

LIMITED ENGLISH PROFICIENCY PLAN

*Pikes Peak
Area
Council of
Governments*

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Limited English Proficiency Plan

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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.

The PPACG Board of Directors provides policy guidance and direction for the regional planning process. This Board is comprised of elected officials from local member governments, representatives from state and federal agencies, and military installations. The MPO serves the following communities:

- El Paso County
- Teller County
- Colorado Springs
- Fountain
- Green Mountain Falls
- Monument
- Palmer Lake
- Woodland Park
- Manitou Springs

The PPACG uses a committee structure that provides subject matter knowledge, citizen and stakeholder participation, project guidance, and decision support.

The **Transportation Advisory Committee (TAC)** provides technical advice on transportation issues, goals, plans, and programs to the PPACG Board of Directors and staff.

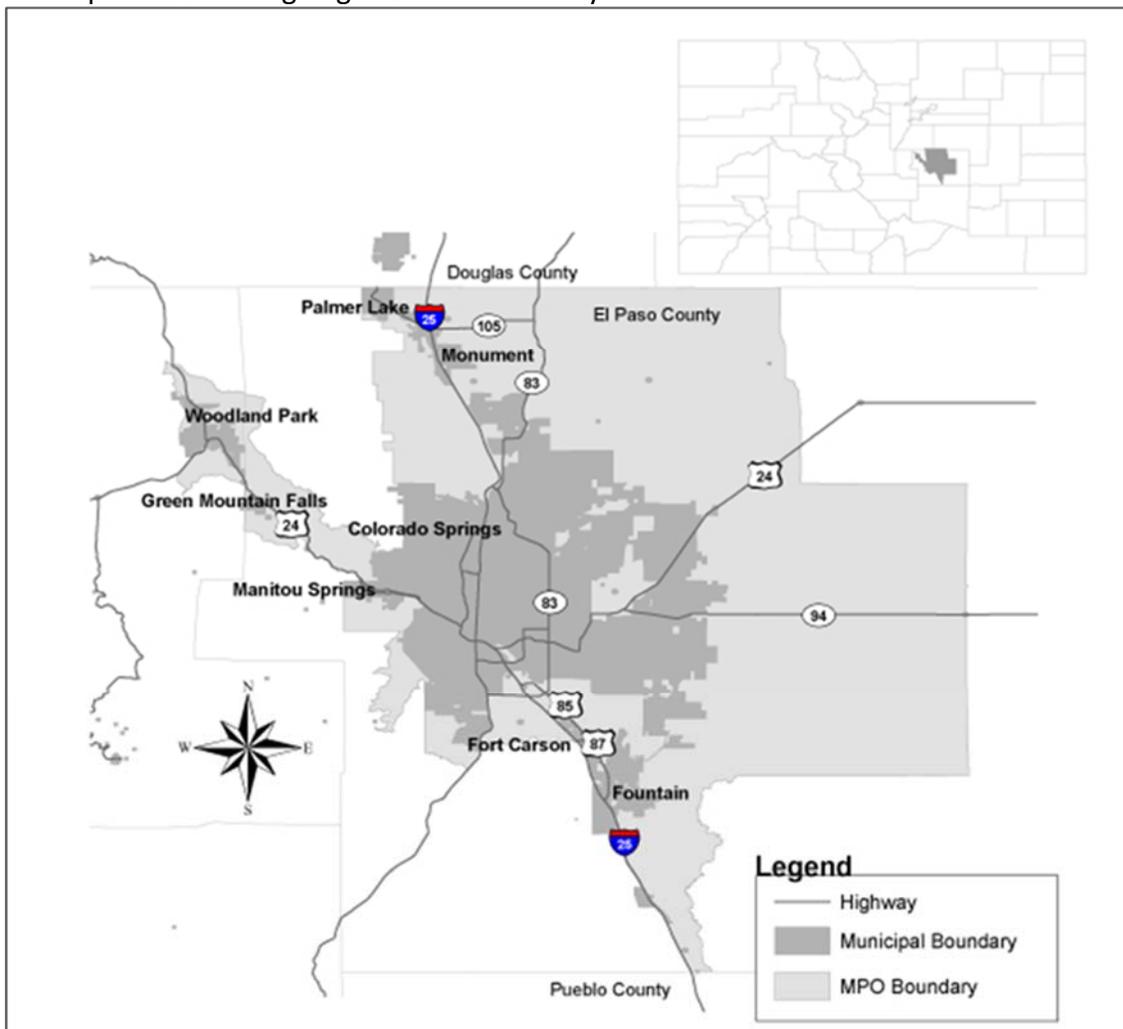
The **Citizens Advisory Committee (CAC)** committee is a nontechnical committee made up of volunteers who offer a citizen’s perspective on issues such as transportation, the

environment, economic development, and military impact planning in the Pikes Peak region.

The **Mobility Coordinating Committee (MCC)** coordinates transit grants and other resources and advises the PPACG board on current emerging issues related to public human service and job-access transit services in the region.

The **Board of Directors (BOD)** sets agency policy and serves as the decision-making body.

Metropolitan Planning Organization boundary



Title VI and Executive Order 13166

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", requires Federal agencies to examine the services they provide, identify

any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. This is an extension of the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964.

Federal regulations require 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.

Four-Factor Analysis

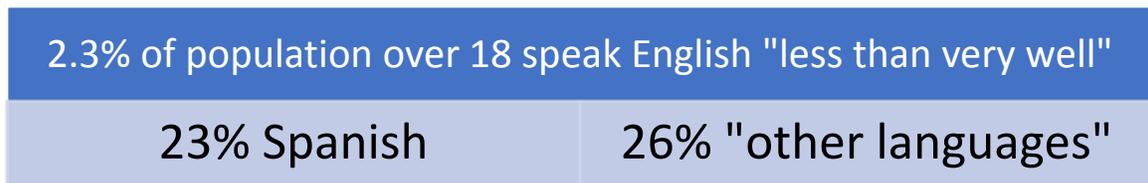
The DOT guidance outlines four factors that funding recipients should apply in order to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

After completing four-factor analysis, the appropriate "mix" of LEP services and outreach can be determined. Overall, PPACG's approach will focus on translation services, accessible documents and website, and working with community partners.

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

The 2016 five-year estimate of the American Community Survey provides some telling information about Limited English Proficiency in the Pikes Peak Area. The LEP population represents a small proportion of the overall population, although the proportion may be dramatically higher in certain areas. In Colorado Springs, about 2.3 percent of citizens 18 years or over reported that they speak English "less than very well". About 23% of those who speak English "less than very well" and speak a language other than English are Spanish speakers, and about 26% speak "other languages" (languages that don't fall into a well-represented category).



Although present in fewer numbers, Asians and Pacific Islanders speak English “less than very well” at the highest rate - about 46%. Those who speak “Other Indo-European Languages” speak English “less than very well” at the lowest rate of about 17%.

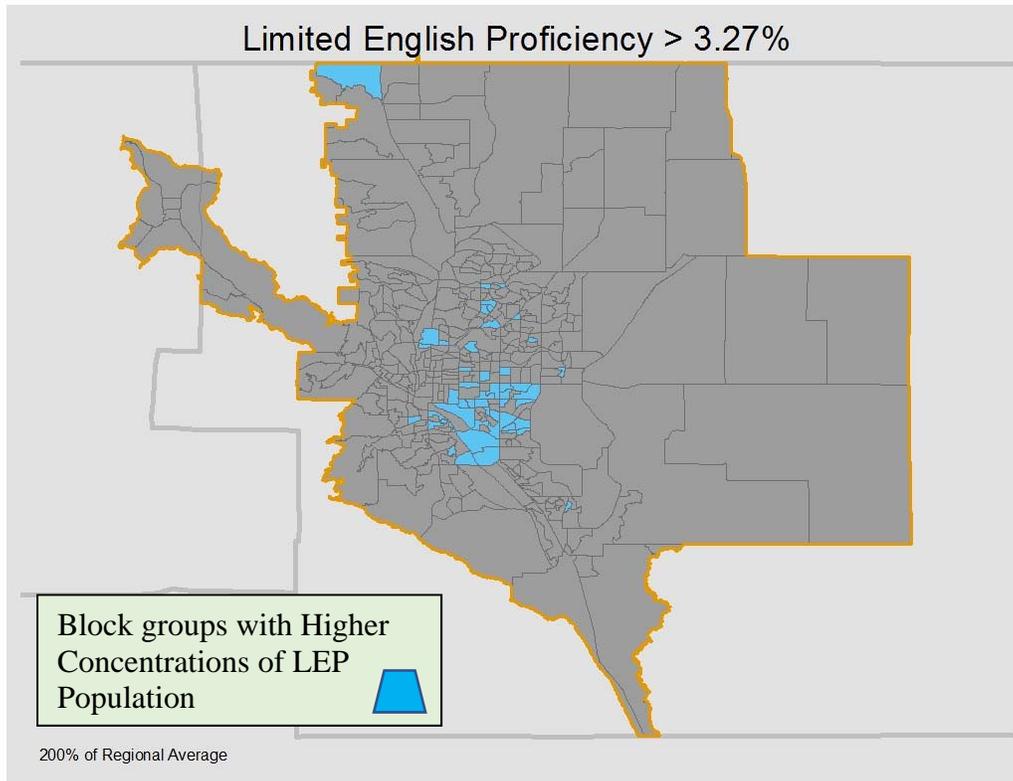
highest and lowest rates of limited English proficiency	
Asians & Pacific Islanders 46%	"Other Indo-European languages" 17%

It will therefore be important to reach out to the Spanish-speaking community and make sure that adequate Spanish translations and translation services are available. Similar outreach and services for Asiatic and Pacific Island languages may become important for plans expected to have substantial impacts in specific areas where those populations are present in larger numbers.

El Paso County reflects similar proportions and trends. A much lower percentage of the population of Teller County reported speaking a language other than English, and a lower percentage of those reported speaking English “less than very well”.

It is noteworthy that for each language category, people aged 65 and over speak English “less than very well” at a significantly higher rate than younger people. For certain plans, therefore, translation services should be most available where there are elderly populations of people who speak a language other than English. Among Asians and Pacific Islanders in Colorado Springs who speak a language other than English, for example, the rate of those who reported speaking English “less than very well” is over 70%. Thus, without language services, people of this age and national origin category are essentially barred from participating. To be clear, this group is present in smaller numbers than Spanish speakers, but their rate of speaking English “less than very well” is higher.

The most common languages in Colorado Springs other than English are 1. Spanish (by a large margin), 2. German, and 3. Korean, in that order. The vast majority of those who speak English “less than very well” in the Colorado Springs Metropolitan Statistical Area are US citizens.



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

Currently, documented interactions with LEP persons are rare. PPACG develops new transportation plans and improvement programs every four years and develops planning work programs annually. Amendments which require public input to these documents are irregular.

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.

While the importance of the regularly occurring RTP and TIP is clear, some type of Factor 3 analysis should be performed for each plan or project conducted by PPACG. It should consider both the nature and the location of the project or plan in question.

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.

The Public Participation Plan (PPP), which can be found on PPACG's website, lists the appropriate public involvement procedures and formats. Any of the communication methods listed might be made available in Spanish or another language, as appropriate.

The PPP also lists the following methods for better engaging traditionally underserved communities:

- A. Hold public meetings or events at locations that are accessible to persons with disabilities and near transit routes;
- B. Hold public meetings at times when the working and non-working public can attend;
- C. Provide ample advanced notice of public meetings and events;
- D. Perform targeted outreach to community associations, churches and/or faith-based organizations, and other organizations that provide support for traditionally underserved communities;
- E. Provide translated documents for limited English speakers and in-person language and deaf translators as needed or requested, with adequate notice;
- F. Provide any other assistance that is requested, within reason and with adequate notice of the need for assistance.

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.

In addition to PPACG's major recurring plan and program, the RTP and the TIP, some type of Factor 4 analysis should be conducted for each plan or project conducted by the agency, with consideration given to the size and cost of the plan or project.

Meaningful Access – Current and Upcoming Plans and Programs

Translation Services

For those with Limited English proficiency (LEP), inclusion means providing both spoken and written translations of program materials and presentations. Translation will be provided for workshops, open-houses, and public meetings when requested, with 7 days' notice.

Korean translation may be provided if practical; Korean is the third most common language in Colorado Springs, and Asian and Pacific Islanders reported the highest rates of speaking English "less than very well" in the 2016 American Community Survey.

For communications concerning plans which will substantially impact areas where there is an identified LEP population, translated materials and/or translation services may be offered even if not requested. In this situation, planning staff will proactively attempt to engage support organizations and to discover advertising channels likely to reach persons in the area who speak limited English.

The procedure for requesting Spanish translation services for PPACG's regularly occurring committee and Board meetings will appear (in Spanish) on all meeting agendas as of the adoption of this plan.

Accessible Documents and Website

Per PPACG's Title VI & Environmental Justice Plan, a brief "primer" will be developed that will offer a simple and easy-to-understand point of entry into PPACG's planning process and give detailed information about upcoming public involvement opportunities. This primer will be available in English and Spanish, and a special effort will be made during Long Range Plan updates to distribute the primer to Spanish-speaking community leaders and support organizations.

Due to limited budget and resources, however, PPACG is unable to translate all documents. It may translate core documents, or portions thereof, as suggested by four-factor analysis. Spanish translations of documents such as the "Title VI Complaint Form" and the "Notice to Beneficiaries of Protection Under Title VI" will be provided in English and Spanish. Executive summaries for the Long Range Transportation Plan and Transportation Improvement Program will also be provided in Spanish and English.

Other plans and program documents may be translated if they are likely to have disproportionate impacts on an identified LEP population.

PPACG's website will feature an easy-to-use translate button made available by Google, which can instantly translate the site into numerous languages. This add-on program also offers the benefit of tracking the number and language of translation requests: this data can then be used to help determine the demand for translations of PPACG's documents and other website content.

Community Outreach

As stated in the Title VI & Environmental Justice Plan, PPACG will rely upon community partners in order to gain the fullest reach to underserved communities and to help overcome barriers of communication and trust. Planners and committee and Board members will reach out to organizations such as community centers, minority chambers of commerce, churches, and other support organizations to request help in sharing PPACG's meeting notices and notices of public comment, distributing surveys, directing members and clients to our website, and describing and interpreting our mission and services. This includes the Spanish-speaking community (others where appropriate). Their feedback on our engagement process and materials will also be sought along with advice on how to make improvements for the next planning cycle.

Along with enlisting the aid of community partners, planners and committee and Board members will attend community events such as farmer's markets, luncheons, and conferences where they can provide an introduction to the organization and discuss opportunities for engagement. In the past, this approach has been found to be far more effective than traditional public meetings or open houses hosted by PPACG alone.

As with Environmental Justice, PPACG's committees and Board can draw on their own experiences and language issues in their communities to provide needed perspectives on the LEP process. Traditionally, these groups have been underused. It will be a goal moving forward to involve the committees and the Board more meaningfully and *earlier* in the LEP process, and to seek and provide feedback as each plan or TIP is wrapping up in order to achieve ongoing improvement.

To further improve diversity for the purpose of achieving a better understanding of language considerations, PPACG will explore expanding the Citizen's Advisory Committee (CAC) to include representatives of the Spanish-speaking community. The CAC is the body most involved in the development and improvement of PPACG's overall public involvement processes.

The "public engagement academy" described in the Title VI and Environmental Justice Plan would also be applicable to the Spanish-speaking and other language communities. Utilizing PPACG's existing diversity and community partners, the "academy", which may

be offered early during the 2050 plan effort, will be a short course or training offered to committee members, Board members, and community partners that will teach them how to discuss PPACG's purpose, mission, and core products. They can then become "ambassadors" to underserved communities they represent or are familiar with, which will help to further remove barriers to communication and trust and improve participation rates among those with limited English proficiency.

Monitoring and Updates

PPACG will update the LEP Plan at the beginning of each long range transportation plan development cycle, if not more frequently. Updates will include the following:

- How the needs of LEP persons have been addressed;
- Determination of the current LEP population and population distribution within the PPACG metropolitan area;
- Determination of whether the need for translation services has changed;
- Determination of whether language assistance programs have been sufficient and appropriate;
- Determination of whether PPACG's financial resources are sufficient to fund additional or other language assistance resources when needed;
- Determination as to whether PPACG fully complies with the goals of the LEP Plan (includes review of any complaints that have been received);

As with Environmental Justice, little LEP-related data has been collected and retained during PPACG's previous planning cycles, so part of the effort of completing the 2045 and 2050 long-range plans will be establishing the pattern of collecting and reviewing data and comments as part of a continual feedback process for improving access for those with limited English proficiency.

Some of the EJ-specific metrics and other feedback that will be tracked as part of the 2045 LRTP process include:

- The number and proportion of public meetings/open houses held in or convenient to target EJ areas during the LRTP process, and attendance rates at those meetings (includes events hosted *or* attended by PPACG)
- Diversity of advertising placements
- Comments received about the public process from members of LEP populations and/or representatives of LEP communities
- Responses to LEP-related questions on surveys completed for the long-range plan, beginning with the 2050 plan
- Website analytics, including some powerful new features

As described previously, the Google translation feature on our website tracks the number and language of translation requests: this data will be used to help determine the demand for translations of PPACG's documents and other website content.

There will also be a sustained effort to increase PPACG's list of LEP contacts and community leaders, and to grow our LEP email/contact list and grow the number of appropriate advertising channels with each planning cycle. With each planning cycle, PPACG will review why this did or did not happen successfully.

Where to Find the Plan

The Plan is posted on the PPACG website at 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:

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