

Limited English Proficiency Plan

Alamo Area Metropolitan Planning Organization

Title VI Coordinator

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Introduction

This *Limited English Proficiency Plan* has been prepared to address the federally funded Alamo Area Metropolitan Planning Organization's (MPO) requirements to meet the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or to understand English could be a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies, which receive federal funds, including the MPO.

Plan Summary

The MPO has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the MPO used the four-factor LEP analysis that considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the MPO.
2. The frequency with which LEP persons may come in contact with MPO services.
3. The nature and importance of services provided by the MPO to the LEP population.
4. The interpretation services available to the MPO and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to require MPO services.

The MPO staff reviewed data from the American Community Survey 5 year estimate (2009-2013) for the most recent year available for each county within the study area.

County	Total Population, 5 years and older	% of Population Speaking Language Other Than English	Speak a language other than English, Numerical	% of Population Speaking English less than very well	Speak English less than very well, numerical
Bexar	1,622,139	42.0	621,864	12.4	201,145
Comal	105,841	17.1	15,298	4.5	4,763
Guadalupe	126,278	24.1	27,628	6.4	8,110
Kendall	33,151	17.6	5,022	7.2	2,387

In the overall area, with 1,887,409 persons, 216,405 have some degree of limited English proficiency, or approximately 11.47% of the total population.

The chart below shows the raw numbers by category of the primary language spoken by persons with Limited English Proficiency by county within the MPO study area. Note: do to estimation percentages by the American Community Survey; totals between the two charts may not be exactly equal.

County	Limited English Proficiency, Spanish primary	Limited English Proficiency, Other Indo-European Languages primary	Limited English Proficiency, Asian and Pacific Island Languages primary	Limited English Proficiency, Other Languages primary
Bexar	180,341	5,902	11,769	2,912
Comal	4,253	314	145	11
Guadalupe	7,349	218	538	12
Kendall	2,154	202	37	0
Total	194,097	6,636	12,489	2,935

In the MPO study area, of those persons with limited English proficiency, 194,097 speak Spanish and 22,060 speak other languages.

2. The frequency with which LEP persons come in contact with MPO services.

The MPO staff reviewed the frequency with which MPO committee members and office staff have, or could have, contact with LEP persons. This includes phone inquiries or office visits. Since June 2001, the MPO has had no requests for interpreters and one request for translated program documents.

3. The nature and importance of services provided by the MPO to the LEP population.

In examining the MPO study area, as shown in Figure 1 at the end of this Plan, central and southern Bexar county have some of the highest concentrations of LEP individuals within the study area. However, within the majority of census tracts within the study area, there are individuals who speak English “less than very well”, including segments within Comal, Guadalupe, and Kendall Counties.

Transportation is a critical element to everyone’s quality of life. The MPO’s comprehensive, coordinated and continuous (“3C”) transportation planning process is important to and benefits the entire urban study area population including LEP persons. MPO committee members and office staff are most likely to encounter LEP individuals through office visits, phone conversations, and attendance at MPO meetings or attendance at meetings in which the MPO has a presence but may not be the convening entity.

4. The resources available to the MPO and overall cost to provide LEP assistance.

The MPO reviewed its available resources that could be used for providing LEP assistance, including those documents that would be most valuable to be translated into Spanish. In Fiscal Year 2014, \$2,100 was spent on translating various MPO documents into Spanish. In Fiscal Year 2015, \$1,400 has been budgeted for translation services due to the hiring of a dedicated Bilingual Public Involvement Specialist.

The Bilingual Public Involvement Specialist is primarily tasked with outreach to LEP communities by designing and implementing appropriate targeted programs between the LEP population and the MPO. Additionally, other MPO staff members are bilingual and can assist LEP individuals at the MPO office, committee meetings and MPO hosted meetings.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be entitled to language assistance with respect to MPO services. Language assistance can include interpretation, which means an oral transfer of a message from one language into another language or translation, which means the written transfer of a message from one language into another language.

How MPO staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All MPO staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

- When the MPO sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event without a 5-business day prior notice, it will help identify the need for future events.

Language Assistance Measures

Because almost 11.47% of the MPO study area's population speak English "less than very well," the MPO will strive to offer the following measures:

1. The MPO staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
 - Foreign language interpreters/translators will be provided given a 5-business day prior notice.
 - Language interpretation/translation will be obtained for all languages either through in-house expertise or a contracted service.

Staff Training

The following training will be provided to MPO staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI LEP complaint.

All contractors or subcontractors performing work for the MPO will be required to follow the Title VI/LEP guidelines.

Translation of Documents

Translation resources have been identified and are available. The following documents have been translated into Spanish and all are available to the public via hardcopy or on our website:

- Citizens Guide to Mobility 2040
- Walkable Community Program brochure
- Bicycle Safety brochure
- Walking & Wheeling brochure
- Spotlight on Mobility quarterly newsletter
- MPO Policy 5: Public Participation Plan
- Walkable Community Program Application

Additionally, videos produced by the MPO are, as of March 2015, being prepared in both English and Spanish for distribution via social media and website channels.

Generally speaking, when staff prepares a document, or schedules a meeting for which the target audience is expected to include a sizable number of LEP individuals, then documents, meeting notices, flyers, and agendas will be made available in an alternative language based on the known LEP population.

Monitoring

Monitoring and updating the LEP Plan -The MPO will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it becomes clear that higher concentrations of LEP individuals are present in the MPO service area. Updates will include the following:

- Documentation of the number of LEP person contacts encountered annually.
- Examination of 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.
- Recording new documents that have been translated into Spanish.
- Determination whether local language assistance programs have been effective and sufficient to meet the need.
- Determination whether the MPO's financial resources are sufficient to fund language assistance resources needed.

- Determination whether the MPO fully complies with the goals of this LEP Plan.
- Determination whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintenance of a Title VI complaint log, including LEP to determine issues and basis of complaints.

Dissemination of the MPO LEP Plan

The LEP Plan will be disseminated as follows:

- The LEP Plan will be posted on the MPO's website.
- Signs will be posted at conspicuous and accessible locations notifying LEP persons of the Plan and how to access language services.
- Agendas and public notices will state in language(s) of targeted MPO LEP groups that documents would be made available in that language upon request.

Adopted: December 3, 2012
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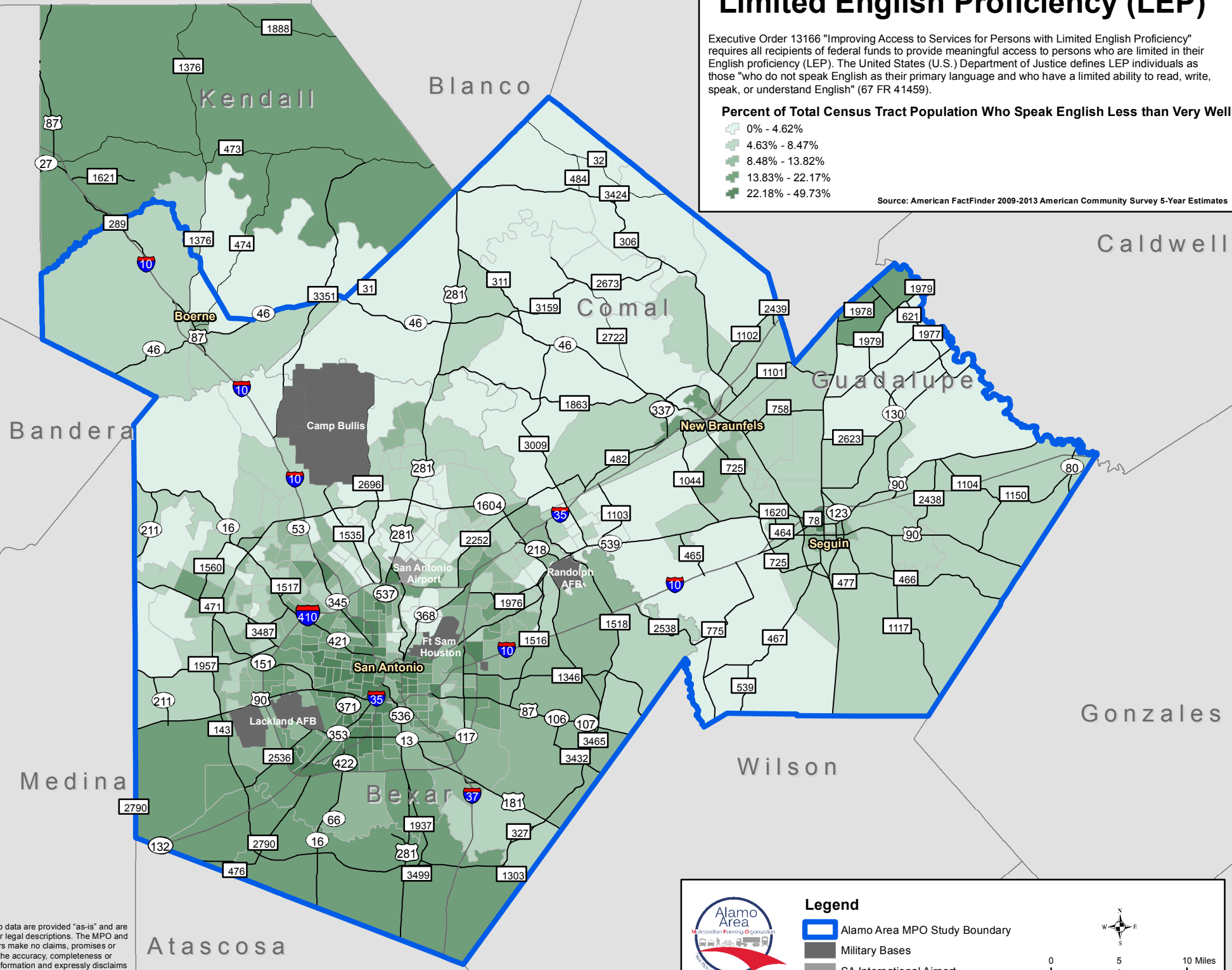
Limited English Proficiency (LEP)

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" requires all recipients of federal funds to provide meaningful access to persons who are limited in their English proficiency (LEP). The United States (U.S.) Department of Justice defines LEP individuals as those "who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English" (67 FR 41459).

Percent of Total Census Tract Population Who Speak English Less than Very Well

- 0% - 4.62%
- 4.63% - 8.47%
- 8.48% - 13.82%
- 13.83% - 22.17%
- 22.18% - 49.73%

Source: American FactFinder 2009-2013 American Community Survey 5-Year Estimates



Disclaimer
The maps and map data are provided "as-is" and are not legal surveys or legal descriptions. The MPO and its members make no claims, promises or guarantees about the accuracy, completeness or adequacy of this information and expressly disclaims liability for any errors and omissions.



- Legend**
- Alamo Area MPO Study Boundary
 - Military Bases
 - SA International Airport

