

Plan for Providing Language Assistance to Persons with Limited English Proficiency in RPA 15

Purpose and Background

The purpose of this Limited English Proficiency Plan is to outline how the Area 15 Regional Planning Commission identifies persons 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. Executive Order 13166 defines LEP persons as those who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English. To prepare this plan, the Area 15 Regional Planning Commission utilized the Four-Factor Analysis to determine the language assistance services that are appropriate to provide. The Four-Factor Analysis considers the following elements:

1. The number or proportion of LEP persons in the region who may interact with the Area 15 Regional Planning Commission or are likely to encounter a transportation planning program, activity, or service provided by the RPC.
2. The frequency with which LEP persons encounter transportation planning programs, activities, or services.
3. The nature and importance of the transportation planning programs, activities, or services provided by the Area 15 Regional Planning Commission to the LEP population.
4. The resources available to the Area 15 Regional Planning Commission for LEP assistance and the costs associated with that assistance.

Four-Factor Analysis

1. The number or proportion of LEP persons in the region who may interact with the Area 15 Regional Planning Commission or are likely to encounter a transportation planning program, activity, or service provided by the RPC.

Information on the Limited English Proficient population of RPA 15 was obtained from the U.S. Census Bureau's 2015-2019 American Community Survey, which includes data on the number and percentage of people over the age of 5 that "speak English less than very well" and people that "speak a language other than English". According to data from the American Community Survey, the region does not have a large Limited English Proficient population as only 3% of the population (2,754 people) "speak English less than very well". This data also shows that the largest portion of the region's LEP population (1,548 people) speak Spanish or Spanish Creole,

followed by Asian and Pacific Island languages (438 people), other Indo-European languages (435 people) , and other languages (333 people).

2. The frequency with which LEP persons encounter transportation planning programs, activities, or services.

Area 15 Regional Planning Commission staff assessed the frequency with which LEP persons have or could have contact with the region's transportation planning programs, activities, or services by reviewing the inquiries for interpreters or for the translation of documents. To date, there have been no requests received by staff for interpreters to be at RPA 15 meetings or for the translation of the RPA's documents.

3. The nature and importance of the transportation planning programs, activities, or services provided by the Area 15 Regional Planning Commission to the LEP population.

The nature transportation planning programs, activities, and services provided by the Area 15 Regional Planning Commission is toward assisting the state department of transportation and local governments with transportation planning activities and involves frequent contact with these entities. Because the planning commission does not provide programs, activities, or services directly to the population of the region, it does not have frequent contact with LEP individuals regarding transportation planning. However, the planning commission must ensure that all segments of the population have the opportunity to be involved in the transportation planning process. This includes providing reasonable accommodations for language assistance to LEP persons to participate in the planning process.

Area 15 Regional Planning Commission staff have reviewed the transportation planning programs, activities, and services provided by the commission and believe the following may be of interest to LEP individuals:

- The Passenger Transportation Plan (PTP)
- The Long-Range Transportation Plan (LRTP)
- The Regional Trails Plan
- The Transportation Improvement Program (TIP)
- The Public Participation Plan (PPP)
- The Transportation Planning Work Program (TPWP)
- Title VI Plan
- Title VI Complaint Form
- Plan for Providing Language Assistance to persons with Limited English Proficiency

4. The resources available to the Area 15 Regional Planning Commission for LEP assistance and the costs associated with that assistance.

The Area 15 Regional Planning Commission has identified the following resources for providing assistance to LEP persons at a low cost to the commission:

- The Microsoft Translator in Microsoft Office will be used to translate written materials at no cost to the planning commission.
- Bi-lingual staff of Ottumwa Transit and 10-15 Transit will provide oral translation at RPA 15 meetings at no cost to the planning commission.

Four Factor Analysis Conclusion

The Area 15 Regional Planning Commission has reviewed the number of requests for LEP assistance and the demographics of the RPA 15 region to determine which languages translation services may be needed for. Based on this review, the commission has determined that written translation of important RPA documents and the availability of oral translation services at RPA 15 meetings is needed for LEP persons who speak Spanish or Spanish Creole since this group meets the 1,000 persons or 5% of the RPA's population threshold requirements. The Area 15 Regional Planning Commission will evaluate and monitor the implementation of this LEP plan to provide appropriate language services to the population of the RPA 15 region.

Implementation

Language Assistance Measures provided by the Area 15 Regional Planning Commission:

The Area 15 Regional Planning Commission will provide language assistance for transportation planning to LEP individuals who speak Spanish or Spanish Creole since this group meets the 1,000 persons or 5% of the RPA's population threshold requirements. This assistance will include the written translating of important documents and the availability of oral translation services at RPA meetings. Other documents not identified will be translated upon request. The planning commission will also attempt to provide language assistance to LEP individuals who speak languages other than Spanish upon request to the extent possible.

How Area 15 Regional Planning Commission Staff will identify LEP persons needing language assistance:

The Area 15 Regional Planning Commission will provide notice of available language assistance to LEP persons and contact information for obtaining assistance. The planning commission staff

will also greet participants at RPA 15 meetings and informally engage them in conversation to gauge their ability to speak and understand English.

Translation of Written Materials:

The Area 15 Regional Planning Commission will make the following RPA 15 documents available in Spanish:

- The Passenger Transportation Plan (PTP)
- A summary of the Long-Range Transportation Plan (LRTP)
- The Regional Trails Plan
- The Transportation Improvement Program (TIP)
- The Public Participation Plan (PPP)
- The Transportation Planning Work Program (TPWP)
- Title VI Plan
- Title VI Complaint Form
- Plan for Providing Language Assistance to persons with Limited English Proficiency

The documents listed above will be made available in Spanish as they are updated. Other transportation planning documents will be translated into Spanish upon request.

Oral Language Services:

The Area 15 Regional Planning Commission will provide oral interpretation to Spanish speaking LEP individuals at RPA 15 meetings upon request. To request interpretive services, the Area 15 Regional Planning Commission should be contacted by calling (641) 684-6551 at least 72 hours before the meeting so that arrangements can be made.

Staff Training:

In order to provide meaningful access to information and services to LEP individuals, Area 15 Regional Planning Commission staff that regularly interact with the public will be trained on the planning commission's Title VI and LEP policies and procedures. This training will ensure that the planning commission is able to provide language assistance and the staff are able to effectively work with LEP individuals.

Providing Notice of available Language Assistance to LEP Persons:

The Area 15 Regional Planning Commission has established the following methods to inform Spanish speaking LEP individuals, supporting organizations and the general public of available language assistance.

- Posting information: The Area 15 Regional Planning Commission will post information in the reception area of its offices and on its website in Spanish and English to notify LEP individuals of available language assistance and how to obtain assistance.
- Outreach Documents: Major outreach documents will include a notice that some language assistance is available. This notice will be in both Spanish and English.
- Local Organizations: The Area 15 Regional Planning Commission will notify local organizations of available language assistance services.
- Public Notices: Periodically the Area 15 Regional Planning Commission will issue notices about available language assistance services.

Contact

In order to request language assistance, please contact:

Chris Kukla – Transportation Director
Area 15 Regional Planning Commission
(641) 684-6551

To discuss Title VI or LEP issues, please contact:

Chris Bowers – Executive Director / Title VI Coordinator
Area 15 Regional Planning Commission
(641) 684-6551

To file a complaint regarding LEP activities, please fill out the Title VI complaint form available at <http://www.area15rpc.com/transportation--planning>. The Area 15 Regional Planning Commission's Title VI complaint procedures will be followed for reviewing all LEP complaints filed.