

Appendix E: Limited English Proficiency Plan

What's in our LEP Plan?



**Content related to planning for LEP populations from
the [Title VI Nondiscrimination Plan \(2018 Update\)](#)**

Limited English Proficient Households

Limited English Proficient (LEP) refers to any person age five and older who reported speaking English less than "very well" as classified by the US Census Bureau. The Hillsborough MPO considers an LEP household to be one in which at least one individual does not speak English as their primary language AND has limited ability to read, speak, write, or understand English.

National Snapshot

In 2013, approximately 61.6 million individuals in the US, both foreign- and US-born, spoke a language other than English at home. While the majority of these individuals also spoke English with native fluency or very well, about 41 percent (25.1 million) were considered LEP. Though most LEP individuals are foreign-born, nearly 19 percent (4.7 million) were born in the US, most to foreign-born parents. Overall, the LEP population represented 8 percent of the total US population age five and older.

Hillsborough County Snapshot

The LEP population in Hillsborough County consists of many different cultural communities speaking many different languages. Several are well-known, but others may require specialized engagement. The ten largest language groups are shown in **Table 1** below. Together, these groups represent nearly 10 percent of the county's population and show the diversity of languages spoken in Hillsborough County.

Table 1: Limited English Proficiency Population by Language in Hillsborough County

Language	Number of Speakers	Number of Speakers Who Do Not Speak English "Very Well"
Spanish	273,082	107,434
Vietnamese	7,833	4,983
French Creole	9,527	2,363
Arabic	7,741	2,377
French	6,945	1,457
Chinese	3,005	1,474
Korean	2,574	1,215
Other Asian Languages	5,812	1,279
Portuguese	3,248	989
German	3,863	697
Total:	310,707	121,303

Source: American Community Survey 2010-2014.

Steps for Limited English Proficiency Persons

As part of its dedication to reduce and/or remove barriers to participation, the MPO provides translation and interpretation services for those who are less than proficient in English, and produces materials using plain language that is reasonably understandable by proficient speakers. The MPO also makes accommodations to ensure citizens with disabilities can access information and meaningfully participate in decision-making.

Translation

Executive Order 13166 requires sub-recipients of federal funding to develop plans for people for whom English is not their native language or who have limited ability to read, speak, write, or understand English. As a sub-recipient of federal funding, the Hillsborough MPO takes reasonable steps to ensure meaningful access to the information and services it provides. Based on guidance from the USDOT, the MPO utilizes a four-factor analysis to determine which language assistance services are appropriate to address the needs of the LEP population. The factors to be considered include:

- Number and proportion of LEP persons in the eligible service area;
- Frequency with which LEP persons come in contact with the program;
- Importance of the service provided by the program; and,
- Resources available and overall MPO cost.

The MPO analyzes the four factors in conjunction with the area demographics, Public Participation Plan, Measures of Effectiveness report, community partner feedback, and funding to determine when and to what extent LEP services are required.

For written documents, the analysis should focus on identifying persons with limited English proficiency using Safe Harbor thresholds to determine whether it is necessary to proactively translate documents into other languages, or simply to provide this service on an as needed basis. Under the Safe Harbor provision, if a recipient or sub-recipient of federal funds creates a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translations obligations under Title VI. The Safe Harbor thresholds are as follows:

- A recipient or sub-recipient of federal funds provides written translations of vital documents for each eligible LEP that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered, as determined by the Four Factor Analysis noted above. Translation of other documents, if needed, can be provided orally; or,

- If there are fewer than 50 persons in a language group that reach the 5% trigger (above), the recipient or sub-recipient does not have to translate vital written materials but provides 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.

The US DOT guidance indicates that once an agency has decided to provide language services, it is important that the recipient notify LEP persons of services available free of charge in a language that LEP persons would understand. Example methods for notification include:

- Signage when free language assistance is available with advance notice;
- Stating in outreach documents that language services are available;
- Working with community-based organizations and other stakeholders to inform LEP individuals of the MPO's services and the availability of language assistance;
- Using automated telephone voicemail attendant or menu to provide information about available language assistance services;
- Including notices in local newspapers in languages other than English;
- Providing notices on non-English-language radio and television about MPO services and the availability of language assistance; and,
- Providing presentations and/or notices at schools and faith-based organizations.



Figure 12: Spanish Translation of an MPO Newsletter

Notices for public hearings are currently placed in two newspapers that serve minority audiences. *La Gaceta* is a weekly publication with circulation over 21,000 with predominantly Spanish-speaking readership; it is the nation's only tri-language newspaper (English, Spanish, and Italian). *The Florida*

Sentinel newspaper has a large, local, mostly African-American readership and is published semi-weekly with a circulation of over 30,000 readers.

The MPO will continue to identify community organizing agencies and advocacy groups that represent LEP populations and invite them to participate in the transportation process.

On the MPO's website there is a catalogue of plans and documents available in Spanish, as shown in the website screenshot below.

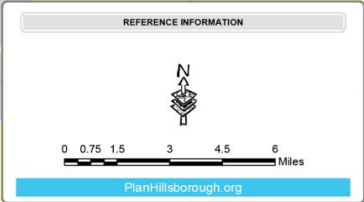
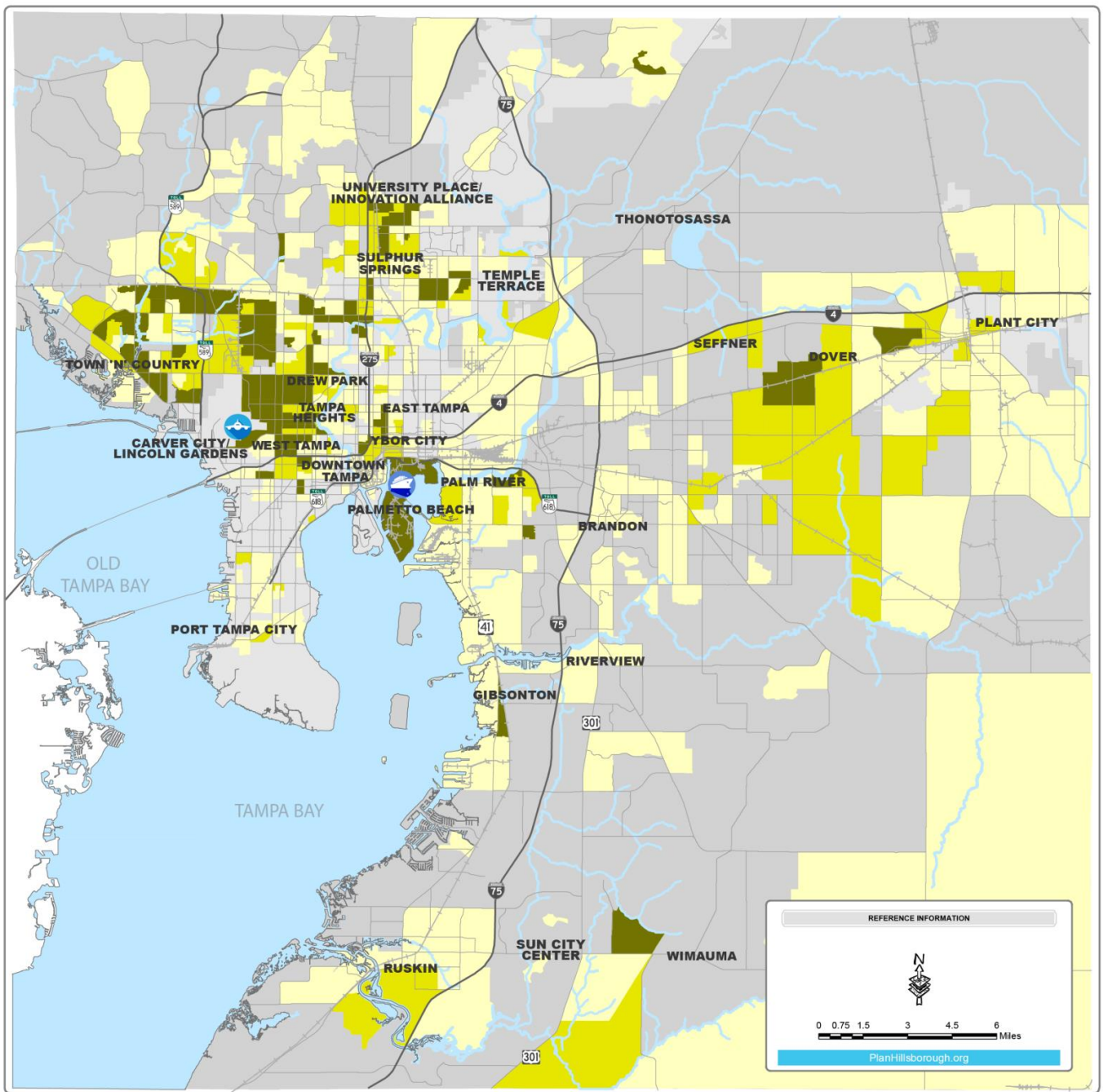
MPO documentos, en Español



Bienvenidos a la Organización de Planificación del Condado de Hillsborough Metropolitana. La Organización de Planificación del Condado de Hillsborough Metropolitana (MPO) es una consejo – la toma de decisiones de política de transporte, requerido por la ley federal y estatal. La MPO es directamente responsable de asegurar que los fondos federales y estatales de transporte gastado en los proyectos existentes y futuros y los programas se basan en un proceso de planificación de transporte continuo, cooperativa e integral. Comprometida con la participación pública significativa a lo largo de este proceso, la MPO es responsable de establecer las prioridades para el corto plazo (5 años) y largo plazo (20 años) necesidades de transporte multimodal para Tampa, Temple Terrace, Plant City, y no incorporado de Hillsborough Condado.

The MPO also hosts a page on its website dedicated to providing easy access to its plans and documents translated to Spanish (see above), from the LRTP to a Citizen's Guide and MPO newsletters (page 25). Planning assistance is offered in Spanish, and a staff member's contact information is readily available, as well as a Spanish language telephone number and extension. The website also has a prominent Google Translate function with more than 100 languages available. New mobile technologies also provide opportunities to translate speech in real-time in order to interact more easily with persons with limited English proficiency.

The MPO has initiated an extensive program to make interpreter services available free of charge, upon request at least three business days prior to a wide variety of meetings and events. This service includes MPO Board and committee meetings, workshops, forums, and all noticed events.



HILLSBOROUGH COUNTY, FLORIDA

HIGH CONCENTRATIONS OF LIMITED ENGLISH PROFICIENCY HOUSEHOLDS BY BLOCK GROUP

Hillsborough MPO
Metropolitan Planning
for Transportation

LEGEND

LIMITED ENGLISH PROFICIENCY HOUSEHOLDS

- Greater than Median
- 1 Standard Deviation Above the Median
- 2 Standard Deviations Above the Median

Concentrations measure as a percentage of the overall household population

- Road
- Railroad
- Hillsborough County Boundary
- City Boundaries
- Urban Service Area
- City Utility Service Area
- Port
- Airport

Figure 1: Areas with High Concentrations of Limited English Proficiency Households

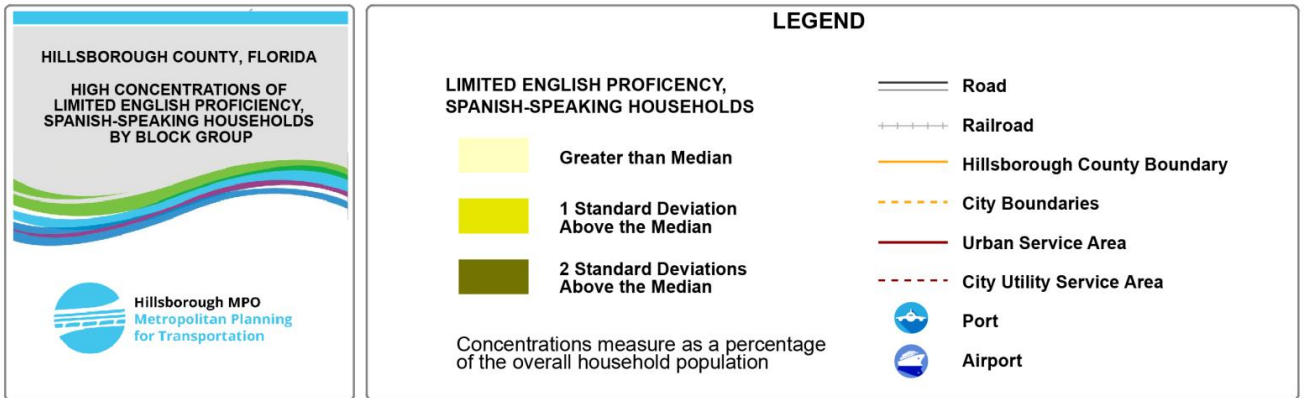
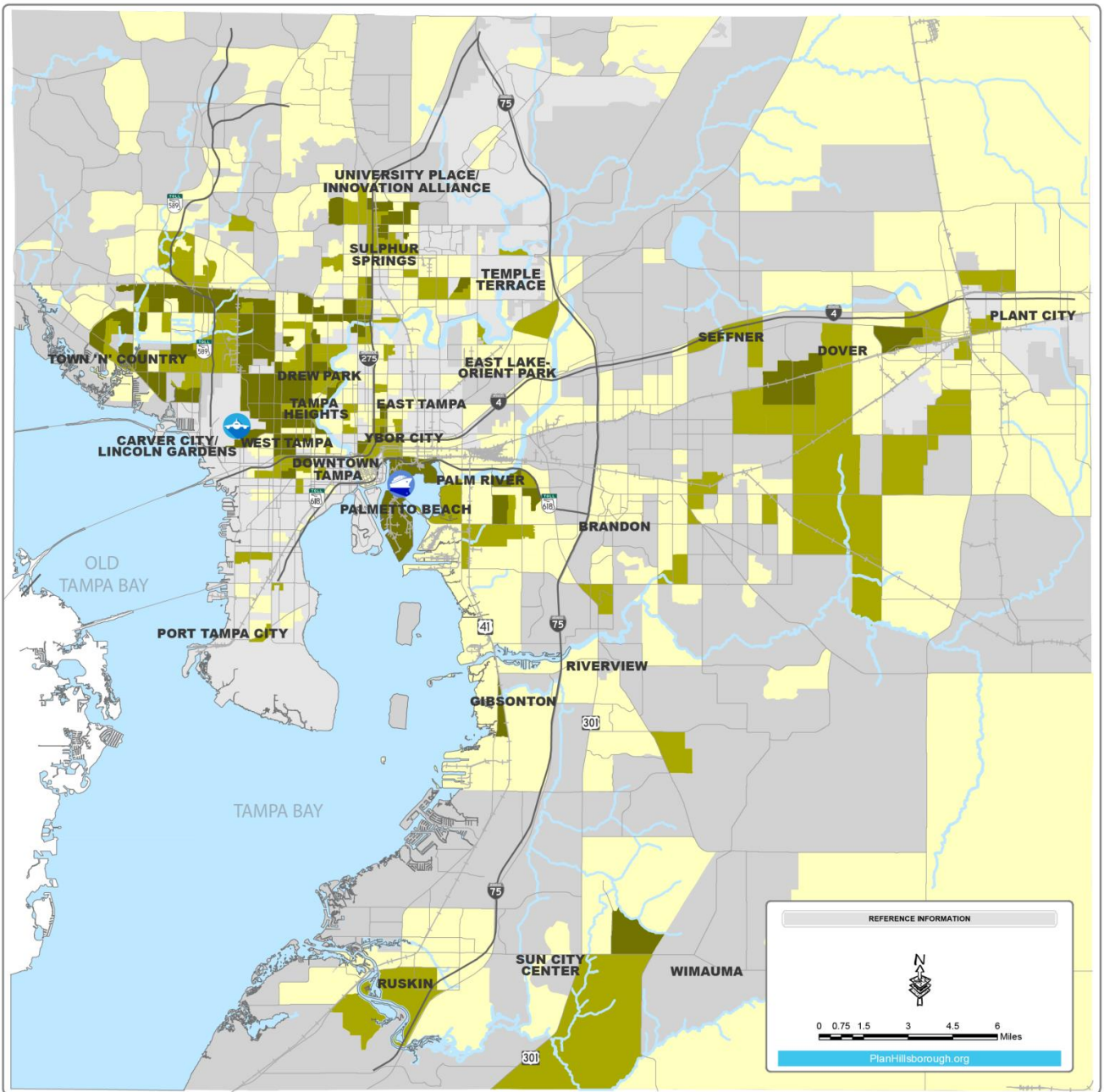
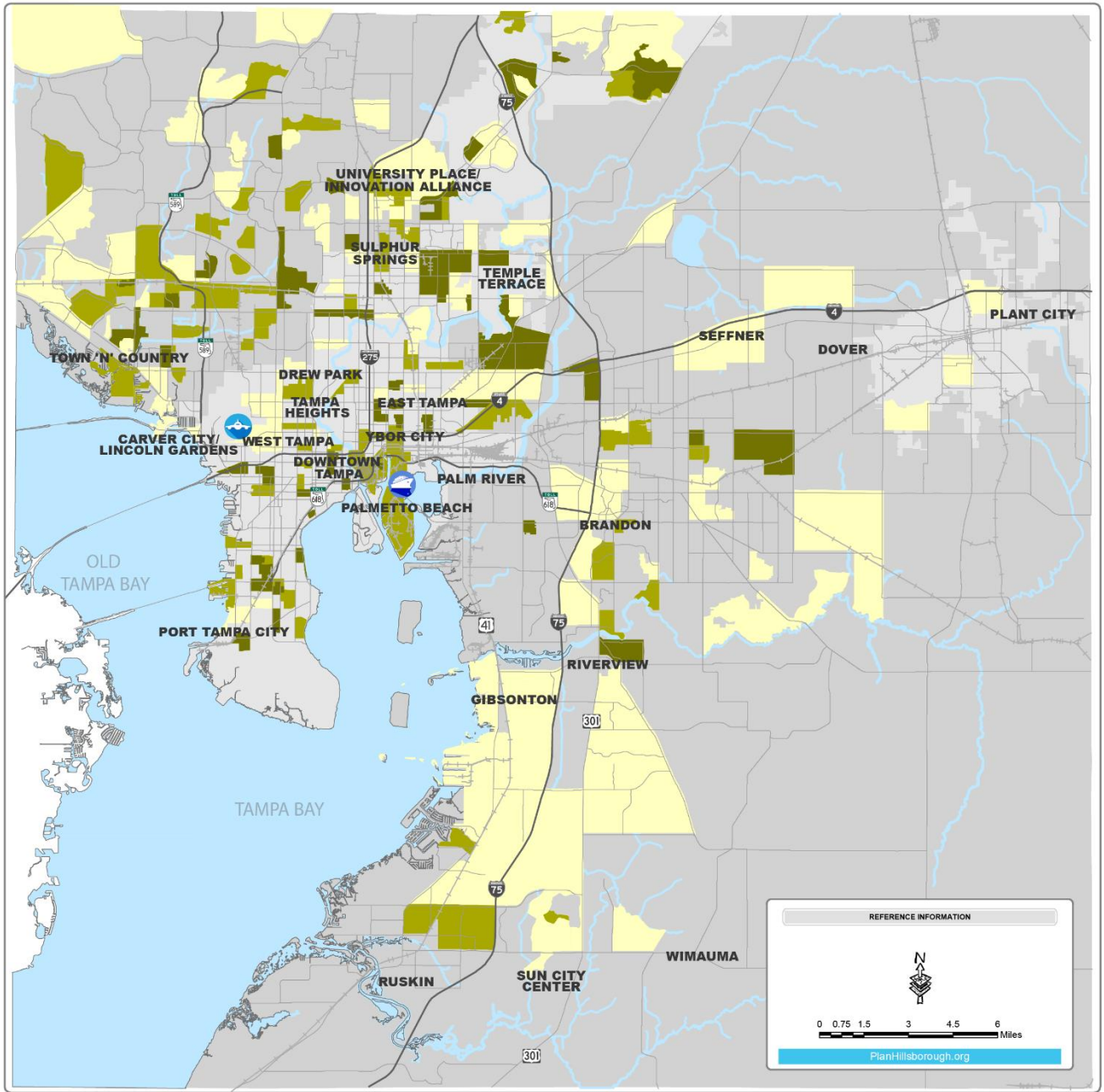


Figure 2: Areas with High Concentrations of Limited English Proficiency Spanish-Speaking Households



HILLSBOROUGH COUNTY, FLORIDA

HIGH CONCENTRATIONS OF LIMITED ENGLISH PROFICIENCY, OTHER THAN SPANISH, BY BLOCK GROUP

Hillsborough MPO
Metropolitan Planning
for Transportation

LEGEND

LIMITED ENGLISH PROFICIENCY, OTHER THAN SPANISH

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Concentrations measure as a percentage of the overall household population

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Figure 3: Areas with High Concentrations of Limited English Proficiency, Other than Spanish

**Content related to planning for LEP populations from
the [Public Participation Plan \(2018 Update\)](#)**

EXECUTIVE ORDER 13166, NATIONAL ORIGIN DISCRIMINATION AGAINST PERSONS WITH LIMITED ENGLISH PROFICIENCY

Executive Order 13166 directed that persons in the United States will not be excluded from participation in USDOT-assisted programs and activities simply because they face challenges communicating in English. To prevent exclusion of the residents in Hillsborough County who do not speak or read English proficiently, a Limited English Proficiency (LEP) Plan was adopted by the MPO to ensure access to the planning process and published information. For further information regarding the LEP, please refer to [Appendix E](#).



Limited English Proficiency (LEP)

For the MPO's purposes, a LEP person is any person five and older who reported speaking English less than "very well" as classified by the US Census Bureau. Individuals who do not speak English as their primary language AND who have a limited ability to read, speak, write or understand English must be included in the MPO transportation planning process. Therefore, executive summaries for key documents will be made available in Spanish and may be presented in alternative formats, such as brochures or newsletters. The [PlanHillsborough.org](http://www.planhillsborough.org) is a key document and includes a feature that enables users to translate it into more than 100 languages. Public engagement pieces like *A Citizens Guide to Transportation Planning* as well as the 2040 Long Range Transportation Plan and the FY 17-18 Transportation Improvement Program have been translated into Spanish and are available for download on the PlanHillsborough.org website at <http://www.planhillsborough.org/mpo-documentos-en-espanol/>.

In considering how to engage LEP persons, a four-factor analysis is used to determine which language assistance services are appropriate to address the identified needs of the LEP population. The four factors are as follows:

Factor 1: Demography: Assessment of the number and proportion of the LEP persons likely to be served or encountered in the eligible service population;

Factor 2: Frequency: Determining how often the populations are contacted or engaged by the agency;

Factor 3: Importance: Determining if the issues under consideration are important to these communities; and

Factor 4: Resources: Keeping an inventory of the resources available to engage these populations, including language assistance services.

These four factors must be used in conjunction with the MPO’s area demographics, Public Participation Plan, measures of effectiveness, community partners, and funding levels to determine when and to what extent LEP services are required. The plans must analyze and discuss the four aforementioned factors to determine the steps, activities and resources the MPO uses to ensure access is meaningful for LEP populations. Furthermore, plans should use plain language and be accessible in length and content for the general population. These plans must be available for public access and comment.

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<i>Source: American Community Survey 2010-2014.</i>		

MPOs in the state of Florida are allowed, but are not required, to comply with Safe Harbor Provisions. These provisions provide affirmative defenses to findings of noncompliance by demonstrating that all vital documents are translated for any LEP language group constituting 5% of the affected population, or 1,000 persons, whichever is less. Based on the agency’s assessment of the 2nd Factor of Analysis, we proactively translate key documents into Spanish. Although other language groups within the county do meet the threshold of the Safe Harbors Provision, individuals from those language groups are infrequently contacted or engaged by the agency. Therefore, the MPO may utilize other resources, such as interpreter services and bilingual family members, to communicate short messages to those LEP populations. **Table 1** shows the top ten LEP language groups in Hillsborough County by number of speakers.

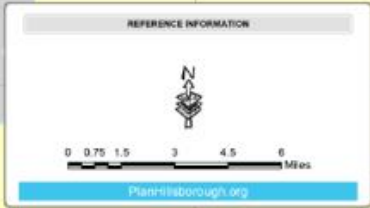
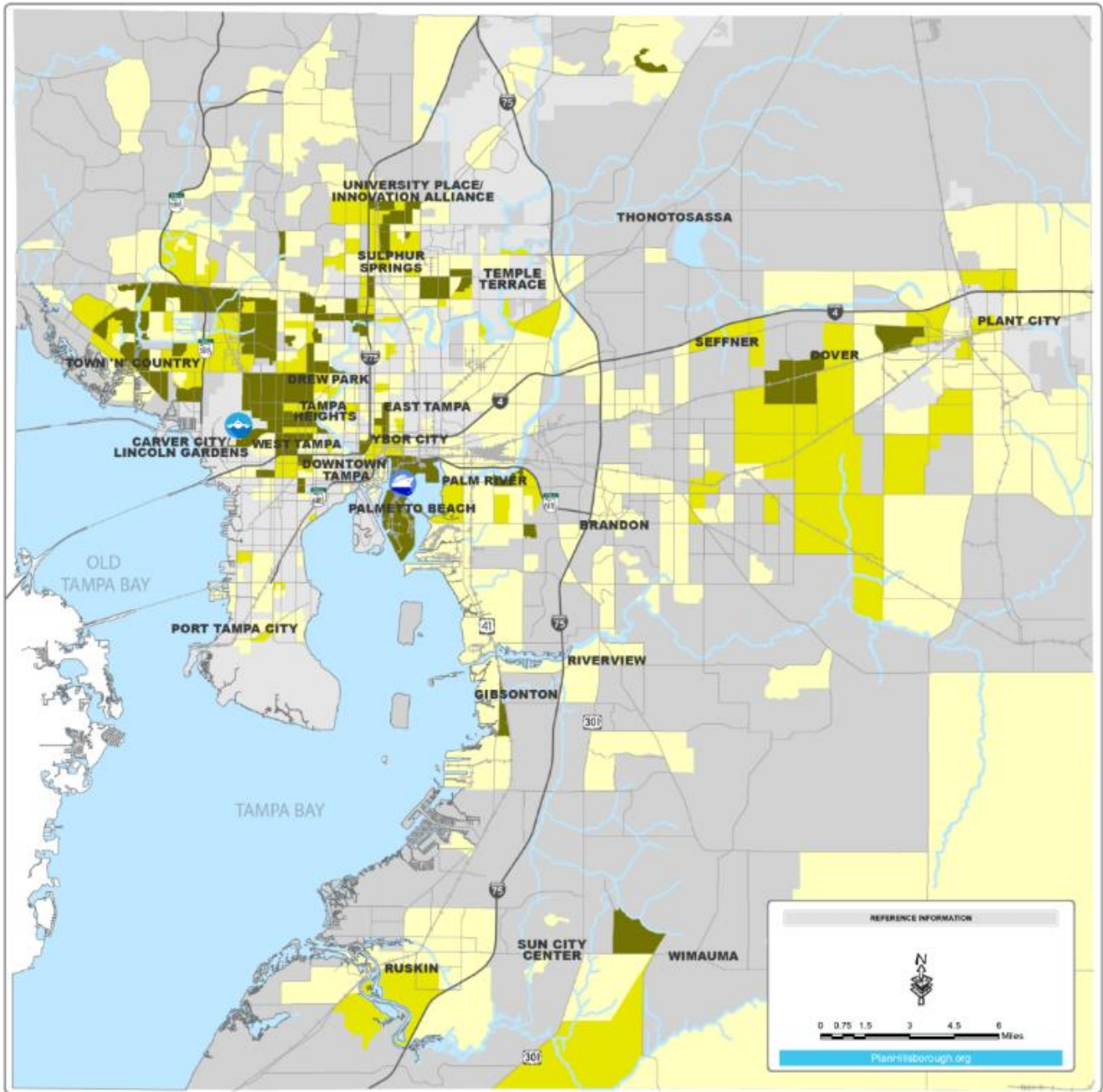
Interpreter services are made available free of charge courtesy of Hillsborough County Communications & Digital Media Services. Interpretation services are available in 30 different languages upon request, which must be made at least 10 business days prior to MPO Board and committee meetings, workshops, forums or events. The Hillsborough

County MPO will make every effort to provide these services. Other special accommodations, including transportation to MPO meetings and events, are offered for those who qualify as transportation disadvantaged. Arrangements can be made by calling Johnny Wong at (813) 273-3774, ext. 370 or by emailing wongj@plancom.org at least three business days in advance.

[Appendix E](#) in the Public Participation Plan contains a portion of the *Title VI Nondiscrimination Plan* pertaining to Limited English Proficiency populations. In order to minimize costs, Hillsborough MPO staff and services provided by Hillsborough County, the local jurisdictions or other agencies will be used whenever possible. Some resources outside the Hillsborough MPO staff include but are not limited to:

<p style="text-align: center;">Hillsborough County Citizens Action Center (Multi-lingual "Language Line" assistance for telephone customers) Phone: (813) 272-5900</p> <p style="text-align: center;">Hillsborough County Communications Department – Language Services (Translation and interpreter services) Contact: Luis Lopez Phone: (813) 307-8377</p> <p style="text-align: center;">Viceversa Language and Music Services (contact for quotes on services) Contact: Maria Lopez Cell: (813) 417-2961</p> <p style="text-align: center;">Communication Access Real-time Translation (CART) Contact: Michele Ogilvie Phone: (813) 273-3774, ext. 317</p>
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The figure on the following page shows the location of high concentrations of LEP households in Hillsborough County. The Hillsborough MPO uses this data to notify LEP persons for whom it proactively provides language services of the availability of these services. Example notifications include signage, presentations at schools and/or faith-based organizations, and working with community-based organizations and other stakeholders to inform LEP individuals of the MPO's services and the availability of language assistance. This data is also used to identify community organizing agencies and advocacy groups that represent LEP populations as a means to invite them to participate in the transportation planning process.



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