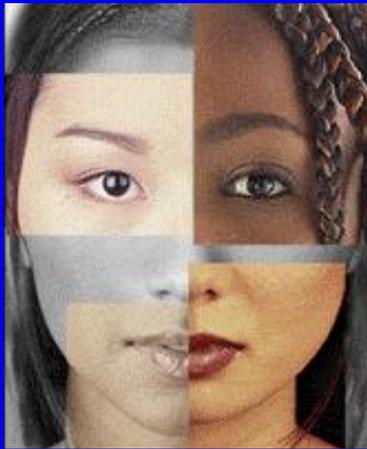


# Waco Metropolitan Planning Organization

# LEP

Limited English Proficiency Plan



Adopted by the  
Waco Metropolitan Planning  
Organization Policy Board on  
August 28, 2012



Prepared by the Waco  
Metropolitan Planning  
Organization in Cooperation  
with the Federal Highway  
Administration, Federal  
Transit Administration and the  
Texas Department of  
Transportation

|   |  |   |                       |   |  |  |                               |
|---|--|---|-----------------------|---|--|--|-------------------------------|
| <b>ARABIC</b> <small>(العربية)</small>          | لغة المثلثة العربية                      | <b>FRENCH</b> <small>(Français)</small>               | Je parle français     | <b>LAOTIAN</b> <small>(ລາວ)</small>               | ສຳເລັດສາສາລາວ                            | <b>SPANISH</b> <small>(Español)</small>      | Yo hablo español              |
| <b>ARMENIAN</b> <small>(Հայերեն)</small>        | Իմ լեզունը հայերենն է                    | <b>FRENCH CREOLE</b> <small>(Français Créole)</small> | M pale kreyòl ayisyen | <b>LITHUANIAN</b> <small>(Lietuvių kalba)</small> | Aš kalbu lietuviškai                     | <b>SWAHILI</b> <small>(Kiswahili)</small>    | Ninaongoa Kiswahili           |
| <b>BENGLALI</b> <small>(বাংলা)</small>          | আমি বলি বাংলা                            | <b>GERMAN</b> <small>(Deutsch)</small>                | Ich spreche Deutsch   | <b>MANDARIN (Chinese)</b> <small>(普通话)</small>    | 我说普通话                                    | <b>SWEDISH</b> <small>(Svenska)</small>      | Jag talar svenska             |
| <b>BOSNIAN</b> <small>(Bosanski jezik)</small>  | Ja govorim bosanski                      | <b>GREEK</b> <small>(Ελληνικά)</small>                | Μιλώ τα ελληνικά      | <b>NORWEGIAN</b> <small>(Norsk)</small>           | Jeg snakker norsk                        | <b>TAGALOG</b> <small>(Tagalog)</small>      | Marunong akong mag-Tagalog    |
| <b>BULGARIAN</b> <small>(Български)</small>     | Аз говоря български                      | <b>GUJARATI</b> <small>(ગુજરાતી)</small>              | હું ગુજરાતી બોલું છું | <b>POLISH</b> <small>(Polski)</small>             | Mówię po polsku                          | <b>THAI</b> <small>(ไทย)</small>             | พูดภาษาไทย                    |
| <b>BURMESE</b> <small>(မြန်မာစာစကား)</small>    | ကျွန်ုပ်တို့ မြန်မာစာစကား ခြေကိုင်ပါသည်။ | <b>HEBREW</b> <small>(עברית)</small>                  | אני מדברת עברית       | <b>PORTUGUESE</b> <small>(Português)</small>      | Eu falo português do Brasil (Brazil)     | <b>TURKISH</b> <small>(Türkçe)</small>       | Türkçe konuşurum              |
| <b>CAMBODIAN</b> <small>(ខ្មែរ)</small>         | ខ្ញុំនិយាយខ្មែរ                          | <b>HINDI</b> <small>(हिन्दी)</small>                  | मैं हिन्दी बोलती हूँ  | <b>PORTUGUESE</b> <small>(Português)</small>      | Eu falo português de Portugal (Portugal) | <b>UKRAINIAN</b> <small>(Українська)</small> | Я розмовляю українською мовою |
| <b>CANTONESE (Chinese)</b> <small>(廣東話)</small> | 我講廣東話                                    | <b>HMONG</b> <small>(Hmong)</small>                   | Kav has lug Moob      | <b>PUNJABI</b> <small>(ਪੰਜਾਬੀ)</small>            | ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦੀ ਹਾਂ                     | <b>URDU</b> <small>(اُردو)</small>           | میں اردو بولتی ہوں            |
| <b>CROATIAN</b> <small>(Hrvatski jezik)</small> | Govorim hrvatski                         | <b>HUNGARIAN</b> <small>(Magyar)</small>              | Beszélek magyarul     | <b>ROMANIAN</b> <small>(Română)</small>           | Vorbesc românește                        | <b>VIETNAMESE</b> <small>(Việt Nam)</small>  | Tôi nói tiếng Việt            |
| <b>CZECH</b> <small>(Česky)</small>             | Mluvim česky                             | <b>ITALIAN</b> <small>(Italiano)</small>              | Parlo italiano        | <b>RUSSIAN</b> <small>(Русский)</small>           | Я говорю по-русски                       | <b>YORUBA</b> <small>(Yorùbá)</small>        | Mo nio Yoruba                 |
| <b>DUTCH</b> <small>(Nederlands)</small>        | Ik spreek het Nederlands                 | <b>JAPANESE</b> <small>(日本語)</small>                  | 私は日本語を話します            | <b>SERBIAN</b> <small>(Српски)</small>            | Ja govorim srpski                        |  |                               |
| <b>FARSI (Persian)</b> <small>(فارسی)</small>   | من فارسی صحبت می‌کنم                     | <b>KOREAN</b> <small>(한국어)</small>                    | 한국어 합니다               | <b>SLOVAK</b> <small>(Slovensky)</small>          | Hovorím po slovensky                     |  |                               |



Waco Metropolitan Planning Organization

## Introduction

This Limited English Proficiency Plan has been prepared to address the Waco Metropolitan Planning Organization's (MPO) responsibilities as a recipient of 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 USC 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, including all programs administered by the Waco MPO.

## Plan Summary

The Waco MPO 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 within the transportation planning process. As defined within 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. This plan outlines how to identify a person 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.

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

1. The number or proportion of LEP persons who may reside within the Waco MPO's jurisdiction.
2. The frequency with which LEP persons come in contact with Waco MPO staff or Policy Board members.

3. The nature and importance of services provided by the Waco MPO to the LEP population.
4. The interpretation services available to the Waco MPO and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

## **Meaningful Access: Four-Factor Analysis**

### **Factor 1: The number or proportion of LEP persons who may reside within the Waco MPO's jurisdiction.**

The jurisdiction of the Waco MPO is coextensive with McLennan County, Texas. According to the American Community Survey in 2010 (US Census), 19.8% of persons within the MPO jurisdiction age 5 or older speak a language other than English. Of those persons, 38.5% have limited English proficiency; that is, they speak English less than 'very well.' This represents 7.6% of the total population 5 years of age or older. In the Waco MPO's jurisdiction, of those persons with limited English proficiency, 92.7% speak Spanish, 2.5% speak other Indo-European languages and 4.5% speak Asian or other Pacific Island languages.

### **Factor 2: The frequency with which LEP persons come in contact with Waco MPO staff or Policy Board members.**

The Waco MPO staff reviewed the frequency with which the MPO staff or Policy Board members have, or could have, contact with LEP persons. This includes documenting phone inquiries, public hearings / meetings or office visits. To date, the Waco MPO has had no requests for interpreters and no requests for translated program documents. The members of the Waco MPO Policy Board have had little contact with LEP persons regarding the transportation planning process.

### **Factor 3: The nature and importance of services provided by the Waco MPO to the LEP population.**

According to the American Community Survey (US Census), the primary concentration of Spanish LEP populations are found in a portion of South Waco with the approximate boundaries of South 17<sup>th</sup> St, LaSalle Ave, Valley Mills Dr and the Union Pacific Railroad. Within this region greater

than 1 out of 3 persons speak Spanish and speak English less than 'very well.' Outside of this area, a lesser concentration of LEP Spanish speakers, between 20 and 30 percent of the population, exist along the 18<sup>th</sup> St and 25<sup>th</sup> St corridors and within portions of South Waco south of Valley Mills Dr and west of Interstate 35. Lesser concentrations of LEP Spanish speakers are also found in Bellmead, Lacy-Lakeview, Downtown Waco and portions of North Waco along the 4<sup>th</sup> & 5<sup>th</sup> St corridors. Map A shows the locations of these concentrations.

In reviewing other language groups, it was determined that no other significant concentrations of LEP populations existed within the Waco Metropolitan Area. With that said, the MPO will be monitoring the following languages and their LEP populations in the future to determine the need for additional language resources should the American Community Survey indicate a potential need: Vietnamese, Mandarin Chinese and Other Asian. Table 1 shows the languages with more than 400 speakers and an LEP percentage of greater than 40% within the Waco Metropolitan Area.

**Table 1: Languages with greater than 400 speakers and Limited English Proficiency of greater than 40% within the Waco Metropolitan Area**

| <b>LANGUAGE</b> | <b>SPEAKERS</b> | <b>PERCENT LEP</b> |
|-----------------|-----------------|--------------------|
| Spanish         | 34,028          | 45.4%              |
| Chinese         | 466             | 41.8%              |
| Vietnamese      | 498             | 60.3%              |
| Other Asian     | 479             | 100.0%             |

Source: US Department of Commerce; Bureau of the Census – American Community Survey, 2006-2010

As a result of significant concentrations of LEP Spanish speakers within the Waco Metropolitan Area, the Waco MPO has adopted several policies to focus on outreach to LEP individuals. In addition, the MPO desires to ensure that reasonable opportunities for input from LEP Spanish speakers is provided regarding plans and programs adopted by the MPO. These policies are outlined in the sections of this plan following the 4-factor analysis.

**Factor 4: The interpretation services available to the Waco MPO and overall cost to provide LEP assistance.**

The Waco MPO reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most

valuable to be translated if the need should arise. In addition, the MPO staff took an inventory of available organizations that could be partnered with for outreach and translation efforts. Although the MPO does not currently have any employees that speak Spanish, the City of Waco Inspection Services Department and City Secretary's Office both have employees fluent in both English and Spanish and are available as interpreters as needed. In addition, Waco Transit System has employees fluent in both English and Spanish who are available as interpreters as needed.

## **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 within the transportation planning process. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

The following steps will be used by the Waco MPO staff to identify an LEP person who needs language assistance:

- Post notice of LEP plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Waco MPO staff will be provided with 'I Speak' cards to assist in identifying the language interpretation needed if the occasion arises.
- Waco MPO staff will record any contacts with LEP persons and MPO staff will review these contacts annually.
- When the Waco MPO sponsors or conducts an informational meeting, hearing or event, an advanced public notice of the event will be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). 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 translation may not be able to be provided at each and every event, it will help identify the need for future events.

## **Language Assistance Measures**

The overall percentage of LEP individuals within the Waco MPO area is relatively small, with approximately 1 in 13 persons over age 5 identified as having limited proficiency in English. As determined in factor 3 of the four-factor analysis, however, certain neighborhoods have much higher percentages than the regional average. As a result, especially in those neighborhoods within high LEP percentages, the Waco MPO will strive to offer the following measures:

1. The Waco MPO will take reasonable steps to provide the opportunity for meaningful access to LEP residents who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
  - Interpreters for the Spanish language are available and will be provided within a reasonable time period at no cost to the individual.
  - Language interpretation will be accessed for all other languages first through either Baylor University or McLennan Community College or if not available through Baylor or MCC, then through a telephone interpretation service.
3. For public informational meetings that are required for plan or program adoptions or amendments as part of the MPO's public participation plan:
  - The MPO will conduct at least one of these meetings within close proximity of the neighborhoods with the highest concentration of LEP Spanish speakers.
  - Spanish language materials will be made available at these meetings including comment cards and brochures identifying language services available.
  - MPO staff will monitor the need for interpretative services at these meetings and will provide interpreters if the need is demonstrated.

## **Staff Training**

The following information will be provided to all MPO staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.

- Use of the 'I Speak' cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

In addition, all MPO staff will be required to be familiar with the policies outlined within this plan.

All consultants, contractors and subcontractors performing work for the MPO will be required to follow the Title VI / LEP guidelines identified within this plan.

## **Translation of Documents**

The Waco MPO 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 documents and the likelihood that most translated documents will not be utilized, at this time it is an unnecessary burden to have most documents translated.

Nevertheless, the MPO will, upon request, translate into Spanish an executive summary of any plan or program developed by the MPO. The MPO will complete and make publicly available the requested translation within 60 days of the request. In addition, the MPO will translate summary notes for an MPO Policy Board into Spanish upon request. The MPO will complete and make publicly available the requested translation within 15 days of the request. All documents translated into Spanish will be made publicly available via the MPO's website within the same timeframe.

In addition to these documents, the MPO also translates comment forms for MPO plans and programs, Title VI complaint forms and information regarding language assistance services in Spanish. These forms and documents are also available via the MPO's website.

Appendix A provides copies of several of the key documents the Waco MPO has translated into Spanish in order to assist LEP individuals participate within the transportation planning process.

## **Monitoring and Updates**

The Waco MPO will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when new data from the US Census is publicly available. Updates will include the following:

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

## **Dissemination of the Waco MPO LEP Plan**

Adoption of the Waco MPO LEP Plan will follow the process approved within the MPO's Public Participation Plan (PPP). In addition to this process, the MPO will also utilize the language assistance measures identified within this plan to ensure that LEP speakers within the Waco Metropolitan Area were afforded reasonable opportunity to comment on this plan.

## **Coordination with Waco Transit**

Since the LEP populations within the Waco Metropolitan Area are also served by Waco Transit, the urban public transportation provider for the Waco Urbanized Area, the Waco MPO has coordinated the development of this document with Waco Transit and has adopted similar policies, where applicable. Similarly, Waco Transit has adjusted their policies to be consistent with those identified within this LEP plan, where applicable.

**Map A: Percent of Persons Over Age 5 who Speak Spanish and Speak English less than 'Very Well'**

**Percent**

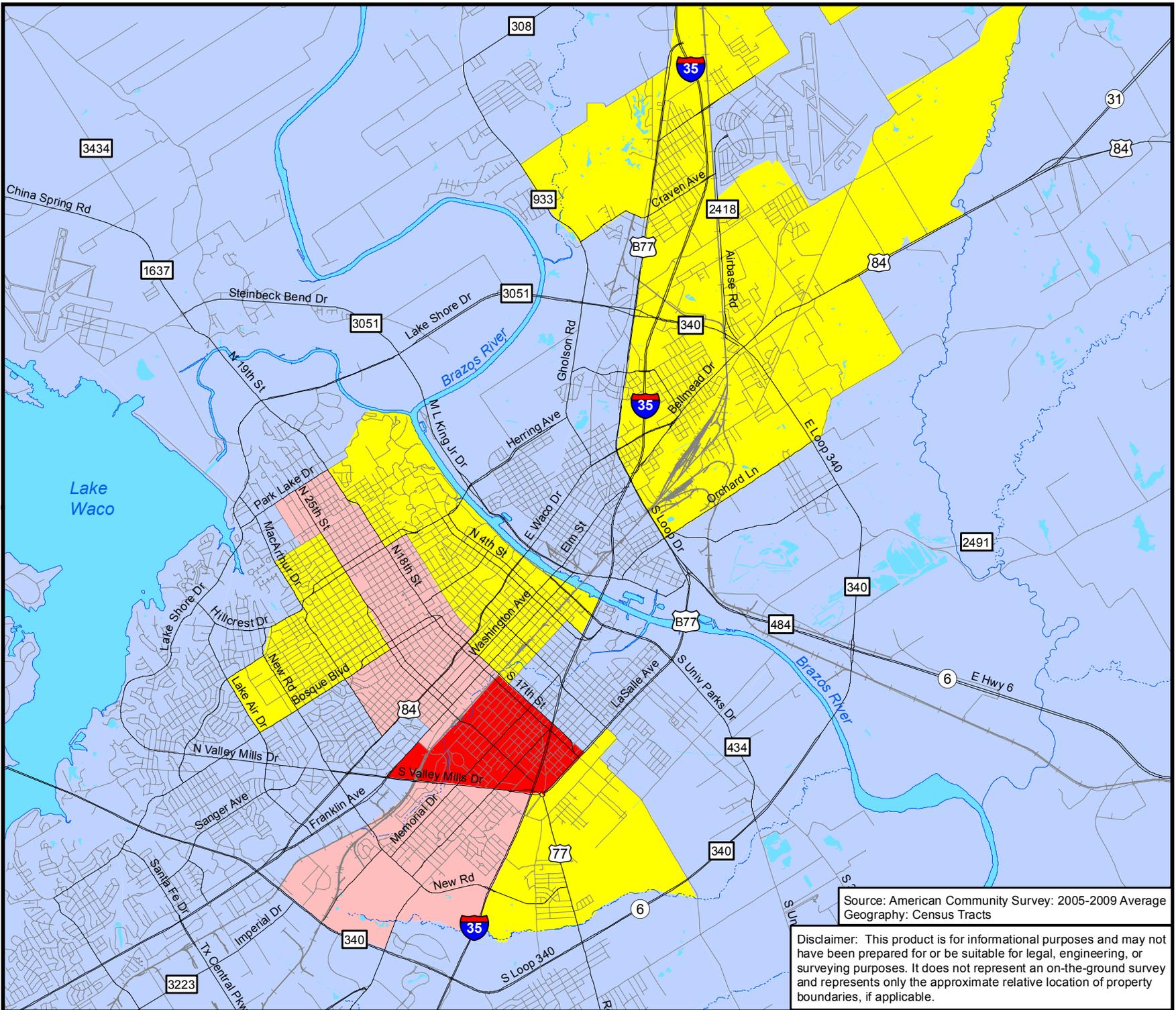
- Greater than 30%
- 20.1% to 30.0%
- 10.0% to 20.0%
- Less than 10%



0 0.25 0.5 1  
Miles

May, 2012

**MAP A: Percent of Persons Over Age 5  
who Speak Spanish and  
Speak English less than "Very Well"\***



Source: American Community Survey: 2005-2009 Average  
Geography: Census Tracts

Disclaimer: This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries, if applicable.

**Appendix A: Documents Translated into Spanish to Assist LEP  
Individuals Participation within the Transportation Planning  
Process.**



Waco Metropolitan Planning Organization

## Documents Available to Assist LEP Individuals

Limited English Proficiency (LEP) refers to a person's inability to speak, read, or understand English due to their national origin.

Non-English speakers have every right to participate in the transportation planning process and understand how transportation decisions impact their lives. Thus, the Waco MPO provides certain materials and certain services in languages most likely to be needed within the Waco region.

The Waco MPO has translated several basic documents into Spanish to provide information regarding the transportation planning process. These materials can be found at the MPO offices as well as the MPO website at: <http://www.waco-texas.com/cms-mpo/page.aspx?id=209>.

- Title VI Rights and Regulations [Legal Authorities]
- Title VI Complaint Form and Discrimination Complaint Processing Procedures
- Title VI Policy Statement
- Title VI Notice to the Public
- Limited English Proficiency Plan and Brochure (free language assistance services)
- Legal notifications of public meetings, public hearings, and policy board meetings
- Public input solicitations (surveys and comment cards regarding plans and programs)