

AMES AREA METROPOLITAN PLANNING ORGANIZATION
TRANSPORTATION POLICY COMMITTEE

SUBJECT: LIMITED ENGLISH PROFICIENCY (LEP) PLAN

BACKGROUND:

The U.S. DOT requires that any entity which receives federal funds create a limited English proficiency Plan in accordance with Executive Order 13166 and the Title VI of the Civil Rights Act of 1964. **Since MPOs receive both FHWA and FTA funding, the Ames Area MPO is required to create its own LEP Plan.**

The primary objective of the LEP Plan is to ensure that individuals with limited English proficiency are provided meaningful access to the Ames Area MPO's various transportation planning information and processes. The LEP Plan was prepared in accordance with the U.S. DOT's requirements and the recent guidelines published by the Iowa DOT. Per U.S. DOT recommendation, the LEP Plan follows the four-factor analysis methodology. The four analysis factors and sections of the plan are as follows:

1. The number and proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by MPO services and programs.
2. The frequency with which persons with limited English proficiency encounter MPO services and programs.
3. The nature and importance of the MPO's services and programs in people's lives.
4. The resources available to the MPO for outreach to persons with limited English proficiency, as well as the costs associated with the outreach.

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7	Factor 2 – Frequency of Contact	Previous Requests, Iowa State University Students, Public Participation Plan
8	Factor 3 – Importance of Services and Programs	MPO Services and Programs, Vital Services and Documents, Planning Documents
9-10	Factor 4 – Resources Available for Outreach	MPO Public Outreach Strategies, City of Ames, CyRide & Iowa State University
11-12	Conclusion	Summary, Language Assistance Services, Outreach Strategies, Updating the LEP Plan, Contact Information

The LEP Plan lists the following language assistance services and resources that the MPO will leverage (discussed on pages 11-12):

1. Oral Interpretation Services – TheBigWord, City Staff, Google Translate
2. Written translation of vital documents (Title VI Notice to the Public, Title VI Policy & Procedures, and a Title VI Complain Form) to Mandarin Chinese, per the Safe Harbor Provision requirements
3. Bureau of Refugee Services
4. MPO Website – Automatic translation to over 90 different languages
5. Regional Partners – Coordinate with regional agencies and groups such as CyRide and Iowa State University

ALTERNATIVES:

1. Adopt the Limited English Proficiency (LEP) Plan.
2. Adopt the Limited English Proficiency (LEP) Plan with Transportation Policy Committee modifications.

ADMINISTRATOR'S RECOMMENDATION:

The LEP Plan was developed based on applicable federal and state regulations, the U.S. DOT guidance, and the newly updated Iowa DOT guidance. The Transportation Technical Committee has reviewed the LEP Plan and unanimously recommended approval.

Therefore, it is recommended by the Administrator that the Transportation Policy Committee adopt Alternative No. 1, thereby adopting the LEP Plan.

Limited English Proficiency (LEP) Plan

2021 Update



AAAMPO

AMES AREA METROPOLITAN PLANNING ORGANIZATION

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Introduction

Background

The primary objective of the Limited English Proficiency (LEP) Plan is to ensure that individuals with limited English proficiency are provided meaningful access to the Ames Area Metropolitan Transportation Planning Organization's (AAMPO's) various transportation planning processes.

[Executive Order 13166](#), signed August 11, 2000, "requires Federal agencies to examine the services they provide, services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them." Additionally, in accordance with this Executive Order, the U.S. DOT issued its own [LEP Guidance](#), which applies to all recipients of U.S. DOT funding, including MPOs. The Iowa DOT also provides additional guidance to Iowa MPOs regarding outreach to limited English proficiency persons as a part of their Public Participation Plan guidance.

The [Title VI of the Civil Rights Act of 1964](#) "prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance." MPOs receive federal funding from both the FHWA and FTA and are therefore required to adhere to Title VI requirements. Regarding Title VI, any conduct that has a disproportionate effect on persons with limited English proficiency is prohibited, since this conduct would constitute national origin discrimination.

Four-Factor Analysis

The U.S. DOT LEP guidance recommends the use of a Four-Factor Analysis during the creation of LEP Plans. The following are the four factors:

1. The number and proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by MPO services and programs.
2. The frequency with which persons with limited English proficiency encounter MPO services and programs.
3. The nature and importance of the MPO's services and programs in people's lives.
4. The resources available to the MPO for outreach to persons with limited English proficiency, as well as the costs associated with the outreach.

The Four-Factor Analysis will act as the framework for the AAMPO's LEP Plan. Each of the four factors will be included as a separate section in this document.

Factor 1 – LEP Population

The first analysis factor is the number and proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by MPO services and programs.

American Community Survey (ACS) Data

The U.S. Census Bureau’s American Community Survey (ACS) is an excellent data source for summarizing socioeconomic data, including data on English proficiency. For this analysis, data was downloaded from <https://data.census.gov> for the census tract level. 5-year ACS data was gathered for years 2015 through 2019. Only census tracts with greater than 10% of their land area located within the MPO boundary were included in the analysis.

Overview of Language Data

Table 1 shows an abbreviated overview of the language data for Ames Area MPO region. Around 86% of the population within the AAMPO region speak only English. Nearly 14% of the population speak a language other than English. Just under 6% of the population are classified with limited English proficiency (speaks English less than “very well”).

Table 1: Abbreviated Overview of Language Populations

Category	Population	Percentage
Speak only English	58,640	86.3%
Speak English "very well"	5,392	7.9%
Speak English less than "very well"	3,949	5.8%
TOTAL	67,981	100.0%

Source: 2015-2019 ACS Data

Safe Harbor Provision

The U.S. DOT’s LEP guidance references the Department of Justice’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding the translation of written materials for LEP populations. In short, the Safe Harbor Provision recommends a written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less. It also adds that the translation of non-vital documents, if needed, can be provided orally.

Table 2 provides a detailed breakdown of all the language group populations, as defined in the American Community Survey. The only language group within the AAMPO boundary which met the above Safe Harbor Provision criteria was Chinese (including Mandarin & Cantonese). Although this group constituted less than 5% of the total population (3.3%), greater than 1,000 people fell within this group (2,263). See **Figure 1** for a map summarizing limited English proficiency populations by census tract within the AAMPO region.

Table 2: Breakdown of Language Group Populations

Category	Population	Percentage
Total:	67,981	100.0%
Speak only English	58,640	86.3%
Spanish:	1,294	1.9%
Speak English "very well"	961	1.4%
Speak English less than "very well"	333	0.5%
French, Haitian, or Cajun:	118	0.2%
Speak English "very well"	87	0.1%
Speak English less than "very well"	31	0.0%
German or other West Germanic languages:	377	0.6%
Speak English "very well"	368	0.5%
Speak English less than "very well"	9	0.0%
Russian, Polish, or other Slavic languages:	180	0.3%
Speak English "very well"	150	0.2%
Speak English less than "very well"	30	0.0%
Other Indo-European languages:	1,188	1.7%
Speak English "very well"	870	1.3%
Speak English less than "very well"	318	0.5%
Korean:	660	1.0%
Speak English "very well"	196	0.3%
Speak English less than "very well"	464	0.7%
Chinese (incl. Mandarin, Cantonese):	4,036	5.9%
Speak English "very well"	1,773	2.6%
Speak English less than "very well"	2,263	3.3%
Vietnamese:	169	0.2%
Speak English "very well"	30	0.0%
Speak English less than "very well"	139	0.2%
Tagalog (incl. Filipino):	142	0.2%
Speak English "very well"	118	0.2%
Speak English less than "very well"	24	0.0%
Other Asian and Pacific Island languages:	763	1.1%
Speak English "very well"	496	0.7%
Speak English less than "very well"	267	0.4%
Arabic:	244	0.4%
Speak English "very well"	189	0.3%
Speak English less than "very well"	55	0.1%
Other and unspecified languages:	170	0.3%
Speak English "very well"	154	0.2%
Speak English less than "very well"	16	0.0%

Source: 2015-2019 ACS Data; **Purple** = Met Safe Harbor Criteria

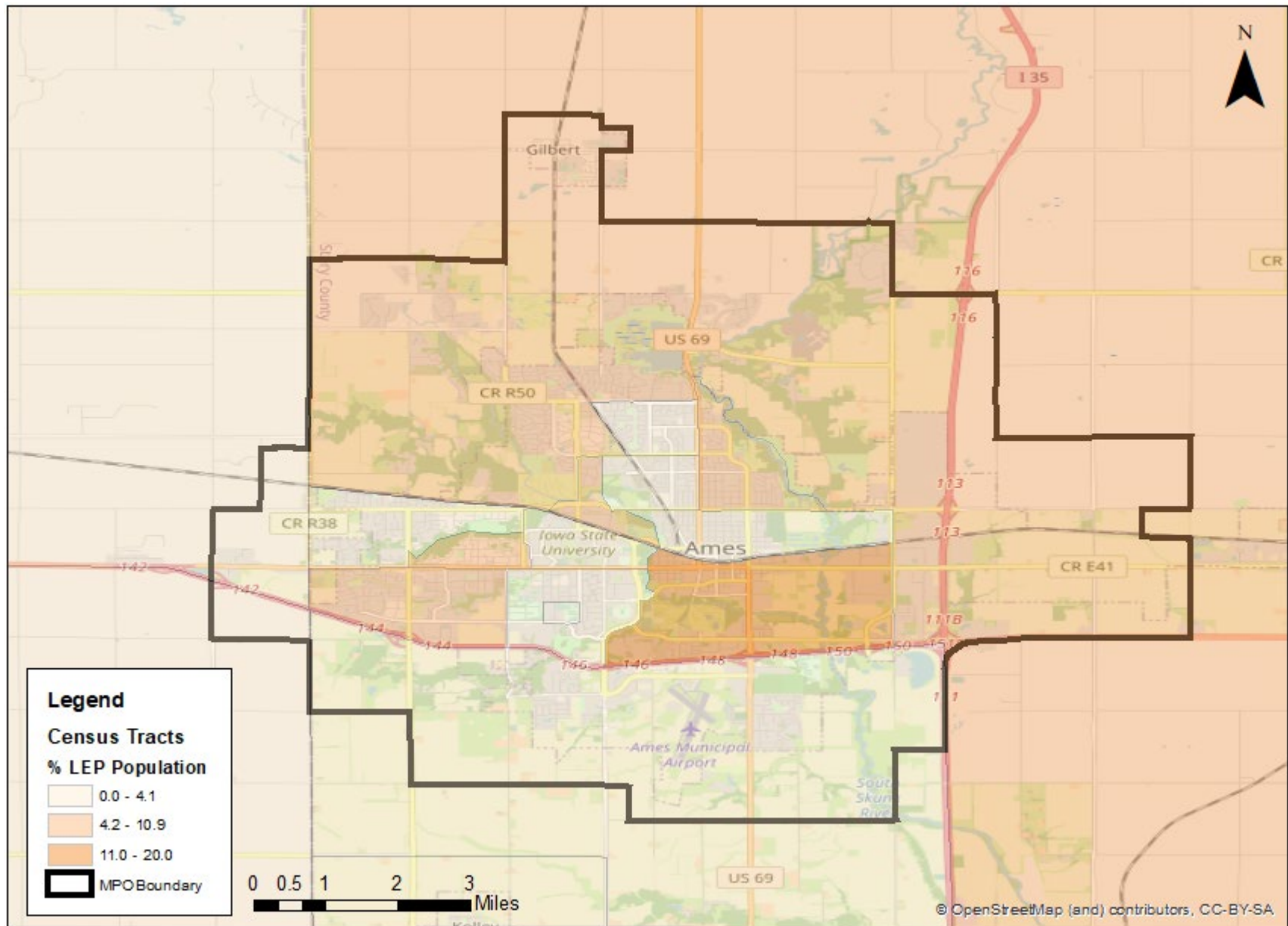


Figure 1: Limited English Proficiency Map (Source: 2015-2019 ACS Data)

Factor 2 – Frequency of Contact

The second analysis factor is the frequency with which persons with limited English proficiency encounter MPO services and programs.

Previous Requests

To date, the Ames Area MPO has never received a request for language assistance services, written or oral, from any individuals or groups with limited English proficiency. However, it is anticipated that the proportion of limited English proficiency individuals within the region could increase. Therefore, the probability of contact with a limited English proficiency group or individual may increase as well.

Iowa State University Students

It is worth noting that approximately 31,000 of 68,000 of the Ames region’s population is comprised of the student body of Iowa State University. Iowa State University has a sizable enrollment of minority populations, including Chinese students, which may have limited English proficiency. The MPO does not typically see many direct contacts from Iowa State University students. However, the MPO does frequently communicate and coordinate with Iowa State University and CyRide, both of which do frequently interact with students. Iowa State and CyRide both have representatives on the MPO’s technical and policy boards.

CyRide, whose staff conducts many of the MPO’s transit planning activities as a part of a joint planning agreement, has its own [LEP Plan](#). CyRide’s LEP Plan follows a similar four factor analysis to this LEP Plan and includes detailed breakdowns of the Iowa State student body as well as CyRide’s interactions with limited English proficiency students who utilize their bus transit system.

Public Participation Plan

The Ames Area MPO’s [Public Participation Plan](#) (PPP) summarizes how the MPO involves the public and stakeholders in its transportation planning efforts, including engagement goals and strategies. The PPP also highlights the MPO’s commitment to providing its planning services to all members of the public, including underserved populations such as those with limited English proficiency.

Factor 3 – Importance of Services and Programs

The third analysis factor is the nature and importance of the MPO’s services and programs in people’s lives.

MPO Services and Programs

The Ames Area MPO provides and coordinates various transportation planning and improvement efforts throughout the Ames region. This includes a data-driven and community-based planning approach which identifies necessary transportation improvements and programs in the region. The MPO also directs the programming and use of federal funds on future transportation projects (including roadway, transit, and multi-modal improvements). Since every individual directly utilizes or relies upon the region’s transportation system in some capacity, the MPO’s transportation planning activities impact everyone within the region.

Vital Services and Documents

The MPO does not provide any emergency-based services such as medical treatments or basic needs services (food, water, shelter, etc.). The MPO does maintain various planning documents (described below) as well as a Title VI Notice to the Public, Title VI Policy & Procedures, and a Title VI Complain Form. These three Title VI documents are considered vital, per FTA Circular 4702.1B.

Planning Documents

The Ames Area MPO maintains five core planning documents including:

1. [Public Participation Plan](#) (PPP)
2. [Metropolitan Transportation Plan](#) (MTP)
3. [Transportation Improvement Program](#) (TIP)
4. [Transportation Planning Work Program](#) (TPWP)
5. [Passenger Transportation Plan](#) (PTP)

More information about these planning documents can be found on the MPO website. They are also summarized within the Public Participation Plan. The MPO also maintains other documents and materials such as Title VI documentation, an Intelligent Transportation Systems Architecture document, and this LEP Plan. These are also all located on the MPO website.

The MPO always prioritizes inclusivity when developing transportation plans, studies, documents, and programs. The impact a transportation project or initiative will have on underserved populations, including limited English proficiency individuals, is always considered when evaluating that project or initiative. The MPO, through the strategies and procedures developed in the Public Participation Plan and LEP Plan, will always attempt to encourage outreach to and allow participation by limited English proficiency groups.

Factor 4 – Resources Available for Outreach

The fourth analysis factor is identifying the resources available to the MPO for outreach to persons with limited English proficiency, as well as the costs associated with the outreach.

MPO Public Outreach Strategies

The MPO's Public Participation Plan (PPP) outlines goals and strategies for public outreach and participation. Some of public outreach methods listed in the PPP and utilized by the MPO include:

- AAMPO Website (www.aampo.org) – Automated translations available for over 90 languages.
- E-Mail Notifications – Signup available on the MPO website.
- Publications – Including Ames Tribune, ISU Daily, and radio stations.
- TV & Streaming – Meetings are broadcast on the local governmental access cable channel (Channel 12), the City of Ames YouTube Channel, and as a live stream on the city's website.
- Social Media – The MPO utilizes the City of Ames' social media accounts on Facebook and Twitter.
- City Side – The City of Ames Newsletter, City Side, is distributed monthly by mail to all City of Ames residents.

City of Ames

The following are a list of resources that the City of Ames has for ensuring access for LEP persons:

- 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.
- The City of Ames, 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 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.
- The City’s web page can allow its information to be translated into different languages by selecting the language of choice.

CyRide and Iowa State University

CyRide’s [LEP Plan](#) provides an excellent summary of the resources they have available to them for reaching out to Limited English Proficiency persons. Some of these resources include:

- Google Translate for documents, notices, agendas, flyers, and other printed materials.
- Coordination with the Iowa State University’s International Student & Scholars
- Coordination with Iowa State University’s Intensive English & Orientation Program/Office of the Registrar
- Coordination with local human service organizations through Story County’s Human Services Council and United Way’s Transportation Collaboration Committee
- Coordination with Community Partners (such as the City of Ames, Iowa State University, and the Iowa State University Student Government)
- CyRide has a contract with “CTS Language Link” who is a 24/7/365 Telephone Interpreting service that supports over 240 languages and has 24-hour support. According to CyRide’s LEP Plan, this service costs about \$0.82/min.

Conclusion

Summary

A four-factor analysis was conducted, per the U.S. DOT LEP guidance, to determine which language assistance services are appropriate for the MPO to implement for effective communication with limited English proficiency persons. The four analysis factors included:

1. The number and proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by MPO services and programs.
2. The frequency with which persons with limited English proficiency encounter MPO services and programs.
3. The nature and importance of the MPO's services and programs in people's lives.
4. The resources available to the MPO for outreach to persons with limited English proficiency, as well as the costs associated with the outreach.

Language Assistance Services

The Ames Area MPO is currently staffed and fiscally supported by the City of Ames. Therefore, the MPO will plan to leverage the resources that the City of Ames has available for engaging limited English proficiency persons. The following is a list of the language assistance services the MPO will provide:

1. **Oral Interpretation Services** – The MPO will leverage 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 an appropriate interpreter, as pointed out by the customer. The City of Ames has also 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 is maintained in the Human Resources internal website. Note that 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. 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. **Written Translations (Vital Documents)** - The MPO will provide a written translation of all vital documents (Title VI Notice to the Public, Title VI Policy & Procedures, and a Title VI Complain Form) to Mandarin Chinese, per the Safe Harbor Provision requirements.
3. **Bureau of Refugee Services** – The MPO will, as needed, work with the Bureau of Refugee Services.

4. **MPO Website** – The MPO’s website can allow its information to be automatically translated into over 90 different languages.
5. **Regional Partners** – The MPO will work with its regional agencies and contact groups such as Iowa State University and CyRide to establish and provide additional language assistance services to the MPO, as needed.

The MPO will continue to monitor for any translation requests made from LEP persons and will evaluate whether full written language translations may be required for any of the core transportation planning documents or other MPO materials in the future. The MPO will leverage its oral interpretation services for the translation of any planning document or written material, upon request.

Outreach Strategies

The MPO will continue to coordinate with its regional contacts, as outlined in the Public Participation Plan, regarding outreach strategies for limited English proficiency persons. Additionally, the MPO will continue to utilize its various public outreach resources such as: the MPO website (with automated translations into over 90 different languages), e-mail notifications, publications, radio stations, Channel 12, streaming, social media, and the City of Ames newsletter, City Side.

Updating the LEP Plan

The MPO will continue to monitor and update the LEP Plan per Iowa DOT and U.S. DOT requirements. Some reasons an update may be warranted include:

- Changes in the region’s LEP population (number, proportion, location) as indicated by new Census and ACS data.
- New analysis strategies for evaluating LEP populations and resources.
- New interactions with or translation requests from LEP persons.
- Updates to LEP policies or procedures at the local, state, or federal level.

The MPO evaluates if an update to the LEP Plan is warranted during its annual self-certification process. The MPO’s Transportation Policy Committee may also direct the creation of an updated LEP Plan at its discretion.

Contact Information

The Ames Area MPO wants to ensure that its Limited English Proficiency Plan is effective in providing outreach and translation services for limited English proficiency persons. Anyone who requires language assistance services should contact the Ames Area MPO using the information below:

Ames Area MPO
515 Clark Ave
Ames, IA, 50010
Phone: (515) 239-5169

[Email](#)