

September 21, 2020



AGENDA ITEM 4B

CRTPA LIMITED ENGLISH PROFICIENCY PLAN (LEPP) UPDATE

TYPE OF ITEM: Consent

STATEMENT OF ISSUE

Staff is seeking approval of a minor update to the CRTPA's Limited English Proficiency Plan (LEPP), provided as ***Attachment 1***.

CRTPA COMMITTEE ACTIONS

On September 1, 2020, the Technical Advisory Committee (TAC) and the Citizen's Multimodal Advisory Committee (CMAC) recommended approval of the Limited English Proficiency Plan (LEPP). Comments received from the CMAC included recognizing the efforts to expand public outreach, and a recommendation for a revision to the Summary Table in the document, which is reflected in the attached document.

RECOMMENDED ACTION

Option 1: The CRTPA Governing Board approve the minor update to the CRTPA's Limited English Proficiency Plan.

BACKGROUND

The CRTPA believes that public involvement is critical to providing safe and equitable transportation facilities for everyone in the Capital Region, including those who are limited English proficient (LEP), either because English is not their native language, or they have low literacy in general. Providing meaningful access to essential CRTPA services for LEP individuals ensures compliance with key civil rights provisions, including Title VI of the Civil Rights Act of 1964 (which in part prohibits national origin discrimination) and subsequent Presidential Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, issued in August of 2000. To ensure LEP access, the CRTPA has completed a minor update to the Limited English Proficiency Plan (LEPP) to evaluate the number or proportion of LEP persons by County and for the region, and the frequency with which these persons contact the CRTPA.

MINOR UPDATE LEPP

The Minor Update to the LEPP utilized the most recent Census Data available from the America Community Five-Year Survey (2013-2018). The most significant change is that Hindi is no longer the predominate limited English proficient language group in Jefferson County. Instead, the data reflects that the significant population group with limited English proficiency is from the Spanish language group; as is the case with the rural counties of Gadsden and Wakulla. In Leon County there are three language groups identified with limited English proficiency. The Spanish language group constitute 38 percent, Asian and Pacific Islander language group make-up 31 percent and the Indo-European language group represent 23 percent of the LEP population. The remaining percentage is “Other”.

NEXT STEPS

Following the adoption of the minor update to the LEPP, updates to the Public Involvement Plan Process (PIPP) will be drafted for review by the public, and the CRTPA Committee and Board Members. As part of the development of the PIPP, staff will explore in greater detail strategies to reach all sectors of the public, including those with limited English proficiency. As applicable, data, resources and strategies identified as part of the PIPP will be incorporated in the LEPP.

To further the CRTPA’s outreach to populations with limited English proficiency, the CRTPA’s website is updated to include a language translation option. At this time translation options are available for ten languages, with additional languages to be included in a future update.

RECOMMENDED ACTION

Option 1: Approve the minor update to the CRTPA’s Limited English Proficiency Plan.
(Recommended)

Option 2: CRTPA Board Discretion.

ATTACHMENT

Attachment 1: Limited English Proficiency Plan (LEPP)



Limited English Proficiency Plan (LEPP)

300 South Adams Street, Tallahassee, Florida, 32301 Phone: 850-891-8630

www.crtpa.org

Limited English Proficiency Plan (LEPP)

Capital Region Transportation Planning Agency

Adopted: *September 21, 2020*

This Limited English Proficiency Plan has been prepared to address the CRTPA responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English 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 understand English is 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.

This Plan was financed in part by the U.S. Department of Transportation (USDOT), the Federal Highway Administration (FHWA), the Federal Transit Authority (FTA), the Florida Department of Transportation (FDOT), and the participating local governments.

The views and opinions of the authors (or agency) expressed herein do not necessarily reflect those of the USDOT, FHWA, FTA, FDOT, or the local participating governments of the CRTPA.

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I. Introduction

What is the CRTPA?

The Capital Region Transportation Planning Agency (CRTPA) serves as the metropolitan planning organization (MPO) for the Capital Region. As such, the CRTPA is responsible for the regional transportation planning that guides the future growth and development of Gadsden, Jefferson, Leon, and Wakulla counties. Mandated by federal and state law, the CRTPA provides continuous, cooperative, and comprehensive transportation planning for these counties and municipalities within.

The CRTPA Board is composed of elected officials who meet on a regular basis to provide direction and make decisions needed to implement transportation projects and strategies. The CRTPA works with its planning and transportation agency partners in Gadsden, Jefferson, Leon, and Wakulla counties, as well as the Florida Department of Transportation (FDOT), CRTPA committees, staff, and the public to:

- Identify and evaluate transportation needs in the region;
- Determine the types of studies, strategies, and improvements needed; and
- Develop short- and long-term programs and plans that include schedules, improvement needs, and funding sources.

Through the public involvement and planning process, the CRTPA guides how federal and state dollars are spent on existing and future transportation projects and programs in the region. The Limited English Proficiency (LEP) Plan is an important component of the public involvement and planning processes, as it provides the blueprint for how individuals with limited proficiency in the English language can have meaningful access to the transportation planning processes.

II. Background On Limited English Proficiency

What is Limited English Proficiency?

Limited English Proficiency (LEP) relates to how well a person can read, write, speak, or otherwise communicate in and understand English. Within the CRTPA region, there are communities, according to Census data, are identified as being language isolated, or not proficient in the English language. This is important information to know because these populations will need special planning consideration to ensure that the language barrier does not prevent them from engaging in the transportation planning process.

How do you identify LEP populations?

CRTPA staff utilizes the Census data as a primary source for identifying the type, number, and approximate geographical location of LEP persons that reside in the CRTPA area. The U.S.

Census Bureau does not define populations as, “Limited English Proficient”, but it does report data by Census Tract as to how well people in the region speak English. CRTPA staff utilizes Population Data Tables, “Language Spoken At Home By Ability To Speak English for the Population 5 Years and Over” to establish the estimated LEP population in the CRTPA Region. Evaluation of the Census data helps CRTPA staff anticipate what type and where the LEP populations may exist so that public involvement activities can be planned for a successful encounter if it happens.

What is a Limited English Proficiency Plan and why must the CRTPA have one?

Public participation is one of the most important components of a continuous, cooperative, and comprehensive, and as such, the CRTPA wants to make every effort to hear as many voices as it can. The CRTPA believes that the best transportation decisions consider the needs of the entire community and recognizes that the inability to speak English proficiently can create a barrier to participation in or access to the organization’s programs, services and activities. The Limited English Proficiency Plan (LEPP) is a document that outlines the measures that the CRTPA will take to bridge the gap and provide individuals with limited proficiency in English meaningful access to the transportation planning process.

Under the LEP Plan, LEP persons are provided an equal opportunity to services, information, or to benefit from those services and/or information that are provided in English or to English-speaking populations. The LEP Plan directs the CRTPA to provide services and information that is consistent with the fundamental mission of the organization but does not intend for the provisions therein to be inordinately burdening to the organization.

III. Building the Limited English Proficiency Plan

Factors Used to Frame the Plan

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

Factor 1: The number or proportion of LEP persons in the Capital Region Planning Area who may be served by the CRTPA.

Factor 2: The frequency with which LEP individuals come in contact with the CRTPA’s programs, services, or activities.

Factor 3: The nature and importance of services provided by the CRTPA to the LEP population.

Factor 4: The resources and interpretation services available and the overall cost to the CRTPA.

Factor Evaluation Updates

CRTPA staff reviews Census data with every long range transportation plan update, and more frequently if major public involvement projects are on the horizon prior to the next long range transportation plan update and new Census data is readily available. Additionally, the CRTPA local governments and advisory committees may alert staff of changes in the population demographics by personal observation. The CRTPA strives to have the most responsive public involvement plan for the CRTPA community. Therefore, the factors building the LEPP will be reviewed on an as-needed basis, and no less frequently than every long range transportation plan update and update to the Census data.

III. CRTPA Area Analysis For LEP

The following pages include an analysis of the CRTPA area pursuant to the four factors identified earlier for building a LEPP. The CRTPA does not intend that the four factor analysis should prevent meaningful access to participation or its documents. Anyone in need of assistance or accommodation in reviewing organization documents may contact the CRTPA Title VI Officer at 850-891-8627.

FACTOR 1: The number/ proportion of LEP persons eligible to be served/ likely to be encountered by CRTPA programs, services, or activities.

Analysis of Type of Contact: The CRTPA conducts regular Board meetings and advisory committee meetings throughout the year. Additionally, there will be public hearings and outreach programs conducted. Although the CRTPA Board meetings and advisory committee meetings are open to the public, the primary sources of contact with citizens is through the webpage and through community outreach and education events. Therefore, it stands to reason that ***the most likely encounter avenue with LEP individuals would be through education and outreach events in the community, and on the CRTPA webpage.***

Analysis of Number of LEP Persons likely to be Encountered: (Data from [Table DP02](#)) Language Spoken At Home by “Ability to Speak English Less than Very Well for the Populations 5 Years and Over” from the U.S. Census Bureau 2018 American Community Survey 5-Year Estimates, was gathered for each CRTPA county.

The results of the Census analysis revealed the following for the CRTPA Region:

County	Percentage of the Total County Population that is LEP	Predominant LEP Language Group as a Percentage of County Population	Percentage of the LEP Population for the County
Leon County	2.4%	Spanish: 4.2%	Approximately 38% of the LEP Population
		Indo-European: 2.6%	Approximately 23 % of the LEP Population
		Asian and Pacific Islander: 2.3%	Approximately 31% of the LEP Population
Gadsden County	4.49%	Spanish: 9.1%	Approximately 85% of the LEP Population.
Jefferson County	1.4	Spanish: 5.1%	Approximately 81% of the LEP Population.
Wakulla County	.8%	Spanish: 3.3%	Approximately 76% of the LEP Population.
Region	Percentage of the Total Region that is LEP	LEP Language Group as a Percentage of Region's Population	Percentage of the LEP Population for the Region
CRTPA Region	2.56	Spanish, 4.71% of the Four-County Region's Population	Approximately 51% of the LEP Population

The predominant LEP language in the region is Spanish. This LEP population group makes up only 1.3 % of the total population of the CRTPA area.

Results from Factor 1 Analysis: *Based on this information, it would seem reasonable to assume that, after English, the language the CRTPA is most likely to encounter is Spanish, and that it is more likely to be encountered in Gadsden County. The most likely encounter avenue with LEP individuals would be through education and outreach events in Gadsden County, and on the CRTPA webpage.*

FACTOR 2: The frequency with which LEP individuals come in contact with these programs, services, or activities.

Analysis of Frequency: The population analysis conducted for Factor 1 revealed that each county within the CRTPA has a different mix of LEP populations, but the most likely language to encounter is Spanish. The size of this population is relatively small, however, and to date, no request for language assistance services has been made by LEP persons.

Results from Factor2 Analysis: Based on this information, it is likely very infrequently that CRTPA staff will come in contact with LEP populations. CRTPA webpage.

FACTOR 3: The nature and importance of the program, service, or activity to people's lives.

Analysis of Importance: The CRTPA uses federal funds to plan for future transportation improvements and projects, including public involvement, education, and outreach endeavors. Although the work of the CRTPA is important to the community, it does not provide critical, emergency, or life-sustaining services to the community.

The CRTPA does program and provide services that affect the entire population of the CRTPA at some point, including the underserved and underrepresented populations. Title VI and Environmental Justice require that the impacts and benefits to these populations be considered in all actions of investment.

Results from Factor 3 Analysis: The primary projects/documents that the CRTPA undertakes that would be of the most importance for the Title VI populations to understand and have access to their content are :

- ***The Unified Planning Work Program***
- ***The Transportation Improvement Program***
- ***The Long Range Transportation Plan***
- ***The Transportation Disadvantaged Program***
- ***Ongoing Corridor Studies and Master Plans***

Therefore, the CRTPA will place emphasis on language assistance for educational materials and public input related to the five (5) major projects/documents above.

FACTOR 4: The resources available and the overall cost to the CRTPA

Analysis of Resources and Costs: Given the size of the LEP population in the CRTPA area and current financial constraints, full-language translations of complete transportation documents are not considered cost-effective. The CRTPA does have local government partners that have foreign language skills that they have offered to the CRTPA. Additionally, translation services, if

needed, could be secured from the General Consultant on contract with the CRTPA. General safety materials in Spanish are available from the Florida Department of Transportation.

Results of Factor 4 Analysis: Due to the small percentage of LEP population that is expected to be encountered and the high cost of translating document into a foreign language, the CRTPA will continue to provide Google Translate on the webpage for the LEP population to convert their own documents into a language they understand. Additionally, the CRTPA plans to continue the practice of having “on-call” translators available to convey information verbally as practical. For educational outreach endeavors, the CRTPA will continue to order outreach tools and brochures from the Florida Department of Transportation in Spanish for use in our community outreach endeavors such as coloring books, posters, etc. for roadway safety lessons.

IV. Methods To Communicate With LEP Individuals

Face-to-Face Language Barrier

The CRTPA staff will utilize language identification sheets to break the initial barrier of language isolation from the transportation planning process. These language identification sheets have the phrase, “Mark this box if you read or speak {name of language} translated into 38 different languages. The Language Identification Cards were downloaded for free at and were developed by the US Census Bureau. A copy of the Language Identification Cards is included in the Appendix.

The Language Identification Sheets will be available at public meetings, regular CRTPA and CRTPA advisory committee meetings, and at the CRTPA office. A list of CRTPA staff and associated individuals who speak and or write a language other than English and who are willing and able to act as interpreters has been identified for the CRTPA and can be called upon to assist at any encounter with a LEP individual. If a verbal translator is not available at the meeting, then the LEP individual will be directed to list their name and contact information so that we may get back with them via e-mail or phone call with a translator.

Oral Interpretation

The CRTPA will utilize bilingual staff to provide LEP services in Spanish, the most prevalent language in the CRTPA area. Further, CRTPA will reach out to its government partners and general consultant staff in an attempt to secure proficient oral interpretation. The organization maintains a list of its LEP service partners and regularly updates the list to add new resources

and languages. If CRTPA is unable to provide meaningful access using these sources, it will utilize professional translation services.

Written Translation

The CRTPA follows US Department of Justice and US Department of Transportation guidelines in providing translation of its documents into languages other than English. Using data collected from the Census, environmental screening tools, past public involvement efforts, and its advisory committees, the CRTPA will assess each of its documents in light of the four (4) factors listed previously and repeated below:

1. The number or proportion of LEP persons in the organization's service area.
2. The frequency with which the organization encounters LEP individuals.
3. The nature and importance of the program, service or activity in question.
4. The resources available to the organization.

To ensure appropriate and competent translation, CRTPA will utilize professional translation services, persons personally known to the CRTPA who are fluent in the requested language, or general consultant services.

As mentioned previously, the CRTPA has installed a Google Translate program <http://translate.google.com> in the website allowing users to view HTML contents in other languages. It is understood that this is not a perfect system, but it should provide enough information for a potential LEP individual or group to make contact with the CRTPA should they have questions or comments.

Notification of Assistance to LEP Persons

It is important to notify LEP persons of services that are available free of charge in a language the LEP persons would understand. The CRTPA will include the following language in English and in Spanish (where appropriate) on meeting notification and other informational materials.

"Public Participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or family status. Persons who require special accommodations under the Americans With Disabilities Act, or persons who require translation services (free of charge) should contact the CRTPA Title VI Coordinator, Suzanne Lex, four days in advance of the meeting at 850-891-8627 (Suzanne.Lex@crtpa.org) and for the hearing impaired, telephone 711 or 800-955-8771 (TDY)."

“La participación pública se solicita sin distinción de raza, color, nacionalidad, edad, sexo, religión, discapacidad o estado familiar. Las personas que requieran adaptaciones especiales en virtud de la Ley de Americanos con Discapacidades, o las personas que requieran servicios de traducción (sin cargo) deben comunicarse con Suzanne Lex, CRTPA Coordinadora del Título VI, al 850-891-8627 (Suzanne.Lex@crtpa.org) y para las personas con discapacidad auditiva, teléfono 711 o 800-955-8771 (TDY) cuatro días antes de la reunión.”

Contact Information

The CRTPA is open to new opportunities and ways of reaching LEP populations, including using foreign language publications in the area, and foreign language ads in English speaking or print media if practical. Anyone wishing to volunteer language services or suggest methods of LEP outreach please contact the CRTPA at 850-891-8627.

Anyone who seeks language services should contact the CRTPA’s Public Involvement/Title VI Coordinator:

Suzanne Lex

Phone: 850-891-8627

Email: Suzanne.Lex@crtpa.org

Appendix

TABLE I Data from American Community Survey Five-Year 2013-2018 Table DP02				
County or Region	Population 5 Years and Over			
County	Total Population Sampled	Language other than English "Speak English Less than "Very Well"	Spanish Spoken at Home	Spanish Spoken at Home "Speak English Less than "Very Well"
Gadsden	43,318	2,218	3,946	1,808
Jefferson	13,494	186	685	152
Leon	273,145	6,570	11,344	2,549
Wakulla	30,324	234	986	179
Capital Four-County Region	Total Population Sampled	Language other than English "Speak English Less than "Very Well"	Spanish Spoken at Home	Spanish Spoken at Home "Speak English Less than "Very Well"
TOTALS	360,281	9,208	16,961	4,688
Percentage	100%	2.56%	4.71%	50.91%

Census Language Identification Cards

- | | | |
|--------------------------|---|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Խոսողո՞ւմ ե՞սք նշողո՞ւմ կատարե՞ք այս քանակությունը, եթե խոսողո՞ւմ կամ կարողո՞ւմ եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید. | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această casuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish