

Limited English Proficiency Plan

South East Texas Regional Planning Commission
Metropolitan Planning Organization

Adopted by the Transportation Planning Committee on July 27, 2023

Prepared by WSP

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Chapter 1: Introduction

1.1 Introduction

This *Limited English Proficiency Plan* has been prepared to address the responsibilities of the South East Texas Regional Planning Commission (SETRPC) as the Metropolitan Planning Organization (MPO) for the planning area comprised of Jefferson, Orange, Hardin, and Jasper Counties receiving federal financial assistance as they relate to 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 implementation regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or natural 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. The order 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 the SETRPC.

1.2 Plan Summary

The SETRPC 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 participate effectively in the MPO's transportation planning process. As defined by 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. Further, while the U.S. Census Bureau does not officially define LEP, it is generally accepted that, when determining LEP populations, the U.S. Census Bureau category of "speaks English less than 'very well'" be used. This plan outlines how to identify individuals 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.

To prepare this plan, the SETRPC utilized a four-factor LEP analysis which considers the following factors:

- ➔ 1) The number or proportion of LEP persons who may reside within the SETRPC metropolitan planning area.
- ➔ 2) The frequency with which LEP persons interact with the SETRPC.
- ➔ 3) The nature and importance of services provided by the SETRPC to the LEP population.
- ➔ 4) The resources available to the SETRPC and overall cost to provide LEP assistance.

A summary of the results of this four-factor analysis is included in the following chapter.

Chapter 2: Meaningful Access: Four- Factor Analysis

2.1 The number or proportion of LEP persons who may reside within the SETRPC metropolitan planning area.

Number of LEP persons: The metropolitan planning area for the SETRPC includes Jefferson, Orange, Hardin, and Jasper Counties. According to the 2011-2015 American Community Survey 5-Year Estimates, an estimated 59,165 persons 5 years and over (in the four-county area) speak a language other than English; this represents 14.9% of the estimated 398,391 persons 5 years and over. Of those 59,165 persons, 22,912 have limited English proficiency; that is, they speak English less than very well; this represents 5.8% of the population 5 years and over within the SETRPC metropolitan planning area. According to Table 1, which presents summary data on LEP populations by language spoken at home, the two most prevalent LEP populations in the SETRPC metropolitan planning area consist of the Spanish (or Spanish Creole) speaking population and the French (including Patois and Cajun) speaking population, with 17,877 persons 5 years and over speaking Spanish (or Spanish Creole) and speaking English less than very well, and 2,302 persons 5 years and over speaking French (including Patois and Cajun) and speaking English less than very well. The remaining 2,733 LEP persons speak some 30 other languages.

In the context of LEP, the Safe Harbor provision has been determined to apply only to the translation of written materials. As such, federal guidance indicates that if written translation of "vital" documents is provided for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or encountered, then such action is considered strong evidence of compliance with the recipient's written translation obligations. According to Table 1, this Safe Harbor provision applies to LEP populations that speak either Spanish or Spanish Creole (hereafter referred to as simply "Spanish") or French (including Patois and Cajun, hereafter referred to as simply "French"), as both have population levels over 1,000.

Proportion of LEP persons: Table 2 presents data from the 2011-2015 American Community Survey 5-Year Estimates that quantifies the total number of LEP populations by Census tract. The cells highlighted in red identify those Census tracts that most significantly contribute to the total LEP population in the SETRPC-MPO planning area. The LEP population of these tracts, when summed, accounts for just over half of the entire LEP population. For example, the four tracts highlighted in

red in the Vietnamese-speaking LEP population column account for just over half of the total Vietnamese-speaking LEP population throughout the three-county area. These tracts are shown in Figure 1 through Figure 3. Figure 1 identifies the locations of the Census tracts that most significantly contribute to the total LEP population for all languages combined, while Figure 2 and Figure 3 identify the location of Census tracts that most significantly contribute to the Spanish- and Vietnamese-speaking LEP populations, respectively.

Table 1: Limited English proficiency (LEP) of persons 5 years and over, by primary language spoken at home

| Language Spoken at Home | Total Number of Persons 5 Years and Over | Number of Persons 5 Years and Over with Ability to Speak English... | | Percent of Total Persons 5 Years and Over with Ability to Speak English Less than Very Well** |
|---------------------------------|--|---|----------------------|---|
| | | Very Well | Less than Very Well* | |
| Spanish or Spanish Creole | 45,490 | 27,613 | 17,877 | 4.487% |
| French (incl. Patois, Cajun) | 4,129 | 1,827 | 2,302 | 0.578% |
| French Creole | 1,966 | 1,614 | 352 | 0.088% |
| Italian | 1,316 | 854 | 462 | 0.116% |
| Portuguese or Portuguese Creole | 874 | 607 | 267 | 0.067% |
| German | 803 | 538 | 265 | 0.067% |
| Yiddish | 655 | 362 | 293 | 0.074% |
| Other West Germanic languages | 633 | 482 | 151 | 0.038% |
| Scandinavian languages | 562 | 372 | 190 | 0.048% |
| Greek | 471 | 405 | 66 | 0.017% |
| Russian | 301 | 241 | 60 | 0.015% |
| Polish | 290 | 230 | 60 | 0.015% |
| Serbo-Croatian | 284 | 204 | 80 | 0.020% |
| Other Slavic languages | 216 | 114 | 102 | 0.026% |
| Armenian | 164 | 82 | 82 | 0.021% |
| Persian | 142 | 69 | 73 | 0.018% |
| Gujarati | 124 | 75 | 49 | 0.012% |
| Hindi | 105 | 105 | 0 | 0.000% |
| Urdu | 100 | 77 | 23 | 0.006% |
| Other Indic languages | 73 | 73 | 0 | 0.000% |
| Other Indo-European languages | 73 | 27 | 46 | 0.012% |
| Chinese | 63 | 45 | 18 | 0.005% |
| Japanese | 59 | 17 | 42 | 0.011% |
| Korean | 55 | 55 | 0 | 0.000% |
| Mon-Khmer, Cambodian | 49 | 35 | 14 | 0.004% |
| Hmong | 40 | 40 | 0 | 0.000% |

| Language Spoken at Home | Total Number of Persons 5 Years and Over | Number of Persons 5 Years and Over with Ability to Speak English... | | Percent of Total Persons 5 Years and Over with Ability to Speak English Less than Very Well** |
|--------------------------------|--|---|----------------------|---|
| | | Very Well | Less than Very Well* | |
| Thai | 30 | 29 | 1 | 0.000% |
| Laotian | 26 | 26 | 0 | 0.000% |
| Vietnamese | 24 | 7 | 17 | 0.004% |
| Other Asian languages | 20 | 0 | 20 | 0.005% |
| Tagalog | 18 | 18 | 0 | 0.000% |
| Other Pacific Island languages | 10 | 10 | 0 | 0.000% |
| Subtotal | 59,165 | 36,253 | 22,912 | 5.75% |
| English Only | 339,226 | | | |
| Total | 398,391 | | | |

***Note:** Persons 5 years and over with ability to speak English “Less than Very Well” are considered to have limited English proficiency.

****Note:** Calculated by dividing the number of persons 5 years and over that speak English “Less than Very Well” by the total number of persons 5 years and over.

Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

Table 2: Percentage of LEP Persons 5 years and over by Census tract

| County | Census Tract | Total Number of Persons 5 Years and Over | Persons 5 Years and Over, with Ability to Speak English Less than Very Well | | | | | |
|---------------|--------------|--|---|-------------|---------|-------------|--------|-------------|
| | | | All Languages | | Spanish | | French | |
| | | | Total | Percentage* | Total | Percentage* | Total | Percentage* |
| Hardin | Tract 301 | 3,387 | 27 | 0.80% | 17 | 0.50% | 0 | 0.00% |
| Hardin | Tract 302 | 5,272 | 13 | 0.25% | 13 | 0.25% | 0 | 0.00% |
| Hardin | Tract 303 | 9,222 | 174 | 1.89% | 174 | 1.89% | 0 | 0.00% |
| Hardin | Tract 304 | 2,161 | 188 | 8.70% | 140 | 6.48% | 0 | 0.00% |
| Hardin | Tract 305.01 | 4,092 | 90 | 2.20% | 0 | 0.00% | 0 | 0.00% |
| Hardin | Tract 305.02 | 8,220 | 84 | 1.02% | 82 | 1.00% | 0 | 0.00% |
| Hardin | Tract 306 | 3,402 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Hardin | Tract 307 | 3,811 | 9 | 0.24% | 9 | 0.24% | 0 | 0.00% |
| Hardin | Tract 308 | 4,320 | 82 | 1.90% | 28 | 0.65% | 0 | 0.00% |
| Hardin | Tract 309 | 4,003 | 36 | 0.90% | 22 | 0.55% | 0 | 0.00% |
| Hardin | Tract 310 | 3,878 | 35 | 0.90% | 35 | 0.90% | 0 | 0.00% |
| Jasper | Tract 9501 | 4,565 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Jasper | Tract 9502 | 3,033 | 292 | 9.63% | 292 | 9.63% | 0 | 0.00% |
| Jasper | Tract 9503 | 3,278 | 193 | 5.89% | 170 | 5.19% | 0 | 0.00% |

| County | Census Tract | Total Number of Persons 5 Years and Over | Persons 5 Years and Over, with Ability to Speak English Less than Very Well | | | | | |
|-----------|--------------|--|---|-------------|---------|-------------|--------|-------------|
| | | | All Languages | | Spanish | | French | |
| | | | Total | Percentage* | Total | Percentage* | Total | Percentage* |
| Jasper | Tract 9504 | 5,112 | 239 | 4.68% | 147 | 2.88% | 0 | 0.00% |
| Jasper | Tract 9505 | 4,102 | 19 | 0.46% | 19 | 0.46% | 0 | 0.00% |
| Jasper | Tract 9506 | 2,297 | 17 | 0.74% | 17 | 0.74% | 0 | 0.00% |
| Jasper | Tract 9507 | 8,132 | 21 | 0.26% | 21 | 0.26% | 0 | 0.00% |
| Jasper | Tract 9508 | 2,817 | 9 | 0.32% | 0 | 0.00% | 9 | 0.32% |
| Jefferson | Tract 1.01 | 5,708 | 198 | 3.47% | 179 | 3.14% | 0 | 0.00% |
| Jefferson | Tract 1.02 | 2,012 | 58 | 2.88% | 58 | 2.88% | 0 | 0.00% |
| Jefferson | Tract 1.03 | 2,726 | 131 | 4.81% | 50 | 1.83% | 14 | 0.51% |
| Jefferson | Tract 2 | 4,666 | 140 | 3.00% | 124 | 2.66% | 0 | 0.00% |
| Jefferson | Tract 3.02 | 6,750 | 172 | 2.55% | 65 | 0.96% | 0 | 0.00% |
| Jefferson | Tract 3.04 | 6,337 | 601 | 9.48% | 459 | 7.24% | 16 | 0.25% |
| Jefferson | Tract 3.06 | 3,518 | 81 | 2.30% | 2 | 0.06% | 7 | 0.20% |
| Jefferson | Tract 3.07 | 3,218 | 297 | 9.23% | 258 | 8.02% | 10 | 0.31% |
| Jefferson | Tract 3.08 | 5,690 | 199 | 3.50% | 40 | 0.70% | 10 | 0.18% |
| Jefferson | Tract 3.09 | 2,737 | 33 | 1.21% | 20 | 0.73% | 13 | 0.47% |
| Jefferson | Tract 3.10 | 5,073 | 183 | 3.61% | 111 | 2.19% | 12 | 0.24% |
| Jefferson | Tract 4 | 3,952 | 72 | 1.82% | 72 | 1.82% | 0 | 0.00% |
| Jefferson | Tract 5 | 2,261 | 157 | 6.94% | 157 | 6.94% | 0 | 0.00% |
| Jefferson | Tract 6 | 5,352 | 422 | 7.88% | 422 | 7.88% | 0 | 0.00% |
| Jefferson | Tract 7 | 2,924 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Jefferson | Tract 9 | 1,746 | 79 | 4.52% | 79 | 4.52% | 0 | 0.00% |
| Jefferson | Tract 11 | 2,018 | 156 | 7.73% | 150 | 7.43% | 0 | 0.00% |
| Jefferson | Tract 12 | 2,272 | 494 | 21.74% | 484 | 21.30% | 0 | 0.00% |
| Jefferson | Tract 13.01 | 4,723 | 250 | 5.29% | 240 | 5.08% | 0 | 0.00% |
| Jefferson | Tract 13.02 | 2,822 | 194 | 6.87% | 62 | 2.20% | 0 | 0.00% |
| Jefferson | Tract 13.03 | 3,120 | 186 | 5.96% | 62 | 1.99% | 0 | 0.00% |
| Jefferson | Tract 17 | 1,694 | 7 | 0.41% | 7 | 0.41% | 0 | 0.00% |
| Jefferson | Tract 19 | 2,803 | 672 | 23.97% | 510 | 18.19% | 0 | 0.00% |
| Jefferson | Tract 20 | 1,949 | 321 | 16.47% | 227 | 11.65% | 0 | 0.00% |
| Jefferson | Tract 21 | 3,043 | 130 | 4.27% | 115 | 3.78% | 15 | 0.49% |
| Jefferson | Tract 22 | 2,750 | 4 | 0.15% | 4 | 0.15% | 0 | 0.00% |
| Jefferson | Tract 23 | 2,846 | 88 | 3.09% | 88 | 3.09% | 0 | 0.00% |
| Jefferson | Tract 24 | 2,569 | 459 | 17.87% | 398 | 15.49% | 0 | 0.00% |
| Jefferson | Tract 25 | 3,497 | 364 | 10.41% | 364 | 10.41% | 0 | 0.00% |
| Jefferson | Tract 26 | 5,815 | 208 | 3.58% | 151 | 2.60% | 0 | 0.00% |

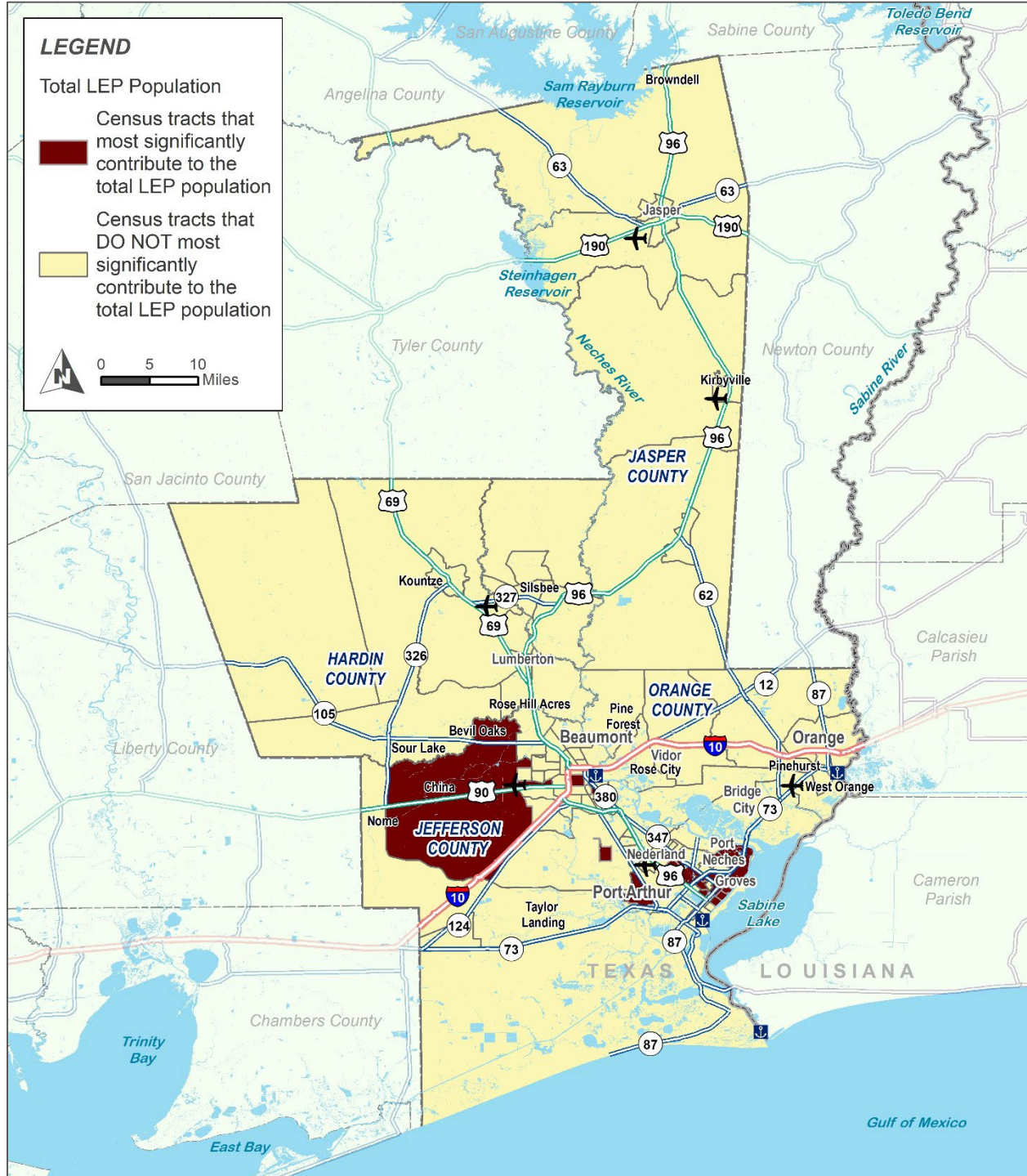
| County | Census Tract | Total Number of Persons 5 Years and Over | Persons 5 Years and Over, with Ability to Speak English Less than Very Well | | | | | |
|-----------|--------------|--|---|-------------|---------|-------------|--------|-------------|
| | | | All Languages | | Spanish | | French | |
| | | | Total | Percentage* | Total | Percentage* | Total | Percentage* |
| Jefferson | Tract 51 | 936 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Jefferson | Tract 54 | 1,246 | 61 | 4.90% | 61 | 4.90% | 0 | 0.00% |
| Jefferson | Tract 55 | 2,802 | 719 | 25.66% | 469 | 16.74% | 0 | 0.00% |
| Jefferson | Tract 56 | 3,527 | 1,408 | 39.92% | 1,254 | 35.55% | 0 | 0.00% |
| Jefferson | Tract 59 | 1,373 | 27 | 1.97% | 23 | 1.68% | 4 | 0.29% |
| Jefferson | Tract 61 | 1,173 | 48 | 4.09% | 28 | 2.39% | 11 | 0.94% |
| Jefferson | Tract 63 | 1,301 | 73 | 5.61% | 61 | 4.69% | 0 | 0.00% |
| Jefferson | Tract 64 | 1,430 | 264 | 18.46% | 257 | 17.97% | 7 | 0.49% |
| Jefferson | Tract 65 | 3,121 | 1,030 | 33.00% | 785 | 25.15% | 0 | 0.00% |
| Jefferson | Tract 66 | 3,544 | 711 | 20.06% | 561 | 15.83% | 8 | 0.23% |
| Jefferson | Tract 67 | 2,616 | 716 | 27.37% | 664 | 25.38% | 0 | 0.00% |
| Jefferson | Tract 68 | 2,118 | 434 | 20.49% | 321 | 15.16% | 0 | 0.00% |
| Jefferson | Tract 69 | 3,026 | 121 | 4.00% | 79 | 2.61% | 13 | 0.43% |
| Jefferson | Tract 70.01 | 5,622 | 569 | 10.12% | 223 | 3.97% | 0 | 0.00% |
| Jefferson | Tract 70.02 | 4,044 | 645 | 15.95% | 200 | 4.95% | 0 | 0.00% |
| Jefferson | Tract 71 | 3,167 | 543 | 17.15% | 486 | 15.35% | 0 | 0.00% |
| Jefferson | Tract 101 | 2,754 | 1,207 | 43.83% | 1,138 | 41.32% | 0 | 0.00% |
| Jefferson | Tract 102 | 1,852 | 308 | 16.63% | 301 | 16.25% | 0 | 0.00% |
| Jefferson | Tract 103 | 2,456 | 542 | 22.07% | 533 | 21.70% | 0 | 0.00% |
| Jefferson | Tract 104 | 2,838 | 121 | 4.26% | 88 | 3.10% | 0 | 0.00% |
| Jefferson | Tract 105 | 3,955 | 589 | 14.89% | 358 | 9.05% | 34 | 0.86% |
| Jefferson | Tract 106 | 4,938 | 101 | 2.05% | 79 | 1.60% | 22 | 0.45% |
| Jefferson | Tract 107 | 3,045 | 91 | 2.99% | 91 | 2.99% | 0 | 0.00% |
| Jefferson | Tract 108 | 4,574 | 46 | 1.01% | 42 | 0.92% | 4 | 0.09% |
| Jefferson | Tract 109.01 | 3,060 | 92 | 3.01% | 0 | 0.00% | 0 | 0.00% |
| Jefferson | Tract 109.02 | 4,514 | 207 | 4.59% | 35 | 0.78% | 0 | 0.00% |
| Jefferson | Tract 110.01 | 4,819 | 39 | 0.81% | 24 | 0.50% | 0 | 0.00% |
| Jefferson | Tract 110.02 | 3,316 | 29 | 0.87% | 18 | 0.54% | 0 | 0.00% |
| Jefferson | Tract 111.01 | 4,412 | 148 | 3.35% | 148 | 3.35% | 0 | 0.00% |
| Jefferson | Tract 111.02 | 2,681 | 183 | 6.83% | 163 | 6.08% | 0 | 0.00% |
| Jefferson | Tract 112.01 | 7,857 | 223 | 2.84% | 180 | 2.29% | 20 | 0.25% |
| Jefferson | Tract 112.02 | 3,552 | 231 | 6.50% | 227 | 6.39% | 0 | 0.00% |
| Jefferson | Tract 112.03 | 2,202 | 118 | 5.36% | 111 | 5.04% | 0 | 0.00% |
| Jefferson | Tract 113.02 | 5,270 | 1,013 | 19.22% | 919 | 17.44% | 0 | 0.00% |
| Jefferson | Tract 113.03 | 2,227 | 64 | 2.87% | 49 | 2.20% | 0 | 0.00% |

| County | Census Tract | Total Number of Persons 5 Years and Over | Persons 5 Years and Over, with Ability to Speak English Less than Very Well | | | | | |
|-----------|--------------|--|---|-------------|---------|-------------|--------|-------------|
| | | | All Languages | | Spanish | | French | |
| | | | Total | Percentage* | Total | Percentage* | Total | Percentage* |
| Jefferson | Tract 113.04 | 3,158 | 28 | 0.89% | 16 | 0.51% | 0 | 0.00% |
| Jefferson | Tract 114 | 7,341 | 499 | 6.80% | 462 | 6.29% | 34 | 0.46% |
| Jefferson | Tract 115 | 2,331 | 82 | 3.52% | 82 | 3.52% | 0 | 0.00% |
| Jefferson | Tract 116 | 1,684 | 186 | 11.05% | 171 | 10.15% | 14 | 0.83% |
| Jefferson | Tract 117 | 1,441 | 172 | 11.94% | 172 | 11.94% | 0 | 0.00% |
| Jefferson | Tract 118 | 1,525 | 63 | 4.13% | 54 | 3.54% | 0 | 0.00% |
| Jefferson | Tract 9800 | 151 | 40 | 26.49% | 0 | 0.00% | 0 | 0.00% |
| Jefferson | Tract 9900 | 0 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 202 | 3,326 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 203 | 2,385 | 41 | 1.72% | 22 | 0.92% | 4 | 0.17% |
| Orange | Tract 205 | 3,200 | 127 | 3.97% | 117 | 3.66% | 8 | 0.25% |
| Orange | Tract 207 | 4,319 | 133 | 3.08% | 13 | 0.30% | 0 | 0.00% |
| Orange | Tract 208 | 1,672 | 22 | 1.32% | 16 | 0.96% | 6 | 0.36% |
| Orange | Tract 209 | 3,253 | 9 | 0.28% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 210 | 2,137 | 9 | 0.42% | 0 | 0.00% | 6 | 0.28% |
| Orange | Tract 211 | 1,742 | 14 | 0.80% | 14 | 0.80% | 0 | 0.00% |
| Orange | Tract 212 | 4,491 | 59 | 1.31% | 38 | 0.85% | 0 | 0.00% |
| Orange | Tract 213 | 5,861 | 54 | 0.92% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 214 | 3,781 | 11 | 0.29% | 9 | 0.24% | 2 | 0.05% |
| Orange | Tract 215.01 | 2,144 | 138 | 6.44% | 68 | 3.17% | 0 | 0.00% |
| Orange | Tract 215.02 | 6,332 | 100 | 1.58% | 100 | 1.58% | 0 | 0.00% |
| Orange | Tract 216 | 3,525 | 26 | 0.74% | 12 | 0.34% | 14 | 0.40% |
| Orange | Tract 217 | 2,223 | 71 | 3.19% | 69 | 3.10% | 0 | 0.00% |
| Orange | Tract 218 | 2,538 | 6 | 0.24% | 6 | 0.24% | 0 | 0.00% |
| Orange | Tract 219 | 6,091 | 36 | 0.59% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 220 | 3,641 | 44 | 1.21% | 42 | 1.15% | 2 | 0.05% |
| Orange | Tract 222 | 3,560 | 0 | 0.00% | 0 | 0.00% | 0 | 0.00% |
| Orange | Tract 223 | 6,811 | 144 | 2.11% | 118 | 1.73% | 19 | 0.28% |
| Orange | Tract 224 | 4,665 | 193 | 4.14% | 156 | 3.34% | 14 | 0.30% |

***Note:** Calculated by dividing the number of persons 5 years and over that speak English “Less than Very Well” within a particular tract by the total population of persons 5 years and over that speak English less than very well within the full metropolitan planning area (Jefferson, Orange, Hardin, and Jasper Counties).

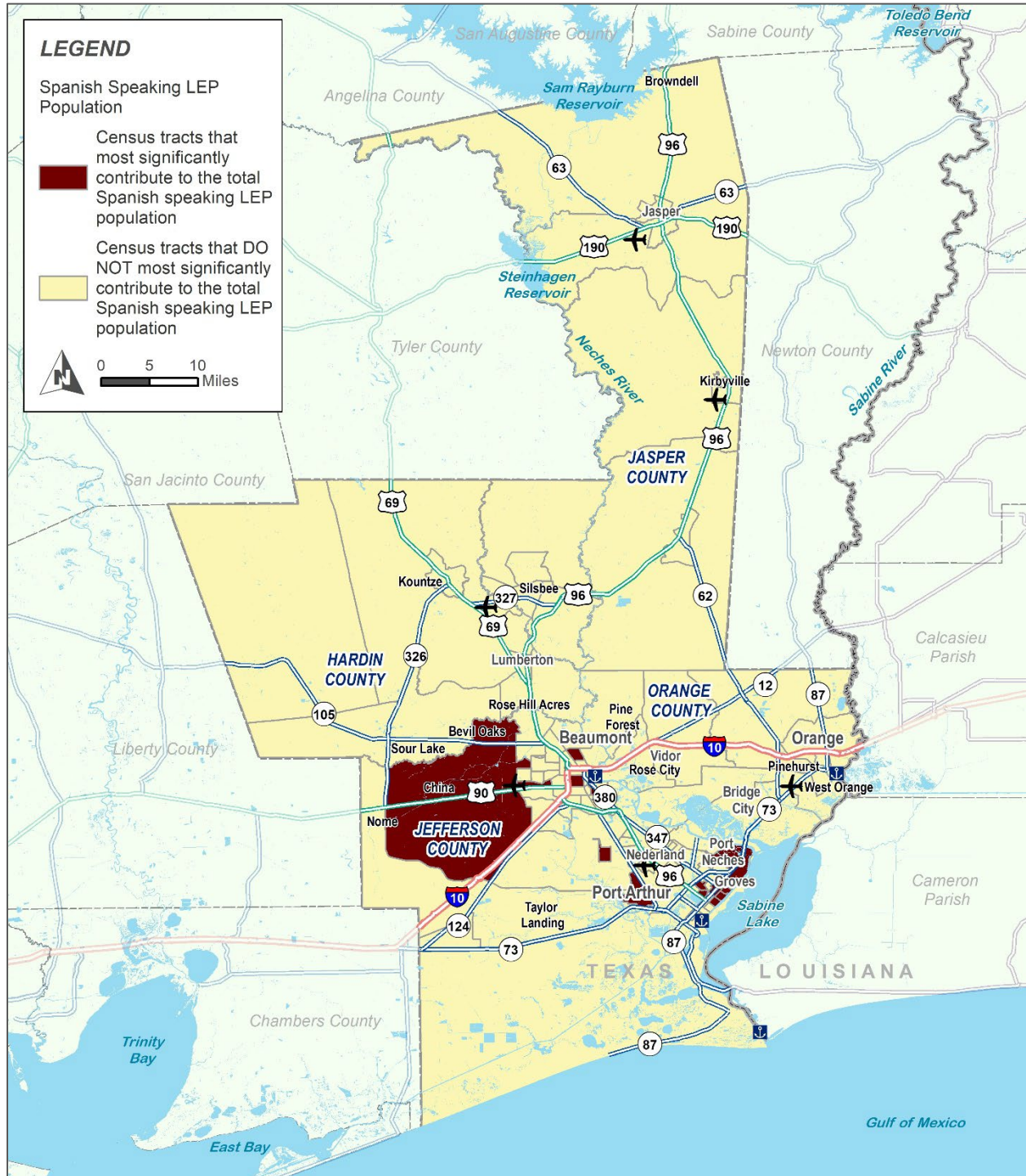
Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

Figure 1: Census tracts that most significantly contribute to the total LEP population



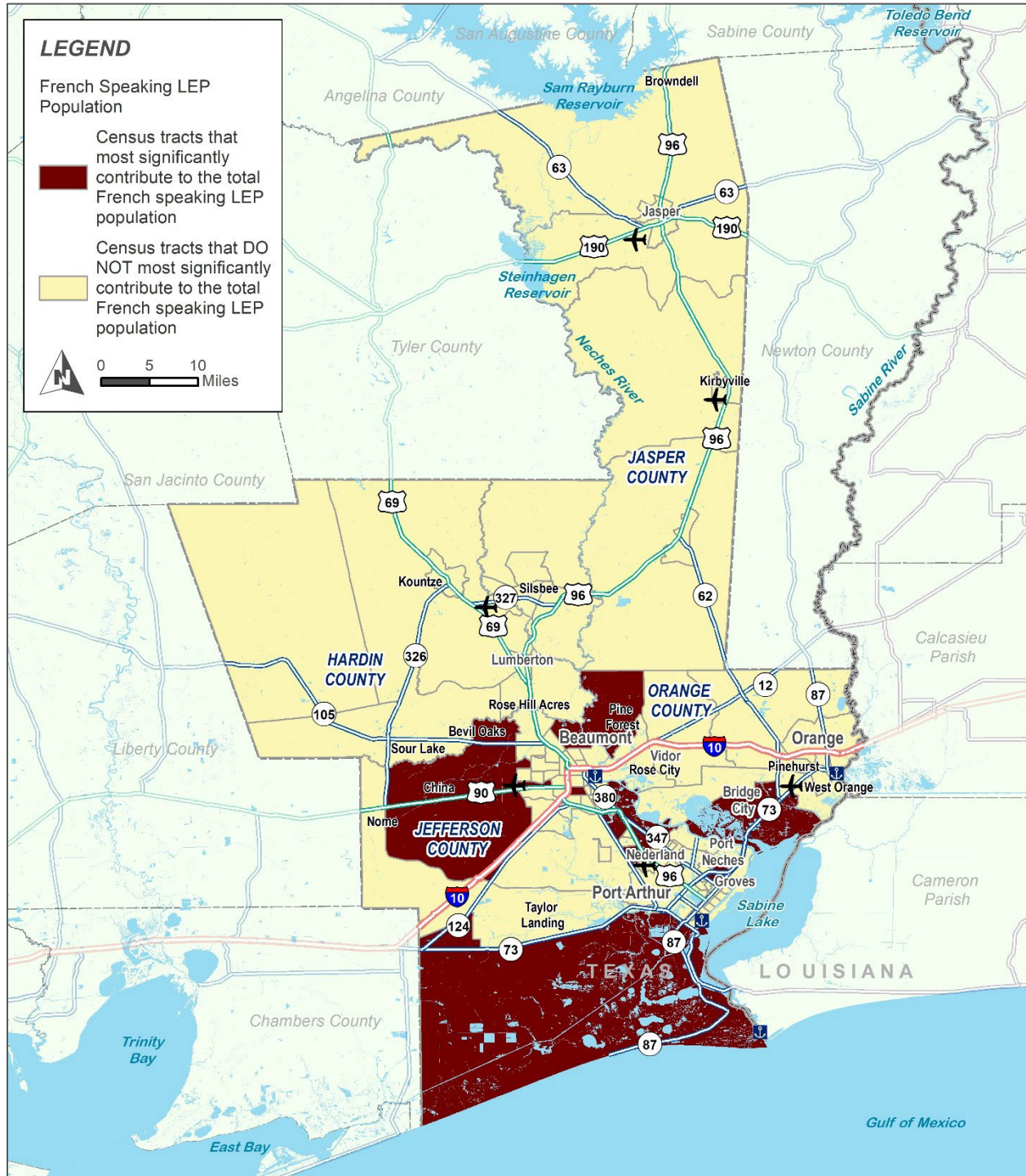
Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

Figure 2: Census tracts that most significantly contribute to the total Spanish-speaking LEP population



Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

Figure 3: Census tracts that most significantly contribute to the total French-speaking LEP population



Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

2.2 The frequency with which LEP persons interact with the SETRPC

The SETRPC staff reviewed the frequency with which the SETRPC staff and Transportation Planning Committee members have, or could have, contact with LEP persons through phone inquiries, office visits, and public meetings. To date, the SETRPC has had no requests for interpreters and no requests for translated planning documents. Moreover, the SETRPC Transportation Planning Committee members have not made staff aware of any contact with LEP persons regarding the transportation planning process.

2.3 The nature and importance of services provided by the SETRPC to the LEP population

As part of its continuing, comprehensive, and cooperative transportation planning process, the SETRPC seeks to develop plans and programs that enhance the quality of life by improving mobility and offering increased transportation options to all residents of the three-county area, regardless of their ability to speak and understand English. Therefore, input into the transportation planning process is encouraged by all members of the community. Due to the concentrations of LEP Spanish and French speakers within the SETRPC metropolitan planning area, the SETRPC has adopted a set of policies to ensure that reasonable opportunities for input from these LEP populations are provided. These policies are presented in the sections that follow the four-factor analysis.

2.4 The resources available to the SETRPC and overall cost to provide LEP assistance

The SETRPC assessed its available resources that could be used for providing LEP assistance and the overall cost to provide such resources. Based upon that assessment, the SETRPC has determined that any LEP assistance provided will be obtained using outside resources. The exact nature of LEP assistance, including translation of documents and interpretation services at meetings, is described within the following section of this plan.

Chapter 3: Engaging the LEP Population

The overall percentage of LEP individuals in the SETRPC metropolitan planning area is relatively small, with approximately 5.8% of individuals 5 years and over identified as having limited English proficiency. However, as shown earlier in Figure 1, certain neighborhoods contain the majority of LEP populations. Therefore, the SETRPC will take reasonable steps to ensure that LEP citizens have an opportunity for meaningful participation in the transportation planning process. For example, SETRPC public meetings will routinely be held at locations in the four-county area that are located within proximity to or are generally accessible by LEP populations. Furthermore, the SETRPC staff will continually assess its choice of meeting locations to ensure that the locations selected adequately afford LEP populations reasonable access.

During the SETRPC's ongoing transportation planning process, the SETRPC staff will take the following steps to identify LEP persons who need language assistance:

- ➔ Post notice of this LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- ➔ SETRPC staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises. The "I Speak" card was developed by the U.S. Census Bureau to aid in identifying the language that an LEP individual speaks.
- ➔ SETRPC staff will record any contacts with LEP individuals, and a review of such records will be conducted annually.
- ➔ When the SETRPC sponsors or conducts an informational meeting or event, an advanced public notice of the event will be published and will include information about making special needs requests for interpretation. 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 interpretation may not be able to be provided at each event, engaging the public will help identify the need for future events.

3.0 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 a limited English proficient person and may be entitled to language assistance with respect to participation in the SETRPC's transportation planning process. Language assistance can include interpretation, which means oral or spoken transfer of a

message from one language into another language, and translation, which means the written transfer of a message from one language into another language.

3.0.1 Interpretation Services

Because no member of the SETRPC staff speaks a language other than English, the SETRPC will rely upon external resources to provide interpretation assistance at its meetings. Specifically, MPO staff will identify a telephone-based interpretation service as a contingency. Due to the need for outside services, individuals requiring interpretation services must make service requests no later than 48 hours prior to the meeting. SETRPC staff will monitor the demand for interpretative services at its meetings and make reasonable adjustments to this policy as demand warrants.

3.0.2 Translation of Documents

The SETRPC weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in the documents, and other relevant factors, at this time the SETRPC considers it an unnecessary burden to have SETRPC documents translated in their entirety.

3.1 Staff and Contractor Compliance

To ensure that all SETRPC staff comply with and fulfill the obligations contained within this LEP plan, the following information, materials, and training will be provided to all SETRPC staff:

- ➔ Information on Title VI Policy and related LEP responsibilities.
- ➔ Description of language assistance services offered by the SETRPC.
- ➔ "I Speak" cards.
- ➔ How to handle a potential Title VI/LEP complaint.

Furthermore, all contractors or subcontractors performing work for the SETRPC will be required to follow the Title VI/LEP guidelines documented in this plan.

3.2 Monitoring and Updates

The SETRPC will update this LEP Plan should any of the following events occur:

- ➔ Federal or state guidance require an update to the LEP plan.
- ➔ Annual data analysis suggests that LEP populations have significantly changed, either in terms of total numbers, proportion, or geographic location.
- ➔ Public outreach activities are marked by participation of LEP individuals that warrant an update to this plan.

Any future update to this LEP plan shall include, to the extent practical:

- ➔ Reassessment of the four-factor analysis.
- ➔ Documentation of the number of LEP persons encountered annually.
- ➔ Documentation of complaints received from LEP populations, and documentation of actions taken, if necessary, to address such complaints.
- ➔ General assessment of how the needs of LEP persons have been addressed.

- ➔ Determination of whether the needs for interpretation and translation services have changed.
- ➔ Re-examination of the SETRPC's financial capacity to provide additional assistance to LEP populations.

3.3 Dissemination of the SETRPC LEP Plan

The SETRPC will utilize the language assistance measures identified within this plan to ensure that LEP individuals have been afforded reasonable opportunity to comment on this plan. In addition, the adopted LEP plan will be available through the South East Texas Regional Planning Commission's website under the Transportation & Environmental Resources Division section (www.setrpc.org/ter).