

**AMES AREA METROPOLITAN PLANNING ORGANIZATION (AAMPO)
TRANSPORTATION POLICY COMMITTEE ACTION FORM**

SUBJECT: **AMES AREA MPO TITLE VI PROGRAM**

BACKGROUND:

As a recipient of Federal funding, the Ames Area MPO is required to operate its programs and activities in accordance with the Civil Rights Act of 1964 and its amendments, collectively known as Title VI, which prohibits discrimination on the basis of race, color, or national origin. The Title VI Program is a comprehensive document, including the Title VI public notices, complaint procedures and complaint forms; a list of Title VI investigations, lawsuits and complaints; table of racial composition of non-elected bodies, where membership is selected by the Ames Area MPO; demographic profile of the MPO planning area; public outreach activities to Title VI populations, and limited English proficiency plan.

The Ames Area MPO creates two Title VI programs, one following the guidelines and requirements of the Federal Highway Administration (FHWA) and the other program is developed using the guidance and fulfilling the requirements of the Federal Transit Administration (FTA). In addition, CyRide has a separate Title VI program meeting requirements for fixed-route transit providers.

The Ames Area MPO updates the FTA Title VI program every three years and is submitted to the Iowa Department of Transportation to demonstrate compliance. The 2018 Title VI Program has been developed to be consistent with FTA's most recent guidelines, published in October 2012 (FTA C 4702.1B). The Title VI program meeting FTA requirements is updated as needed.

ALTERNATIVES:

1. Approve the FTA Title VI Program for submission to the Iowa Department of Transportation.
2. Approve the Title VI Program with Transportation Policy Committee modifications for submission to the Iowa Department of Transportation.

ADMINISTRATOR'S RECOMMENDED ACTION:

The AAMPO Technical Committee has unanimously recommended approval of the Ames Area MPO Title VI Program, meeting all FTA requirements. Therefore, it is recommended by the Administrator that the Transportation Policy Committee adopt Alternative No. 1, as noted above.

The FHWA Title VI program is updated on an as needed basis and, therefore, does not need updating at this time.

AMES AREA MPO TITLE VI PROGRAM

OCTOBER 2018



AMES AREA METROPOLITAN PLANNING ORGANIZATION
515 Clark Ave. Ames, IA 50010

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Introduction

The Ames Area Metropolitan Planning Organization (Ames Area MPO) was official designated the MPO of the Ames urbanized area by the Governor of Iowa in March 2003. This designation was the result of the Ames urbanized area having a population of greater than 50,000 in the 2000 census. As a result of the 2010 Census, the urbanized areas of Ames and Gilbert were combined into one urbanized area, therefore requiring the Metropolitan Planning Area to be expanded to encompass this area in its entirety.

The Ames Area MPO approved the current Metropolitan Planning Area boundary on November 13, 2012. The City of Gilbert and Iowa State University were added to the Transportation Policy Committee on March 26, 2013.

Title VI of the 1964 Civil Rights Act provides that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (Sec. 601).

The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers much comply with Federal civil rights laws, rather than just the particular programs or activities that receive Federal funds.

This plan provides information on the Ames Area MPO compliance policies, complaint procedures, and a form to initiate the complaint process for use by members of the public. This plan does not govern disputes between individuals and other individuals or businesses that have no relation to the Ames Area MPO.

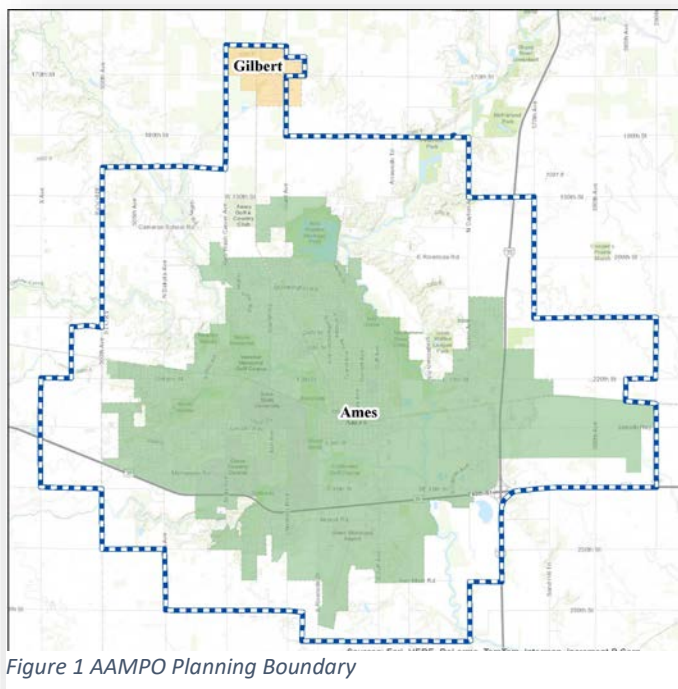


Figure 1 AAMPO Planning Boundary

General Requirements

“THE AMES AREA METROPOLITAN PLANNING ORGANIZATION HEREBY GIVES PUBLIC NOTICE THAT IT IS THE POLICY OF THE DEPARTMENT TO ASSURE FULL COMPLIANCE WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, RELATED STATUTES AND REGULATION PROVIDE THAT NO PERSON SHALL ON THE GROUND OF RACE, COLOR, NATIONAL ORIGIN, GENDER, AGE OR DISABILITY BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE.”


Ames Area MPO Notice to the Public

Title VI Notice to the Public

The Ames Area MPO provides a notice to the public of their rights under Title VI of the Civil Rights Act of 1964. This notice includes information on who to contact to file a complaint.

The notices are posted at the following locations:

- Ames Area MPO office, Room 212 (515 Clark Ave, Ames, IA)
- Ames City Hall entrance (515 Clark Ave, Ames, IA)
- Public Meeting Rooms
- www.aampo.org



Title VI Notice to the Public

The **Ames Area Metropolitan Planning Organization** hereby gives public notice that it is the policy of the Department to assure full compliance with Title VI of the Civil Rights Act of 1964, related statutes and regulation provide that no person shall on the ground of race, color, national origin, gender, age or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

We are also concerned about the impacts of our programs, projects and activities on low income and minority populations (“Environmental Justice”) under Title VI. Any person who believes that they are being denied participation in a project, being denied benefits of a program, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact:

Brian Phillips, City of Ames Title VI Civil Rights Coordinator – 515-239-5101
Iowa Department of Transportation – 800-262-0003

YOU SHOULD CONTACT THE ABOVE INDIVIDUAL OR IOWA DOT OFFICE AS SOON AS POSSIBLE BUT NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION OCCURRED, OR IF THERE HAS BEEN A CONTINUING COURSE OF CONDUCT, NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION WAS DISCONTINUED.

Figure 2 Notice to the Public

Instructions how to file a complaint

This Complaint Procedure is established to meet the requirements of the Civil Rights Act of 1964 and its amendments. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of race, color, or national origin in the provision of services, activities, programs, or benefits by the City of Ames. There are certain exceptions to this process. The Clerk of Court and City Assessor maintain offices within City Hall, but are not under the exclusive purview of the City of Ames. In the event that there is a complaint about unfair treatment within the Clerk of Court or City Assessor offices, complainants should contact that office directly for assistance navigating their complaint procedures. Complaints arising out of transit-related concerns are governed by special requirements from the Federal Transit Administration. These complaints should be made directly to CyRide in order to comply with those requirements. Please contact CyRide at (515) 292-1100 for information on how to file a complaint.

Additionally, transit-related complaints can be filed with the Federal Transit Administration's Office of Civil Rights. Finally, complaints of discrimination regarding employment in the City of Ames are governed by the City's Personnel Policies. Please contact the City of Ames Human Resources Office to file a complaint related to employment. If you are unsure about the appropriate office to address a complaint to or if you need assistance navigating procedures, complaints of any type can be filed with the Iowa Civil Rights Commission. Should a citizen have a complaint about access to public services, he/she should complete the attached complaint form and submit it to the City Manager's Office. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. The attached form provides spaces for all necessary information. The complaint should be submitted by the complainant and/or his/her designee as soon as possible but no later than 180 calendar days after the alleged violation to:

Title VI Civil Rights Coordinator
City Manager's Office
515 Clark Avenue
Box 811
Ames, IA 50010

The image shows a 'Title VI of the 1964 Civil Rights Act Discrimination Complaint Form' from the City of Ames. The form is titled 'Title VI of the 1964 Civil Rights Act Discrimination Complaint Form' and features the City of Ames logo. It includes instructions: 'Please fill out this form completely, in black ink or type. Sign and return to the address on the next page. Alternate means of filing a complaint, such as a personal interview or audio recording, will be made available upon request.' The form contains several sections for information: 'Contact Person:' with fields for name, address, city/state/zip, telephone number, and date filed; 'Do you intend to...' with a yes/no response; 'Person Discriminated Against:' with fields for name, address, city/state/zip, and telephone number; 'Where did the alleged discrimination take place?'; 'When did the alleged discrimination occur? (Date/Time)'; and a section for 'Describe the acts of discrimination...' with lines for text. There are also fields for 'Signature:' and 'Return To:'.

Within 30 calendar days after receipt of the complaint, the Title VI Coordinator or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days of the meeting, the Title VI Coordinator or his/her designee, in consultation with the City of Ames Legal Office, will respond in writing. The response will explain the position of the Coordinator and other options for substantive resolution of the complaint.

If the response by the Title VI Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the City's Title VI Appeals Committee. The appeal should take the form of a written letter describing the initial complaint, the initial response, and the ways in which the initial

response does not satisfactorily address the complaint. The appeal should be sent to the same address the initial complaint was delivered to.

The Title VI Appeals Committee will consist of representatives from three departments not involved in the complaint. The departments will be chosen at random. The three representatives will choose one individual among them to serve as chair of the committee. The Legal Office will serve to advise the committee.

Within 30 calendar days after receipt of the appeal, the Title VI Appeals Committee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Title VI Appeals Committee will respond in writing. All complaints received by the Title VI coordinator or his/her designee, appeals to Title VI Appeals Committee, and responses from these two offices will be retained by the City Clerk's Office for at least five years.

List of investigations, complaints, lawsuits

There are no concluded or outstanding Title VI complaints filed against the Ames Area Metropolitan Planning Organization.

Investigations	File Date	Summary of Incident	Summary of Findings	Other Claims Filed	Actions Taken	Close Date
-	none	-	-	-	-	-
Lawsuits	File Date	Summary of Incident	Summary of Findings	Other Claims Filed	Actions Taken	Close Date
-	none	-	-	-	-	-
Complaints	File Date	Summary of Incident	Summary of Findings	Other Claims Filed	Actions Taken	Close Date
-	none	-	-	-	-	-

Public Participation Plan

Purpose of the Public Participation Plan

The public involvement process required by 23 CFR 450 should “...provide complete information, timely public notice, full public access to key decisions, and support early and continuing involvement of the public in developing plans and Transportation Improvement Programs...” Through public involvement, the Ames Area MPO aims to identify methods for obtaining public input and encouraging public involvement in the transportation planning process.

Outreach methods

The Ames Area MPO utilizes the following methods to engage minority and EJ populations:

- Public Meetings – Question and answer formatted meeting designed to connect members of the public with Ames Area MPO staff in a casual setting.
- Public Hearings – The public is invited to present comments in a public hearing setting in front of the Transportation Policy Committee and comments are committed to the record. The public hearing is

governed by rules concerning who speaks when and for how long and is overseen by the Transportation Policy Committee chairperson.

- Opportunity for Public Comment – A solicitation for public input on a specific subject over a specified duration of time.
- General Comments – The Ames Area MPO is always open to accepting public comment, regardless of whether they were given as part of an organized effort. Comments can be sent to the Ames Area MPO by phone at (515) 239-5169, by e-mail at tfilippini@city.ames.is.us, or by mail sent to: Ames Area MPO, 515 Clark Ave., Ames, Iowa, 50010.

Outreach Summary

From 2016 – 2018 the Ames Area MPO used a variety of tools to outreach to diverse populations include EJ and minority populations through the following tools:

- Publishing notices on the City of Ames Facebook page and City of Ames Twitter page
- Providing a translation tool for over 100 languages on the Ames Area MPO Website at www.aampo.org
- Announcing meeting dates and topics to local human services working groups who represent low-income and international communities
- Included MPO activities in City of Ames communications distributed on Channel 12 and City of Ames utility bills.

Limited English Proficiency

This Limited English Proficiency (LEP) Procedure Manual has been prepared to address the Ames Area MPO responsibilities as a recipient of federal financial assistance for the planning processes and tasks as the local planning agency for the Ames area, as they relate to the needs of individuals with limited English language skills. This manual has been prepared in accordance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. 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 understands English is a type of national origin discrimination. The executive order directs each federal 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 Ames Area MPO which receives federal assistance through the U.S. Department of Transportation. The Ames Area MPO is committed to ensuring that no person is excluded from participation in or denied of its transportation planning services on the basis of race, color, or national origin. This manual was developed to guide MPO staff in its management of LEP related activities. The full LEP is included as appendix A.

The Ames Area MPO has the following resources available for providing language assistance:

- Oral Interpretation Service – The Ames Area MPO offers the Language Line Interpretation Service through TheBigWord. If there is a non-English speaking individual that comes into a city department, staff can show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language and in English). Staff members can call the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the customer. Staff members can utilize a speaker phone so both the staff member and the customer can be on the line at the same time. Flyers offering the Language Line Interpretation Service will be posted in the Administrative Offices. Additionally, where best appropriate, staff employees will also utilize Google Translator Interpretation Service from their computers and/or as application on their cell phones.

- Bureau Refugee Services – the Ames Area MPO as needed, will work with the Bureau of Refugee Services.
- The City of Ames has developed a list of all City employees that speak, write, or read a language other than English fluently. The City of Ames may contact employees on this list for interpretation services as their schedule permits. A current list will be maintained in the in the Human Resources internal website.
- The Ames Area MPO will also allow LEP persons to use an interpreter of their own choosing (whether a professional interpreter, family member, or friend) in place of or as a supplement to the Language Line interpretation services offered by the Ames Area MPO.
- The MPO web page has the ability to allow its information to be translated into different languages by selecting the language of choice.

Monitoring and Updating the LEP Procedures Manual

The LEP procedures manual will be reviewed and updated as necessary by the Ames Area MPO administrator and staff. The LEP procedures manual will be available to all Ames Area MPO staff that has contact with the public.

Committee membership

The Ames Area MPO did not organize any committees during the period of 2016 through 2018.

Body	Caucasian	Latino	African American	Asian American	Native American	Two or More
Population	82%	4%	3%	9%	0%	2%
No committees	-	-	-	-	-	-

Subrecipient compliance

To comply with Title VI requirements, all subrecipients of the Ames Area MPO must also comply with Title VI requirements. To demonstrate compliance with Title VI, the Ames Area MPO does the following to ensure compliance:

- collects and stores Title VI programs from subrecipients and reviews the programs for compliance for the following:
 - A copy of the subrecipient Title VI notice to the public including a listing of posting locations,
 - A copy of the subrecipient instructions to the public on how to file a Title VI complaint along with a copy of the form,
 - A list of all Title VI transportation related investigations, complaints or lawsuits filed with the subrecipient since the last submission related to the FTA funded project,
 - A public participation plan that includes an outreach plan to engage minority and LEP populations and a summary of outreach efforts made since the last submission,
 - A copy of the subrecipient LEP plan,
 - Membership of non-elected planning boards/councils/committees for transit-related projects, including racial breakdown and a description of efforts to encourage minority participation,
 - A copy of the Title VI equity analysis during the planning stage for facility projects,

- Copy of the subrecipient's governing board approving the Title VI program.
- collects and stores Title VI programs,
- As required, asks subrecipients to verify that their level and quality of service is provided on an equitable bases.

The Ames Area MPO monitors both contractors and subrecipients for Title VI compliance as required by Federal regulations. Currently the Ames Area MPO does not have any subrecipients.

Subrecipients are required to electronically file an annual Title VI report to the Ames Area MPO Administrator, and are subject to a desk or site review at any time. The Ames Area MPO will check all listed elements for compliance and offer a notice of concurrence that the program complies with Title VI requirements.

Demographic Profile

The following table documents the minority populations in the aggregate within the Ames Urbanized Boundary as defined in the 2010 U.S. Census.

Population by Race/Ethnicity	Population	Percent of Urbanized Area
White	51,006	82.2%
Hispanic	2,240	3.61%
Black or African American	1,972	3.18%
American Indian and Alaskan Native	53	0.09%
Asian	5,553	8.95%
Other	11	0.02%
Two or More	1,212	1.95%
Total	62,047	100%

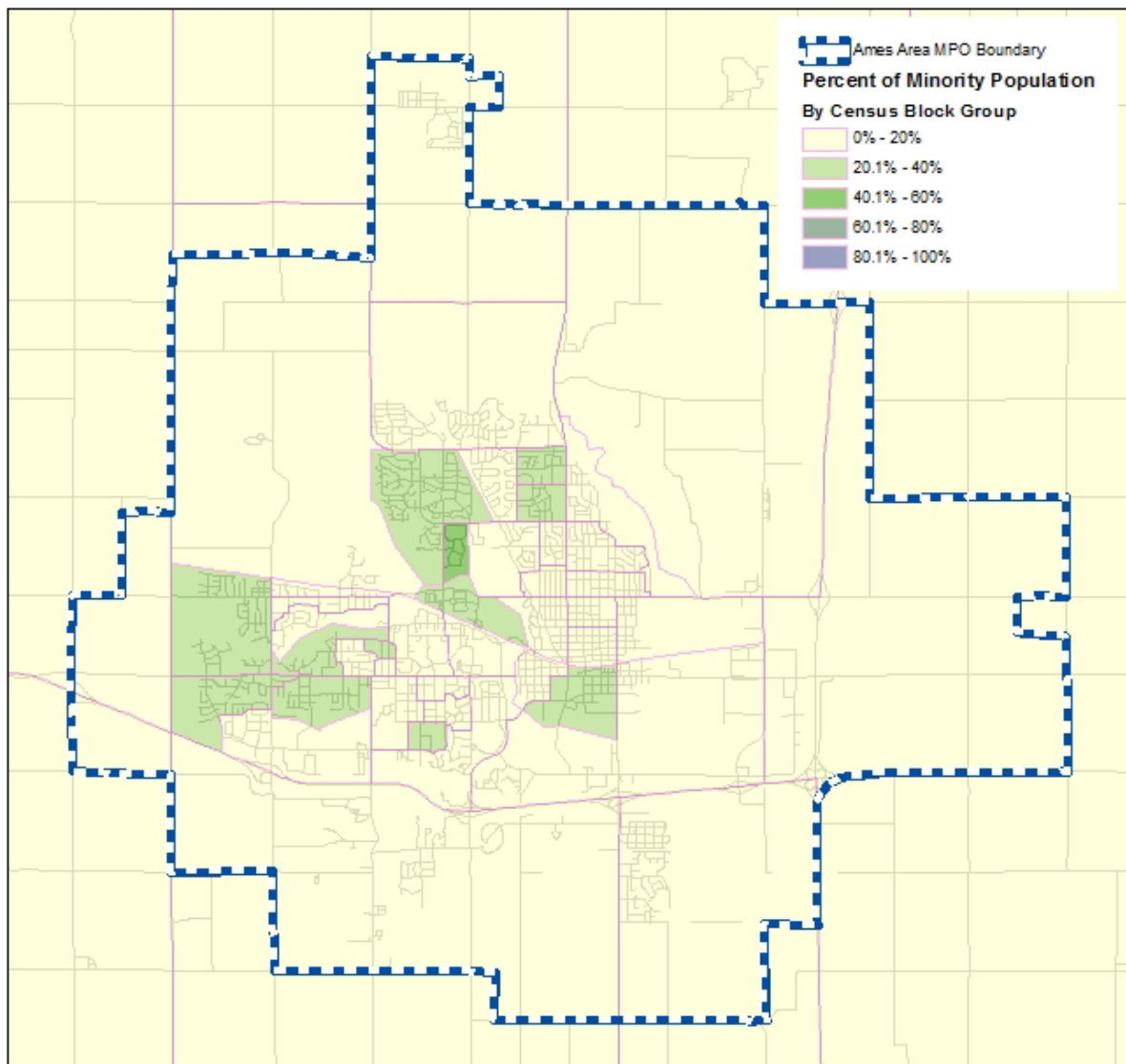
ACS demographic and Housing Estimate, Ames, IA Urbanized Area, 2010

Procedures for an Inclusive Planning Process

Planning activities are conducted in centralized locations with ADA accessible rooms and along CyRide routes. Transportation Policy Committee meetings are held in an ADA accessible room at the Ames City Hall and are televised on Ames Channel 12. Video records of meetings are also available on demand at www.cityofames.org as well as the AmesChannel12 YouTube channel.

Demographic maps

Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient



2010 U.S. Census – Census Block Group

Analysis identifying disparate impacts

The Ames Area MPO awards Surface Transportation Block Grant (STBG) and Transportation Alternatives Projects (STBG-TAP). An analysis to determine the impacts of the distribution of State and Federal funds in the aggregate for public transit purposes is required to identify any disparate impacts on the basis of race, color, or national origin. This analysis would be conducted for transit facility or transit station projects but does not include vehicles or bus stops. To date, the MPO has not awarded these funds to transit facility projects and therefore no impact has been identified.

Appendix

- A. Limited English Proficiency (LEP) document



City of Ames in Your Language



CITY OF
Ames™

**Language Communication Guidelines
to Ensure Equal Access to City Services
for People with Limited English Proficiency**



March 2014



LANGUAGE COMMUNICATION GUIDELINES

1-A. OVERVIEW

The City of Ames in utilizing federal funds will take affirmative steps to communicate with people who need services or information in a language other than English. Limited English Proficiency (LEP) persons are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this Policy, LEP persons are citizen's households who are eligible to participate and/or benefit from the various federally funded programs administer by the various City Departments (e.g. Planning & Housing (CDBG Funds); Cy-Ride (Transportation funds); Public Works (DOT Funds); Police (Homeland Security funds); Fleet and Facilities (Department of Energy funds) Water and Pollution Control (Environmental Protection Agency) and others that may receive funds in the future.

2-B. ASSESSING NEED FOR PROGRAM ACCESS:

Each City Department that receives federal funding will conduct a Four Factor Analysis (FAA) in determining the need for program access for persons of LEP based on the program and/or project being administered as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program(s) administered through the above departments and others;
2. The frequency with which LEP persons come into contact with the program(s);
3. The nature and importance of the program, activity, or service provided by the program to people's lives; and
4. The resources available to the program/recipient and costs.

The City has conducted a Four-Factor Analysis (FFA), which serves as the guide for determining which language assistance measures the City of Ames will undertake to guarantee access to its various federally funded programs. The data used in the FFA is from the 2008-12 American Community Survey (ACS) Estimate. The ACS data revealed that the **1.23 percent** of people in the City of Ames **do not** speak English as their primary language and who have a **limited** ability to read, write, speak or understand English. This percentage **does not** meet the threshold that would require the City to develop a specific Language Assistance Policy (LAP). However, the City being a proactive and a responsive government is creating **Language Communication Guidelines** for Limited English Proficiency (LEP) persons to access services and programs provided by the City of Ames.

3-C. The City of Ames' LANGUAGE COMMUNICATION GUIDELINES (LCG)

The City of Ames has established the following **Language Communication Guidelines** for Limited English Proficiency (LEP) persons to ensure compliance with the various Federal agencies regulations and Executive Order 13166 issued by President Clinton in 2000 along with subsequent guidance under Title VI of the Civil Rights Act of 1964. Under these requirement and guides,

the City of Ames must take reasonable steps to ensure meaningful access to their programs and activities by persons with Limited English Proficiency (LEP).

4-D. SAFE HARBORS

In accordance with the safe harbors for LEP persons, the cities must translate written documents for groups that are at least 5% of the eligible population, or 1,000 persons, whichever is less.

If there are fewer than 50 persons in a language group that reaches the 5% trigger above, cities are not required to translate the vital written materials, but should provide written notice in the primary language of the LEP group of the right to receive competent oral interpretation of those written materials, free of cost.

DOCUMENT TRANSLATION

- a. The City of Ames seeks to have available all translated documents that have been made available by the various federal agencies providing funding to the City.
- b. As necessary, per the results of the above analysis, the City of Ames may continue to offer documents in other languages as the analysis above reveals is necessary and/or upon a reasonable request from the Agency's customers or service providers serving our mutual customers.
- c. The City of Ames will evaluate the need for posting announcements in the most common languages encountered.

CURRENT RESOURCES OFFERED:

The City of Ames currently offers the following resources to ensure access to LEP persons:

1. Oral Interpretation Service –
The City of Ames offers the Language Line Interpretation Service. If there is a non-English speaking individual that comes into a city department, staff can show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language and in English). Staff members can call the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the customer. Staff members can utilize a speaker phone so both the staff member and the customer can be on the line at the same time. Flyers offering the Language Line Interpretation Service will be posted in the Administrative Offices.

Additionally, where best appropriate, staff employees will also utilize Google Translator Interpretation Service from their computers and/or as application on their cell phones.

2. Bureau Refugee Services – the City of Ames as needed, will work with the Bureau of Refugee Services.
3. The City of Ames has developed a list of all City employees that speak, write, or read a language other than English fluently. The City of Ames may contact employees on this list for

interpretation services as their schedule permits. A current list will be maintained in the in the Human Resources internal website.

4. The City of Ames will also allow LEP persons to use an interpreter of their own choosing (whether a professional interpreter, family member, or friend) in place of or as a supplement to the Language Line interpretation services offered by the City of Ames.
5. The City's web page has the ability to allow its information to be translated into different languages by selecting the language of choice.

STEPS TO ENSURE ACCESS TO LEP PERSONS/PROVIDING ONGOING NOTICE TO LEP PERSONS

1. The City will on an ongoing basis provide to its employees a copy of Thebigword (over the phone interpreting service) display posters and/or a table stand offering the Language Line Interpretation Service in their Administrative Offices.
2. The City will include the availability of the Language Line Interpretation Service in their announcements, informational packets and other media material when administering a project and/or program.
3. Additionally, where best appropriate, staff employees will also utilize Google Translator Interpretation Service from their computers and/or as application on their cell phones.
4. The City as needed will make outreach efforts for assistance with the Bureau of Refugee Services, Iowa State University and other organizations to provide assistance with LEP needs within our jurisdiction.

STAFF TRAINING

The City of Ames will conduct staff training periodically, either in a group setting or by written communication with staff. The following are the subjects will be reviewed during each training session:

1. Types of language translator services available;
2. How staff can obtain those services;
3. How to respond to Limited English Proficiency (LEP) callers;
4. How to respond to written communications from LEP persons; and
5. How to respond to LEP persons who have in-person contact with staff

MONITORING AND UPDATING THE LANGUAGE COMMUNICATION GUIDELINES

The City of Ames will monitor the effectiveness of its' Language Communication Guidelines Proficiency (LEP) Policy by reviewing information in the following areas on an bi-annual basis:

1. Reviewing the current available American Community Survey data to determine the LEP populations in the City of Ames jurisdiction and if threshold numbers have changed.

2. Have Departments monitor the frequency of encounters with LEP language groups that may come in contact through the administration of their projects and/or programs.
3. Continuing to conduct outreach to service providers to ensure awareness and access to the City of Ames' programs and services are known;
4. Reviewing and identifying available resources, including technological advances and associated costs imposed translation software the City of Ames is made aware of via e-mail notification, newsletters, web sites, etc.;
5. Reviewing whether existing services are meeting the needs of the LEP persons, by reviewing the annual use of the language line and any requests for translated materials made by customers and/or service providers;
6. Conducting annual staff training; and
7. Updating resources in the community that have been identified as sources for assistance to determine if they are still in operation and providing the same services to the community.



FOUR-FACTOR ANALYSIS and LANGUAGE ACCESS POLICY FOR LIMITED ENGLISH PROFICIENCY PERSONS CITY OF AMES, IOWA

Purpose: In compliance with Executive Order 13166, Ames has developed the following Language Access Policy (LAP) for Limited English Proficiency (LEP) persons.

History: Title VI of the Civil Rights Act of 1964 is the federal law which protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failures to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

City of Ames Four-Factor Analysis: The following Four-Factor Analysis will serve as the guide for determining which language assistance measures the City of Ames will undertake to provide LEP customer access to the services provided by the various Departments in the City of Ames.

1. Number or proportion of LEP persons served or encountered in the eligible service population (served or encountered includes those persons who would be served by the recipient if the person received education and outreach and the recipient provided sufficient language services).

The City of Ames utilized the data from The American Community Survey Data for 2008-2012- Age by Language Spoken at Home By Ability to Speak English for Populations 5 Years and Over (see table) to determine the populations that may need assistance with language skills to access and/or benefit from the various programs administered throughout the City using federal funding. However, all citizen participation activities are open to the general public.

Source: 2008-2012 American Community Survey – Story County, Iowa

General Characteristics of persons 5 years and older:

Total Population of persons 5 and older = 56,549
Population of persons 5 to 17 years = 5,297

Population of persons 18 to 64 years = 46,661
Population of persons 64 years and older = 4,591

Number and percent of Spanish-speaking Population = 1,211 or 2.0%

Number and percent of persons speaking other Indo-European languages = 1,298 or 2.3%

Number and percent of persons speaking Asian and Pacific Islander languages = 3,461 or 6.12%

Number and percent of persons speaking other languages = 261 or 0.4%

Characteristics of Persons 5 and Older Who Speak a Language other than English at Home:

Spanish-speakers: Speak English “very well” and “well” = 1,109; speak English “not well” or “not at all” = 102 persons or 0.18%

Speakers of other Indo-European languages: Speak English “very well” and “well” = 1,229; speak English “not well” or “not at all” = 69 persons or 0.12%

Speakers of Asian and Pacific Island languages: Speak English “very well” and “well” = 3,029; speak English “not well” or “not at all” = 449 persons or 0.79%

Speakers of other languages: Speak English “very well” and “well” = 257; speak English “not well” or “not at all” = 4 persons or 0.002%

Total persons who speak English “not well” or “not at all” = 624 persons or 1.23% of total population

*Age by language spoken at home by ability to speak English for population 5 years and over.
American Community Survey 2008-2012, City of Ames, Story County, Iowa

Other languages = Based on the above languages do not have sufficient information to determine the number of persons that speak a certain type of language. For example, other Indo European languages could include languages such as Indian, Hindu, and several other languages. Data is not available for each specific language; therefore, the City of Ames is unable to determine the percentage of number of persons.

2. The frequency with which the LEP persons come into contact with the program.

The City of Ames administers various projects that utilizing federal dollars, each Department receiving these funds will identify in their individuals programs the nature of the projects that residents are likely to have considerable direct contact with the project or program and its staff.

3. The nature and importance of programs, activities, or services provided by the Department.

Some of the projects administered with federal funding do provide direct assistance to beneficiaries related to housing, utilities, transit, infrastructure, emergency services and protection, etc.; therefore, the nature of the activity or service is of significant importance to all eligible residents.

Other services administered with federal funding do not provide direct assistance to individuals (e.g. public infrastructure, construction and maintenance, and similar type projects). As a result, LEP persons rarely come into contact with these City programs. However, all citizen participation activities are open to the general public.

4. The resources available and costs to the recipient.

Currently, the City of Ames web site can be utilized to translate information into various languages posted on this site. Additionally, the City offers the following services:

- a. Oral Interpretation Service – The City of Ames has contracted a Language Line Interpretation Service. If there is a non-English speaking individual that comes into the office, staff members can show them the brochure for the Language Line Interpretation Service and have them select the language that they understand (the languages are written in both the native language, and in English). The staff member can call the Language Interpretation Service and asks for the appropriate interpreter as pointed out by the customer. Staff can utilize a two line (head set) system or speaker phone so both the staff member and the customer can be on the line at the same time. A flyer indicating that the Language Line Interpretation Service will be provided to all City employees at their workstations. The flyer is also posted at customer contact areas in each Department.*
- b. In order to ensure that any limited English or non-English speaking resident receives equal access to services, the City of Ames will display in those Departments with service desk the "I Speak" posters to provide assistance.*
- c. The City of Ames has developed a list of all City employees that speak, write, or read a language other than English fluently. The City of Ames may contact employees on this list for interpretation services as their schedule permits. See attached list.*
- d. The City of Ames permits LEP persons to use an interpreter of their own choosing (whether a professional interpreter, family member, or friend) in place of or as a supplement to the Language Line Interpretation Service offered by the City of Ames.*


Additionally, many of the common forms used in the implementation of a City programs are available in multiple languages on the HUD, DOL, and other federal websites. Therefore, limited Language Access Policy (LAP) measures are reasonable given the resources available to City of Ames.

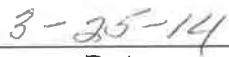
In conclusion, based on the data collected from *The American Community Survey Data for 2008-2012- Age by Language Spoken at Home By Ability to Speak English for Populations 5 Years and Over*, the populations in the City of Ames currently **do not meet** the 1,000 or 5% LEP persons threshold for any languages or language(s) identified, therefore the City is not required to a Language Access Plan (LAP) for its jurisdiction. However, the City of Ames will adopt a Language Communication Guidelines. The Four-Factor Analysis (FFA) will be kept in the City's Fair Housing and Equal Opportunity Plan and a copy of the FFA will also be provided to the City's Affirmative Action Officer.


Certification: Based on the above Four-Factor Analysis, the City of Ames is **not** required to develop a Language Access Plan (LAP).

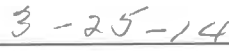
However, the City of Ames will implement **Language Communication Guidelines** to provide reasonable attempts to accommodate Limited English Proficiency (LEP) persons to gain access to services, programs and other activities provided by the City of Ames.

Chief Elected Official


Ann H. Campbell, Mayor


Date


Attest: Diane Voss, City Clerk


Date

Age by Language Spoken at Home by Ability to Speak English for Population 5 Years and Over					
City of Ames, Story County, Iowa (2008-2012 American Community Survey Estimate)					
	5 to 17	18-64	65 & Over	Total Population 5 and over	Percent of Total Population est. population
Total Population	5,297	46,667	4,591	56,549	
Speak Spanish	117	1,058	36	1,211	
Speak English "very well" and "well"	116	951	36	1,103	
Speak English "not well"	1	79	0	80	
Speak English "not at all"	0	22	0	22	
Sub-total speakers that speak English "not well" or "not at all"	1	101	0	102	0.18
Speak other Indo-European language	98	1,068	132	1,298	
Speak English "very well" and "well"	98	1,025	106	1,229	
Speak English "not well"	0	43	26	69	
Speak English "not at all"	0	0	0	0	
Sub-total speakers that speak English "not well" or "not at all"	0	43	26	69	0.12
Speak Asian/Pacific Island language	341	3,034	86	3,461	
Speak English "very well" and "well"	322	2,700	7	3,029	
Speak English "not well"	13	317	40	370	
Speak English "not at all"	23	17	39	79	
Sub-total speakers that speak English "not well" or "not at all"	36	334	79	449	.079
Speak other languages	47	205	9	261	
Speak English "very well" and "well"	47	201	9	257	
Speak English "not well"	0	4	0	4	
Speak English "not at all"	0	0	0	0	
Sub-total speakers that speak English "not well" or "not at all"	0	4	0	4	0.01
Grand Total of people 5 and over who speak English "not well" or "not at all"	37	482	105	624	1.23

List of Interpreters within the City of Ames to assist with non-English speakers or speech/hearing impaired:

<u>Language</u>	<u>Dept.</u>	<u>Contact info.</u>
Spanish		
Paul Sandoval	Fire	X 5108
Amber Rozeboom	Police	X 5133
Blake Marshall	Police	X 5133
Julie Huisman	HR	X5199
Nicki Hayes	Utility Customer Service	X5226
French		
Dominic Roberge	PW	X 5278
Neal May	Elec. Eng.	X 5207
German		
Brian Phillips	CMO	X 5227
Mandarin Chinese		
Sue Xia	Finance-Accounting	X5212
Welsh		
Brian Phillips	CMO	X 5227