



### PURPOSE OF LEP PLAN

This plan addresses LWCAMPO's responsibilities (as a recipient of federal financial assistance) & outlines implementation procedures to meet the needs of individuals with Limited English Proficiency (LEP) skills.

### LAWS & POLICIES GUIDING LEP PLAN

LWCAMPO 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, & how to notify LEP persons that assistance is available.

#### KEY FEDERAL ACTION

Executive Order (EO) 13166: Improving Access to Service for individuals with Limited English Proficiency.

#### FEDERAL CERTIFICATION REVIEW

According to federal regulations, LWCAMPO's LEP Plan will be evaluated by the Federal Highway Administration (FHWA) & the Federal Transit Administration (FTA) as a part of the MPO's regular federal certification review.

### PERTINANT INFORMATION TO LWCAMPO'S FEDERAL CERTIFICATION REVIEW

The following table illustrates the laws, policies, & considerations pertinent to the LEP Plan & the MPO's review:

	Title VI of the Civil Rights Act of 1964	LEP Executive Order No. 13166
Law or Policy	Federal Law	Federal Policy
Enactment Year	1964	August 2000
Consideration(s)	All Individuals	Eligible Populations
Law/Policy Content	Contains monitoring & oversight compliance review requirements	Contains monitoring & oversight compliance review requirements
Requirement(s)	<ul style="list-style-type: none"> <li>Factor criteria is required</li> <li>no numerical or percentage thresholds</li> </ul>	<ul style="list-style-type: none"> <li>Factor criteria is required</li> <li>no numerical or percentage thresholds</li> </ul>
Outcome	Provides protection based on race, color, & national origin	Provides protection based on national origin
Focus	Eliminating discrimination in federally funded programs	Providing LEP Individuals with meaningful access to services using four factor criteria
Annual Accomplishment & Upcoming Goals	Report to FHWA	Report to FHWA

### HOW DOES LWCAMPO DETERMINE THE DEGREE OF OF LEP SERVICES TO PROVIDE?

LWCAMPO provides language assistance measures, to the degree that funding permits, based on the following factors:

#### Limited English Proficiency Four Factor Analysis

##### Factor 1

The number or proportion of LEP persons in the study area who may be served by the LWCAMPO program, activity or service

##### Factor 2

The frequency with which LEP persons come in contact with LWCAMPO staff.

##### Factor 3

The nature and importance of services provided by LWCAMPO to the LEP population.

##### Factor 4

The resources available to LWCAMPO, & overall cost to provide LEP assistance.

### IDENTIFYING LEP INDIVIDUALS

Based on the four-factor analysis:

- Majority of LEP persons are Spanish-speaking
- The remaining language groups combined total is approx. 1% of LEP persons

Language assistance services will be focused towards the Spanish speaking LEP language group.

- LWCAMPO will continue to assess the need for language assistance to other LEP language group

### LANGUAGE ASSISTANCE MEASURES

The MPO's language assisted measures include:

- Translation (in Summary) of vital documents in Spanish
- Posting advertisements/public notices of public meetings in Spanish
- Providing Outreach literature in Spanish (includes brochures, pamphlets, handouts, etc.)
- Provide oral interpreter services at any MPO public meeting or public hearing (advanced notice required)
  - Interpreter to include foreign language & the hearing impaired

### STAFF TRAINING

MPO Staff will be training includes, but is not limited to:

- LWCAMPO's LEP policies & procedures
- Environmental Justice (EJ) policies & procedures
- Data Collection Methodology

### TITLE VI PROGRAM VISIBILITY

Providing Notice to LEP Persons:

- LWCAMPO will provide statements in public information & public notices, as per Public Participation Plan, (with reasonable advance notice to the MPO).

### MONITORING & UPDATING THE LEP PLAN

LWCAMPO will update the LEP Plan as required by Federal guidelines

- At a minimum, the plan will be reviewed & updated when new data from the U. S. Census becomes available

### MONITORING & UPDATING THE LEP PLAN

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via:

- phone, in person, by mail, or email.

**Note:** translation of the LEP Plan will be provided *in summary* (upon request)

### KEY TERMS

#### LEP INDIVIDUAL / PERSONS

As defined by DOJ & the Federal Interagency Working Group on Limited English Proficiency:

"Individuals who do not speak English as their primary language [&] who have a limited ability to read, speak, write, or understand English..."

#### SAFE HARBOR STIPULATION

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 & LEP Requirements

- This safe harbor provision applies to the translation of written documents only.