

# LIMITED ENGLISH PROFICIENCY PLAN 2016



**Pikes Peak Area**  
Council of Governments  
Communities Working Together

## Limited English Proficiency Plan

### Introduction

Most individuals living in the United States read, write, speak, and understand English. There are many individuals, however, for whom English is not their primary language. These individuals can be limited English proficient, or “LEP,” and, therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964 and under Executive Order 13166.

The United States Department of Transportation (USDOT) published guidance concerning services and policies of federal agencies related to persons with limited English proficiency. This guidance requires federal agencies and others receiving federal funds to provide a fully coordinated process which includes analysis of the LEP community and public involvement that considers the needs of the LEP population. The Pikes Peak Area Council of Governments’ (PPACG) Limited English Proficiency Plan (hereinafter referred as the Plan) outlines this coordinated effort in the Pikes Peak Region.

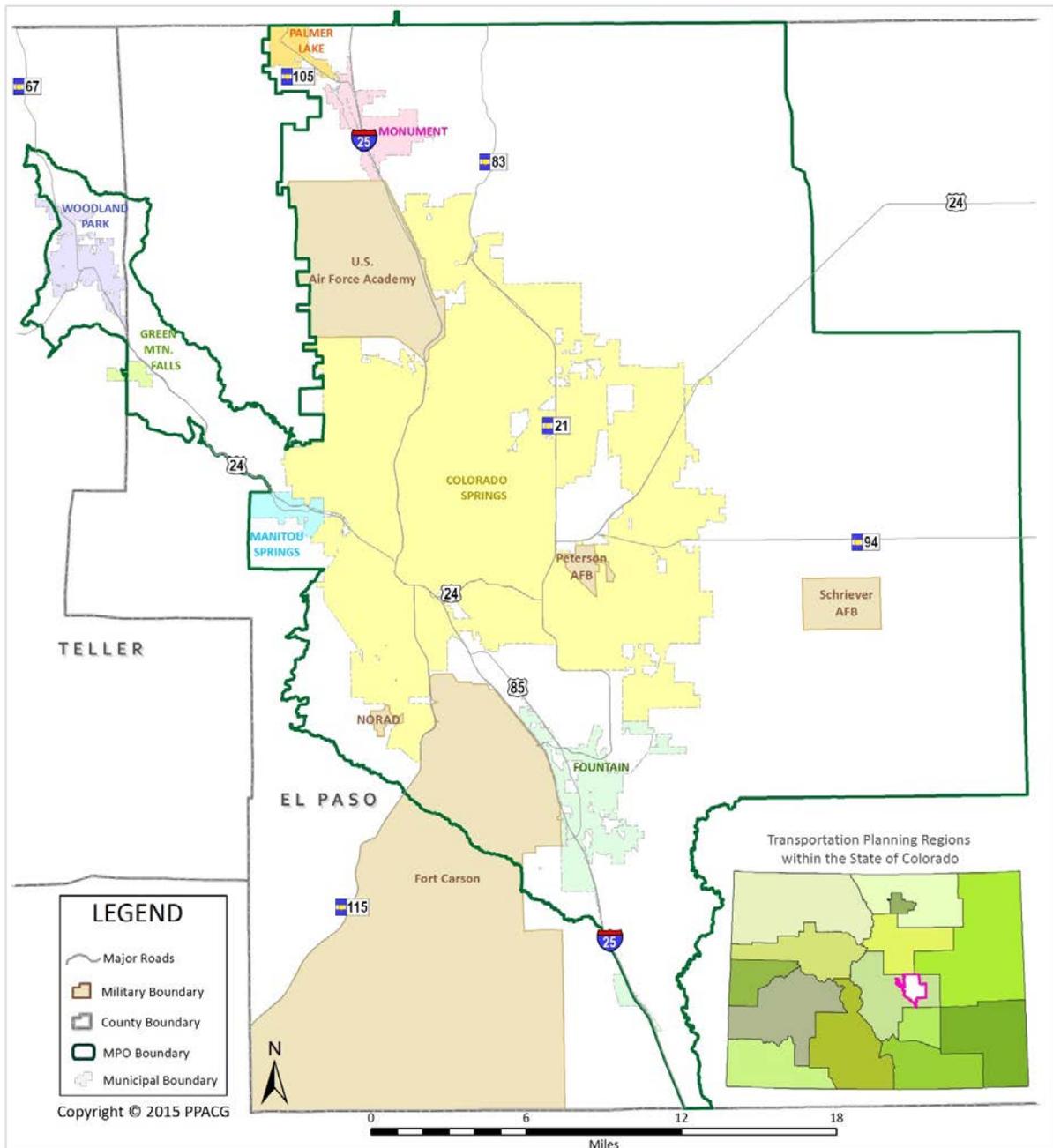
Serving the Pikes Peak region for over 47 years, the Pikes Peak Area Council of Governments (PPACG) is the federally designated Metropolitan Planning Organization (MPO) for the region. Established in 1967, PPACG provides comprehensive, coordinated transportation planning in two counties and seven municipalities.

### Title VI and Executive Order 13166

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 subjected to discrimination under any program or activity receiving federal financial assistance.”

Executive Order 13166, signed in August 2000, requires federal agencies subject to the requirements of Title VI, to examine the services they provide, identify any need for services for those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them, all without unduly burdening the fundamental mission of the agency.

PPACG incorporates Title VI considerations in its public participation outreach efforts by encouraging participation by ethnic, minority, and low-income groups, persons with disabilities and the elderly. This Plan outlines PPACG’s efforts to consider the needs of the LEP community and to provide the proper access so LEP persons can participate in the transportation planning and decision-making process.



### Four-Factor Analysis

Executive Order 13166 requires all federal agencies, and others which are federal financial assistance recipients, to apply a four-factor analysis in providing meaningful access for LEP individuals to all federally conducted programs and activities. The four-factor analysis considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity or service provided by the federal-funding recipient to people’s lives.
4. Resources available to federal funding recipients and costs of language assistance.

**Factor 1 Analysis – The number and proportion of LEP persons in the service area**

Subject	El Paso County, Colorado		Teller County, Colorado	
	No one age 14 and over speaks English only or speaks English "very well"		No one age 14 and over speaks English only or speaks English "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error
All households	2.0%	+/-0.2	0.5%	+/-0.4
Households speaking --				
Spanish	16.1%	+/-2.2	8.6%	+/-9.5
Other Indo-European languages	7.2%	+/-1.9	0.0%	+/-13.2
Asian and Pacific Island languages	16.1%	+/-3.7	31.9%	+/-28.8
Other languages	21.9%	+/-9.4	-	**
<b>PERCENT IMPUTED</b>				
Language status	3.4%	N/A	5.4%	N/A
Language status (speak a language other than English)	4.2%	N/A	14.6%	N/A
Ability to speak English	5.4%	N/A	11.0%	N/A

*Source: U.S. Census Bureau, American Community Survey, 2008-2012 5-Year Estimates.*

Based on the American Community Survey 5-year data, of those who speak a foreign language at home, less than 3% of both counties speak English less than well. Spanish alone accounts for half of this population.

**Factor 2 Analysis – The frequency in which LEP persons encounter the MPO programs**

Currently, interactions with LEP persons are rare. PPACG develops new transportation plans and improvement programs every four years. Amendments requiring public input to these documents are unpredictable and infrequent. PPACG is prepared, however, to use oral interpretation and/or written translation services for any LEP persons, when necessary.

### Factor 3 Analysis – The importance of the service provided by PPACG

As the federally designated MPO, PPACG must produce and maintain two major products which include transportation projects that have both beneficial and adverse impacts:

- Regional Transportation Plan
- Transportation Improvement Program

These products must conform to a “3C” planning process (continuing, cooperative, and comprehensive), to determine investment priorities for billions of dollars in federal, state, and local funds.

While involvement by any citizen with the transportation planning process is voluntary, PPACG must ensure all segments of the population, including LEP persons, have had the opportunity to be involved. One of PPACG’s core public involvement objectives is to ensure all citizens have the opportunity for public input. PPACG strives to make the planning process as inclusive and accessible as possible.

### Factor 4 Analysis – The resources available and overall cost

The fourth factor assesses the needs of LEP persons within the region against the resources and costs available to PPACG in addressing such needs. In order to meet PPACG’s goal to provide a cooperative transportation planning process, it is essential that information be disseminated in multiple formats to encourage a high level of participation.

PPACG employs the following media strategies to disseminate information: media kits, briefings, brochures, media interviews, public service announcements, social media (Facebook, YouTube and Twitter), PPACG’s website, and advertisements. PPACG’s website contains timely information with upcoming meetings and posted agendas, schedules, comment boxes, maps, and surveys. Meetings are open to the public and staff is always available to address diverse groups and various organizations and to field inquiries from citizens. Continued public involvement is encouraged throughout the process.

Due to limited budget and resources, however, PPACG must consider reasonable steps to provide language services. That is, PPACG is unable to translate all documents. PPACG will translate vital documents, or portions thereof, and those that provide access to essential services such as the “Title VI Complaint Form” and the “Notice to Beneficiaries of Protection Under Title VI.” PPACG will translate executive summaries for regional transportation plans and implementation programs. These documents will be translated into Spanish, the primary language identified for LEP persons in the region.

To reduce resource and cost issues, PPACG will use the latest technological advances in translation such as Google Translate for its web pages. With the appropriate amount of time, PPACG is committed to providing oral interpretation at public meetings.

### Monitoring and Updates

PPACG will update the LEP Plan at the beginning of each long range transportation plan development cycle. Updates will include the following:

- The number of documented LEP persons contacts encountered annually;
- How the needs of LEP persons have been addressed;
- Determination of the current LEP population within the PPACG metropolitan area;
- Determination as to whether the need for translation services has changed;
- Determination as to whether local language assistance programs have been effective and sufficient to meet the need;
- Determination as to whether PPACG's financial resources are sufficient to fund language assistance resources when needed;
- Determination as to whether the PPACG MPO fully complies with the goals of the LEP Plan;
- Determination as to whether complaints have been received concerning the MPO's failure to meet the needs of LEP individuals; and
- Maintenance of a Title VI complaint log, including LEP to determine issues and the basis of complaints.

### Where to Find the Plan

The Plan is posted on the PPACG website at [www.ppacg.org](http://www.ppacg.org). Copies of the Plan have been provided to the Colorado Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration.

Any questions or comments regarding this plan should be directed to:

Title VI Coordinator  
Pikes Peak Area Council of Governments  
15 South 7<sup>th</sup> Street  
Colorado Springs, CO 80905  
719-471-7080

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**Pikes Peak Area**  
**Council of Governments**  
Communities Working Together

**RESOLUTION BY**  
**THE PIKES PEAK AREA COUNCIL OF GOVERNMENTS**  
**BOARD OF DIRECTORS**  
**APPROVING**  
**THE TITLE VI AND LIMITED ENGLISH PROFICIENCY PLANS**  
**FOR THE METROPOLITAN TRANSPORTATION PLANNING PROGRAM**

**December 14, 2016**

**WHEREAS**, Title 23, Chapter 1, Section 134 and Title 49, Section 8, United States Code, as updated by the Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21) Act of 2012, requires that each urban area, as a condition to the receipt of Federal Capital or Operating Assistance, have a continuing, cooperative, and comprehensive transportation planning process that results in transportation plans and programs consistent with the planned development of an urbanized area, and

**WHEREAS**, pursuant to the aforementioned legislation, the Pikes Peak Area Council of Governments was designated by the Governor of the State of Colorado as the Metropolitan Planning Organization responsible for carrying out the transportation planning and programming requirements of Title 23 and Title 49, United States Code, and

**WHEREAS**, the Pikes Peak Area Council of Governments operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act, and

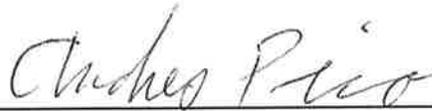
**WHEREAS**, in accordance with Title VI non-discrimination laws in regard to providing appropriate access to services and activities provided by federal agencies and recipients of federal assistance, the Limited English Proficiency Plan was drafted to define how the Pikes Peak Area Council of Governments will accommodate persons with Limited English Proficiency, and

**WHEREAS**, individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter, and

**WHEREAS**, the Pikes Peak Area Council of Governments assures that all of its programs and activities will be free from discrimination, whether those programs and activities are federally funded or not,

**NOW, BE IT THEREFORE RESOLVED**, the Pikes Peak Area Council of Governments hereby approves and adopts the Title VI Plan and the Limited English Proficiency Plan.

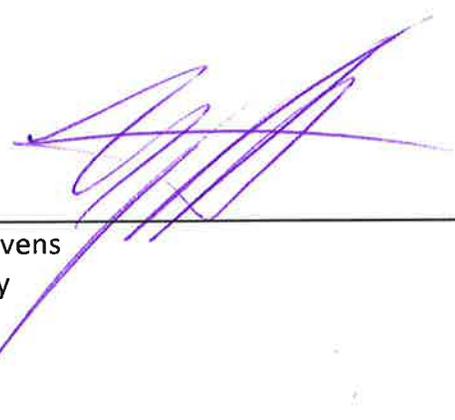
**RESOLVED, APPROVED, and ADOPTED** by the Pikes Peak Area Council of Governments this 14<sup>th</sup> day of December 2016, at Colorado Springs, Colorado.



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Andy Pico  
Chair

ATTEST



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Tyler Stevens  
Secretary