasks required by state rule or by federal policy.

The MPO's major annual responsibilities are to perform the tasks of preparing the Unified Planning Work Program (UPWP), the Transportation Improvement Program (TIP), the annual List of Priority Projects (LOPP), Transportation Disadvantaged Service Plan (TDSP), and the annual MPO Audit Report. As with all transportation planning legislated by federal and state laws, the MPO is responsible for ensuring adequate representation of and compatibility among state, county, and municipal projects in the transportation planning process. This includes consideration of all modes of transportation with respect to various members of the public. For example, the MPO incorporates into its planning efforts the needs of the elderly and persons with disabilities as outlined in the Americans with Disabilities Act.

As part of the MPO planning process, public involvement is given a major priority. Projects funded through public dollars are to be planned in a manner that encourages public participation and incorporates public comments into planning efforts. As a result, a responsibility is placed on MPOs to develop a plan where the opportunity for public involvement is assured. As part of that plan and involvement process, outreach will be made in accordance with Title VI. The requirements and the procedures for following Title VI requirements are detailed further in this Title VI Plan.

## PURPOSE

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, national origin, sex, age, disability, religion, or family status in employment and the provision of government services. The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and consultants, whether such programs and activities are federally assisted or not. These requirements include the establishment of a Title VI Nondiscrimination Plan, along with a regular review of its effectiveness and conformity with federal and state law.

This **Title VI Nondiscrimination Plan** works in unison with the LSMPO's **Public Involvement Plan (PIP)** and **Limited English Proficiency (LEP) Plan**, which identify specific techniques for outreach, engagement, and involvement including notification, information, and opportunities for diverse participation.

# POLICY STATEMENT & RESPONSIBILITIES

The Lake~Sumter MPO assures that no person shall based on 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 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. The Lake~Sumter MPO further assures that every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs and activities are federally funded or not. In the event the LSMPO distributes federal aid funds to another governmental entity, the MPO will include Title VI language in all written agreements and will monitor for compliance.

## Objectives

- Identify and analyze relevant demographic data in Lake and Sumter counties to further the effectiveness of the Title VI Nondiscrimination Plan and to ensure that planning products analyze, mitigate, minimize or avoid disproportionate and adverse impacts on identified minority or low income communities;
- Engage citizens and other interested parties in LSMPO activities through broad notification and proactive opportunities for full and fair participation by communities traditionally underserved in the planning process (i.e. environmental justice);
- Engage citizens and other interested parties in LSMPO activities through broad notification and proactive opportunities for full and fair participation by communities traditionally underserved in the planning process (i.e. environmental justice); and
- Comply with federal and state requirements associated with Title VI nondiscrimination and the transportation planning process.

## Title VI Delegation Contacts

The Executive Director is responsible for ensuring implementation of the organization's **Title VI Nondiscrimination Plan** and provides direction to the **Title VI Specialist**. The Title VI Specialist, on behalf of the Executive Director, is responsible for the overall management and day to day administration of the Title VI program.

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### Lake~Sumter Metropolitan Planning Organization



**Michael Woods**  
Interim Executive Director & Title VI Specialist  
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## Title VI Specialist Responsibilities

The Title VI Specialist is charged with the responsibility for implementing, monitoring, and ensuring the MPO's compliance with Title VI regulations. Title VI responsibilities are as follows:

- Process the disposition of Title VI complaints received by the MPO;
- Collect statistical data (race, color, sex, age, disability or national origin) of participants in and beneficiaries of state highway programs, e.g., displaced individuals, affected citizens, and impacted communities;
- Conduct annual Title VI reviews of program areas (planning, consultant selection) to determine the effectiveness of program activities at all levels;
- Conduct Title VI reviews of consultants and other recipients of federal aid highway fund contracts administered through the MPO;
- Participate in training programs on Title VI and other related statutes for MPO employees and recipients of federal highway funds;
- Prepare a yearly report of Title VI accomplishments and goals, as required by 23 CFR 200.
- Develop Title VI information for dissemination to the public and, where appropriate, in languages other than English;
- Conduct post grant approval reviews of MPO programs and applicants (e.g., consultants, design and relocation, and persons seeking contracts with the MPO), for compliance with Title VI requirements;
- Identify and eliminate discrimination; and
- Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

## Lake~Sumter MPO Staff

Lake~ Sumter MPO staff members involved in public involvement are responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the Lake~ Sumter MPO 's public involvement process. These staff members will:

- Ensure that all communications and public involvement efforts comply with Title VI/LEP and Environmental Justice requirements;
- Develop and distribute information on Title VI programs to the public and provide information in languages other than English, as needed;
- Disseminate information to minority media and ethnic/gender related organizations, to help ensure all social, economic, and ethnic interest groups in Lake and Sumter counties;
- Include the Title VI Notice to the Public, full or abbreviated versions in relevant press releases and on the Lake~Sumter MPO website;
- Notify affected, protected groups of public meetings regarding proposed actions, and make the meetings accessible to all residents, including the use of interpreters when requested, or when a strong need for their use has been identified;
- Collect statistical information voluntarily from attendees of public meetings using zip codes if possible to track how well different segments of the population are represented; and
- Encourage Lake~Sumter MPO's committees to include representation from Title VI relevant populations.

## Compliance

To ensure compliance with federal Title VI requirements, LSMPO will coordinate LEP efforts in line with the following processes and procedures.

### Title VI Program Reviews

The MPO's Title VI Program reviews will be performed by the Title VI Specialist to assess the MPO's administrative procedures, staffing, and resources available for Title VI compliance. All programs will be reviewed annually to assure their effectiveness in compliance with Title VI provisions. This is in addition to the day to day monitoring. Title VI Specialist will coordinate efforts to ensure their equal participation in all programs and activities at all levels. The Title VI Specialist will conduct reviews of consultants and all other sub-recipients of FDOT's federal funds to ensure compliance with Title VI provisions.

### Annual Reports

An annual report will be submitted to the FDOT District Five's Title VI Coordinator reviewing Title VI accomplishments achieved during the year. The Title VI Specialist will be responsible for coordination and preparation of the report. A Title VI Annual Report will be submitted to FDOT by June 1<sup>st</sup> of each year. The report will describe the accomplishments and changes to the program occurring during the preceding year, and will also include any changes to the goals and objectives for the upcoming year.

### Post Grant Reviews

Review post grant approval procedures to ensure compliance with Title VI requirements

### Complaints

If any individual believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex, disability age or income status s/he may exercise their right to file a complaint with the MPO. Every effort will be made to resolve complaints informally at the MPO and consultant level.



## Legislation & Guidance

**Title VI of the Civil Rights Act of 1964** provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under a program or activity receiving federal financial assistance.

**The National Environmental Policy Act of 1969 (NEPA)** addresses both social and economic impacts of environmental justice, stressing the importance of providing safe, healthful, productive, and aesthetically pleasing surroundings for all Americans. NEPA requires a systematic, interdisciplinary approach to aid in considering environmental and community factors in decision making.

**The Civil Rights Restoration Act of 1987** clarified Title VI to include all programs and activities of federal aid recipients, sub recipients, and contractors whether federally funded or not. It also restored broad coverage intended by Congress, covering classes such as sex, age, and disability.

**The Florida Civil Rights Act of 1992** added religion and family status as protected classes.

**Federal Highway Administration and the Federal Transit Administration** issued a memorandum implementing Title VI requirements in metropolitan and statewide planning. The memorandum articulated that environmental justice is just as important during planning stages as it is during the project development stage.

## Remedial Action

The MPO will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and reducing to writing a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

- Sub-recipients placed in a deficiency status will be given a reasonable time, (not to exceed 90 days after receipt of the deficiency letter), to voluntarily correct deficiencies;
- The MPO will seek the cooperation of the sub-recipient in correcting deficiencies found during the review. The MPO will also provide the technical assistance and guidance needed to aid the sub-recipient to comply voluntarily;
- When a sub-recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the MPO will submit to FDOT's Civil Rights Office and the FHWA two copies of the case file and a recommendation that the sub-recipient be found in noncompliance; and
- A follow up review will be conducted within 180 days of the initial review to ensure that the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

## Limited English Proficiency (LEP)

The U.S. Supreme Court has also interpreted [Title VI](#) to prohibit conduct that has a disproportionate effect limited English proficiency persons; as such conduct constitutes discrimination based on national origin. Executive order requires reasonable steps to ensure meaningful access. LSMPO has developed a separate, yet related, plan to provide access to programs and services in languages other than English. The [Limited English Proficiency \(LEP\) Plan](#) works in unison with the [Title VI Nondiscrimination Plan](#) and the [Public Involvement Plan \(PIP\)](#).

## PROGRAM ADMINISTRATION & TITLE VI RESPONSIBILITIES

Five areas of the Lake~Sumter MPO's responsibilities have been recognized as applicable to Title VI regulations. These areas include:

1. Communications & Public Involvement;
2. Planning & Programming;
3. Environmental Affairs;
4. Consultant Contracts; and
5. Education and Training

The first three (3) Title VI applicable areas noted above are interrelated. However, to provide maximum clarification for this plan, these areas have been separated in this section.

## Communications & Public Involvement

The Communications and Public Involvement Program Area applies to and affects the Lake~Sumter MPO's organization, mainly tasks related to Planning & Programming and Environmental Affairs Program Areas. It has been treated as a separate program area for purposes of clarity, and consistent with Lake~Sumter MPO's organization. The Lake~Sumter MPO strives to have important and continuing public involvement in the transportation planning process and to encourage the public to express their ideas and values related to transportation issues. This will help support an open and effective communication channel with citizens in Lake and Sumter counties.

### Opportunities for Public Comments

The Lake~Sumter MPO routinely offers three different ways for citizens to comment on activities, programs, and decisions made at the Lake~Sumter MPO, including:

- **Comments are accepted at any time:** Comments are accepted via an online comment form, by phone, fax, email, U.S. mail, and in person at any board or committee meeting. Contact information for all Lake~Sumter MPO staff is provided on the website, and contact information for the Lake~Sumter MPO is included in all publications produced for the Lake~Sumter MPO. The Lake~Sumter MPO makes every effort to respond to all comments received;
- **Citizen comments are requested at agency meetings:** All board and committee meetings are open to the public. Meeting dates are posted well in advance on the Lake~Sumter MPO website. Public comments and responses made during these meetings are kept on record in the official meeting summaries. The MPO maintains mailing lists, to which anyone can request to be added; and
- **Formal public comment periods for major activities:** Formal public comment and review periods are used to solicit comments on major planning and programming activities. Comment periods are highlighted in advertisements in local newspapers, Lake~Sumter MPO publications, on the website, and in various press releases. Comments can be made in person, by email, by U.S. mail, fax, or telephone. The Lake~Sumter MPO will make every effort to respond to any comments received and will forward comments to other agencies when appropriate.

### Strategies for Engaging Title VI Protected Groups

The Lake~Sumter MPO understands that there are important segments of the population from who input is seldom, if ever, received. To improve representation of these groups in the transportation planning process, the MPO will take the following steps:

- Public meetings should be held in locations that are accessible by public transit. Also, facilities should be compliant with the Americans with Disabilities Act (ADA). If a targeted population is in a certain geographic area, then the meeting location should be in that area for their convenience;
- To facilitate involvement of traditionally underserved populations, community leaders and organizations that represent these groups should be consulted about how to most effectively reach their members. Relationships with these groups should be maintained for future partnerships in the planning process;

- In addition to mainstream media organizations, advertisements and news releases announcing public participation opportunities should be targeted to media that reaches minority and ethnic populations;
- Upon notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public involvement will include contact information for people needing these or other special accommodations; and
- At public meetings, MPO staff should attempt to communicate as effectively as possible. Technical jargon should be avoided and appropriate dress and conduct are important. For some meetings, it may be best to use trained facilitators or language translators to better communicate with the audience.

### Strategies for Engaging Individuals with Limited English Proficiency

The Lake~Sumter MPO will intermittently examine the socio-economic characteristics of the region to understand the ethnicities, income levels, and languages that are used in this region and develop strategies to communicate with these population segments. The MPO will attempt to ensure that public notices and advertisements are advertised in Spanish in minority newspapers, and will maintain a list of those MPO staff members who speak a language other than English to provide points of contact for persons needing information.

### Public Dissemination

The Title VI Specialist will disseminate Title VI Program information to MPO employees, sub-recipients, consultants, and beneficiaries as well as the public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation near proposed projects and announcements of hearings and meetings in minority publications.

In accordance with Title VI of the Civil Rights Act of 1964, the MPO is committed to establishing and maintaining practices that will ensure meaningful access to the MPO's plans and programs by persons with Limited English Proficiency (LEP). It is the policy of the MPO to ensure that no person is denied access to plans and programs as the result of the inability or limited ability to communicate in the English language

### Planning and Programming

The Lake~Sumter MPO is responsible for developing long and short range transportation plans to provide efficient transportation services to the Lake and Sumter Counties. A wide-ranging transportation planning process is used, which involves guidance from various transportation planning documents.

Primary guidance is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450;
- Moving Ahead for Progress in the 21st Century (MAP 21), reauthorizing surface transportation programs through fiscal year 2014. Each reauthorization amends the Federal Transit Laws codified in 49 USC Chapter 53. MAP 21 took effect on October 1, 2012.; and
- State and federal Clean Air Acts (CAA) and amendments.

The Lake~Sumter Metropolitan Planning Organization annually updates and coordinates the MPO's future transportation improvement plans and programs. A comprehensive transportation planning process is used which incorporates input from the public in coordination with the various jurisdictions affected. Planning includes the monitoring and collection of data. Title VI responsibilities include but are not limited to:

1. Ensure that all aspects of the planning process operation comply with Title VI of the Civil Rights Act of 1964;
2. Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic/gender related organizations and participating in roundtable meetings in predominantly minority communities;
3. Assist the Title VI Specialist in gathering and organizing the Planning section of the Annual Title VI Update Report;
4. Review the department's work program and other directives to ensure compliance with Title VI and other nondiscrimination program requirements; and
5. Attend public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.

## Data Collection

Statistical data on race, color, national origin, sex, age, disability and income status of participants in and beneficiaries of federally funded program will be gathered and maintained by the Title VI Specialist. Each of the Title VI program areas will maintain data to be incorporated in the Title VI Annual Update. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

## Environmental Affairs

The concept of environmental justice comprises the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Regarding regional transportation planning, environmental justice considers the relative delivery of costs and benefits from transportation investment strategies and policies among different segments of society. If a disproportionate impact is recognized, a mitigation plan will be developed and implemented based on feedback from the affected population. Lake~Sumter MPO staff members are responsible for evaluating and monitoring environmental justice compliance with Title VI. Staff members will:

- Ensure Title VI environmental justice compliance;
- Analyze and make findings regarding the population affected by the action;
- Analyze and make findings regarding the impacts of planned projects on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups; and
- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all agency public involvement procedures, including the dissemination of information to groups representing minority media and ethnic/gender related organizations, and the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

## Consultant Services & Contracting Services

The Procurement Department of Lake County is responsible for setting policy and establishing procedures for consultant selection, negotiation, and administration of consultant contracts for the MPO. Title VI responsibilities include but are not limited to:

1. Monitor DBE program requirements;
2. Ensure that all consultant contracts administered by the MPO have the appropriate Title VI provisions included;
3. Review directives and procedures to ensure Title VI compliance; and
4. Maintain necessary data and documentation required for completion of the department's Title VI Annual Report.

## Disadvantaged Business Enterprise (DBE) Program

It is Lake~Sumter MPO's policy to encourage all qualified businesses to actively participate in the procurement of all Lake~Sumter MPO sponsored contracts. The Lake~Sumter MPO does not discriminate based on race, color, sex, national origin, age, military status or disability. The Lake~Sumter MPO has established a **Disadvantaged Business Enterprise (DBE) program** in accordance with regulations of the U.S. Department of Transportation (USDOT), 49 CFR, Part 26.

### DBE Program Description

It is the Lake~Sumter MPO's policy to ensure that Disadvantaged (DBE) Businesses and Small Businesses (SBE) have an equal opportunity to receive and participate in USDOT assisted contracts. It is also the Lake~Sumter MPO's policy to:

- Ensure nondiscrimination in the award and administration of USDOT assisted contracts;
- Create a level playing field on which DBE/SBEs can compete fairly for USDOT-assisted contracts;
- Ensure that the DBE Program is narrowly tailored in accordance with applicable law;
- Ensure that only firms that fully meet 49 CFR, Part 26 eligibility standards are permitted to participate as DBEs;
- Help remove barriers to the participation of DBE/SBEs in USDOT assisted contracts; and
- Assist the development of firms that can compete successfully in the market place outside the DBE Program.

## Education & Training

Minorities, women, veterans, individuals with a disability, and other individuals are protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in all employment related decisions, including opportunities for education and training.

### LSMPO Training Program

Title VI training will be made available at least annually to employees, consultants, sub-recipients, and program area specialists. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints. A summary of the training conducted will be reported in the MPO's Annual Report.

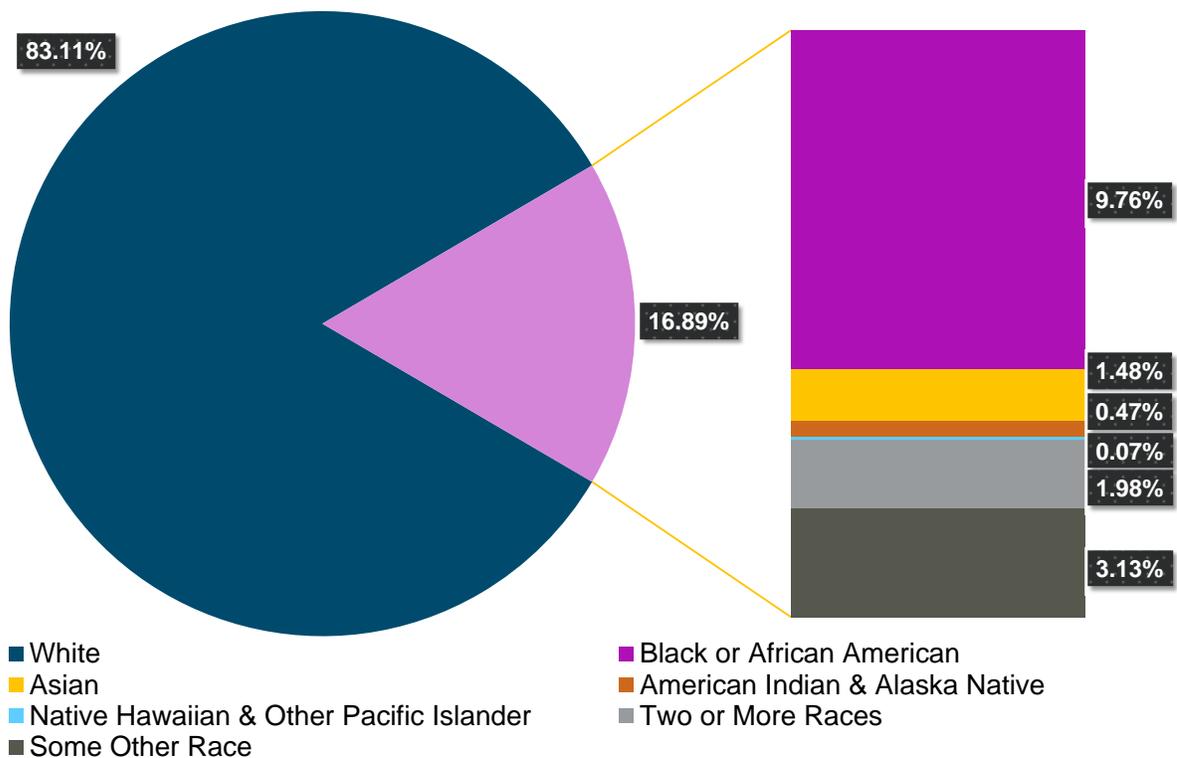
# SOCIOECONOMIC PROFILE OF LAKE~SUMTER MPO AREA

A review of the 2015 U.S. Census data, specifically the American Community Survey results, for the Lake~Sumter was conducted to evaluate the distribution of minority populations and low-income households throughout the region. The representation for each of these groups is summarized in the following section.

## Ethnic Makeup of Lake~ Sumter MPO Region

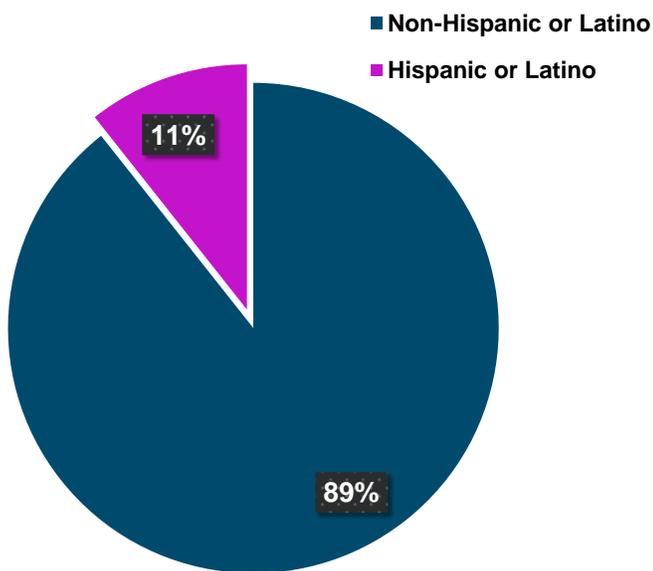
The ethnicity distribution in the Lake~Sumter MPO region is detailed in **Figure 1**. The minority population with the largest representation in the area is individuals identifying with Black or African American ethnicity, representing 10% of the population. There is some presence of individuals identifying as American Indian 3%, Asian 2%, and Native Hawaiian/Pacific Islander 2%.

**Figure 1 | Ethnic Make Up of Lake~Sumter MPO Region**



Source: US Census Bureau’s American Community Survey, 2015

**Figure 2 | Lake~Sumter MPO Region Hispanic or Latino Population**



Regarding populations identifying with a Hispanic or Latino heritage, the Lake~Sumter MPO region has 41,590 or 11% throughout Lake and Sumter counties as demonstrated in **Figure 2**. Most of this population resides Lake County with 36,009 residents identifying with Hispanic or Latino heritage. Of the total Hispanic or Latino group, the top heritages within this population are Mexican and Puerto Rican with both presenting 3.69% and this is followed by Cuban at 0.81%.

Source: US Census Bureau’s American Community Survey, 2015

### Ethnic Breakdown and Changes over Time for Lake~Sumter MPO Region

A comparison of the American Community Survey data from 2010-2015, shown in **Table 1**, demonstrates the changes over time for population groups in the LSMPO region. The total population has increased by 41,500 during this five-year span, with the minority population increasing by 3,854. The percent growth of minorities in the region for this time period is 6% increasing from 60,486 in 2010 to 64,340 in 2015. Specifically, the Black or African American population has increased the most, 3,073, in five years.

**Table 1 | Lake~Sumter MPO Population Group Changes Over Time**

<i>LSMPO Region</i>	<i>2010</i>	<i>2015</i>	<i>Pop. Change</i>	<i>2010 Percent</i>	<i>2015 Percent</i>	<i>% Change</i>
White	317,076	354,722	37,646	84%	85%	12%
Black or African American	36,294	39,367	3,073	10%	9%	8%
American Indian & Alaska Native	1,375	1,590	215	0%	0%	16%
Asian	5,515	6,295	780	1%	2%	14%
Native Hawaiian & Other Pacific Islander	273	373	100	0%	0%	37%
Two or More Races	5,935	7,809	1,874	2%	2%	32%
Some Other Race	11,094	8,906	2,188	3%	2%	20%

Source: US Census Bureau’s American Community Survey, 2015

**Table 2 | Lake County Population Group Changes Over Time**

<i>Lake County</i>	<i>2010</i>	<i>2015</i>	<i>Pop. Change</i>	<i>2010 Percent</i>	<i>2015 Percent</i>	<i>% Change</i>
White	242,871	258,871	16,000	83%	83%	7%
Black or African American	27,189	30,316	3,127	9%	10%	12%
American Indian & Alaska Native	1,123	1,183	60	0%	0%	5%
Asian	4,986	5,519	533	2%	2%	11%
Native Hawaiian & Other Pacific Islander	243	332	89	0%	0%	37%
Two or More Races	4,988	6,770	1,782	2%	2%	36%
Some Other Race	10,271	7,570	-2,701	4%	2%	-26%

Source: US Census Bureau's American Community Survey, 2015

**Table 3 | Sumter County Population Group Changes Over Time**

<i>Sumter County</i>	<i>2010</i>	<i>2015</i>	<i>Pop. Change</i>	<i>2010 Percent</i>	<i>2015 Percent</i>	<i>% Change</i>
White	74,205	95,851	21,646	86%	88%	29%
Black or African American	9,105	9,051	-54	11%	8%	-1%
American Indian & Alaska Native	252	407	155	0%	0%	62%
Asian	529	776	247	1%	1%	47%
Native Hawaiian & Other Pacific Islander	30	41	11	0%	0%	37%
Two or More Races	947	1,039	92	1%	1%	10%
Some Other Race	823	1,336	513	1%	1%	62%

Source: US Census Bureau's American Community Survey, 2015

### Lake & Sumter County Changes Over Time

**Tables 2 and 3** display the group changes over time per county. Lake County has the most significant percentage of diverse groups with 12% of the 2015 population identifying with an ethnic group outside of White. However, Sumter County, while having the least percentage of diverse group populations has witnessed a greater overall increase in ethnic populations with an 8% increase compared to Lake County's 6% increase when comparing 2015 datasets.

Despite these statistics, Sumter County did experience a 1% decrease within the Black or African American ethnic group population. Both counties did witness a significant increase in the Asian ethnic group population; with Lake County incurring 11% growth and Sumter County 47% growth from 2010 to 2015.

## English Language Proficiency for Lake~Sumter MPO Region

The 2015 American Community Survey 5-year estimate identified over 45,149 of the counties' households, Lake and Sumter counties combined, as speaking a language other than English at home; 33.92% of this population spoke English less than very well. **Table 4** identifies the top four languages spoken at home where English is not spoken very well. Where Spanish is spoken at home and English is not spoken well, this group is approximately 26.12% of the total LEP population (2.94% of MPO Population).

**Table 4 | Lake~Sumter MPO LEP Populations, 2015**

<i>Language Spoken</i>	<i>Speaks English "Less Than Very Well"</i>	<i>Percent Of MPO Population</i>	<i>Percent Of LEP Population</i>
Spanish	11,795	2.94%	26.12%
French Creole	764	0.19%	1.69%
French	363	0.09%	0.80%
Chinese	337	0.08%	0.75%
Vietnamese	287	1.87%	0.07%
Various Other Languages	1,797	11.71%	0.45%
<b>Total</b>	<b>15,343</b>	<b>100%</b>	<b>3.83%</b>

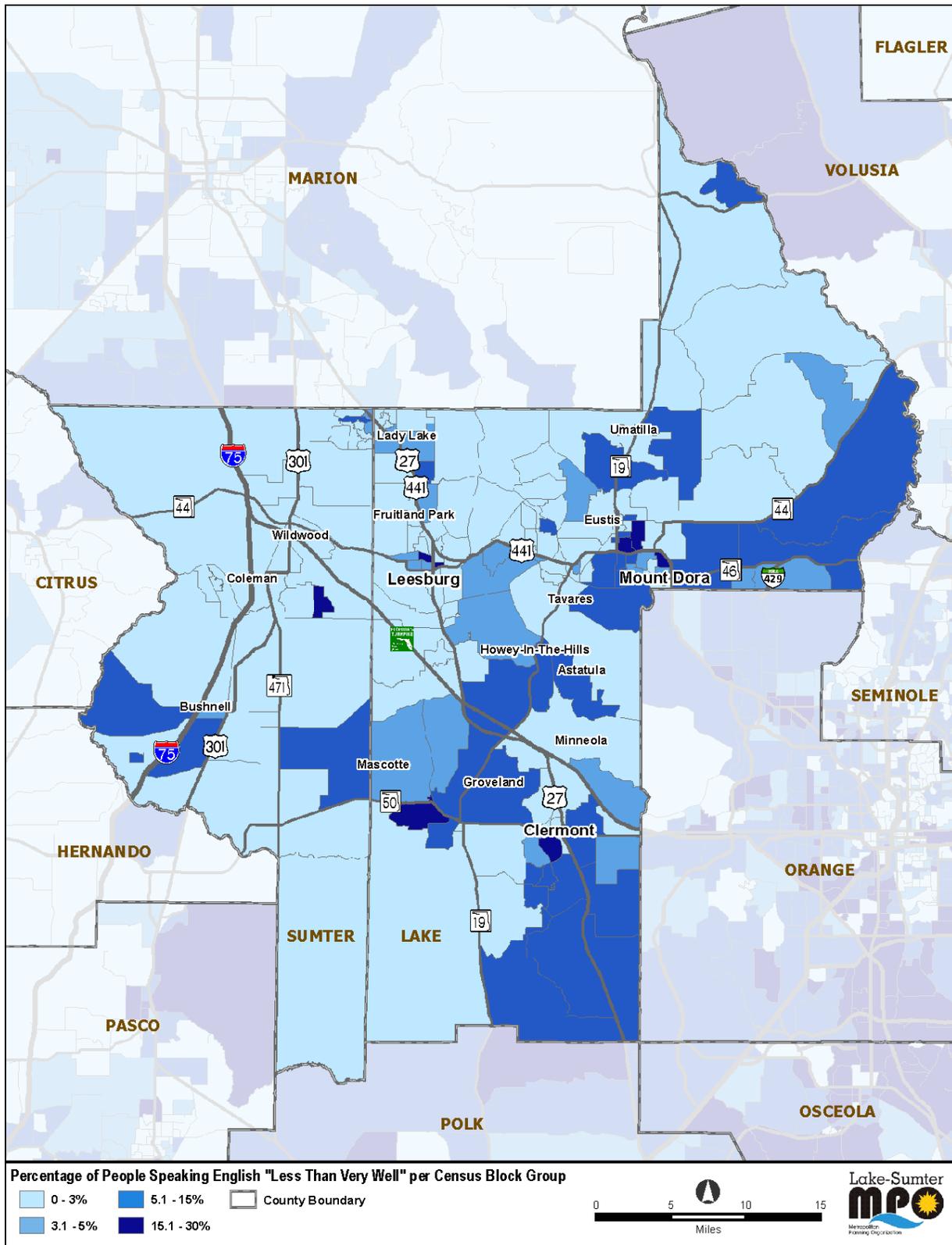
Source: US Census Bureau's American Community Survey, 2015

## LSMPO Title VI Spatial Analysis

A series of maps have been developed to help better understand the spatial distribution of the populations considered under Title VI requirements. **Figure 3** through **Figure 6** illustrate limited English proficiency, household income and below poverty, Hispanic, and minority populations within the Lake and Sumter Counties.

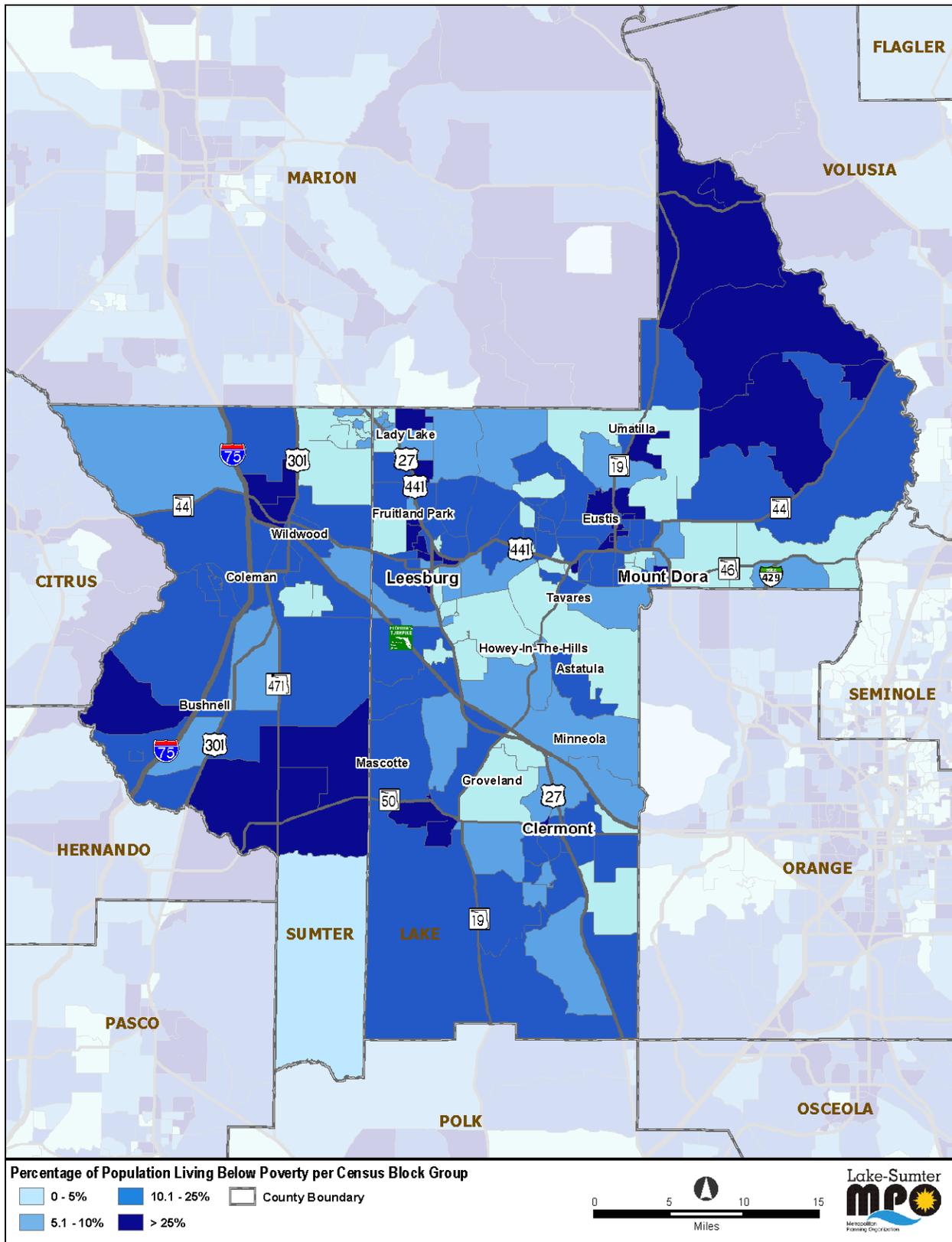
<p>Anyone wishing to contact the LSMPO with comments, questions, or complaints regarding Title VI, please contact:</p>	 <p><b>Michael Woods</b> Interim Executive Director &amp; Title VI Specialist (352) 315-0170 <a href="mailto:mwoods@LakeSumterMPO.com">mwoods@LakeSumterMPO.com</a></p>
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Figure 3 | Limited English Proficiency (LEP) Populations



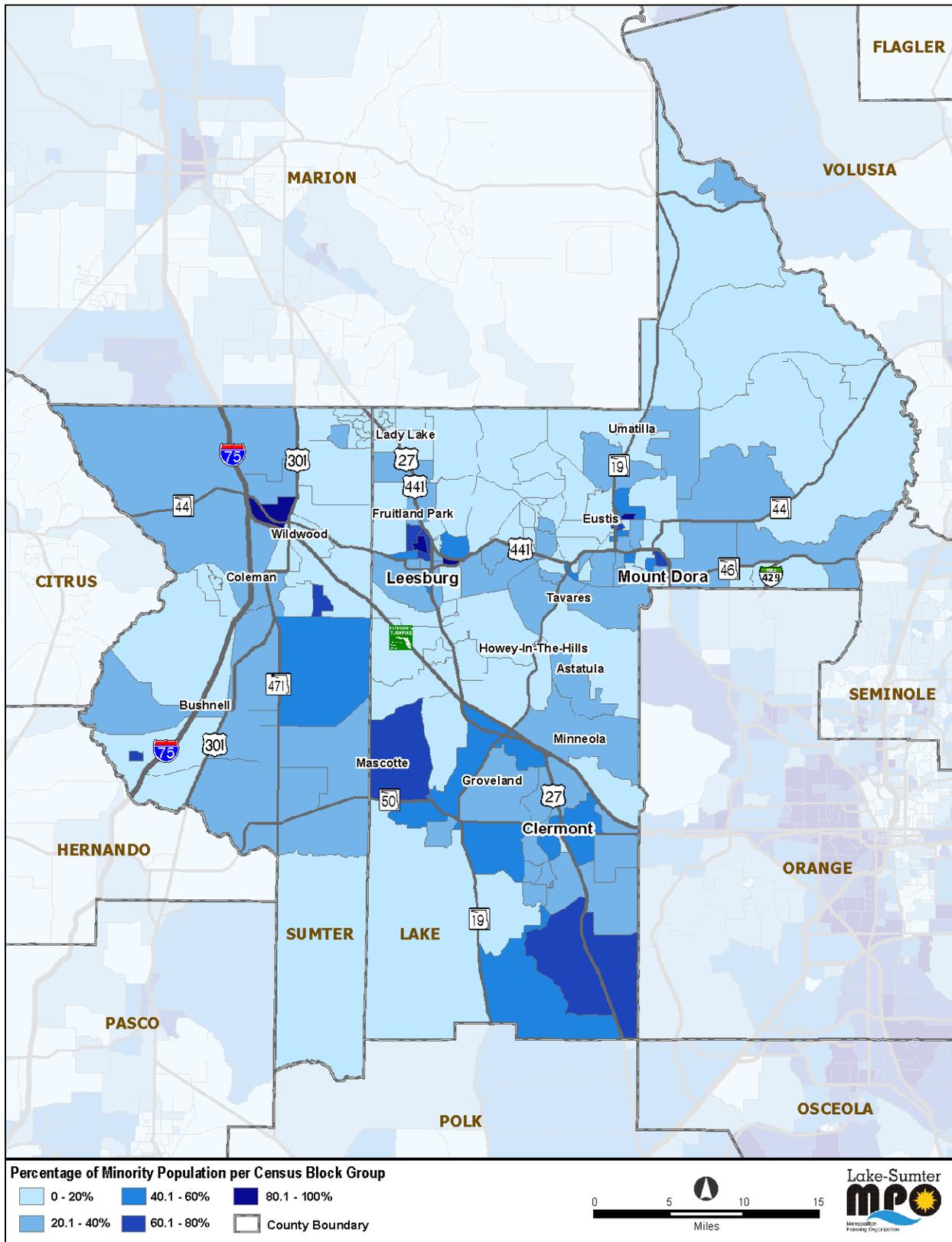
Source: US Census Bureau's American Community Survey, 2015

Figure 4 | Populations Living in Poverty



Source: US Census Bureau's American Community Survey, 2015

Figure 5 | Minority Group Populations



Source: US Census Bureau's American Community Survey, 2015

# APPENDIX A: POLICY STATEMENT

Original Available  
Upon Request

## Lake~Sumter MPO Title VI Policy Statement

Lake~Sumter MPO assures the Florida Department of Transportation 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 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.

Lake~Sumter MPO further agrees to the following responsibilities with respect to its programs and activities:

1. 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 Appendix A 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.**

\_\_\_\_\_  
Michael Woods  
Interim Executive Director  
Lake~Sumter Metropolitan Planning Organization

\_\_\_\_\_  
Date

## APPENDIX B: TITLE VI ASSURANCES

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### Lake~Sumter MPO Title VI Assurances

The Lake~Sumter Metropolitan Planning Organization (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d-42 USC 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a) (1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program.

1. That the Recipient agrees that each "program" and each "facility" as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program and in adapted form in all proposals for negotiated agreements

The Lake~Sumter Metropolitan Planning Organization in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d-d4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, sex, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix 1 of this Assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal Aid Highway Program.
8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom s/he delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, consultants, subconsultants, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

**THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, sub-grantees, consultants, sub-consultants, transferees, successors in interest and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign the Assurance on behalf of the Recipient.**

Michael Woods	Date
Interim Executive Director	
Lake~Sumter Metropolitan Planning Organization	

# APPENDIX C: TITLE VI COMPLAINT PROCEDURE

## Lake~Sumter MPO Title VI Complaint Procedure

Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities, may file a written complaint. All written complaints received by the recipient shall be referred immediately by the recipient's Metropolitan Planning Organization (MPO) Title VI Specialist to the FDOT's District Five Title VI Coordinator for processing in accordance with approved State procedures.

### **Title VI Complaint Procedure:**

1. Verbal and non-written complaints received by the recipient shall initially be addressed informally by the recipient's MPO Title VI Specialist. 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, the recipient's MPO Title VI Specialist shall refer the Complainant to the FDOT's District Five Title VI Coordinator for processing in accordance with approved State procedures.
2. The recipient's MPO Title VI Specialist will advise the 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 the 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)
  - 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 Specialist 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 Specialist 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 Specialist 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 Specialist 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 Specialist 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

**Note:** Consistent with the organization's Title VI Nondiscrimination Policy and Complaint Processing and Procedure, LSMPO accepts written or verbal discrimination complaints related to Title VI and other nondiscrimination authorities. A standard form, titled LSMPO Title VI Discrimination Complaint Form, is available in English and Spanish, online or 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 FDOT District Five Title VI Coordinator and (2) documentation filed in the official LSMPO log of Title VI complaints.

# APPENDIX D: FTA CIVIL RIGHTS ASSURANCE

Original Available  
Upon Request

## Lake~Sumter MPO Federal Transit Administration (FTA) Civil Rights Assurance

The Lake~Sumter Metropolitan Planning Organization HEREBY CERTIFIES THAT, as a condition of receiving Federal financial assistance under the Federal Transit Act Amendments of 1991, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit related benefits.
2. The Lake~Sumter Metropolitan Planning Organization will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The Lake~Sumter Metropolitan Planning Organization will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

\_\_\_\_\_  
Michael Woods  
Interim Executive Director  
Lake~Sumter Metropolitan Planning Organization

\_\_\_\_\_  
Date

# APPENDIX E: FEDERAL HANDICAP ASSURANCE

Original Available  
Upon Request

## Assurance Concerning Nondiscrimination on the Basis of Handicap in Federally Assisted Programs and Activities Receiving or Benefiting from Federal Financial Assistance (United States Department of Transportation)

The Lake~Sumter Metropolitan Planning Organization (the "Recipient") AGREES THAT, as a condition to that approval or extension of any Federal financial assistance from the United States Department of Transportation to construct any facility, or to participate in or obtain any benefit from any program administered by the Department, to which the Department's regulation set forth in Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 27 "Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance" (the "Regulation") applies, no otherwise qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives or benefits from Federal financial assistance administered by the Department of Transportation including the Federal Transit Administration, and GIVES ASSURANCE that it will conduct any program or operate any facility so assisted in compliance with all of the requirements imposed by the Regulation, or any directive issued pursuant to that Regulation.

\_\_\_\_\_  
Michael Woods  
Interim Executive Director  
Lake~Sumter Metropolitan Planning Organization

\_\_\_\_\_  
Date

# APPENDIX F: TITLE VI COMPLAINT FORMS

*English Language Form:*



## Lake~Sumter MPO 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 against you, position (if known):			
Please describe the event, occasion, place, etc. where the discrimination took place:			
Date of alleged incident:			
Discrimination on the basis of (please check):			
<input type="checkbox"/> Race	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Sex	<input type="checkbox"/> Familial Status
<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Age	<input type="checkbox"/> Disability
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

**Mail to:** Michael Woods, Lake~Sumter MPO, 225 W. Guava Street, Suite 211, Lady Lake, FL 32159

**Email:** [mwoods@lakesumtermpo.com](mailto:mwoods@lakesumtermpo.com)

**Fax:** (352)315-0993

**Spanish Language Form:**



# Lake~Sumter MPO

## Título VI Forma de Reclamo

Nombre de la persona discriminada		Número de teléfono diurno (si disponible)	Número de teléfono nocturno (si disponible)
Dirección de residencia (número y calle, número de departamento)		Ciudad, estado, y código postal de residencia	
Nombre de la persona que discriminó contra usted, y la posición de trabajo (si conocido):			
Describa por favor el acontecimiento, la ocasión, el lugar, etc. donde la discriminación sucedió:			
Fecha del incidente discriminatorio:			
Discrimination on the basis of (please check):			
<input type="checkbox"/> Raza	<input type="checkbox"/> Retaliación	<input type="checkbox"/> Sexo	<input type="checkbox"/> Estado Civil
<input type="checkbox"/> Color de Piel	<input type="checkbox"/> Nacionalidad	<input type="checkbox"/> Edad	<input type="checkbox"/> Impedimento Físico o Mental
<p>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.)</p>			
Firma		Fecha	

**Envíe por correo a:** Michael Woods, Lake~Sumter MPO, 225 W. Guava Street, Suite 211, Lady Lake, FL 32159

**Correo Electrónico:** [mwoods@lakesumtermpo.com](mailto:mwoods@lakesumtermpo.com)

**Fax:** (352)315-0993