

## TITLE VI, MINORITY, LIMITED ENGLISH PROFICIENCY (LEP), AND LOW INCOME PUBLIC OUTREACH PLAN



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### TITLE VI: MINORITY AND LOW-INCOME POPULATIONS (MLI)

Title VI refers to the section of the Civil Rights Act of 1964 that states:

"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."

This law is the basis for metropolitan planning organizations (MPOs) to verify that their programs are not creating a "disproportionate burden" on any one group. MPOs also check to see that the benefits of their programs are equitably distributed.

In addition to the 1964 Civil Rights Act, the following are also considered part of the MPO checks for fairness:

- Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender),
- Older Americans Act (1965) and Age Discrimination Act of 1975 (age), and
- Section 504 of the Rehabilitation Act of 1973/Americans With Disabilities Act of 1990 (disability)
- Executive Order 12898 (1994), Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. (minority, low-income)

Taken together, these requirements define an over-arching Title VI/Nondiscrimination Program.

**"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."**

***- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 1994***

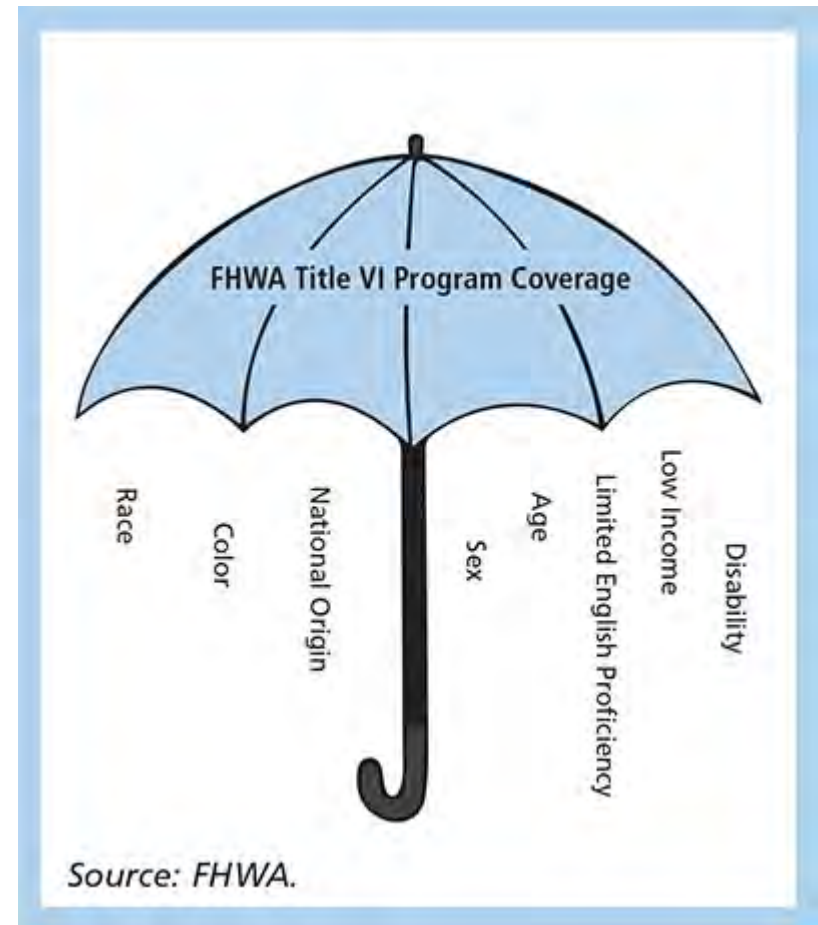
In 1997 the U.S. Department of Transportation issued its final order (DOT Order 5610.2a, updated in 2012) which specifically addressed environmental justice for minorities and low income populations with the intent to ensure that all federally funded transportation projects/programs do not bring disproportionately high or negative impacts on these populations.

Many people in minority and low-income communities have traditionally been underserved by conventional outreach methods. People may be unable to attend public events if they do not own a car, if they cannot afford childcare, or if they work late shifts or more than one job.

CAMPO will seek and consider the needs/interests of individuals, groups, and communities that are traditionally underserved by the transportation system policies and investments. The following are representative of public involvement CAMPO uses:

- ✓ Provide ample opportunity through effective public notices and outreach activities to engage this segment of the population or their respective representation in the early planning phases of a project which may include the formation of a specific Environmental Justice Task Force to provide input on the development of transportation plans;

- ✓ Utilize the “Interested and Affected Parties Contact List” to identify all interest groups with the intent to foster relationships with relevant agencies and to establish direct contact for feedback on federally funded transportation projects/programs from these agencies;
- ✓ Identify concentrations of protected classes of people by mapping demographic data;
- ✓ Utilize geographical information systems (GIS) to map transportation investments in relation to low income and minority areas with an intent to identify, highlight and analyze projects within these areas; respective to the Metropolitan Transportation Plan (MTP or Transportation Improvement Program (TIP);
- ✓ Investigate the impacts of transportation projects on these populations and work with interest groups and/or neighborhood organizations to explore alternatives;
- ✓ Incorporate environmental justice considerations into MTP and TIP criteria to ensure these issues are addressed in the early phases of the planning process.



1THE FHWA TITLE VI PROGRAM IS BROADER THAN THE TITLE VI STATUTE AND ENCOMPASSES OTHER NONDISCRIMINATION STATUTES AND AUTHORITIES UNDER ITS UMBRELLA, INCLUDING EXECUTIVE ORDER 12898 ON EJ.







The Capital Area MPO uses Block Group-level data from the US Census American Community Survey to look for concentrations of protected classes. These “communities of concern” (CofC’s) represent where the greatest likelihood of encountering these populations exists geographically. This is not the only way the MPO will identify those populations, but for regional-scale efforts this allows the MPO use outreach resources most effectively. Local planning efforts will require more in-depth research, including site visits, local planners, language assistance resource contacts, and street-view inventories.



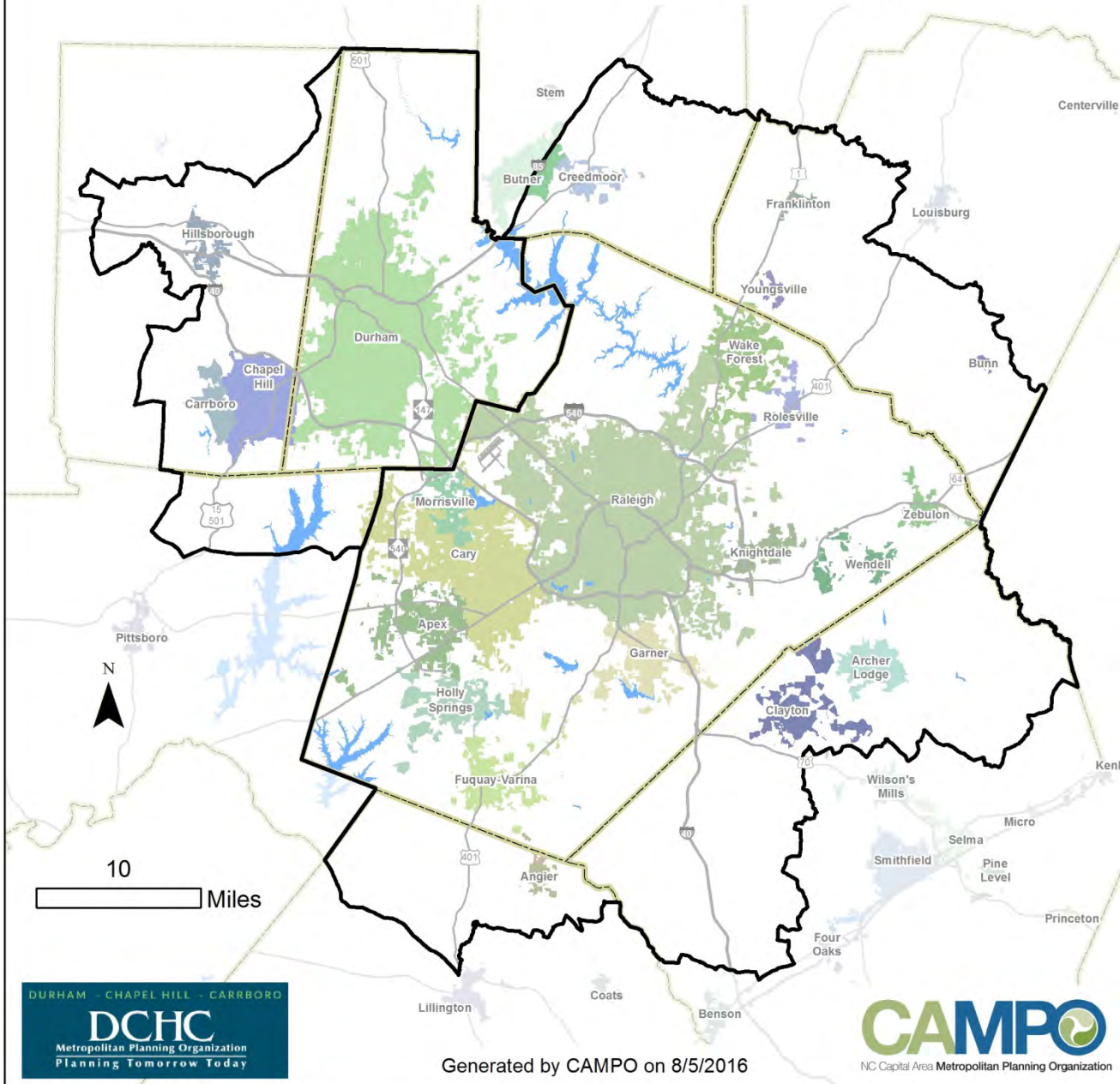
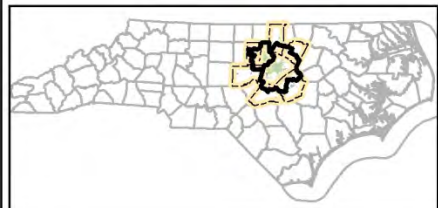
# CAMPO and DCHC MPO Context Map

The combined regions of the North Carolina Capital Area Metropolitan Planning Organization (CAMPO) and the Durham-Chapel Hill-Carrboro (DCHC) Metropolitan Planning Organization include all of Durham and Wake Counties, plus portions of Orange & Chatham (DCHC), and Franklin, Granville, Harnett, and Johnston (CAMPO).

Cities and Towns are shown in varying colors of grey and green on the map.

-  RDU Airport
-  CAMPO/DCHC\_Boundaries
-  Interstate
-  US Route; NC 147 & NC 540
-  Counties in 2-MPO Region
-  Lakes

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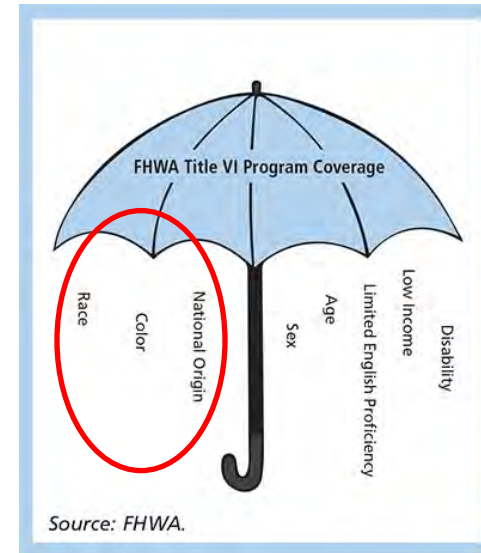


## REGIONAL DEMOGRAPHIC PROFILES





## DEMOGRAPHIC PROFILES: RACE, COLOR, & ORIGIN



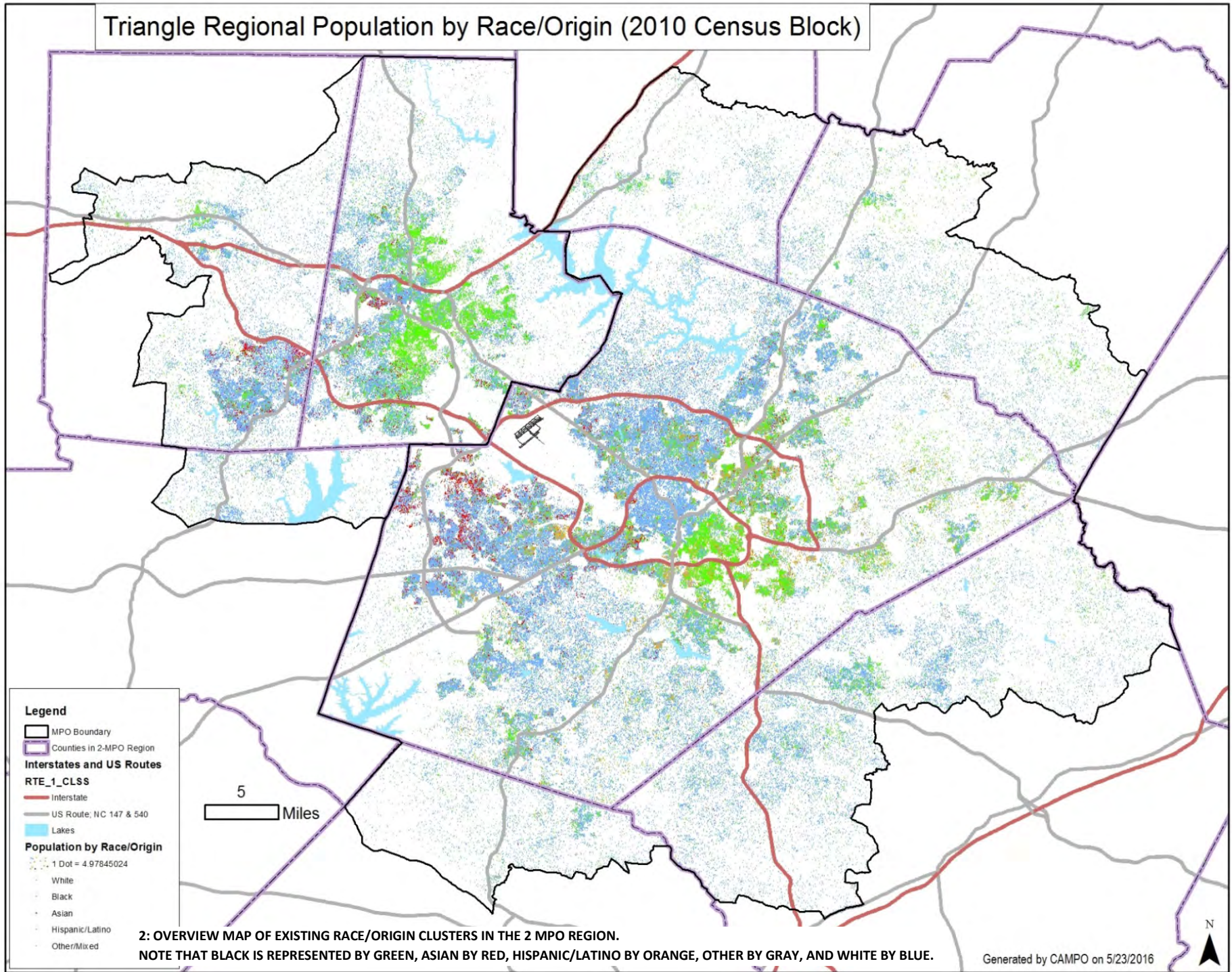
Under the Title VI Program Coverage umbrella, CAMPO first looked at Race, Color, and National Origin. Initially we looked at rolling all the components of these classes into a single measure. The nature of our region made it more effective to measure the most prevalent groups separately. Since the Census does not gather data on “Color” separately, we use Race to stand for both Race and Color. National Origin is treated separately due to its overlap with Race.

CAMPO used the following measures for Race and Origin:

1. Non-white race: it includes all race categories that are not white in the census. The two most prevalent in the region are black and Asian. The cutoff for inclusion is  $\geq 45.40\%$  of the people in a block group identifying as non-white.
2. Hispanic/Latino Origin: if a block group is 12.86% Hispanic/Latino or above, it is included as a CofC. Note that someone can be a white race, black race, or any race category and still identify as having Hispanic or Latino origin. For that reason it is treated separately from race.



# Triangle Regional Population by Race/Origin (2010 Census Block)













# Top 25% of Non-White Race Census Block Groups

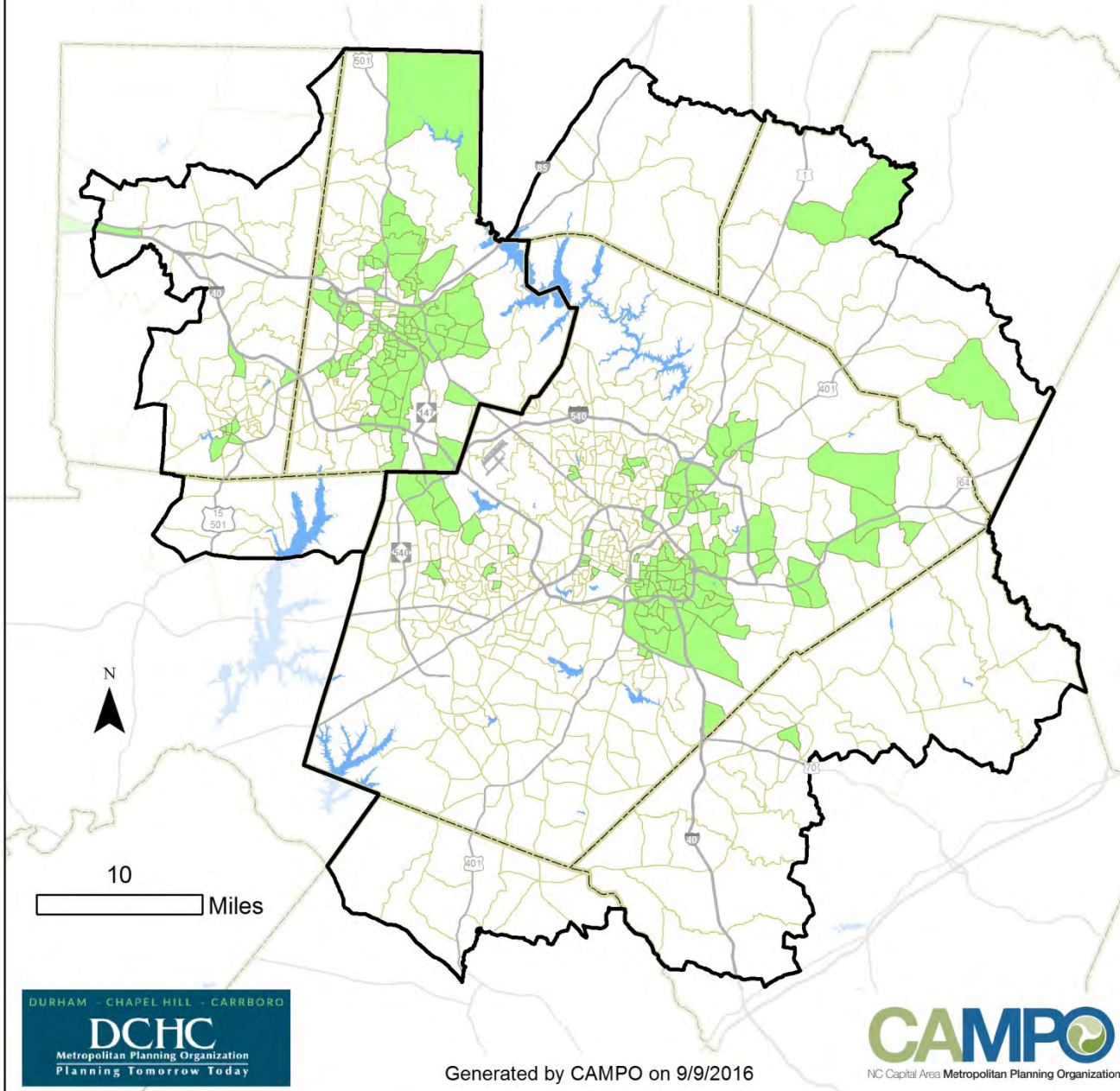
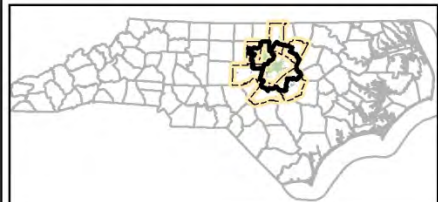
This map shows where concentrations of populations of non-white race exist in the region at or above the 45.40% threshold. The threshold represents block groups where 45.40% of the people living there identify as a non-white race for the Census.

45.40% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

**Note that Hispanic/Latino origin is treated separately from race.**

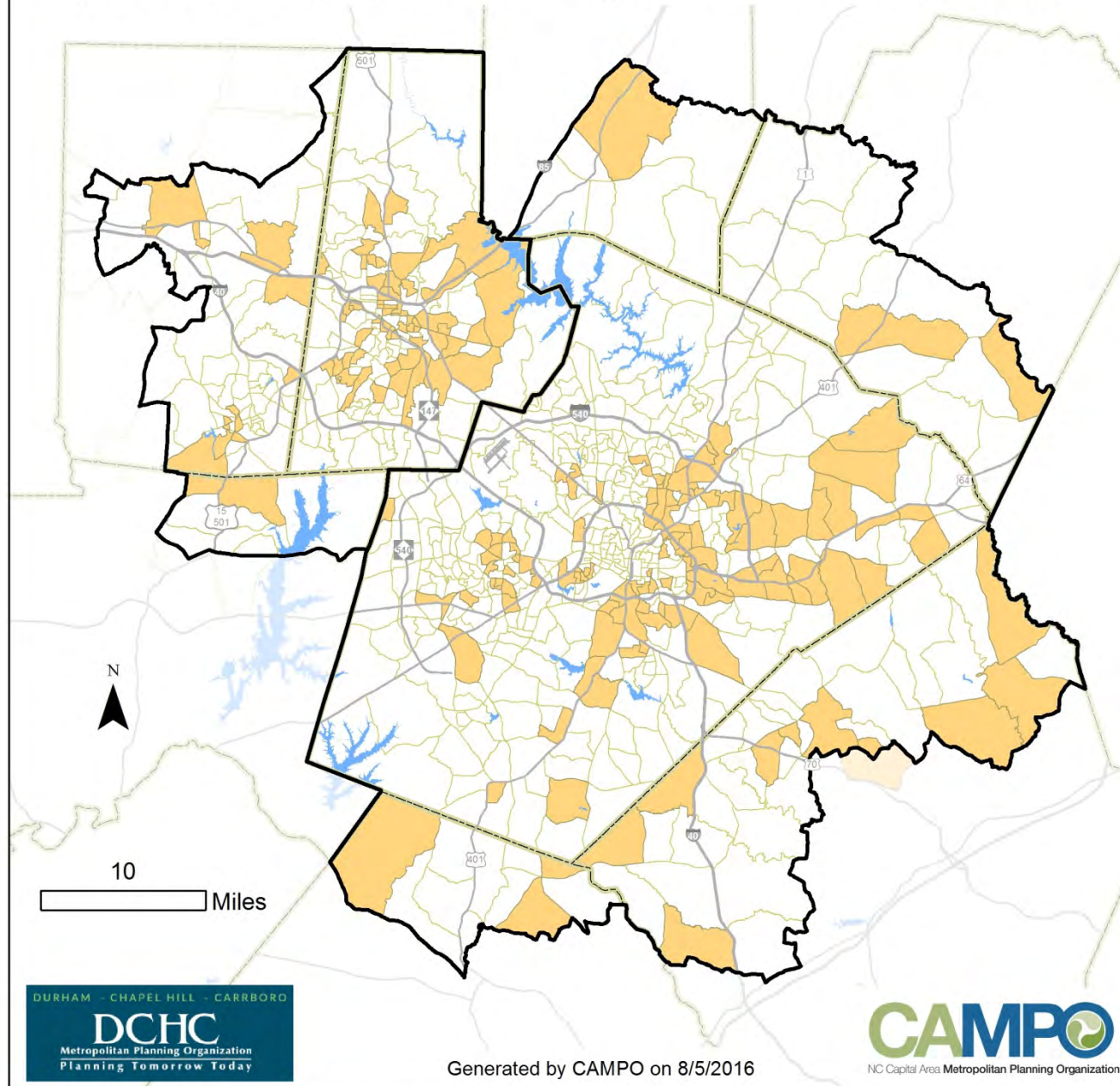
-  RDU Airport
-  CAMPO/DCHC\_Boundaries
-  Interstate
-  US Route; NC 147 & NC 540
-  Counties in 2-MPO Region
-  Lakes
-  MinorityNonWhite 45.40%
-  Other Block Groups

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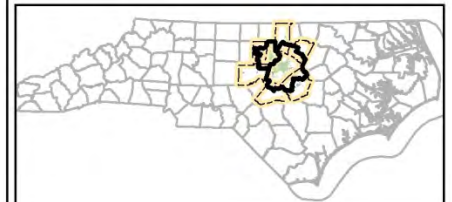
# Top 25% of Hispanic/Latino Origin Census Block Groups



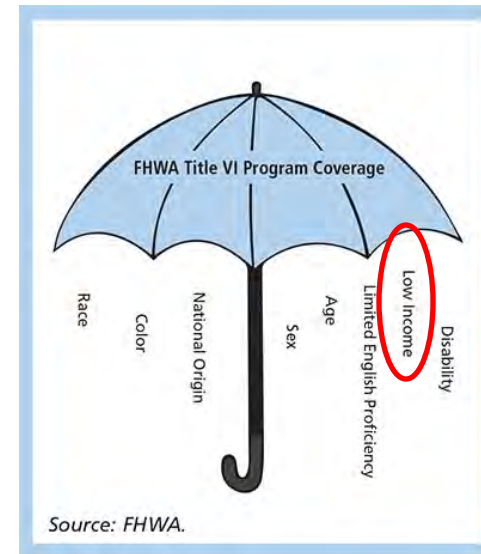
This map shows where concentrations of populations of Hispanic/Latino origin exist in the region at or above the 12.86% threshold. The threshold represents block groups where 12.86% of the people living there identify as a non-white race for the Census.

12.86% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

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## DEMOGRAPHIC PROFILES: LOW-INCOME



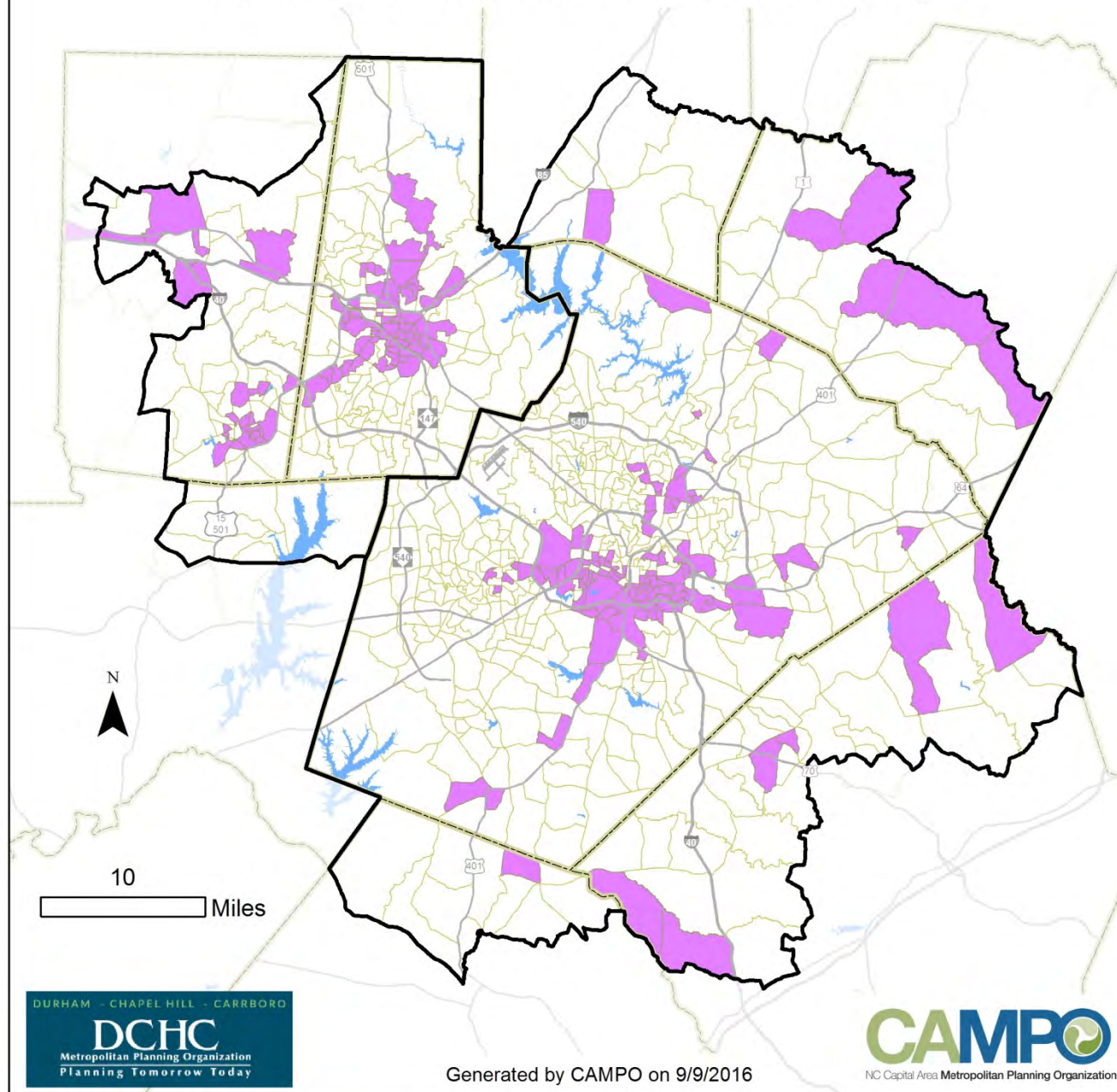
Under the Title VI Program Coverage umbrella, CAMPO considers Low-income as a measure to use for CofC's based on Executive Order 12898 and subsequent Federal Highway Administration (FHWA) guidance.

Poverty is calculated by the US Bureau of the Census based on a set of rules created in the 1960's by the Department of Agriculture. "Below the poverty line" is actually a sliding scale for different age groups and family sizes. Our data were normalized so that all of people in a block group could be compared equally.

Since so many people are one paycheck away from being a poverty statistic, we defined low income as a combination of those below the federal poverty line and those near the poverty line. If 34.07% of a block group meets the criterion, that block group is included as a CofC for regional outreach and analysis based on the 75th percentile.



## Top 25% of Low Income Census Block Groups

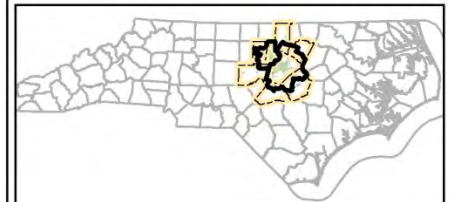


Since so many people are one paycheck away from being a poverty statistic, we defined low income as a combination of those below the federal poverty line and those near the poverty line. "Near" the poverty line are those with an income below 150% of the poverty line.

This map shows where concentrations of populations low income individuals exist in the region at or above the 34.07% threshold. The threshold represents block groups where 34.07% of the people living there meet the low income criteria.

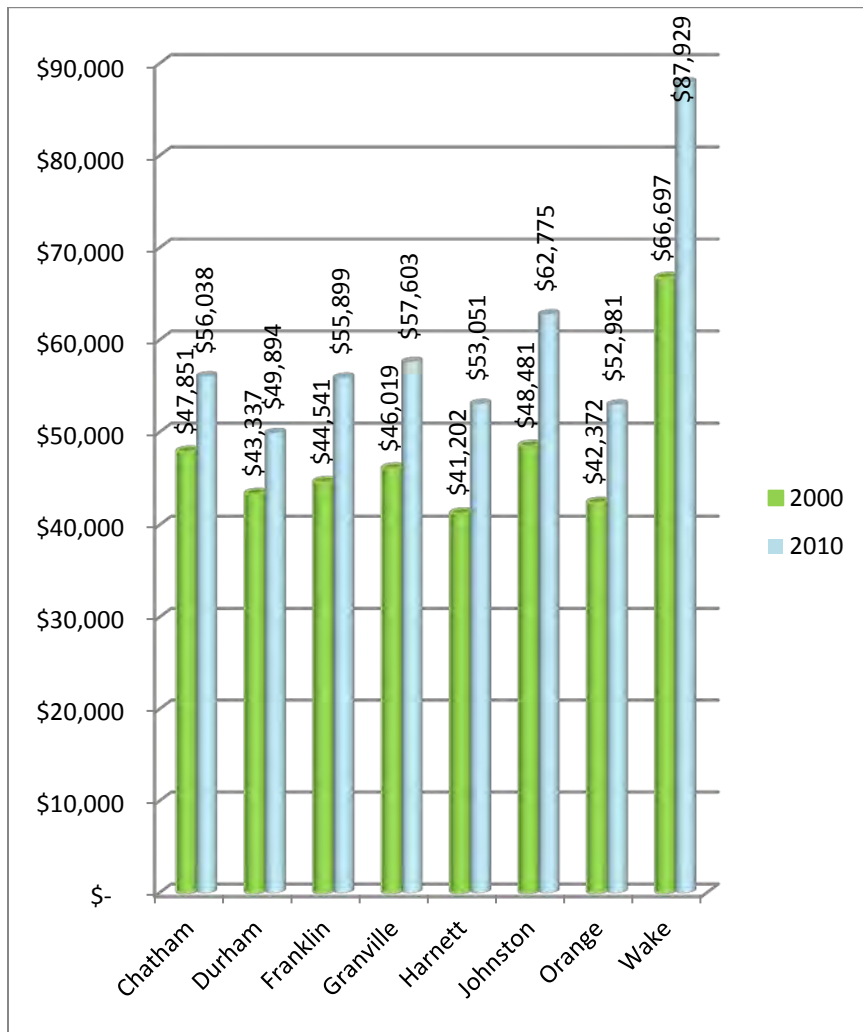
- RDU Airport
- CAMPO/DCHC\_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Below 150% of Poverty 75th
- Other Block Groups

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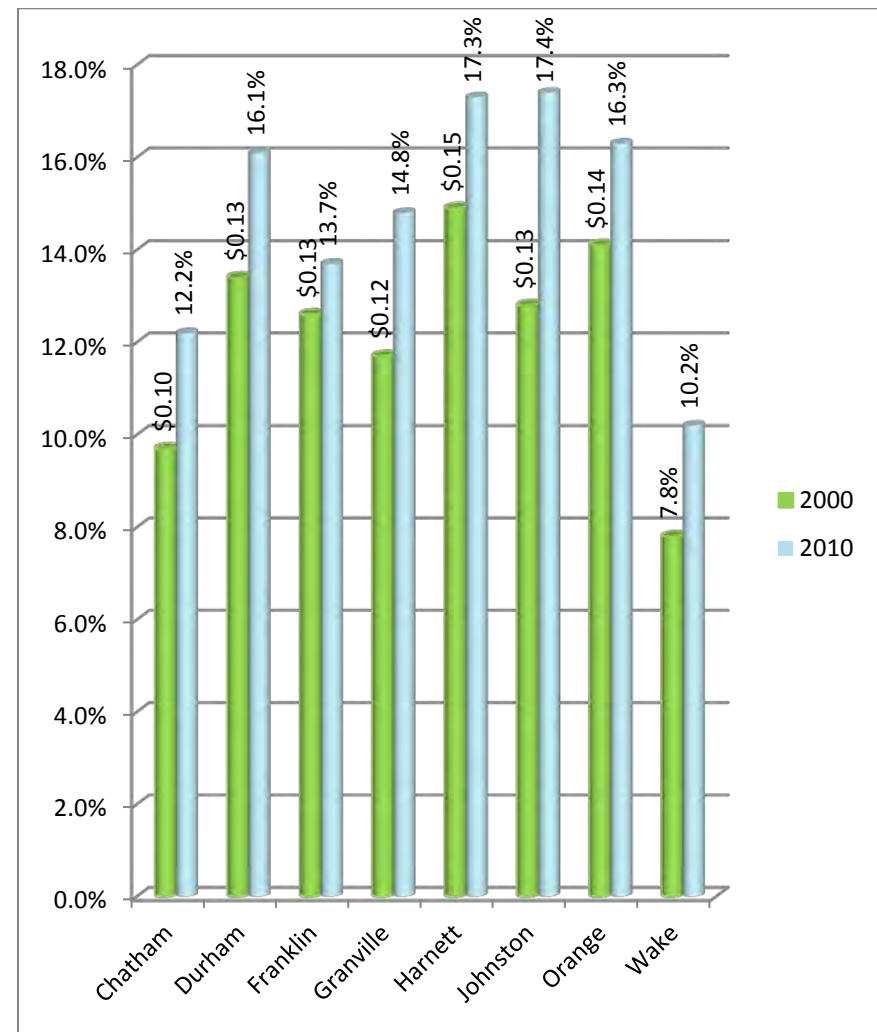
As general background, the US **median household income** for 2000 was \$50,046 and in 2010 it decreased to \$49,455. By comparison, the median household income for the two MPO region's counties those two years increased as shown below:

### MEDIAN HOUSEHOLD INCOME FOR TRIANGLE COUNTIES



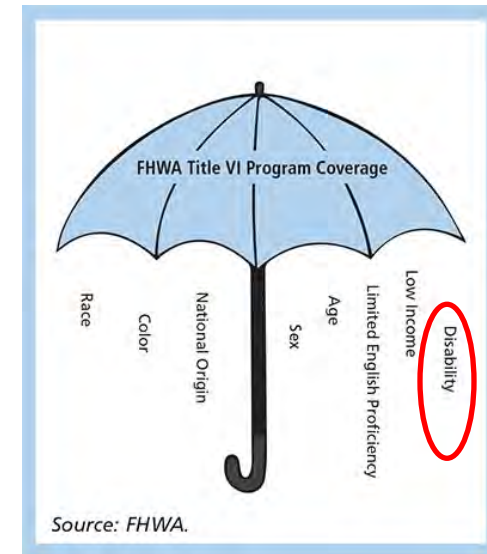
The official poverty threshold depends on family size. For a family of four, the national 2009 poverty line was an income of \$22,350 per year. Using that figure, within the MPO area, the following percentages of persons fell below the poverty level:

### % POPULATION LIVING BELOW POVERTY LEVEL





## DEMOGRAPHIC PROFILES: ZERO CAR HOUSEHOLDS



Under the Title VI Program Coverage umbrella, CAMPO considers Zero-car Households as a surrogate for the transportation needs of disabled persons. A review of disabled status persons shows that with a few exceptions in the most rural block groups, there is an even distribution across the region for this measure. This meant that as a standalone measure, Disability did not meet principle 3<sup>1</sup>: yields a pattern that allows for targeted outreach and a meaningful analysis.









After meeting with the regional partners, it was determined that where transportation is concerned, zero-car households was an available measure that might work.

<sup>1</sup> see the "Technical Notes" section immediately following the demographic profiles to see all 3 principles

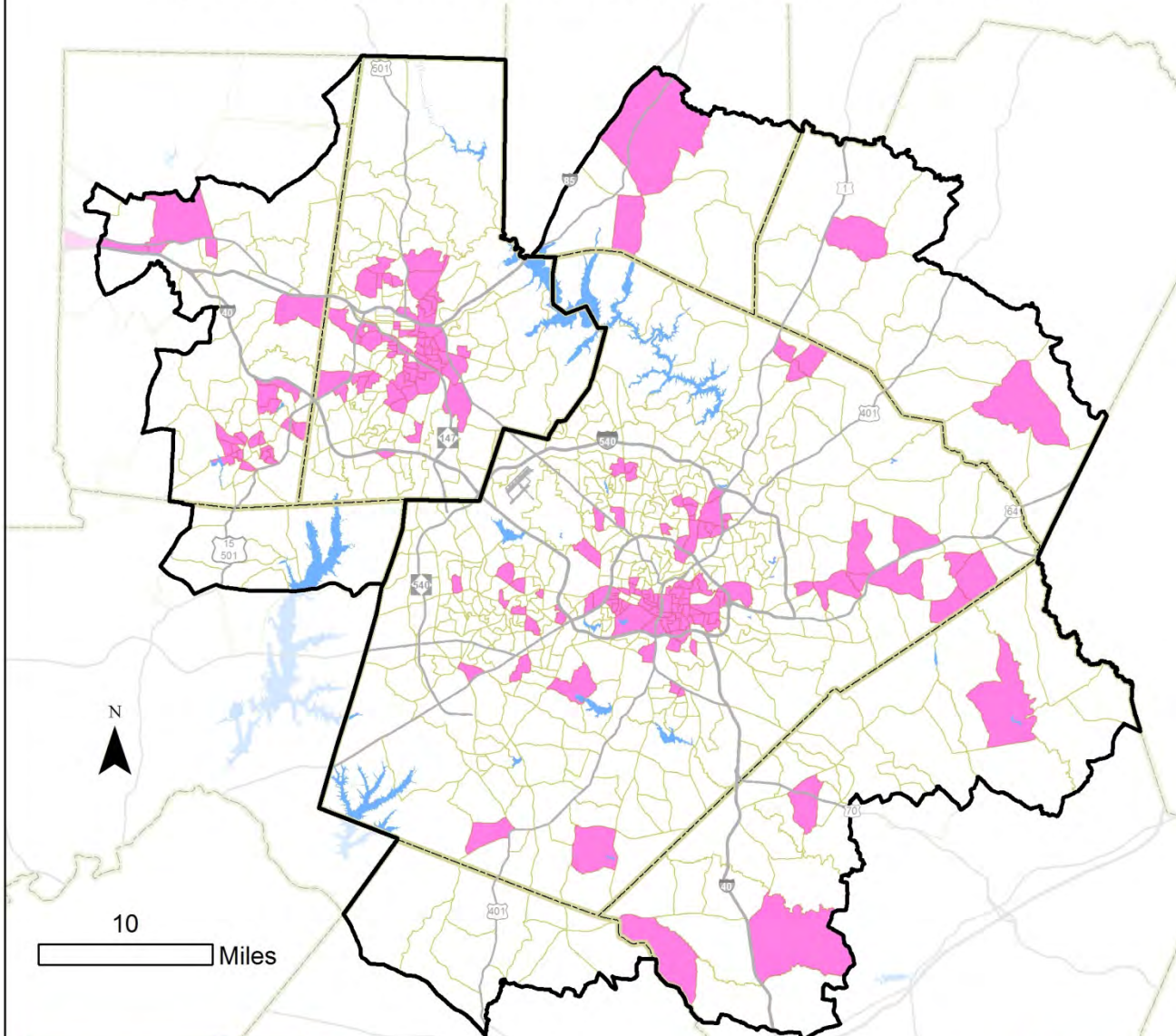
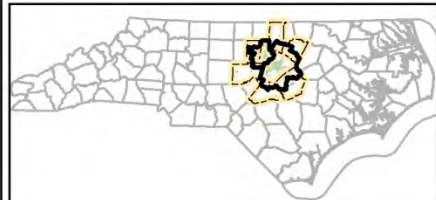
## Top 25% of Zero-Car Household Census Block Groups

This map shows where concentrations of populations of households with no automobile transportation exist in the region at or above the 7.98% threshold. The threshold represents block groups where 7.98% of the people living there identify as a non-white race for the Census.

7.98% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed

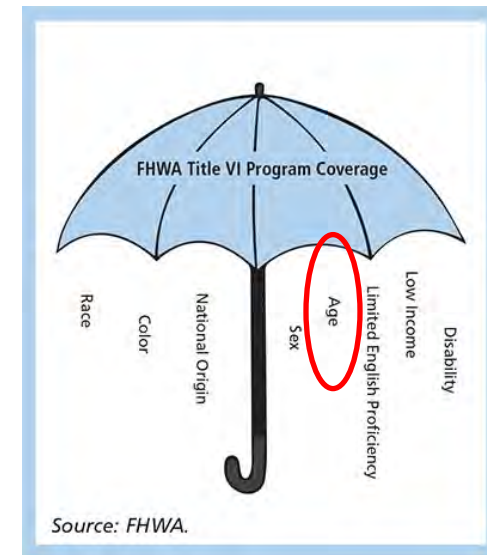
-  RDU Airport
-  CAMPO/DCHC\_Boundaries
-  Interstate
-  US Route; NC 147 & NC 540
-  Counties in 2-MPO Region
-  Lakes
-  Zero Car HHs 7.98%
-  Other Block Groups

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## DEMOGRAPHIC PROFILES: AGE



The Older Americans Act of 1965 and the Age Discrimination Act of 1975 made age one of the things we consider when identifying special populations. We looked at populations likely to have a large share of non-drivers—those over 70 year old.

For aging drivers, a person's age is not by itself an indicator of their driving ability. There are people driving safely well into their 90s, while there are others in their 50s and 60s who are dangers to themselves and others when behind the wheel. Physical and mental condition and ability are the main considerations.

**Vision:** Conditions such as cataracts, macular degeneration, glaucoma and diabetic retinopathy can hamper driving ability. Your parent's optometrist or ophthalmologist can identify vision problems, limitations, concerns and cautions. It is possible that some limitation in vision can be accommodated by not driving at dusk or night. Some conditions, such as cataracts and glaucoma, can be corrected surgically. If your mom or dad wears glasses, schedule an annual eye and vision examination.

**Physical ability:** Driving takes dexterity, ability and strength in both arms and legs/feet to control the vehicle at all times. Consider any physical limitations. Consider, too, if he or she has shrunk a bit in physical size, where the solution may be to move the driver's seat forward and upward

for both better control and vision over the hood of the car, and/or adding a pillow.

**Physical activity:** Mature adult drivers die in auto accidents at a rate higher than other age bracket because, at home, many do little or no exercise, not even a daily walk outside. Therefore, if your parent currently does no physical activity to maintain or build strength, agility and aerobic ability, this should be a concern. Importantly, it is probably correctable by introducing him or her to less television time and more physical activity.

**Diseases:** Patients with Alzheimer's disease can become disoriented almost anywhere, and a severe diabetic may fall into a coma. The parent's physician can advise of such possible problems and risks. But, don't assume that your parent has Alzheimer's if he or she forgets momentarily the location of a wallet, purse or newspaper.

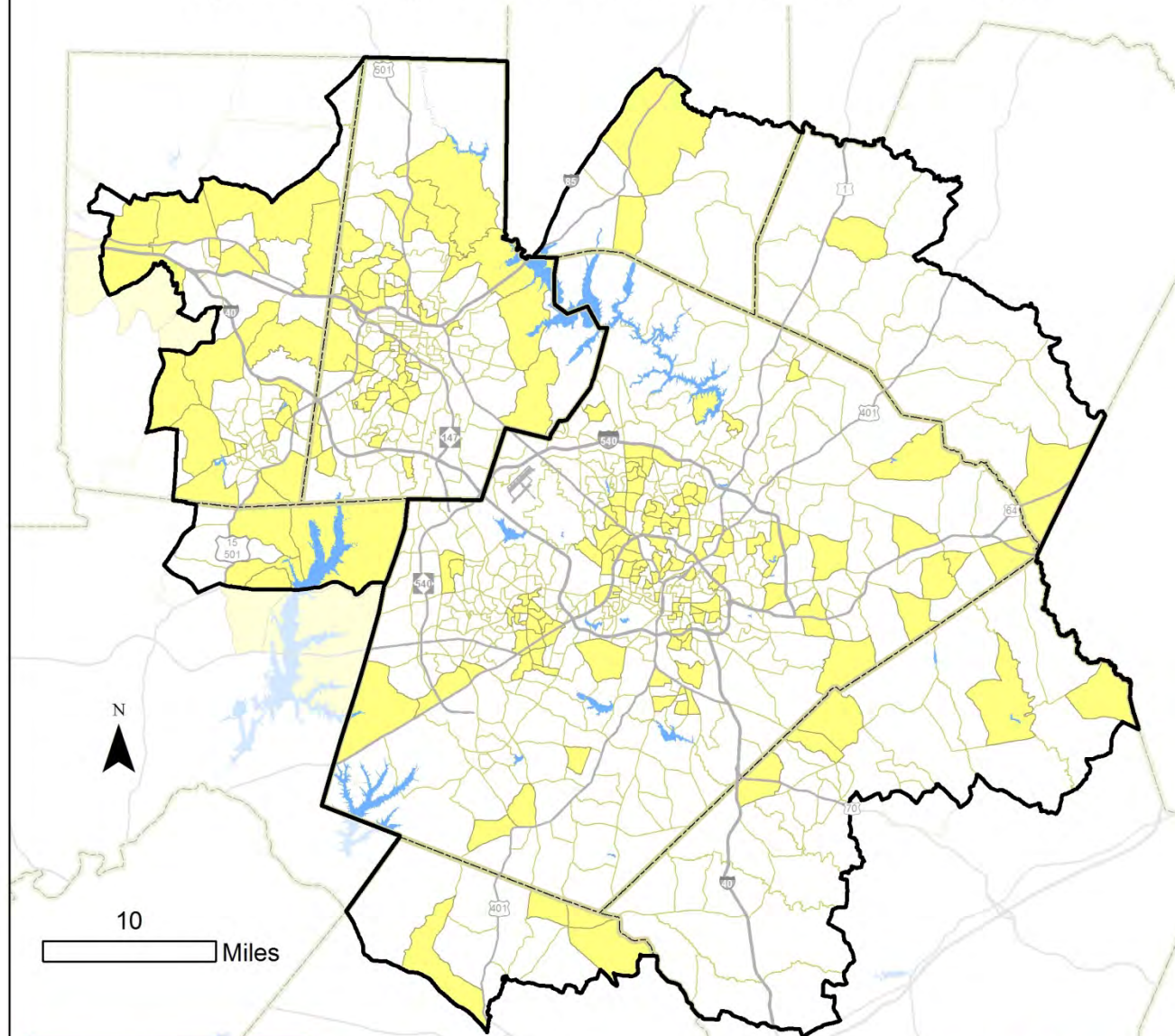
**Medications:** Prescription drugs are chemicals designed to produce specific and desired changes or functions within the body. But, as in the law of physics, for every action there is a reaction. That reaction may be drowsiness and/or a slowing of the person's reaction time. In the field of medicine these are identified as side effects and may effect, even seriously, a person's ability to drive.

Because of the potential loss of their ability to drive, people over 70 were included as in indicator for special consideration for transportation planning.





## Top 25% of Age 70 and Over Census Block Groups



DURHAM - CHAPEL HILL - CARRBORO  
**DCHC**  
 Metropolitan Planning Organization  
 Planning Tomorrow Today

Generated by CAMPO on 8/17/2016

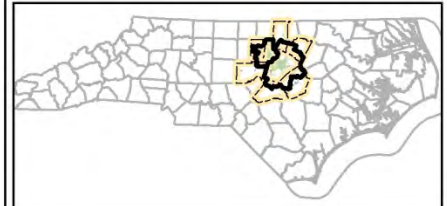
**CAMPO**  
 NC Capital Area Metropolitan Planning Organization

This map shows where concentrations of populations of persons 70 years old and older exist in the region at or above the 9.23% threshold. The threshold represents block groups where 9.23% of the people living there identify as a non-white race for the Census.

9.23% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed

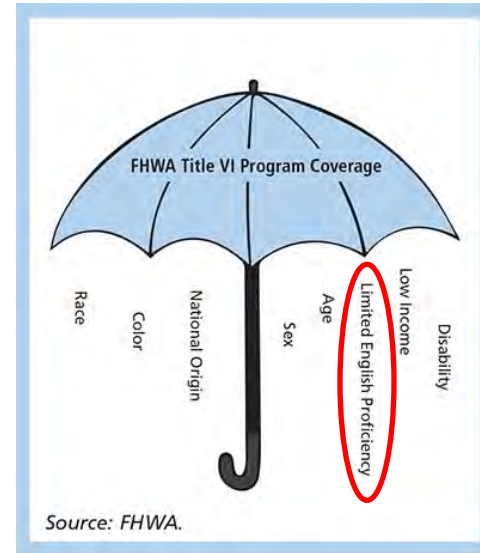
- RDU Airport
- CAMPO/DCHC\_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Age70Plus
- Other Block Groups

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## DEMOGRAPHIC PROFILES: LIMITED ENGLISH PROFICIENCY

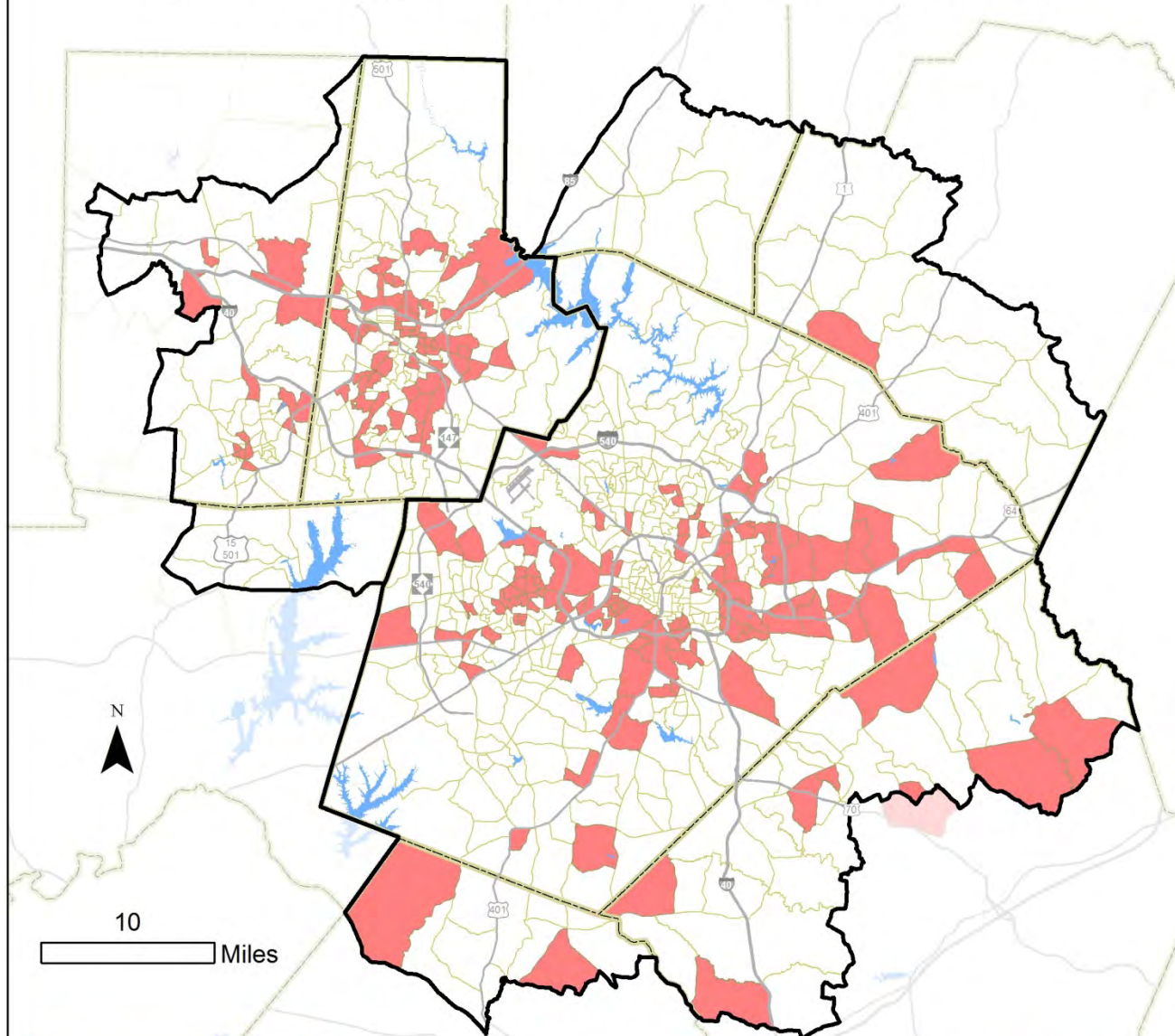


While limited English proficiency (LEP) is an inclusive term that includes people who speak another language and “speak English less than very well or not at all,” it can also include individuals with literacy or vision challenges. The census block groups that trigger for LEP are shown here and followed by the final map showing all the overlaps of what was measured. After that, there is a full break out of the Limited English Proficiency Outreach as its own chapter.





## Top 25% of Linguistically Isolated Census Block Groups



DURHAM - CHAPEL HILL - CARRBORO  
**DCHC**  
 Metropolitan Planning Organization  
 Planning Tomorrow Today

Generated by CAMPO on 8/17/2016

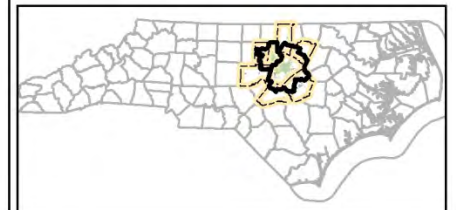
**CAMPO**  
 NC Capital Area Metropolitan Planning Organization

This map shows where concentrations of populations of persons who do not speak English or speak English "less than very well" exist in the region at or above the 6.42% threshold. The threshold represents block groups where 6.42% of the people living there identify as a non-white race for the Census.

6.42% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

- RDU Airport
- CAMPO/DCHC\_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Linguistically Isolated
- Other Block Groups

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## DEMOGRAPHIC PROFILES: GENDER

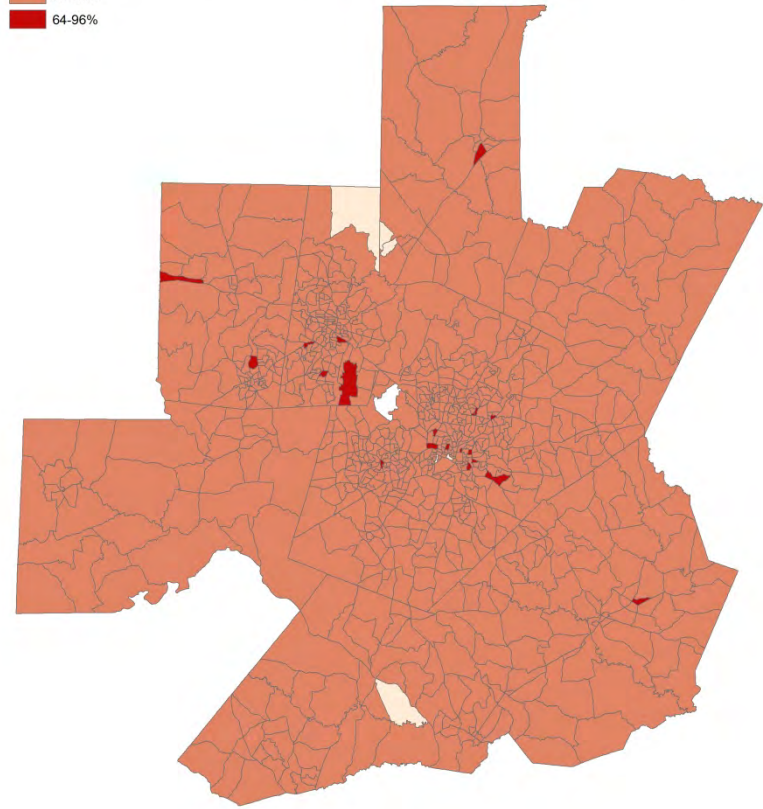
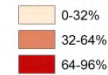
As mentioned in the introduction, the spatial distribution of gender is relatively equal throughout the region other than a few group quarters (college dormitories, etc). The vast majority of the region hovers around 50%, or at least in the middle 1/3. Due to this, it is not used in mapping CofCs.



### DISTRIBUTION OF FEMALE POPULATION CAMPO & DCHC COUNTIES

ACS\_2014\_5YR\_BG\_37\_NORTH\_CAROLINA

SEX BY AGE: Female: Total population -- (Estimate) / SEX BY AGE: Total: Total population -- (Estimate)



Generated by CAMPO on: 6/30/2016

25

Miles



## DEMOGRAPHIC PROFILES: FINAL COMMUNITY OF CONCERN MAP



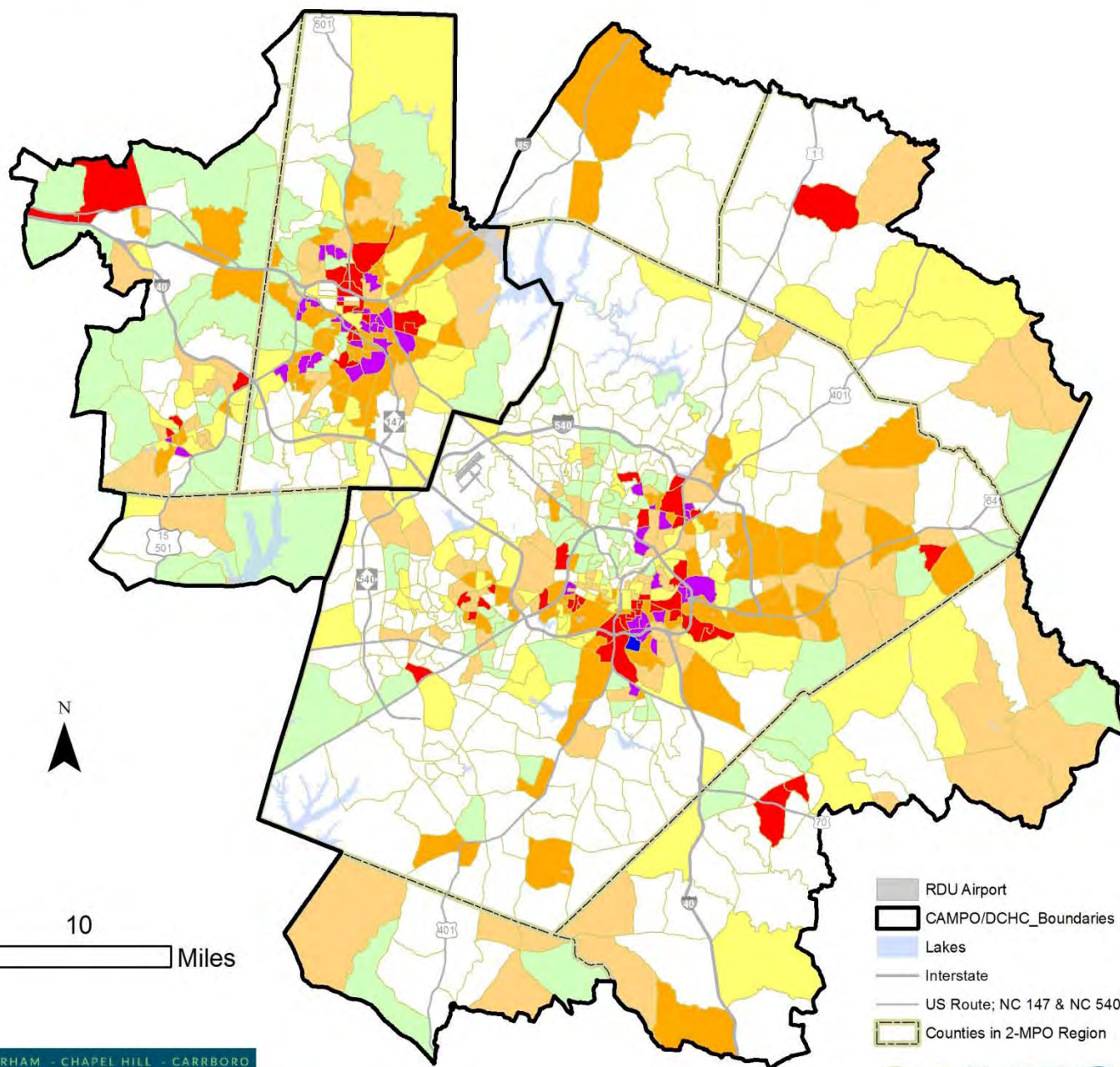
Once all the places with concentrations of likely Title VI populations are mapped, we put them all together to create a map that shows where the different things we measure overlap one another.

To recap, it will show where the following exist in concentrations:

- Non-White Race
- Hispanic/Latino Origin
- Individuals Making less than 150% of the Federal Poverty Rate
- Individuals who speak English “Not at all” or “Not very well”
- Zero-car households
- Individuals Age 70 and older

Where age is the only trigger, those areas are shown differently because age does not cluster spatially like many of the other indicators.

# Regional 75th Percentile Number of Indicators Overlap



This map is meant to be a regional-scale tool for the MPOs to use in regional-scale planning and regional-scale outreach. It does not identify every community that might meet Title VI protected status, but seeks to identify where there are concentrations of Title VI and other populations subject to protections under the law and associated policies. When working at a more local scale, additional identification may be needed.

The map shows the overlap of 6 indicators at the Census Block Group: Non-white race, Hispanic/Latino Origin, Individuals below 150% of the federal poverty threshold, Linguistic Isolation, Zero-car Households, and Age 70 and over. Each indicator has a threshold calculated for the 75th percentile (top 25%), and any Block Group that meets or exceeds the threshold is included.

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## Number of Overlapping Indicators





### Additional Consideration

The MPO shall also make a special effort to seek out and consider the needs of groups or communities traditionally not well-served by existing transportation systems. These include, but are not limited to low-income households and minority households. To assure adequate participation of these groups, the MPO shall use tools such as advisory boards (whose members shall be either low-income or minority individuals, or represent low-income or minority groups), target mailing list, workshops, and public notices in minority or low-income targeted media outlets.

The MPO's efforts in this regard shall be consistent with the Environmental Justice Executive Order (EO 12898) dated February 11, 1994, and other related guidance from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA).

The MPO shall also make a special effort to seek out and consider the needs of individuals or communities with Limited English Proficiency. The MPO efforts in this regard shall be consistent with the signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," dated August 11, 2000, and other related guidance from the FHWA and FTA.

Federal regulations 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.

CAMPO's Public Participation Plan (PPP) references this plan for special outreach strategies used to increase participation in populations not effectively reached by conventional methods. Many of the populations in the communities of concern fall into this category.

It is important to understand that the community of concern identification is meant to be used at the regional scale. For small area plans, corridor plans, and project-level outreach the community of concern map is a starting point. Additional strategies for outreach and identifying unique populations are likely to be needed at these scales.

Examples of additional methods of identifying where special populations might be could include (but are not limited to):

- Increasing the threshold for the indicators to be above the regional average (mean) or regional median.
- Field surveys
- Outreach to community organizations to assist staff

## TECHNICAL NOTES: METHODOLOGY FOR DETERMINING IF A BLOCK GROUP IS A REGIONAL-SCALE COMMUNITY OF CONCERN





*CAMPO will look at each protected class and then show how they overlap geographically, identifying where there is a combination of the highest concentrations and largest number of protected class overlaps. These areas will be called “Communities of Concern” (CofC), and will be used to target special outreach and evaluate the relative benefit/burden of transportation investments in the region in the Metropolitan Transportation Plan (MTP) or Transportation Improvement Program (TIP).*

## HOW TO DETERMINE A COMMUNITY OF CONCERN

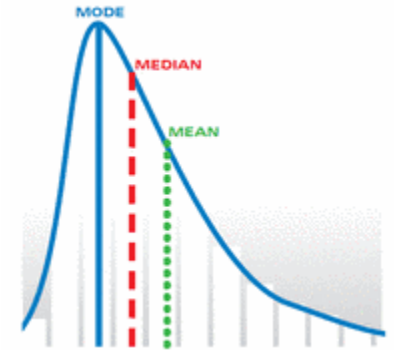
The MPO looked at many different statistical methods to get at the fundamental question, “What is a community of concern?” With the end in mind, there were 3 principles that guided how to define if an area was “in” or “out” statistically:

1. If everyone is special, no one is special; we do not want to set the threshold too low. Ideally around 60% of the region should not trigger 2 or more measures; around 75% one or more.
2. Be as inclusive as possible in light of the above; we do not want to leave anyone out without good reason
3. The final analysis should yield a pattern that allows for targeted outreach and a meaningful analysis of transportation investment

Percentiles are just like the median “average” measure; the difference is instead of using the halfway point (50%), a percentile can be adjusted. If you just want the top 25% of whatever you are measuring, you set the percentile to 75. If you wanted the top 10%, you set the percentile to 90, et cetera. Our region has 755 block groups, so each measure will take the highest 188 block groups (top 25%).

There are three statistical tools to note for all the protected classes we evaluated:

1. Use of Census Block Groups in the 2-MPO region as the geographic unit. This is because they are updated each year, and some data are only available at this scale. It also helps compare urban, suburban, and rural areas in and “apples to apples” way.<sup>2</sup>
2. Choice of which “average” we use. By choosing to use the “median” as our measure, it gets around any extremes that may exist within the block group. For instance, if a millionaire has a house in a block group where most residents are low-income, the “mean” (what most people think of as the “average”) will be too high due to millionaire. By using a median, the primary makeup of the block group is reflected because extremes will not have as much impact.
3. Measuring each item we evaluate as a percentage. This also helps to create an “apples-to-apples” comparison for urban, suburban, and rural parts of the region.



The MPO also tried to match the data that are available to the protected classes under the Title VI Program Coverage umbrella. Statistically, choosing what gets measured has tremendous impact on the outcome. CAMPO sat

<sup>2</sup> The way block groups are drawn, it helps “spatially normalize” the data.

down with other regional stakeholders involved in the statistical definition of what goes into identifying CofCs on February 4, 2016. DCHC MPO, Triangle J Council of Governments and NCDOT Community Studies staff reviewed existing methodologies and a draft proposal from CAMPO using percentiles to determine a threshold for “in” or “out”. On August 2<sup>nd</sup> the group reconvened with FHWA and NCDOT’s Office of Civil Rights included as well.

In looking what to measure, some things came to light:

Even though gender is a protected class, the even distribution of men and women did not make it a useful measure geographically. As such, it is the one protected class that was not used at all for determining CofCs.

The same was true for disability in terms of where people are, but for the people affected the most by transportation investments, the group supported using Zero-car Households as a surrogate measure.

Using a composite “minority” measure may miss some key groups. As an example, a block group that might be included for “Black alone” only needs around 32% of the block group to identify as Black. In a single minority measure, the threshold is around 57%, and if no other minorities are present this might miss too many people that need to be included. The final selection of how to measure led to using “Non-white Race” and “Hispanic/Latino Origin” as separate variables. Some block groups with Asian minority presence that may not meet the combined race threshold for minority trigger under “Linguistic Isolation” and thus be included.

It is important to understand that these are regional-scale, planning level proxies for actual EJ communities. When working with individual projects or specific outreach efforts, this analysis is just a guidance or screening tool to begin the identification of the actual communities.



# LIMITED ENGLISH PROFICIENCY



## LIMITED ENGLISH PROFICIENCY OUTREACH

The LEP policy guidance provided by the US Department of Transportation (see attached pages A-1 and A-2) is to clarify the responsibilities of recipients of federal financial assistance from the US DOT and assist them in fulfilling their responsibilities to LEP persons, pursuant to Title VI of the Civil Rights Act of 1964, and other implementing regulations. It was prepared in accordance with title VI of the civil rights act of 1964, 40 42 U.S.C. 2000d, and its implementing regulations provide 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.



## LIMITED ENGLISH PROFICIENCY (LEP): EXECUTIVE ORDER 13166

Executive Order 13166, improving access to services for persons with limited English proficiency, reprinted as 65 FR 20121 program (August 16, 2000), directs the Federal agency that is subject to the requirements of title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such documents are consistent with the compliance standards and framework detailed in as part of justice and policy guidance entitled Enforcement of Title VI of the civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency (see 65 FR 50123, August 16, 2000, USDOJ’s General LEP and other Guidance). Disparate treatment based on a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

The LEP plan is in place to ensure access to the planning process and information published by the MPO for those who do not speak or read English proficiently. The term LEP, describes individuals who do not speak English as their primary language AND who have a limited ability to read, speak, write, or understand English.



## LIMITED ENGLISH PROFICIENCY — DEFINED

Language and literacy barriers prohibit people who identify as LEP from obtaining services and information relating to transportation services and programs. Because LEP populations are not able to read instructions or correspondence written in English and may not understand verbal information, they often are not aware of regulatory requirements and legal implications of the services they seek. It is essential that MPO staff and other recipients or sub-recipients of federal funds become informed about their diverse clientele from a linguistic, cultural, and social perspective. These individuals should become culturally competent so they can encourage vulnerable LEP /minority populations to access and receive appropriate transportation services with more knowledge and confidence.

What is low literacy? What is limited English proficiency? National surveys have determined that about 20 percent of Americans are "low literate;" i.e., they read and comprehend in English below a fifth-grade level. Another 25 percent of Americans have literacy skills below a seventh-grade level. The 2000 Census found that about 18 percent of Americans speak a language other than English at home. Limited-English proficiency individuals have low English literacy and may or may not be literate in their primary language. In many cases, there is a direct correlation between low literacy, limited English proficiency, low educational attainment, and low income.

U.S. DOT guidelines require that recipients of federal financial assistance provide "meaningful access to programs and activities" by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. The Department will take "reasonable steps" to remove barriers for LEP individuals.

Once identified, the MPO should make every reasonable effort to ensure the LEP populations have timely and inclusive access to the information and processes.

## LIMITED ENGLISH PROFICIENCY: PLAN SUMMARY

As a recipient of federal funding, the MPO must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the Federal Register, volume 70, number 239, Wednesday, December 14, 2005, there are four factors to be considered in determining reasonable steps:

1. the number and proportion of MLI and LEP persons in the eligible service population
2. the frequency with which MLI and LEP persons come in contact with the program or activity
3. the importance of the service provided by the program
4. the resources available, to the recipient

USDOT policy guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of the need in the capital area MPO in relation to the four factors and the transportation planning process.



## LIMITED ENGLISH PROFICIENCY: THE NUMBER AND PROPORTION OF LEP PERSONS IN THE ELIGIBLE SERVICE POPULATION:

The NC Capital Area MPO planning area consists of Wake County and portions of Franklin, Granville, Harnett, and Johnston Counties. The first step toward understanding the profile of individuals who could participate in the transportation planning process is a review of census data. The Census data from the 2010-2014 American Community Survey indicates that in all MPO planning areas, English is the primary language spoken at home. Census data for individual cities is not readily available. Table 1 displays the general characteristics, language, estimated population, and percent of individuals who would be classified as LEPs.

Spanish continues to be the primary language that triggers the need for targeted outreach and proactive translation of materials for both MPOs. The 2010-2014 ACS data estimates almost 79,000 native Spanish speakers who speak English "Less than very well" in the 9-county region. That is 4.25% of the region's population. No other language group comes close, with the next highest being Chinese at 0.36%. Because "Chinese" does not differentiate between major language groups (Mandarin, Cantonese, Wu, Min, Hakka, etc), Korean is the next, true comparison with 3,129 speakers. For written communication, written Chinese does not differ between the main Chinese languages; for on-site interpreting they are different.

Because the two MPOs do not have the same language profiles, for the purposes of the regional plan, a language that is considered "primary consideration" means that it meets thresholds for both MPOs. "Secondary consideration" means that it only triggers in one of the two MPOs. Each MPO is responsible for meeting translation policies and requirements as they apply in their individual MPO.

## THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH THE PROGRAMS OR ACTIVITIES.

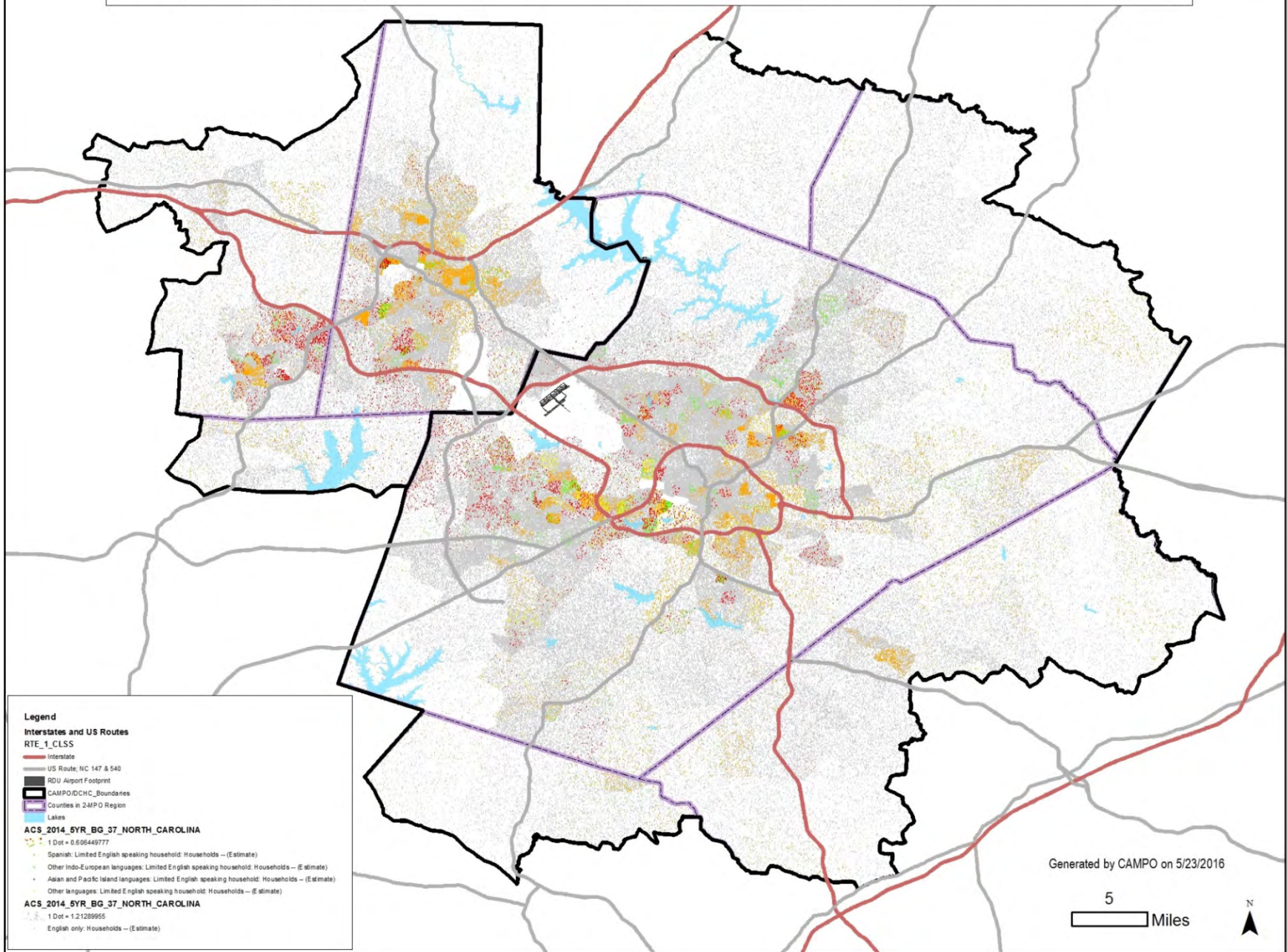
Although targeted specifically at outreach events current contact with LEP individuals is relatively infrequent but our commitment to serve this group is a priority. In areas with more concentrated LEP populations, LEP individuals sometimes attend the MPO events with English-speaking family members, or our community and agency partners at these events are bilingual and translate as needed. To date, no request had been made for either individuals or groups directly to the MPO for Spanish or other language interpreters or publications. Nevertheless, arrangements have been made with the city of Raleigh public affairs department to put together a list of employees who speak languages other than English to be available for translation services if needed. North Carolina State University participates in an English translation program for various languages as well.



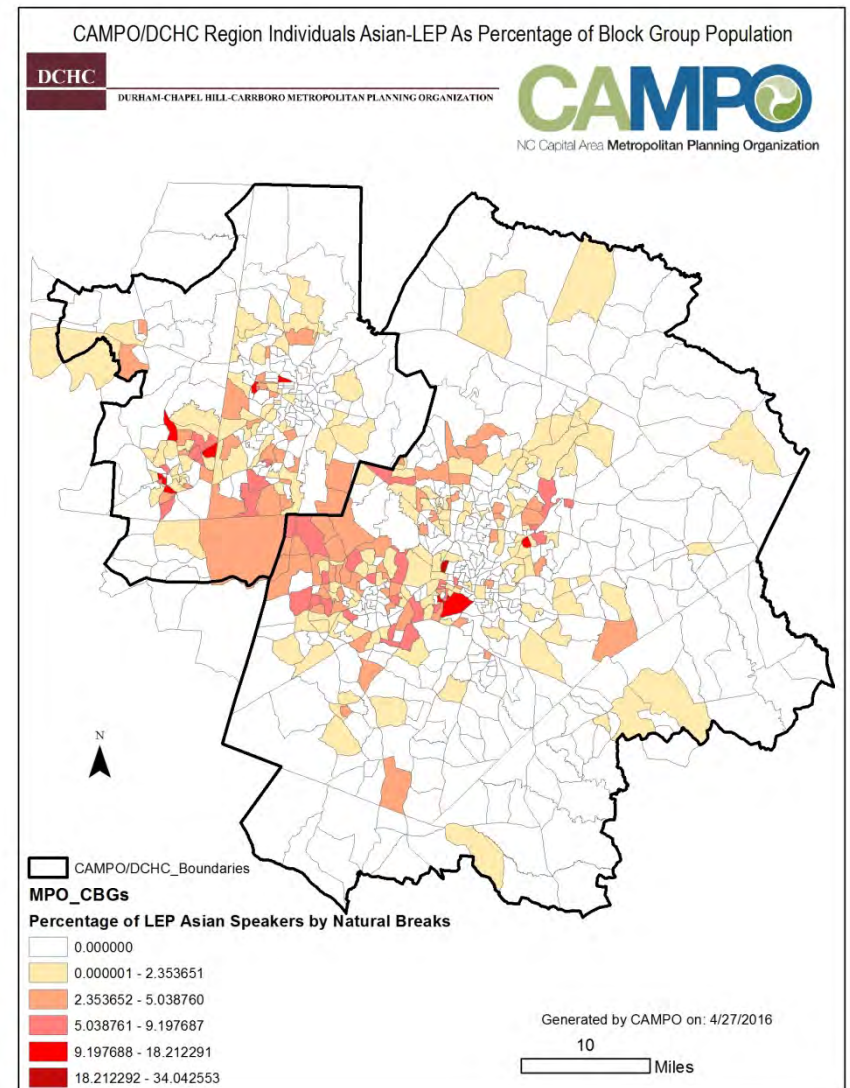
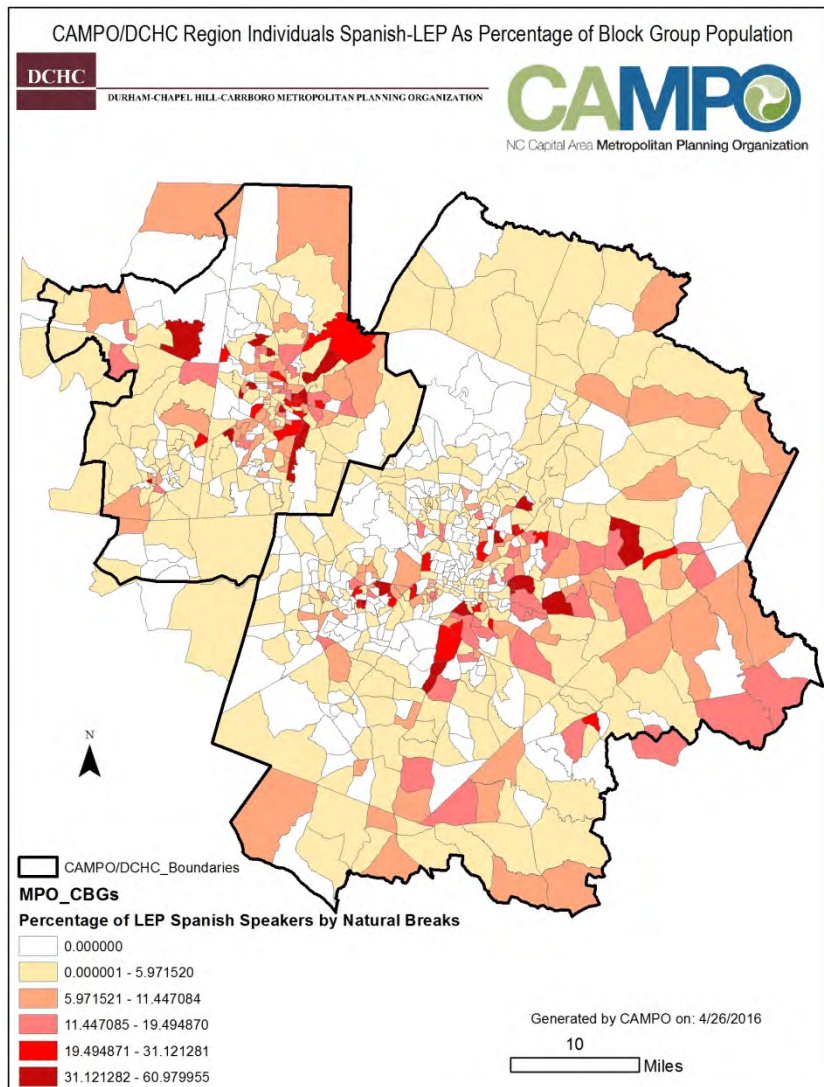


Language Information	Number of Persons	% Speak English less than "very well"	Language Information	Number of Persons	% Speak English less than "very well"
<b>8-County Region Total</b>	<b>1730550</b>				
<b>Speak only English</b>	<b>1460699</b>				
<b>Spanish or Spanish Creole:</b>	160267		<b>Other Indic languages:</b>	4697	
Speak English less than "very well"	78781	4.55%	Speak English less than "very well"	1532	0.09%
<b>French (incl. Patois, Cajun):</b>	8042		<b>Other Indo-European languages:</b>	1949	
Speak English less than "very well"	1760	0.10%	Speak English less than "very well"	429	0.02%
<b>French Creole:</b>	615		<b>Chinese:</b>	15427	
Speak English less than "very well"	122	0.01%	Speak English less than "very well"	6387	0.37%
<b>Italian:</b>	2121		<b>Japanese:</b>	1675	
Speak English less than "very well"	281	0.02%	Speak English less than "very well"	624	0.04%
<b>Portuguese or Portuguese Creole:</b>	1584		<b>Korean:</b>	6362	
Speak English less than "very well"	434	0.03%	Speak English less than "very well"	3129	0.18%
<b>German:</b>	4775		<b>Mon-Khmer, Cambodian:</b>	308	
Speak English less than "very well"	415	0.02%	Speak English less than "very well"	206	0.01%
<b>Yiddish:</b>	28		<b>Hmong:</b>	157	
Speak English less than "very well"	6	0.00%	Speak English less than "very well"	32	0.00%
<b>Other West Germanic languages:</b>	1145		<b>Thai:</b>	630	
Speak English less than "very well"	42	0.00%	Speak English less than "very well"	296	0.02%
<b>Scandinavian languages:</b>	709		<b>Laotian:</b>	213	
Speak English less than "very well"	85	0.00%	Speak English less than "very well"	66	0.00%
<b>Greek:</b>	794		<b>Vietnamese:</b>	5510	
Speak English less than "very well"	150	0.01%	Speak English less than "very well"	2919	0.17%
<b>Russian:</b>	2103		<b>Other Asian languages:</b>	10826	
Speak English less than "very well"	453	0.03%	Speak English less than "very well"	2313	0.13%
<b>Polish:</b>	926		<b>Tagalog:</b>	3718	
Speak English less than "very well"	189	0.01%	Speak English less than "very well"	768	0.04%
<b>Serbo-Croatian:</b>	189		<b>Other Pacific Island languages:</b>	1080	
Speak English less than "very well"	35	0.00%	Speak English less than "very well"	443	0.03%
<b>Other Slavic languages:</b>	1253		<b>Navajo:</b>	14	
Speak English less than "very well"	264	0.02%	Speak English less than "very well"	7	0.00%
<b>Armenian:</b>	85		<b>Other Native North American languages:</b>	244	
Speak English less than "very well"	8	0.00%	Speak English less than "very well"	24	0.00%
<b>Persian:</b>	1881		<b>Hungarian:</b>	514	
Speak English less than "very well"	658	0.04%	Speak English less than "very well"	55	0.00%
<b>Gujarati:</b>	3380		<b>Arabic:</b>	8257	
Speak English less than "very well"	1157	0.07%	Speak English less than "very well"	2256	0.13%
<b>Hindi:</b>	6545		<b>Hebrew:</b>	455	
Speak English less than "very well"	866	0.05%	Speak English less than "very well"	41	0.00%
<b>Urdu:</b>	2053		<b>African languages:</b>	8889	
Speak English less than "very well"	328	0.02%	Speak English less than "very well"	2291	0.13%
<i>Spanish is the only language that triggers primary consideration</i>			<b>Other and unspecified languages:</b>	431	
<i>1000 is the threshold for secondary consideration (Safe Harbor)</i>			Speak English less than "very well"	163	0.01%
<i>Secondary may not be applicable in grouped categories</i>					

# Triangle Regional Population by Limited English Proficiency (2009-2013 ACS Block Group)







## LIMITED ENGLISH PROFICIENCY: THE IMPORTANCE OF THE SERVICE PROVIDED BY THE PROGRAM

MPO programs use federal funds to plan for future transportation projects and therefore, do not include any service or program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs, like food or shelter.

The MPO must ensure that all segments of the population, including LEP persons, have been involved, or have the opportunity to become involved, in the transportation planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process for use of federal funds in three major areas: 1) an annual unified planning work program, 2) a seven-year transportation improvement program, 3) a long-range transportation plan covering 20+ years.

Inclusive public participation is a priority and other MPO plans studies and programs as well. The impacts of transportation improvements resulting from these planning activities do have an impact on all residents. Understanding and involvement are encouraged throughout the process. The MPO is concerned with input from all stakeholders, and every effort is made to make the planning process as inclusive as possible.

Progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies is not within the MPO's authority. These state and local organizations have their own policies to ensure LEP individuals can participate in the process that shapes where how and when a specific transportation project is implemented.

## LIMITED ENGLISH PROFICIENCY: RESOURCES AVAILABLE TO THE RECIPIENT AND THE OVERALL MPO COST

Given the size of the LEP population in the MPO's planning boundary and financial constraints, full translation of all transportation plan documents, except for vital documents (a document that contains information critical to obtaining federal funds or benefits), is not feasible at this time. However, continued growth of our area and its Spanish-speaking population makes offering Spanish translation, in many areas, a good community investment; therefore, the MPO will make efforts to collaborate with state and local agencies to provide language translation and interpretation services were impractical within the scope of funding available.

The Capital Area MPO will use a "seven business day" notification statement in order to be most accommodating to the public. If the seven-day notice becomes impractical to meet LEP assistance requests, this LEP plan standard will be changed.



## LIMITED ENGLISH PROFICIENCY: MEETING THE REQUIREMENTS

Engaging the diverse population within the MPO boundaries is important. CAMPO is committed to providing quality services to all citizens, including the LEP population we serve. All language access activities detail below will be coordinated in collaboration with the MPO board and staff.

## LIMITED ENGLISH PROFICIENCY: PROVIDING NOTICE TO UNDERSERVED POPULATIONS INCLUDING LEP PERSONS

The USDOT LEP guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of service is available free of charge in languages LEP persons would understand. Examples of methods of notification include:

1. Stating in outreach documents that language services are available
2. Signage that free language assistance is available with advance notice
3. Working with community-based organizations and other stakeholders to inform LEP individuals of the MPO services and the availability of language assistance
4. Providing information as to the availability of translation services (parenthesis free of charge) when advertising for public hearings were MPO related workshops.

Other reasonable steps will depend on:

- The number and proportion of LEP persons potentially served by the program or activity and the variety of languages spoken in the service area.
- The frequency with which LEP individuals are affected by the program or activity.
- The importance of the effect of the program on LEP individuals.
- The resources available to the recipient and the urgency of the situation.
- The level of services provided to fully English proficient people.
- Whether LEP persons are being excluded from services or provided a lower level of services.
- Whether the recipient has adequate justification for restrictions, if any, on special language services or on speaking languages other than English.

The Capital Area MPO intends to take reasonable steps to make available interpreter services, free of charge, and to include, at a minimum, Spanish translators upon request of at least seven business days prior to MPO board and committee meetings, workshops, forums, or events. The MPO is defining an interpreter as a person who translates spoken language as opposed to a translator who translates written language and transfer the meaning of written text from one language into another.

Ongoing MPO service standards include:

- Coordination with the City of Raleigh personnel department to provide an interpreter for phone and/or walk-in customers.
- Coordination with non-English newspapers to translate small documents - up to two pages.
- Coordination with the Gov. Morehead School to convert small documents - up to three pages - to braille provided there is a seven day advance notice.
- Coordination with partner agencies and special needs organizations to meet requested needs.
- The MPO maintains an online presence and strives to make both translation engines for many languages and
- automated readers/text resizing for the visually impaired or those with literacy challenges.
- The MPO will initiate:
  - Creation of a list of inside and outside sources that can provide competent oral and written translation services
  - Analysis of the cost of these services, if any
  - Identification of potential budget and personnel limitations pertaining to these services
  - When an interpreter is needed, either in person or on the telephone, we first determine which language is required. If a translator for the required language is not available or a formal interpretation is required staff shall consider using a private translation service company.

## LIMITED ENGLISH PROFICIENCY: MPO STAFF TRAINING

MPO staff will be provided with the LEP plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. The appeal will establish meaningful access to information and services for LEP individuals and employees in public contact positions, and those who will serve as translators for interpreters will be properly trained. Such training will be developed to ensure that staff is fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals. MPO board members will receive a copy of the LEP plan and have access to training, assuring they are fully aware of and understand the plan and its implementation.

## LIMITED ENGLISH PROFICIENCY: MONITORING AND UPDATING

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the empty MPO will evaluate, and update if appropriate, the LEP plan on a semiannual basis. Each update should examine all plan components, such as:

- How many LEP persons were encountered
- were their needs met
- what is the current LEP population of the MPO area by County
- has there been a change to the type of languages were translation services are needed
- have the MPO's available resources, such as technology, staff, and financial costs, changed
- has the MPO fulfilled the goals of the LEP plan
- were any complaints received

## LIMITED ENGLISH PROFICIENCY: DISSEMINATION OF THE LEP PLAN

The MPO will post the LEP plan on its website at [www.campo-nc.us](http://www.campo-nc.us). Any person, including social service, nonprofit, and other community partners with Internet access, will be able to access the plan. For those without personal Internet service, County libraries offer free Internet access. Copies of the LEP plan P provided to each member jurisdiction's personnel department, NCDOT, FHWA, FTA, and any person or agency requesting a copy. Each MPO sub recipient will be provided a copy and will be educated on the importance of providing language assistance.

Any questions or comments regarding this plan should be directed to the MPO staff:

Title VI Compliance-LEP  
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