

CENTRAL MASSACHUSETTS METROPOLITAN PLANNING ORGANIZATION



# Language Assistance Program & Limited English Proficiency (LAP/LEP)

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and Implementation Plan

**3/30/2015**  
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*Prepared by the transportation staff of the*



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## 1.0 INTRODUCTION

This Limited English Proficient (LEP) Plan has been developed consistent with FTA Circular 4702.1B, “*Title VI Requirements and Guidelines for FTA Recipients*,” published October 1, 2012. This plan is a living document; it is continually reviewed, updated and improved to help better meet the needs of Limited-English Proficient persons in the CMRPC service area.

This plan describes the strategic approach that CMRPC is pursuing to achieve its program to better deliver services to people who are Limited English Proficient (LEP). CMRPC’s goal is to ensure that LEP persons have meaningful access to the benefits, services, and information provided by CMRPC’s programs and related MPO activities. This plan clarifies the fulfillment of CMRPC’s responsibilities with respect to LEP requirements as a recipient of federal financial assistance from the U.S. Department of Transportation to people who are Limited English Proficient in accordance with:

- **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 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 under any program or activity that receives federal financial assistance.
- **Executive Order 13166** “Improving Access to Services for Persons With Limited English Proficiency” of August 16, 2000, which directs that Federal agencies subject to the requirements of Title VI publish guidance for their recipients clarifying LEP obligations. Executive Order 13166 directs that all guidance documents be consistent with the compliance standards and framework detailed in the U.S. Department of Justice’s Policy Guidance “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency.” This guidance advises that different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies, programs and operations of entities that receive funds from the federal government, which includes CMRPC.

These federal regulations and guidance define persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities.

This plan is being made available to people and organizations for which LEP may be a common consideration, including social service, non-profit, and law enforcement agencies. This plan is available in electronic PDF format on CMRPC’s website at [www.cmrpc.org](http://www.cmrpc.org). Paper copies of this LEP Plan will be provided to the members of the Central Massachusetts Metropolitan Planning Organization (CMMPO), the Massachusetts Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any other person or agency requesting a copy.



## 2.0 FOUR-FACTOR ANALYSIS

This plan utilizes the four-factor analysis of an individualized assessment described in the FTA guidance publication of April 13, 2007 entitled *“Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers.”*

CMRPC’s prior experience with LEP individuals is longstanding. The CMRPC region includes communities with diverse ethnicities, including many people for whom English is not their native language. Employees of CMRPC are an ethnically diverse group, of which many individuals share cultural backgrounds with ethnic groups in the region. This personal experience and connection with local communities is one of the most regular and important ways that CMRPC has developed and maintains its sensitivity to the concerns of LEP persons.

In accordance with this guidance, Section 2 examines each of the following factors to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to transportation planning information within the CMRPC region. These factors are:

- Factor 1: Proportion, Numbers and Distribution of LEP Persons in the CMRPC region
- Factor 2: Frequency of Contact with LEP Persons
- Factor 3: Nature and Importance of CMRPC services to LEP Persons
- Factor 4: Resources Available to CMRPC and Cost

Implementation measures to address the results of the analysis are described in Section 3.0.

### 2.1 Factor 1: Proportion, Numbers and Distribution of LEP Persons

The U.S. Census Bureau stopped asking the three questions related to language spoken at home and the ability to speak English for the population 5 years of age and older. The American Community Survey (ACS) is now responsible to gather the sample data in a 1-year, 3-year and 5-year periods depending on the population size of a given geographical area. The 5-year period survey is comparable to the 2000 U.S. Census long form sample products. The four distinctions of level of proficiency that the Census used in the past are now reduced to two levels of proficiency: “Speak English Very Well” and “Speak English Less than Very Well”. The last one includes those who reported speaking English “well”, “not well” and “not at all”.

In order to be consistent with federal guidance, this plan considers people who are reported by the ACS to speak English “Less Than Very Well” as Limited English Proficient persons.

#### 2.1.1 Service Area Geographic Boundaries

The geographic boundaries of the CMRPC region are the 40 municipalities listed below and are displayed in the map on the previous page.

Auburn	Brookfield	Grafton	Mendon
Barre	Charlton	Hardwick	Millbury
Berlin	Douglas	Holden	Millville
Blackstone	Dudley	Hopedale	New Braintree
Boylston	East Brookfield	Leicester	North Brookfield

Northborough	Shrewsbury	Warren
Northbridge	Southbridge	Webster
Oakham	Spencer	West Boylston
Oxford	Sturbridge	West Brookfield
Paxton	Sutton	Westborough
Princeton	Upton	Worcester
Rutland	Uxbridge	

### 2.1.2 Analysis of Language-related US Census Data

The 2021 American Community Survey (ACS) 5-year estimates demographic data for the 40 communities presented in Figure 1 shows that the proportion of residents within the CMRPC region who may be considered LEP is **2.92%**, which is less than the Massachusetts statewide average of 8.7%. The total population five years of age and older within the CMRPC region is 570,264, of which 10.77% reported speaking a language other than English at home.

**Figure 1**  
**Language Spoken at Home and Ability to Speak English**

CMRPC Region	Total	Percent%	Average Percent
<b>Population 5 years or more</b>	<b>570,264</b>	<b>100%</b>	<b>x%</b>
Spoke only English at home	445,882	78.18%	89.24%
Spoke a language other than English at home	124,382	21.81%	10.77%
<i>Speak English "less than very well"</i>	<i>46,875</i>	<i>8.21%</i>	<i>2.92%</i>

*Source: 2021 American Community Survey (ACS) 5-Year Estimates S1601  
"Language spoken at Home by ability to Speak English for the Population 5 Years and Over".*

The analysis of the four major language groups within the LEP population shows that Spanish is spoken by 41.07% of the population, 30.10% speaks other Indo-European languages, whereas 16.55% speaks Asian and Pacific Island languages. These figures are similar to the top five languages spoken in the region, in order of significance, are Spanish, Portuguese, French (including Patois and Cajun), Chinese, and African languages.

**Figure 2**  
**Languages other than English Spoken in the CMRPC Region**

CMRPC Region	Total	Percent	Average Percent
<b>Spoke a language other than English at home</b>	<b>124,382</b>	<b>100.0%</b>	<b>x%</b>
Spanish and Spanish Creole	51,092	41.07%	3.61%
Other Indo-European Languages	37,450	30.10%	4.53%
Asian and Pacific Island Languages	20,594	16.55%	1.57%
All other languages	15,246	12.25%	1.04%

*Source: 2021 American Community Survey (ACS) 5-Year Estimates C16001 "Language spoken at Home by ability to Speak English for the Population 5 Years and Over".*

Related to the Safe Harbor threshold for the LEP population in the CMRPC/CMMPO region, none of the languages exceed five percent threshold. Nonetheless, at least nine languages exceeded the 1,000 person threshold. These languages are: Spanish or Spanish Creole, Portuguese or Portuguese Creole, Vietnamese, Chinese, African languages, Polish, Other Indo-european languages, French (including Patois, Cajun) and other Asian languages. See Figure 3.

**Figure 3**  
**Language Spoken at Home and Ability to Speak English**  
**CMRPC Region**

CMRPC Region	Language Other than English Spoken at Home		Speak English "less than very well"	
<b>Languages other than English</b>	<b>124,382</b>	<b>x%</b>	<b>46,875</b>	<b>x%</b>
<b>SPANISH AND SPANISH CREOLE</b>	<b>51,092</b>	<b>41.07%</b>	<b>20,002</b>	<b>42.67%</b>
<b>OTHER INDO-EUROPEAN LANGUAGES</b>	<b>37,450</b>	<b>30.10%</b>	<b>9,409</b>	<b>20.07%</b>
French (incl. Patois, Cajun):	5,526	4.44%	<b>1291</b>	2.75%
French Creole:		%		%
Italian:		%		%
Portuguese or Portuguese Creole:		%		%
German or other West Germanic Languages:	1,531	1.23%	164	.34%
Yiddish:		%		%
Scandinavian languages:		%		%
Greek:		%		%
Russian, Polish, or other Slavic Languages:	6,597	5.30%	2,423	5.1%
Serbo-Croatian:		%		%
Armenian:		%		%
Persian:		%		%
Gujarati:		%		%
Hindi:		%		%
Urdu:		%		%
Other Indic languages:		%		%
<b>ASIAN AND PACIFIC ISLAND LANGUAGES</b>		<b>%</b>		<b>%</b>
Chinese:	5,346	4.29%	<b>2,717</b>	5.79%
Japanese:		%		%
Korean:	688	0.55%	195	0.41%
Mon-Khmer, Cambodian:		%		%
Hmong:		%		%
Thai:		%		%
Laotian:		%		%
Vietnamese:	6,767	%	<b>4,027</b>	8.5%
Other Asian languages:		%		%
Tagalog:	485	0.38%	76	0.16%
Other Pacific Island languages:	7,326	5.88%	1,498	3.19%

ALL OTHER LANGUAGES		%		%
Navajo:		%		%
Other Native North American languages:		%		%
Hungarian:		%		%
Arabic:	4,975	3.99%	2,029	4.32%
Hebrew:		%		%
African languages:		%		%
Other unspecified languages:	10,165	8.17%	3,065	6.53%

*Source: 2021 American Community Survey (ACS) 5-Year Estimates C16001 "Language spoken at Home for the Population 5 Years and Over".*

Written translations of key documents are now available by request in any of the aforementioned languages to meet the safe harbor standard. In the past, CMRPC had focused its efforts in communicating the availability of translations by request in Spanish consistent with the Four Factor Analysis. However, despite that Spanish is the predominant LEP language, CMRPC sees all of its communities as being significant enough to safe harbor provisions of LEP program efforts due to the fact that transportation planning and projects affect all communities in the CMRPC region. For this reason, when a project is being planned, CMRPC staff gathers and analyze data for the impact area. If LEP population is identified in such impact area, CMRPC then determines the best outreach approach consistent with the Public Outreach Plan.

The data shows a growing trend of LEP population, especially in the City of Worcester, considered New England’s Central City. The Central Massachusetts region is highly attractive for its central location, low living costs, affordable housing, and diversity of business opportunities. As an example, the Massachusetts Department of Elementary and Secondary Education (ESE) reports that between the years of 2011 and 2012, 43.8% of all students in the Worcester School District had a First Language other than English, of these, 28.6% were Limited English Proficient. These figures are reasonably high compared to ESE reports from years 2006 and 2007, when 37.8% of all students in the Worcester School District had a First Language other than English, and 16.6% of them were Limited English Proficient.

### 2.1.3 Analysis of LEP Individuals with Disabilities

Regarding the Americans with Disabilities Act (ADA) of 1990 and section 504 of the Rehabilitation Act of 1973 (section 504), that states that, entities must provide auxiliary aids to individuals with disabilities, at no additional cost, where necessary to ensure effective communication with individuals with hearing, vision, or speech impairments. The 2021 American Community Survey (ACS) 5-year estimates demographic data for the 40 communities presented in Figure 4 shows that the proportion of residents within the CMRPC region who may be considered LEP individuals with disabilities is **10.47%**. Not including ambulatory difficulties, self-care difficulties, and independent living difficulty. As CMRPC continues to improve their communication with LEP individuals within the community, if there was an LEP individual with disabilities who would like to request any of our documents in any auxiliary aid form, CMRPC will provide the correct form of communication to accommodate.



**Figure 4**  
**Disability Characteristics in the CMRPC Region**

<b>CMRPC Region</b>	<b>Total</b>	<b>Percent</b>
<b>Total Civilian Noninstitutionalized Population</b>	<b>594,306</b>	<b>100.0%</b>
<b>With a Disability</b>	<b>73,964</b>	<b>12.44%</b>
Cognitive Difficulty	30,881	5.19%
Hearing Difficulty	20,680	3.47%
Vision Difficulty	10,800	1.81%

*Source: 2021 American Community Survey (ACS) 5-Year Estimates S1810 "Disability Characteristics".*

**2.1.4 Involvement of Community Organizations and Committees**

CMRPC is engaged with community based organizations that serve LEP persons in two general ways: 1) participating in meetings of organizations and agencies that deal with LEP issues; and 2) participating in the public outreach activities of the Central Massachusetts Metropolitan Planning Organization (CMMPO).

CMRPC participates on an ongoing basis in the meetings and activities of the following community and municipal organizations and CMRPC committees that address in part the needs of LEP persons:

- Working with community organization like Centro Las Americas, Common Pathways of Worcester, and the Southeast Asian Coalition to assist in public outreach and providing feedback.
- Municipalities Organized for Regional Effectiveness (M.O.R.E.)
- CMRPC Transportation Committee
- CMRPC Physical Development Committee
- CMRPC Member Community Quarterly Meetings
- Mass In Motion
- Central Region Homeland Security Advisory Council
- Blackstone Valley Prioritization Project
- Compact 13 Prioritization Project
- Brownfield Steering Committee
- Neighborhood conversations

CMRPC continues to work with CMMPO to identify other organizations not traditionally involved in service of LEP persons. The following list outlines the various organizations that met with CMMPO staff during outreach performed during 2012 for several CMRPC projects:

➤ **Annual Environmental Consultation Session**

- Department of Environmental Protection (DEP)
- Department of Conservation & Recreation (DCR)
- US Environmental Protection Agency (EPA), Region 1, Diesel Idling, Abby Swaine
- Conservation Law Foundation (CLF), Attorney, Jennifer Rushlow

- P&W Railroad, Dave Rutkowski, Chief Maintenance Officer
- Federal Highway Administration, MA Division, Paul Maloney
- Town of Spencer, Superintendent, Steven J. Tyler, P.E.

➤ **Environmental & Climate Change**

- Regional Environmental Council (REC)
- John H. Chafee Blackstone River Valley National Heritage Corridor Commission (JHCBRVNHCC)
- Blackstone River Coalition
- Blackstone Canal Conservancy
- Uxbridge Conservative Club
- Friends of Upton State Forest
- Massachusetts Audubon Society
- Quaboag/Quacumquasit Lake Association (QQLA)
- Blackstone River Watershed Association (BRWA)
- Spencer Conservation Commission

➤ **Environmental Justice**

- Common Pathways
- TPAG Elderly & Disabled Transportation Task Force
- Mass. Mobility Task Force (United We Ride Program)
- WRTA Transit Consumer Advocacy Committee
- Regional Workforce Development
- South Sudan-American Friendship and Trade Association (SSAFTA)

➤ **Freight**

- Growth Options for the 21<sup>st</sup> Century (GO21), railroad advocacy group, Pamela Mann, spokesperson
- New England Rail Expo, Grafton & Upton Railroad presentation
- State Rail Plan public meetings
- Providence & Worcester Railroad 166<sup>th</sup> Annual Shareholder meeting
- MassCentral Railroad Ribbon Cutting Ceremony, South Barre,
- New England Automotive Gateway (NEAG) intermodal facility, East Brookfield/Spencer, George Bell, operator
- Regional Freight Advisory Committee meetings

➤ **Health**

- Mass. In Motion
- Edward M. Kennedy Community Health Center
- Worcester Refugee Mental Health
- Milford Regional Medical Center
- Golden Life Board and Care Home

➤ **Bicycle & Pedestrian**

- Bicycle & Pedestrian Task Force

- Bay State Trail Riders Assoc.
  - Dudley Trails and Greenways
- **Land Use**
- Mendon Land Use
  - Representatives and planners from the towns of Sturbridge, Spencer, Holden, Millbury, Douglas, Dudley, Leicester, Auburn, Northbridge, Mendon, West Boylston, Oxford, Charlton, Paxton, Warren, Worcester, Blackstone
  - Dudley Conservation Land Trust
  - Upton Open Space
  - Metacomet Land Trust
  - Common Ground Land Trust
  - Opacum Land Trust
- **Economic Development**
- Worcester Office on Economic Development
  - Regional Planners Forum
  - Worcester Regional Chamber of Commerce
  - Blackstone Valley Chamber of Commerce
  - Massachusetts Executive Office of Housing and Economic Development
  - Chamber of Central Mass South (CMS Chamber)
  - Worcester Business Development Corporation
  - Dudley Economic Development Committee
- **Legislative**
- U.S. Congressional Delegation, including Representative James McGovern
  - Central Massachusetts Legislative Delegation
- **Academic Institutions**
- Clark University
  - Quinsigamond Community College
- **Central Regional Homeland Security Advisory Council (Worcester County)**

Every year CMRPC staff attend Common Pathways, a Massachusetts Department of Public Health Community Health Network, “Neighborhood Conversations” with a broad group of stakeholders, as shown below. As part of the proactive outreach process, CMRPC staff on the Transportation Subcommittee requested Common Pathways to include general transportation need questions as part of the Neighborhood Conversations.

*Neighborhood Conversations Participants*

- Albanian Rescue League
- Belmont Hill Seniors
- Children’s Friend: School Age Mothers Program
- Iraqi Women’s group

- Kennedy Community Health Center / Burmese families
- Parent/Professional Advocacy League
- Women Together

CMRPC maintains contact with, and gathers information about the needs of LEP persons from the community based organizations and committees of the region listed on page 7.

## **2.2 Factor 2: Frequency of Contact with LEP Persons**

Employees of CMRPC are in contact with LEP persons on a regular basis. The most frequent type of encounter is between staff members and attendees at public hearings, tabling events, and/or meetings.

- Public hearings
- Meetings with community based organizations

## **2.3 Factor 3: Nature and Importance of CMRPC to LEP Community**

CMRPC is committed to making its services available and as accessible as possible to all persons living within its service area. CMRPC is also committed to providing opportunities for all persons to participate in the transportation planning process.

This outreach to LEP persons is important to CMRPC because: 1) public participation from all residents in the region is highly valued in the regional transportation planning and community development processes; 2) LEP persons may tend to be more dependent on transit service than English speakers in the region.

Any denial, delay or reduction in access to CMRPC services because of language-related barriers is unacceptable to the CMRPC. CMRPC recognizes that thousands of persons depend on transit each day in its service region for critical mobility needs, such as traveling to medical appointments, shopping for food, commuting to work, and getting to school.

## **2.4 Resources Available to CMRPC and Overall Cost**

CMRPC utilizes federal and state sources of operating and capital assistance to support LEP programs and services. LEP is tightly integrated with planning projects and public outreach.

In the future, CMRPC will continue to identify LEP concerns and seek appropriate additional funding that may be available for LEP programs and services.

### 3.0 SAFE HARBOR STIPULATION

Federal law provides a “safe harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A safe harbor means that if a recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not required. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under safe harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. CMRPC’s translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Currently, in the CMRPC region the LEP language groups that surpasses the threshold of 1,000 persons of population five years of age or older are the following:

**Figure 5**

**Safe Harbor Threshold**

CMRPC Region	Speak English "less than very well"	
	Total	Percent
Spanish and Spanish Creole	20,002	3.6%
Other Indo-European languages	9,409	0.3%
Vietnamese	4,027	0.7%
Other and Unspecified Languages	3,065	
Chinese	2,717	0.5%
Russian, Polish, or other Slavic Languages	2,423	0.4%
Arabic	2,029	0.4%
Other Asian languages	1,498	0.2%
French (incl. Patois, Cajun)	1,291	0.3%

*Source: 2021 American Community Survey (ACS) 5-Year Estimates C16001 "Language spoken at Home for the Population 5 Years and Over".*

## **4.0 IMPLEMENTATION PLAN FOR LANGUAGE ASSISTANCE**

This section describes CMRPC's current and future plans for providing language assistance to LEP persons in the service area.

### **4.1. Identifying LEP Persons Who Need Language Assistance**

CMRPC identifies LEP persons who need language assistance through the following programs, activities and services:

- Working with community organizations to hold public meetings in specific locations that may require language translation and/or signing interpreter services
- Conversations at public meetings
- Participation on CMRPC or CMMPO committees
- Inclusion of instructions for requesting language translation on public meeting notices
- Demographic assessment of census data to ascertain likely geographic location of potential LEP customers
- Outreach to community based organizations and municipal agencies to ask their assistance in identifying LEP persons who may need language assistance

### **4.2. Providing Language Assistance**

This section describes the current and future services that CMRPC provides for enhancing the access of its system to LEP persons.

Information regarding CMRPC services is made available through multiple means, including website translation services for the new CMRPC website expected to debut in 2024 and working with the Worcester Regional Transit Authority's (WRTA's) and various community organizations bilingual staff whenever possible.

#### **4.2.1 Existing LEP Programs and Services**

Following is a summary of the language assistance, programs and services currently provided:

- CMRPC has staff that speak Spanish
- CMRPC consults with community organizations and other resources to provide interpretation and translation services for Vietnamese, Portuguese, and Polish, customers
- CMRPC staff regularly evaluate customers' LEP needs and options to better serve them
- CMRPC staff are trained in the use of online translation services for other languages (i.e., Russian, Portuguese, Vietnamese) to assist persons
- Some CMRPC staff are bilingual (Chinese, Spanish, and Hindi)
- Many other CMRPC are also familiar with common phrases used by persons in the region in languages other than English
- Professional language interpreter (Spanish) available at some public meetings

- Website translation function using Google Translate (list of languages available in drop-down menu)
- Translation of key CMRPC notices and documents available upon request
- Meeting notices include explanation of procedures to request language translation
- Meetings with community based organizations

CMRPC defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

#### **4.2.2 Future LEP Programs and Services**

CMRPC's proposed future programs and services to enhance participation in the transportation planning process to LEP persons include:

- Continued and expanded partnerships with community organizations to develop a list of language translation volunteers who are available for public meetings. This option could be used where advanced notice is provided that translator services are needed. This option may also help increase the number of languages for which translation services are available
- Development of written translation and oral interpreter service providers database which would improve the speed and convenience with which written documents can be translated for the public, and reduce the need to have public requests for them
- Use of CMMPO's LEP services outlined in the organization's LEP plan, as developed
- Ensure other CMMPO members are aware of the U.S. DOT's LEP guidance and support their LEP planning activities, as appropriate
- Updates to the CMRPC LEP Plan, as needed by new events, such as the release of language-related demographic data from the 2010 decennial census, ACS and/or indications of increases in LEP population
- Identify community based organizations that are not being contacted through existing outreach

#### **4.2.3 CMRPC Coordination with Regional MPO**

As its staff, CMRPC participates in the public involvement activities of the Central Massachusetts Metropolitan Planning Organization (CMMPO) for capital planning. The CMMPO works to engage persons with LEP in region-wide planning activities, such as the adoption of the Regional Transportation Plan (RTP), Unified Planning Work Program (UPWP), transit studies, and the regular updating of the Transportation Improvement Plan (TIP). The CMMPO does this through outreach to Spanish-speaking residents, which represent the largest group of LEP people in the region. The CMMPO publishes meeting notices in Spanish.

The CMMPO also engages LEP persons in the region in special activities that may be

focused on a specific neighborhood or corridor. This is accomplished by producing maps that depict the distribution of non-English speaking persons at the beginning of any such project to assess whether or not outreach in languages other than English are needed. If it is determined that such outreach is needed, CMMPO consults with neighborhood groups, ethnic associations and religious organizations to identify the best methods and channels for reaching and involving LEP residents.

### **4.3. Training Staff**

CMRPC does not have formal existing training for better serving LEP persons in the region, however, anticipated LEP training activities in the future will include development and implementation of formal LEP training for all agency staff in the near future.

### **4.4. Providing Notice to LEP Persons**

U.S. DOT's LEP guidance states: "Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons can understand.

CMRPC provides this notification through the following:

1. Meeting notices include instructions on how to request language assistance (with advance notice)
2. Working with community-based organizations and other stakeholders to inform LEP individual of CMRPC's services, including the availability of language assistance services

Future notification services are expected to include:

- An inventory of existing public service announcements and community outreach the agency currently performs
- Greater incorporation of notices of language assistance availability into existing outreach
- Targeted community outreach to LEP persons, especially via community based organizations that serve and represent them
- Providing notices on non-English-language radio and television states about the available language assistance services and how to get them
- Providing presentations and/or notices at schools and religious organizations
- Including notices in local newspapers in languages other than English

### **4.5. Monitoring and Updating This LEP Plan**

CMRPC continues to develop a process for monitoring and updating this LEP Plan. Related activities will likely include:

- Establishing and implementing a process to obtain feedback from LEP persons, directly, as well as community members and agencies



- Conducting internal monitoring and random spot checks of LEP services
- Refining and improving the LEP Plan described above consistent with feedback received
- Considering new language assistance needs when expanding service
- Regularly updating the plan with the Title VI Program (every three years) or when significant new language-related demographic data becomes available.