

Limited English Proficiency Plan
Alamo Area Metropolitan Planning Organization

Title VI Liaison
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Introduction

This *Limited English Proficiency Plan* has been prepared to address the federally-funded Alamo Area Metropolitan Planning Organization's (AAMPO) 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 AAMPO.

Plan Summary

AAMPO 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. As defined in 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, AAMPO 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 AAMPO.
2. The frequency with which LEP persons may come in contact with AAMPO services.
3. The nature and importance of services provided by AAMPO to the LEP population.
4. The interpretation services available to AAMPO 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 AAMPO service area who may be served or are likely to require services.

AAMPO staff reviewed data from the American Community Survey 5-year estimate (2017-2021) for each county within the study area.

County	Total Population, 5 years and older	% of Population Speaking Language Other Than English	Number who Speak a language other than English	% of Population Speaking English less than very well	Number who Speak English less than very well
Bexar	1,854,261	38.3	709,910	11.3	209,373
Comal	147,516	16.5	24,407	3.6	5,262
Guadalupe	159,314	21.3	33,884	5.7	9,072
Kendall	41,822	13.6	5,675	5.1	2,139
Total	2,202,913	35.1	773,876	10.3	225,846

In the overall area, with 2,202,913 persons, 225,846 have some degree of limited English proficiency, or approximately 10.3% of the total population.

The charts below show the raw numbers and percentages by category, and by county, of the primary language spoken by persons with Limited English Proficiency. Note: due 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, French, Haitian, or Cajun languages	Limited English proficiency, German or other West Germanic languages	Limited English Proficiency, Russian, Polish, or other Slavic languages	Limited English Proficiency, other Indo-European languages	Limited English Proficiency, Korean language
Bexar	638,131	3,093	4,383	3,174	17,586	3,082
Comal	20,716	371	1,168	81	839	244
Guadalupe	30,300	142	701	281	353	249
Kendall	5,004	82	149	9	70	47
Number Total	694,151	3,688	6,401	3,545	18,848	3,622
Percent Total	31.5%	0.17%	.30%	.016%	0.85%	0.16%

County	Limited English Proficiency, Chinese (incl. Mandarin, Cantonese) languages	Limited English Proficiency, Vietnamese language	Limited English Proficiency, Tagalog (incl. Filipino) language	Limited English Proficiency, other Asian and Pacific Island languages	Limited English Proficiency, Arabic language	Limited English Proficiency, other unspecified languages
Bexar	6,055	4,991	6,476	12,320	7,087	3,532
Comal	62	40	179	402	109	196
Guadalupe	302	630	431	333	1	161
Kendall	89	8	59	91	58	9
Number Total	6,508	5,669	7,145	13,146	7,255	3,898
Percent Total	0.30%	0.26%	0.32%	0.60%	0.33%	0.18%

In the counties that make up the AAMPO Study Area, persons with limited English proficiency total 773,876 with 694,151 speak primarily Spanish and 79,725 primarily speak other languages.

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

AAMPO staff reviewed the frequency with which Alamo Area MPO committee members and office staff have, or could have, contact with LEP persons. This includes phone inquiries or office visits. Since March 2017, AAMPO has had no requests for interpreters and no requests for translations related to LEP. It is important to note for six consecutive years, AAMPO accommodated one committee member, for hearing impairment, with Communication Access Real-Time Translation (CART) services.

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

In examining the AAMPO 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. 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. AAMPO’s comprehensive, coordinated, and continuous (3C) transportation planning process is important to and benefits the entire study area population including LEP persons. AAMPO committee members and office staff are most likely to encounter LEP individuals through office visits, phone conversations, and attendance at AAMPO meetings, or attendance at meetings in which AAMPO has a presence but may not be the convening entity. Since COVID pandemic stay at home orders were lifted in

2021, AAMPO bilingual staff has increased in-person outreach events through health fairs, church sponsored community resources, and interactions at public transportation transit centers.

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

AAMPO 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 2017, AAMPO hired a dedicated Bilingual Public Involvement Specialist. In addition, AAMPO budgets at least \$300 every fiscal year, with the ability to increase this amount as needed, to provide for LEP assistance and/or a sign language interpreter.

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 AAMPO. Additionally, five other AAMPO staff members are bilingual and can assist LEP individuals at the AAMPO office, committee meetings, and other AAMPO hosted meetings and events.

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 AAMPO 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 AAMPO 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 AAMPO staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

When AAMPO sponsors an informational meeting or event, an advanced public notice of the event is published including information related to accommodating special needs related to offering a translator (LEP) or interpreter (sign language or CART services 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 five-business day prior notice, it will help identify the need for future events. Efforts are made for AAMPO fluent Spanish-speaking staff to be present at all public meetings.

Language Assistance Measures

Because 10.3% of the AAMPO Study Area's population speak English "less than very well," AAMPO will strive to offer the following measures:

1. AAMPO 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 five-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 AAMPO 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 AAMPO will be required to follow the Title VI/LEP principles and 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 AAMPO's website:

- AAMPO Overview Rack Card
- Alamo Commutes Rack Card
- Active Transportation Rack Card
- Bicycle Safety Rack Card
- Clean Air Rack Card
- Walk Safe Rack Card
- Limited English Proficiency Plan
- AAMPO Policy 2: Public Participation Plan
- Walkable Community Program brochure
- Walkable Community Program Application

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

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

AAMPO will periodically update the LEP Plan. At a minimum, the plan will be reviewed and updated when new data from the U.S. Census Bureau is available, or when it becomes clear that higher concentrations of LEP individuals are present in the AAMPO service area. Updates will consider the following, as tracked by AAMPO staff:

- 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 AAMPO 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.

See AAMPO LEP Map on next page.

LEP Plan Adopted: December 3, 2012

Revised: March 31, 2015

Revised: March 6, 2023

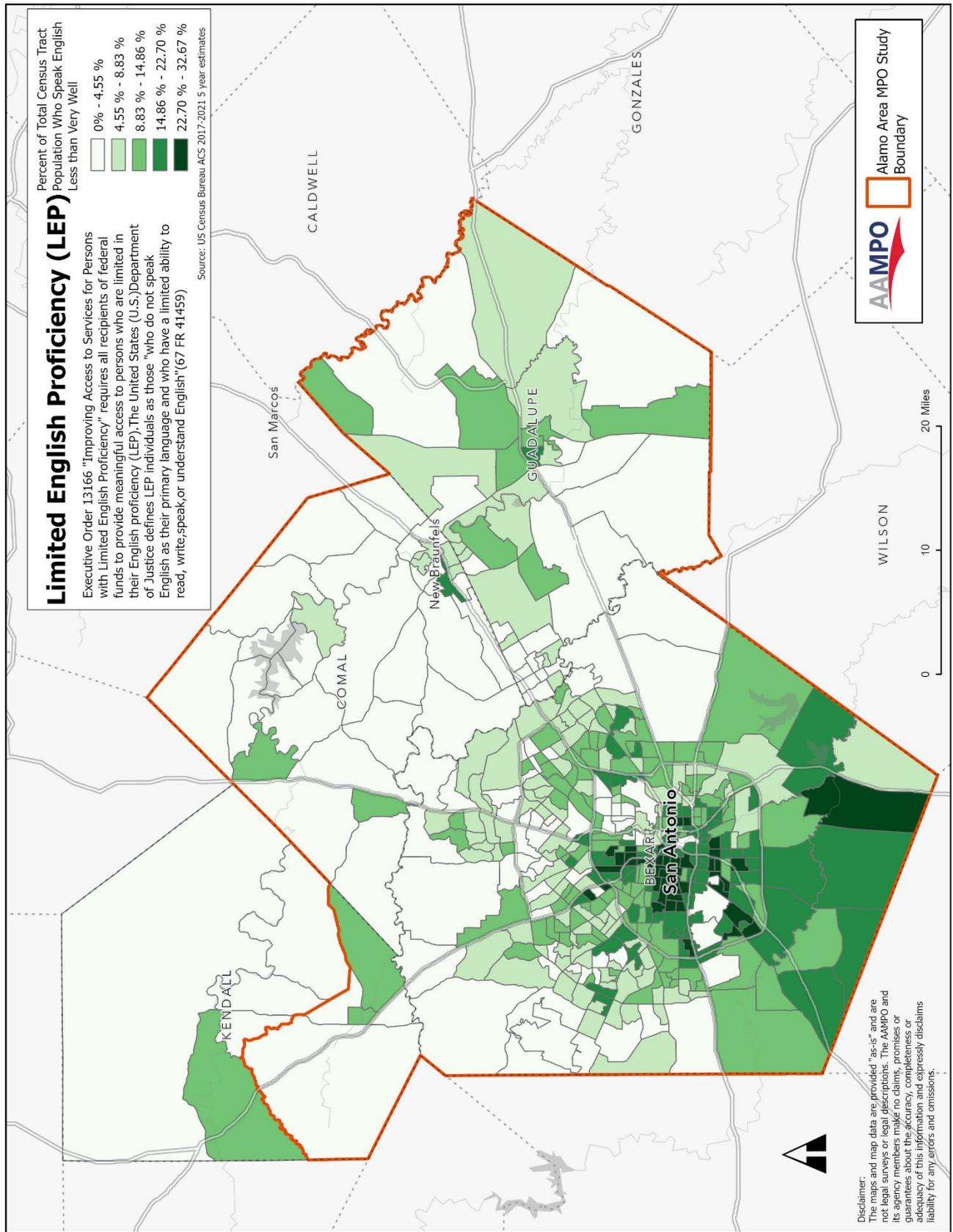


Figure 1 AAMPO Study Area LEP (March 2023)