



# Language Assistance Plan

Central Iowa Regional Transportation Planning Alliance

October 2015

## Table of Contents

Introduction.....	3
Background.....	3
Language Assistance Needs Assessment – Four Factor Analysis.....	4
Implementation of the Language Assistance Plan.....	10
Contact Information.....	12

The Central Iowa Regional Transportation Planning Alliance (CIRTPA) has prepared this document with partial funding from the United States Department of Transportation’s Federal Highway Administration and Federal Transit Administration, and in part through local matching funds provided by CIRTPA’s member governments. These contents are the responsibility of CIRTPA. The United States Government and its agencies assume no liability for the contents of this report or for the use of its contents.

## Introduction

The Central Iowa Regional Transportation Planning Alliance (CIRTPA) is a transportation policy-making board responsible for planning and prioritizing transportation projects and funding allocation in the eight-county area of Boone, Dallas, Jasper, Madison, Marion, Polk, Story, and Warren counties, though not including the planning areas of the Des Moines Area Metropolitan Planning Organization or Ames Area Metropolitan Planning Organization. The CIRTPA works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans and programs through a continuing, cooperative, and comprehensive planning process. This planning process guides the use of federal and state dollars spent on existing and future transportation projects and programs. The **Language Assistance Plan (LAP)** plays an important part in that process. It ensures individuals with limited English proficiency have meaningful access to the transportation planning process.

## Background

The U.S. Department of Transportation (DOT) requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide 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 any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The LAP outlined below is based on the federal guidance provided by U.S. DOT.

Who is a Limited English Proficient Person? Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are considered limited English proficient, or "LEP." The U.S. Census Bureau does not define limited

English proficiency or non-limited English proficient populations. It reports data based on the four categories of English-speaking ability: very well, well, not well, and not at all.

## Language Assistance Needs Assessment – Four Factor Analysis

This plan outlines how to identify a person who may require language assistance, the ways in which the CIRTPA provides such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment was conducted utilizing the four factor analysis, as recommended by USDOT. The four factors are:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by CIRTPA services and programs.
- Factor 2: The frequency with which LEP persons come into contact with CIRTPA services and programs.
- Factor 3: The nature and importance of the CIRTPA's services and programs in people's lives.
- Factor 4: The resources available to the CIRTPA for LEP outreach, as well as, the costs associated with the outreach.

### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by CIRTPA services and programs**

The planning and programming decisions made by the CIRTPA will affect the future economic health of the region and the transportation options available to residents. An effective LAP program is the only way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be addressed through the planning and project development process.

As indicated in the table below, the latest Census data shows a steady growth of the increasingly diverse population in the planning area. The eight county region has experienced a substantial increase in non-English speaking population or people who speak a language "other than English" (see Table 1).

Table 1: English Proficiency

CIRTPA	2000	2013	Percent Change
Language Spoken At Home	8-County Total		
Population 5 years and Over	600,230	704,478	17%
Language Other Than English	44,699	67,834	52%
Speak English Less than "very well"	20,788	29,549	42%
Spanish	19,471	31,627	62%
Speak Spanish Less than "very well"	9,234	14,832	61%
Other Indo-European Languages	12,823	14,508	13%
Speak English Less than "very well"	4,693	4,585	-2%
Other languages	12,405	21,699	75%
Speak English Less than "very well"	6,788	9,880	46%

Source: U.S. Census Bureau

When the LEP is further broken down, it indicates that is the Spanish, Serbo-Croatian, Chinese, Vietnamese, other Asian languages, and African languages groups pass the threshold for speaking English less than very well (see Table 2). The CIRTPA will continue to monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached in any additional language groups.

Table 2: Detailed Breakdown of English Proficiency

	Total	Percent
Total:	704,478	100%
Speak only English	636,644	90%
<b>Spanish or Spanish Creole:</b>	<b>31,627</b>	<b>4%</b>
<b>Speak English "very well"</b>	<b>16,795</b>	<b>2%</b>
<b>Speak English less than "very well"</b>	<b>14,832</b>	<b>2%</b>
French (incl. Patois, Cajun):	1,552	0%
Speak English "very well"	1,272	0%
Speak English less than "very well"	280	0%
Italian:	427	0%
Speak English "very well"	333	0%
Speak English less than "very well"	94	0%
Portuguese or Portuguese Creole:	208	0%
Speak English "very well"	175	0%
Speak English less than "very well"	33	0%
German:	1,915	0%
Speak English "very well"	1,469	0%
Speak English less than "very well"	446	0%
Yiddish:	66	0%
Speak English "very well"	62	0%
Speak English less than "very well"	4	0%
Other West Germanic languages:	311	0%
Speak English "very well"	219	0%
Speak English less than "very well"	92	0%
Scandinavian languages:	320	0%
Speak English "very well"	276	0%
Speak English less than "very well"	44	0%
Greek:	96	0%
Speak English "very well"	82	0%
Speak English less than "very well"	14	0%
Russian:	761	0%
Speak English "very well"	463	0%
Speak English less than "very well"	298	0%
Polish:	229	0%
Speak English "very well"	136	0%
Speak English less than "very well"	93	0%
<b>Serbo-Croatian:</b>	<b>4,856</b>	<b>1%</b>
<b>Speak English "very well"</b>	<b>2,665</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>2,191</b>	<b>0%</b>

Other Slavic languages:	145	0%
Speak English "very well"	67	0%
Speak English less than "very well"	78	0%
Armenian:	28	0%
Speak English "very well"	9	0%
Speak English less than "very well"	19	0%
Persian:	106	0%
Speak English "very well"	68	0%
Speak English less than "very well"	38	0%
Gujarati:	144	0%
Speak English "very well"	81	0%
Speak English less than "very well"	63	0%
Hindi:	982	0%
Speak English "very well"	759	0%
Speak English less than "very well"	223	0%
Urdu:	403	0%
Speak English "very well"	297	0%
Speak English less than "very well"	106	0%
Other Indic languages:	1,466	0%
Speak English "very well"	938	0%
Speak English less than "very well"	528	0%
Other Indo-European languages:	493	0%
Speak English "very well"	300	0%
Speak English less than "very well"	193	0%
<b>Chinese:</b>	<b>4,513</b>	<b>1%</b>
<b>Speak English "very well"</b>	<b>2,324</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>2,189</b>	<b>0%</b>
Japanese:	275	0%
Speak English "very well"	202	0%
Speak English less than "very well"	73	0%
Korean:	1,129	0%
Speak English "very well"	496	0%
Speak English less than "very well"	633	0%
Mon-Khmer, Cambodian:	258	0%
Speak English "very well"	107	0%
Speak English less than "very well"	151	0%
Hmong:	225	0%
Speak English "very well"	145	0%
Speak English less than "very well"	80	0%
Thai:	1,124	0%
Speak English "very well"	699	0%
Speak English less than "very well"	425	0%

Laotian:	2,156	0%
Speak English "very well"	1,353	0%
Speak English less than "very well"	803	0%
<b>Vietnamese:</b>	<b>3,180</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,307</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,873</b>	<b>0%</b>
<b>Other Asian languages:</b>	<b>2,427</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,376</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,051</b>	<b>0%</b>
Tagalog:	653	0%
Speak English "very well"	413	0%
Speak English less than "very well"	240	0%
Other Pacific Island languages:	468	0%
Speak English "very well"	260	0%
Speak English less than "very well"	208	0%
Navajo:	-	0%
Speak English "very well"	-	0%
Speak English less than "very well"	-	0%
Other Native North American languages:	143	0%
Speak English "very well"	115	0%
Speak English less than "very well"	28	0%
Hungarian:	3	0%
Speak English "very well"	3	0%
Speak English less than "very well"	-	0%
Arabic:	1,676	0%
Speak English "very well"	905	0%
Speak English less than "very well"	771	0%
Hebrew:	91	0%
Speak English "very well"	91	0%
Speak English less than "very well"	-	0%
<b>African languages:</b>	<b>3,269</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,923</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,346</b>	<b>0%</b>
Other and unspecified languages:	109	0%
Speak English "very well"	100	0%
Speak English less than "very well"	9	0%

Source: U.S. Census Bureau

\*Bold Text indicates languages that meet threshold

**Factor 2: The frequency with which LEP persons come into contact with the CIRTPA services and programs.**

The first factor identified Spanish as the most significant language spoken by the LEP population in the CIRTPA. The size of the LEP population in this region will likely continue to increase and, as a result, so will the probability of future contact with the CIRTPA. However, to date, no requests for language assistance services have been made by LEP individuals or groups. As the LEP program is expanded in the planning area, any requests for language assistance will be monitored and used to gauge the effectiveness of the CIRTPA's outreach to these populations.

The CIRTPA conducts regular board meetings and public hearings throughout the year. Community outreach and the CIRTPA's website is the main source of potential contact between the CIRTPA and LEP persons. As a result, the frequency of contact is difficult to anticipate.

The CIRTPA's Public Participation Plan highlights the need for outreach opportunities that engage populations that have traditionally been underserved and lacked involvement in the transportation planning process.

**Factor 3: The nature and importance of CIRTPA services and programs in people's lives.**

The CIRTPA programs use federal funds to plan for future transportation improvements and projects, and therefore do not include any direct services or programs that require vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter). Further, the CIRTPA does not conduct activities such as applications or interviews prior to participation in its programs or events. The participation of any citizen with the CIRTPA or its committees is voluntary.

However, the CIRTPA must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and the policy of the CIRTPA.

The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process in use of federal funds in three major areas for the CIRTPA. These three areas are deemed to have the most widespread impact on the lives of people in the planning area:

- The **Public Participation Plan (PPP)**, public engagement plan for planning activities;
- The **Transportation Improvement Program (TIP)**, a 4-year staged program of federally funded projects for all modes of travel; and,
- The **Long Range Transportation Plan (LRTP)**, a 35-year forecast of multi-modal transportation needs.

Inclusive public participation is a priority consideration in other CIRTPA plans, studies and programs as well. The impacts of transportation improvements resulting from these planning activities have an effect on all residents. The CIRTPA will place greatest emphasis on language assistance for educational materials and public input related to the three major programs and plans identified above. Related materials are often helpful with outreach for other CIRTPA projects and studies.

**Factor 4: The resources available to the CIRTPA for LEP outreach, as well as the costs associated with the outreach.**

The CIRTPA seeks input from all stakeholders, and every effort is made to ensure that the planning process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process.

Given the size of the LEP population in the CIRTPA area and current financial constraints, full language translations of complete transportation plan documents and maps is not considered warranted or cost feasible at this time. However, the CIRTPA plans to continue its practice of sending press releases to Spanish newspapers for important meetings and activities, and will evaluate the cost feasibility of additional translations of summary fact sheets and key website information into Spanish.

The CIRTPA will seek to identify any existing Spanish outreach materials from organizations such as federal, state, and local transportation agencies that can be effectively used as outreach tools to these communities. The CIRTPA will also expand efforts to collaborate with state and local agencies and educational facilities to provide language translation and interpretation services when practical, in consideration of funding limitations.

## Implementation of the Language Assistance Plan (LAP)

One of the main tasks for the CIRTPA is to monitor the prioritization of transportation projects in its Long Range Transportation Plan (LRTP). In particular, the CIRTPA must analyze any major decision made to the overall transportation system, particularly if it negatively affects areas of high concentration of LEP population. Some of the ongoing LAP implementation strategies include:

- Identifying the LEP Individuals who need Language Assistance;
- Language Assistance Measures;
- Public Involvement; and
- Monitoring and Updating the LAP.

**Identifying the LEP Individuals who need Language Assistance:**

The CIRTPA will continue to monitor the language needs of the LEP individuals within its services area and will continue to do the following:

- Continue to monitor the languages and the customers' needs encountered by the front-line staff;
- Use the Census Bureau's Language Identification Flashcards to help identify LEP individuals at public meetings and the front desk;
- Continue to monitor the American Community Survey 1-Year Estimate published each year by the US Census Bureau for changes in the LEP population; and,
- Closely monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached for LEP populations.

**Language Assistance Measures:**

The CIRTPA will continue to implement the current measures to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:

- Continue to provide for interpreters as needed in Spanish, Serbo-Croatian, Chinese, Vietnamese, and any other language requested through the Iowa International Center's Interpretation and Translation Services;
- When possible have a dedicated staff person willing to provide assistance to a Spanish speaking person;
- Provide links on the CIRTPA website in Spanish, Serbo-Croatian, Chinese, and Vietnamese with information on how to receive translation assistance;
- Continue to translate important notices regarding major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population; and,
- Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

**Public Involvement:**

The CIRTPA will continue to implement an inclusive public outreach process as detailed in the Public Participation Plan:

- Continue to monitor the effectiveness of the current process via feedback received from the public as well as certain targeted surveys;
- Update the Public Participation Plan as needed; and,
- Explore new and innovative techniques and strategies to engage the public in transportation planning.

### **Monitoring and Updating the LAP:**

The CIRTPA will continue to update the LAP as required by the USDOT and as the characteristics of the population changes. Updates will be made as necessary and may include, but not limited to:

- Changes in LEP population by number or area as new information are made available;
- Updated analysis of the current LEP service area;
- Requirements for addition language translation services; and,
- Updates to policies and procedures, if such guidance is directed by the CIRTPA Board.

### Contact Information

The CIRTPA does not intend that its LAP Plan exclude anyone requiring language assistance and will make every reasonable effort to accommodate requests. Anyone who requires special language services should contact the CIRTPA's Title VI Coordinator or the Communications Manager:

Tracey Deckard  
Office Manager/Title VI Coordinator  
420 Watson Powel, Suite 200  
Des Moines, IA 50309  
515.334.0075  
[tdeckard@dmampo.org](mailto:tdeckard@dmampo.org)

Gunnar Olson  
Communications Manager  
420 Watson Powel, Suite 200  
Des Moines, IA 50309  
515.334.0075  
[golson@dmampo.org](mailto:golson@dmampo.org)