

Overcoming Barriers

Strengthening Connections

M.P.O. M.P.O. M.P.O.	Grand Forks - East Grand Forks Metropolitan Planning Organization
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Ensuring Opportunities

Planning One Community

Limited English Proficiency Plan



The preparation of this Report was financed, in part, through the U.S. Department of Transportation's Federal Highway Administration, and through local contributions from the Governments of Grand Forks, North Dakota, and East Grand Forks, Minnesota.

2019

INTRODUCTION

This *Limited English Proficiency (LEP) 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 *LEP 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 Survey 5-Year Estimates from 2013-2017 using the Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over table. Staff was able to determine that approximately 6.2% or 4,044 people spoke a language other than English in the Grand Forks-East Grand Forks MPO Area. Of the 4,044 people reporting they speak languages other than English, 1,465 or 2.2% of respondents speak English “less than very well”.

MPO Area ACS* Data 2013-2017			
	MPO Area	Grand Forks	East Grand Forks
Total Population Age 5+ Years	65,679	56,533	9,146
Population Speaking English Less Than Very Well	1,465	1,209	256
Percent	2.2%	2.1%	2.8%
2 Times Percent	4.5%	4.3%	5.6%

*American Community Survey Census Block Group

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.

The Forks MPO adheres to the concept of “meaningfully greater” areas in its determination of the thresholds of populations of interest. A population is of a “meaningfully greater” interest, if it is two times the total percent population within the metropolitan boundary or if the geographic unit exceeds 50% of the

minority population. These areas with “meaningfully greater” interest are identified as areas of high concentration. Meaningfully greater is a detailed screening “threshold level” analysis technique used to support transportation long range, improvement, and state strategic improvement plans. The “threshold level” analysis does require a robust knowledge of Geographic Information System; coupled with a sound understanding of Census data. It does not require an intense data collection.

Data from the American Community Survey (ACS) at the Block group level (2013-2017) was used for the creation of the high concentration LEP map. All data from the ACS is estimated; thus, there are margins of error that were not taken into consideration. The U.S Census Block Group is an appropriate geographic unit level of analysis to address MPO’s requirements.

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. With the areas identified as having “meaningfully greater” proportion of LEP population, MPO staff will examine in greater detail the necessity of distributing notices and other information in another language. The ACS Urban Area Data does breakdown the languages spoken in the Grand Forks- East Grand Forks Urban Area.

Language Spoken At Home By Ability to Speak English for Age 5 Years & Older ACS* Data 2013-2017						
	MPO Area		Grand Forks		East Grand Forks	
	Number	Percent	Number	Percent	Number	Percent
Speaks English	61,635	93.8%	52,998	93.7%	8,637	94.4%
Speaks Spanish	856	1.3%	682	1.2%	174	1.9%
Speaks Other Indo-European	1,319	2.0%	1,220	2.2%	99	1.1%
Speaks Asian & Pacific Island	977	1.5%	916	1.6%	61	0.7%
Speaks Other	892	1.4%	717	1.3%	175	1.9%
Total Non-English Speakers	4,044	6.2%	3,535	6.3%	509	5.6%
Total Population	65,679		56,533		9,146	
*American Community Survey Census Block Groups						

Insert map

Language Spoken at Home for Population 5 Years and Over		
	Total	Percentages
All Populations	60,311	
English Speakers	56,407	93.5%
Non-English Speakers	3,904	6.5%
Speaks Very Well	2,473	4.1%
Speaks Less Than Well	1,431	2.4%
Spanish Speakers	810	1.3%
French, Haitian, or Cajun Speakers	246	0.4%
German or Other West Germanic Speakers	267	0.4%
Russian, Polish, or Other Slavic Speakers	163	0.3%
Other Indo-European Speakers	608	1.0%
Korean Speakers	45	0.1%
Chinese (incl. Mandarin, Cantonese) Speakers	479	0.8%
Vietnamese Speakers	50	0.1%
Tagalog (incl. Filipino)	103	0.2%
Other Asian and Pacific Island Speakers	241	0.4%
Arabic Speakers	155	0.3%
Other & Unspecified Speakers	737	1.2%
Note: American Communittee Survey Census Urban Area		

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** (the most common language spoken after English) 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:
 - The MPO website will have translation capability to convert from English to other languages.
 - 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 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 LEP complaint.

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

TRANSLATION OF DOCUMENTS

As stated earlier, the MPO website has the capability to translate from English to other languages. When it comes to printed items, 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. 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 area of LEP concentration is included or adjacent to the topic, 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 every four years using the most current American Community Survey data.** 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.
- 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.
- State on agendas and public notices in the language LEP persons would understand that documents are available in that language upon request at the **MPO** office.
- Post on the **MPO** website the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at 701-746-2660