

TITLE VI COORDNIATOR
Earl Haugen, Executive Director
255 N. 4th Street, Grand Forks, ND 58201
701-746-2660

INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the **Grand Forks-East Grand Forks Metropolitan Planning Organization (MPO)** responsibilities as a recipient of federal financial assistance as they related to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled ***Improving Access to Services for Persons with Limited English Proficiency***, indicated that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each 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 Grand Forks-East Grand Forks MPO which receives federal grant funds.

PLAN SUMMARY

The MPO has developed this ***Limited English Proficiency Plan*** to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance maybe provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the Grand Forks-East Grand Forks MPO used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service who may be served by the MPO.
2. The frequency with which LEP persons come in contact with the services.
3. The nature and importance of services provided by the MPO to the LEP population.
4. The interpretation services available to the MPO and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Grand Forks-East Grand Forks MPO services.

The MPO staff examined the U.S. Census Bureau American Community 5-Year Survey Estimates from 2006-2010 and was able to determine that approximately 6.1% or 5,653 people spoke a language other than English. The Grand Forks, ND-MN Metropolitan

Statistical Area speak a language other than English. Of the 5,653 people reporting they speak other languages other than English, 1,848 or 2.0% of respondents speak English "less than very well". In the Grand Forks Metropolitan Statistical Area, of those persons with limited English proficiency the two most significant languages spoken at home other than English and speak English less than "very well" include Japanese with 460 persons (0.46%) and Spanish with 236 (0.24%).

2. The frequency which LEP persons come in contact with Grand Forks-East Grand Forks MPO services.

The MPO staff reviewed the frequency with which the Executive Board, Technical Advisory Committee (TAC), and office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the MPO has received no request for interpreters and no request for translated program documents. The MPO Executive Board, Technical Advisory Committee, and office staff are mostly likely to encounter LEP individuals through office visits, phone conversations, and attendance at Executive Board/TAC meetings.

3. The nature and importance of services provided by the Grand Forks-East Grand Forks MPO to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the MPO. The overwhelming majority of the population, 93.8%, speaks only English. As a result, there are a few social, services, or professional and leadership organizations within the MPO service area that focus on outreach to LEP individuals. The MPO staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from maintenance staff of impacts on city/service area services and attendance at meetings.

4. The resources available to the Grand Forks-East Grand Forks MPO and overall cost to provide LEP assistance.

The MPO reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the MPO would pay a fee.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the MPO services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language to another language.

How the MPO staff may identify an LEP person who needs language assistance

- Post notice of LEP Plan and the available of interpretation or translation services free of charge in languages LEP persons would understand.
- All MPO staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All MPO staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year. Any contacts will be formally documented on a form and evaluated for frequency.
- When the MPO sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistant Measures

Although there are a very low percentage of LEP individuals in the service area, that is, persons who speak English “not well” or “not at all”, it will strive to offer the following measures:

1. The MPO staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Language interpretation/translations services will be pursued to accommodate the LEP request within a reasonable time period.
 - Language interpretation will be accessed for all other languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use the “I speak” cards.
- Documentation of language assistance request.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the Grand Forks-East Grand Forks MPO will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

The MPO weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small LEP population, the Grand Forks-East Grand Forks MPO does not have a formal outreach procedure in place, as of 2012. Translation services have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the MPO will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan- The Grand Forks-East Grand Forks MPO will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when the latest Decennial U.S. Census is available, or when it is clear that higher concentration of LEP individuals are present in the Grand Forks-East Grand Forks MPO service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the MPO financial resources are sufficient to fund language assistance resources needed.
- Determine whether the MPO fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

DISSEMINATION OF THE GRAND FORKS-EAST GRAND FORKS MPO LEP PLAN

- Post signs in the MPO service area notifying LEP person of the LEP Plan and how to access language services.
- Post on the MPO website the LEP Plan and how to access language services.
- State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request within 5 business days at [701-746-2660](tel:701-746-2660).
- However based on the limited LEP population and request for translation services, all initial documents will be publish in English with the availability to translate upon request.