



Mid-Ohio Regional  
Planning Commission

# LIMITED ENGLISH PROFICIENCY PLAN

■ DECEMBER 1, 2015

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### Attachments

- **Summary of Diverse Populations**
  - Diversity & Inclusion Summary
  - 2013 LEPP Summary
- **Document Translation**
  - Translation Costs
  - Language Line Translation Estimate
- **Interpretation Services Process**
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- **LEP Outreach**
  - Air Quality Brochure - Spanish
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  - Full Ad - Somali
  - Web Banner - Somali
  - RideSolutions in Spanish and Somali
  - Weatherization Flyer in Spanish

## Mid-Ohio Regional Planning Commission

The Mid-Ohio Regional Planning Commission (MORPC) is a voluntary association of local governments in Central Ohio. Franklin County and nearby counties as well as their cities, villages and townships are eligible for membership. Elected and appointed officials sit on the Commission, which is the policy-making body of the organization.

As a regional planning commission, MORPC has the flexibility and capability to be responsive to its members' needs. MORPC assists with planning and implementing programs in areas of energy conservation, infrastructure, transportation, land use, economic prosperity, environmental protection and others.

MORPC serves as a forum for state and local governments on regional issues and helps represent local communities' interests and needs at the state and federal levels. MORPC recognizes and encourages public and private collaboration on a regional basis and works to build consensus, sound planning practices and realistic decision making for the future. Because of MORPC's role in the region, MORPC's Transportation Policy Committee was originally designated the Metropolitan Planning Organization (MPO) for the Columbus urbanized area in 1964 and re-designated in 1973.

As the MPO, MORPC's Transportation Policy Committee conducts the federally required 3C (continuous, cooperative and comprehensive) transportation planning process. This process results in plans and programs that consider all transportation modes and supports the goals of the metropolitan transportation plan. It is the basis for the development of the 20-year Metropolitan Transportation Plan and the 4-year Transportation Improvement Program (TIP). The plans and programs lead to the development and operation of the region's integrated, multimodal transportation system that facilitates the efficient and economic movement of people and goods.

MORPC's Data and Mapping services provides quick answers to specific questions or performs analysis that helps inform decision makers about transportation, housing, economics, environment, energy, or sustainability policies. MORPC serves as a clearinghouse for Census data; population, housing and job forecasts; traffic counts; historic aerial photography; and downloadable GIS data.

MORPC provides support and expertise for local governments to align community needs proactively with regional energy use and development, including regional air quality forecasting and alerts; Residential Energy Efficiency Programs; policy and programs related to cleaner air, financing, energy reliability and infrastructure; and manufacturing, building, and housing energy assessments.

MORPC provides services and planning to serve and enhance Central Ohio's natural environment; and to improve quality of life, public health, and economic prosperity and growth through bicycle and pedestrian planning, complete streets policies and tools, local foods, transportation safety and greenways and water quality.

MORPC provides a number of housing services to help stabilize and redevelop neighborhoods in communities around Central Ohio. Services vary by community and include home repairs.

## Limited English Proficiency

Compliance with Title VI includes Limited English Proficient (LEP) persons. The Limited English Proficiency (LEP) portion of this plan addresses Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities with limited-English proficiency to participate in a federally funded program violates Title VI (Federal-Aid Recipient Programs & Activities) regulations. Additionally, requirements are outlined in Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, signed on August 11, 2000. Its purpose is to ensure accessibility to programs and services to eligible persons who have limited proficiency in the English language. Furthermore, the U.S. Department of Transportation (DOT) published Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons in the December 14, 2005 Federal Register, Volume 70; Number 239. The guidance explicitly identifies Metropolitan Planning Organizations (MPOs) as organizations that must follow this guidance. The Limited English Proficiency (LEP) Plan must be consistent with the fundamental mission of the organization, though not unduly burdening the organization.

Federal Transit Administration's Circular FTA C 4702.1B, October 1, 2012, provides recipients of FTA's financial assistance with guidance and instructions necessary to carry out U.S. DOT Title VI regulations (49 CFR, part 21) and to integrate into their programs and activities considerations expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).

In March 2014, MORPC approved Resolution T-1-14: **"REQUESTING APPOINTMENT OF THE TRANSPORTATION POLICY COMMITTEE AS THE DESIGNATED RECIPIENT FOR FEDERAL TRANSIT ADMINISTRATION SECTION 5310 FUNDS FOR THE COLUMBUS URBANIZED AREA"**. T-1-14 appointed the Transportation Policy Committee as the Designated Recipient for FTA's §5310 (*Enhanced Mobility of Seniors and Individuals with Disabilities*) funds for the Columbus Urbanized Area with all of the responsibilities incumbent upon that appointment.

### Plan Summary

MORPC has developed this *Limited English Proficiency Plan* to identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access MORPC services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and who 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 may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, MORPC undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a MORPC program, activity or service.
2. The frequency with which LEP persons come in contact with MORPC programs, activities or services.
3. The nature and importance of programs, activities or services provided by MORPC to the LEP population.
4. The resources available to MORPC and overall cost to provide LEP assistance.

A summary of the results of MORPC's four-factor analysis is in the following section.

## FOUR FACTOR ANALYSIS

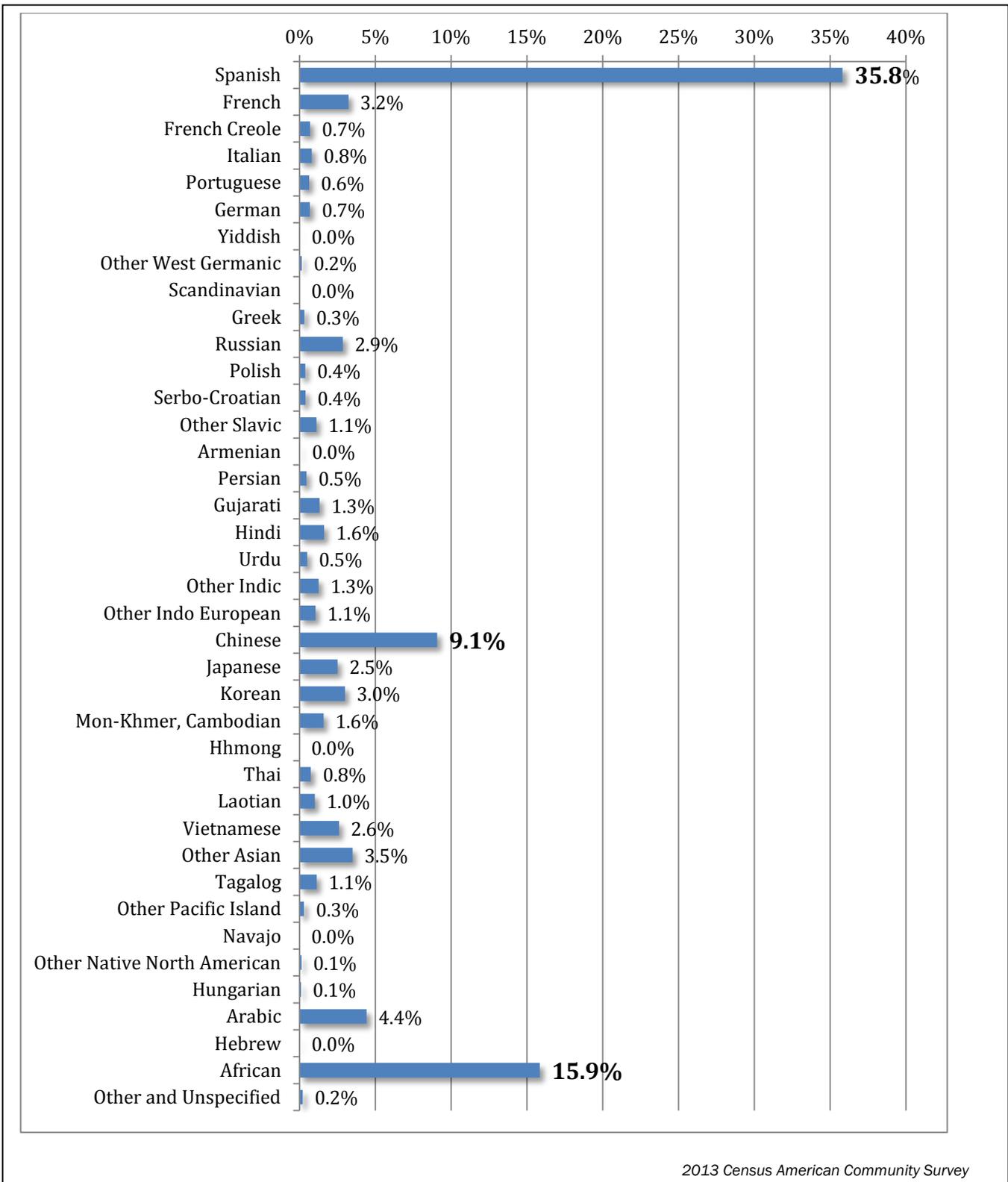
### LEP Persons Encountered by the Services

MORPC collaborates with the general public, local communities, transit agencies, county engineers and the Ohio Department of Transportation to conduct the federally required metropolitan planning process for the region and to identify transportation projects for funding. MORPC does not provide bus service, rail service or other transportation services to the public other than RideSolutions, a rideshare program.

MORPC has additional programs that interact with or could interact with LEP persons:

- Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program provides Federal funding to improve mobility for seniors and people with disabilities. This program distributes grant funds for capital expenses for vehicles and related equipment used to transport seniors and people with disabilities and activities related to mobility management. Funds may also be used for operating projects, travel training to instruct persons with disabilities on using fixed-route bus services, and capital projects to remove barriers at bus stops for persons with disabilities.
- The Residential Energy Efficiency Program improves the comfort of homes and creates energy savings for income-eligible renters and homeowners in Franklin County. These free services are available year-round in Franklin County and include assessment of the home to identify energy improvements.
- MORPC Housing Rehab Program helps low- and moderate-income homeowners maintain and improve their homes through several housing rehabilitation programs. With funding provided by multiple agencies, MORPC has programs available to help with exterior repairs, emergency repairs and whole home rehabilitation. Basic program eligibility requirements are based on total household income, ownership of the home, and area of residency.
- MORPC's RideSolutions program promotes sustainable transportation alternatives with the goal of reducing congestion in the region, saving commuters on their fuel costs and improving the environment.
- MORPC's Air Quality Awareness Program seeks to address our region's air quality issues, and to inform and alert the public, local governments, businesses, organizations and individuals of the actions they can take to protect public health and reduce air pollution.

MORPC identified the LEP populations within its MPO boundary, including Delaware and Franklin counties, Bloom and Violet townships in Fairfield County, New Albany, Pataskala and Etna Township in Licking County and Jerome Township in Union County. The total number of LEP persons according to the 2013 Census American Community Survey is 59,107 or 4.48 percent. The three largest LEP groups in the MPO area are Spanish (21,147) or 35.8 percent, African (9,358) or 15.9 percent, and Chinese (5,369) or 9.1 percent.



## Frequency of Contact with MORPC Services

As the MPO, LEP persons may come into contact with MORPC through participation in the transportation planning process, the RideSolutions program and the Air Quality Awareness Program. MORPC's public involvement processes are outlined in the Public Involvement Plan (PIP), which was last updated in 2015. The PIP outlines MORPC's policies with regard to public involvement, public outreach and public comments. MORPC conducts public open houses and attends community meetings to receive input regarding the region's prioritization list or for special projects, as they may occur. Public outreach is achieved through a three-tier process; Advisory Committees, Public Outreach/Information and Project-Specific Public Involvement.

The RideSolutions program reaches out to the public through MORPC's website, telephone hotline, Facebook and Twitter social media, highway signs, employer programs, community festivals and fairs, summits and conferences, radio, television and newspaper advertising and interviews. Information on the program has been provided in Spanish, Somali and English.

The Air Quality program reaches out to the public through MORPC's website, telephone hotline, Facebook and Twitter social media, employer programs, community festivals and fairs, summits and conferences, radio, television and highway message signs. Information on Air Quality Alerts is provided in Spanish and English. The telephone hotline provides air quality alerts in both English and Spanish.

The Residential Energy Efficiency Program and the Housing Rehab programs reach out to the public through direct mail, MORPC's website, Facebook and Twitter, community festivals and fairs and television. The Residential Energy Efficiency Program has provided information in Spanish and English.

Attached is a summary of diverse populations, compiled through our Diversity & Inclusion Plan, who have requested services from MORPC. While it does not include those necessarily considered LEP, it does provide some indication of the populations utilizing our services. MORPC provides interpreters and translators, as needed, for all programs.

## Nature and importance of the Service

The designation of MORPC in November 2014 as the recipient of FTA's Section 5310 funds requires consideration of the regional LEP population when providing access to people with a disability and seniors. MORPC's 5310 funds are distributed to subrecipients who provide service to people with disabilities and seniors. Air Quality Alerts, Section 5310, RideSolutions and MORPC Residential Energy and Housing Rehab programs provide services that benefit people with disabilities and seniors in all diverse populations.

## Resources for LEP Outreach

There are several funding resources available to MORPC for LEP outreach. MORPC membership dues, through the Diversity and Inclusion Program, are currently budgeted for translation and interpretation services. Program transportation funds (Public Involvement, RideSolutions, Air Quality and Section 5310) are also eligible for translation and interpretation services.

Translation of major transportation documents has been researched and found to be extremely costly, especially in Somali. A focus group was held with members where English is their second language (ESL) to determine if it would be beneficial to translate MORPC's large technical transportation documents. The members of the focus group felt that it would not be beneficial, but a less expensive option, the translation of applications, brochures, newsletters, one-page fact sheets, and executive and popular summaries would be more appropriate. See attached.

MORPC will continue to reach out to the LEP community and provide language translation and interpretation services when practical and in consideration of the funding available. When applicable, the translation of documents will begin after the final English version has been completed. Some documents, such as brochures, can be produced in multiple languages in the same document where size is not an issue.

Based on the four-factor analysis, MORPC has developed its LEP Plan as outlined in the following section.

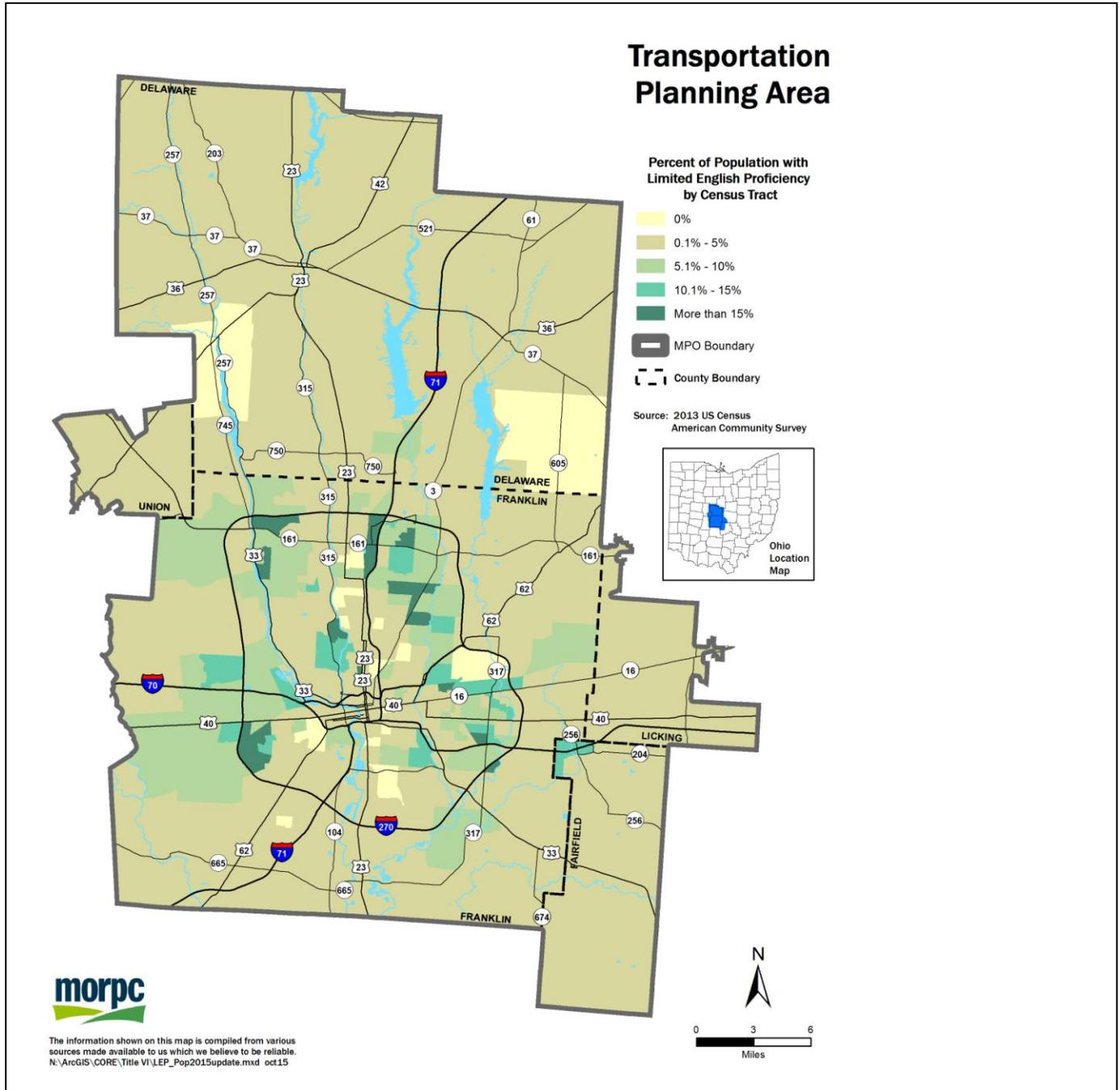
## Historical and Current Efforts

In April 2013 MORPC completed a Limited English Proficiency Summary that identified the three primary LEP populations and their locations in the MPO planning area. When seeking input on our transportation planning process, special projects, and communicating the availability of our services and programs, MORPC has utilized a variety of tools in reaching out to our LEP populations, which include the following:

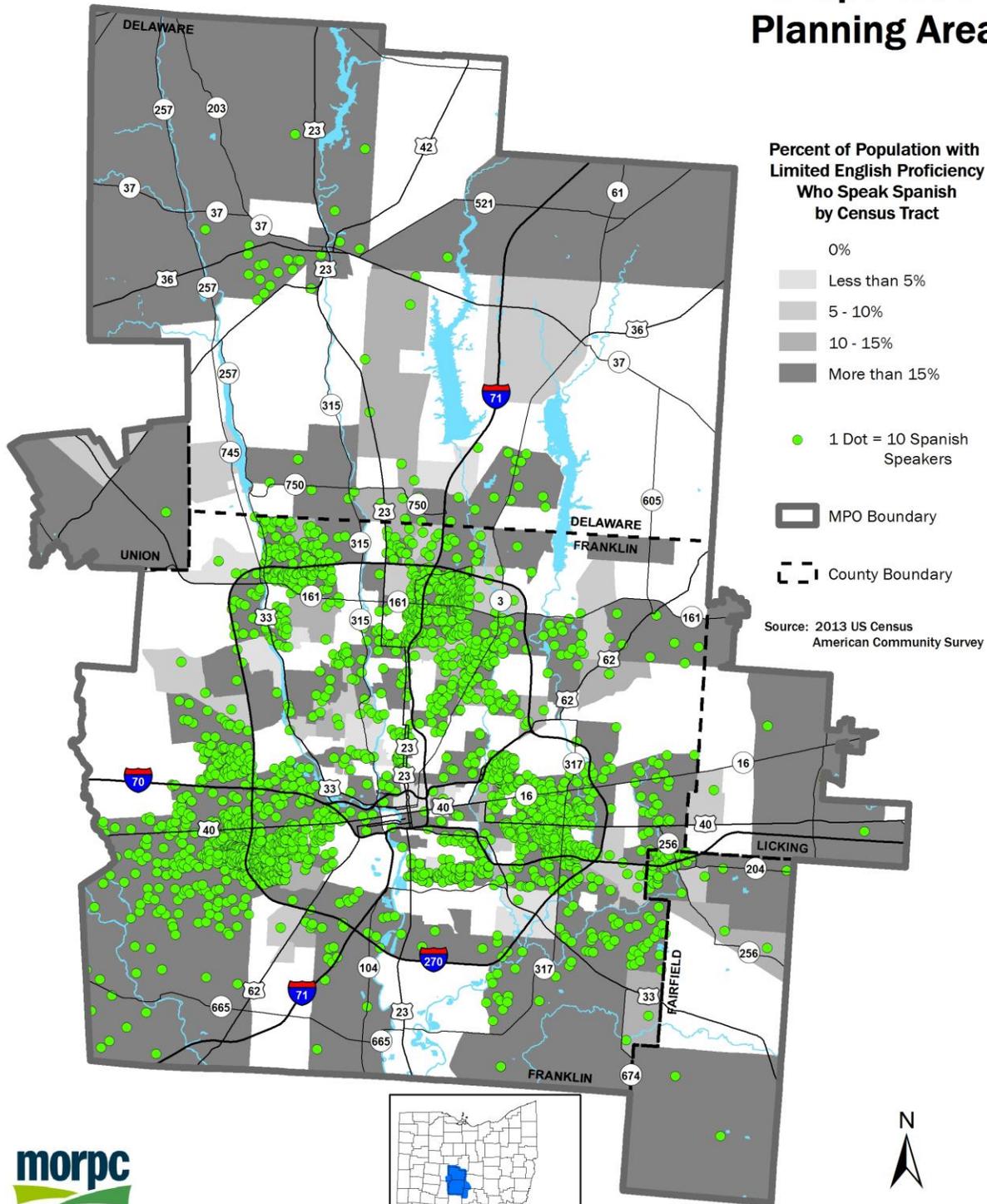
- A language translation tool on its website
- *Language Identification cards* available in the front lobby for walk-ins
- Process created to assist persons with limited English proficiency
- Partner organizations within the Latino and Asian communities that assist MORPC in outreach to LEP individuals specifically and to the Latino community in general (Hispanic Coalition, Empleos & Employment, Columbus New Americans, US Together, Council on World Affairs)
- Title VI notice to the public in English and Spanish located in MORPC's Lobby and Lounge
- Air Quality Hotline in Spanish
- Air Quality brochure produced in Spanish and English
- Weatherization flyers produced in Spanish
- RideSolutions radio ads produced in Spanish
- RideSolutions postcard produced in Somali and English
- RideSolutions television ads produced in Somali
- Table display at the Somali Mall, Latino Job Fairs, Columbus International Festival and Asian Festival
- Advertisements placed in event programs
- Intercept surveys conducted at a Hispanic grocery store/restaurant

## Identification of LEP population

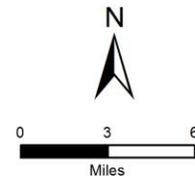
The LEP population was mapped to show LEP individuals as a percent of total population by census tract as shown in the attached map. There are several concentrations of LEP populations located mostly in Franklin County. These areas include: between SR 161 and I-270, south of SR 161 along I-71, around the Columbus International Airport between Broad Street and 5<sup>th</sup> Avenue, The Ohio State University, along SR 33 south of SR 161 and along west I-270 and West Broad Street. Individually, Spanish-speaking LEP populations are located throughout Franklin County, African-speaking primarily on the East side of Franklin County and Chinese-speaking primarily on the Northwest side of Franklin County.



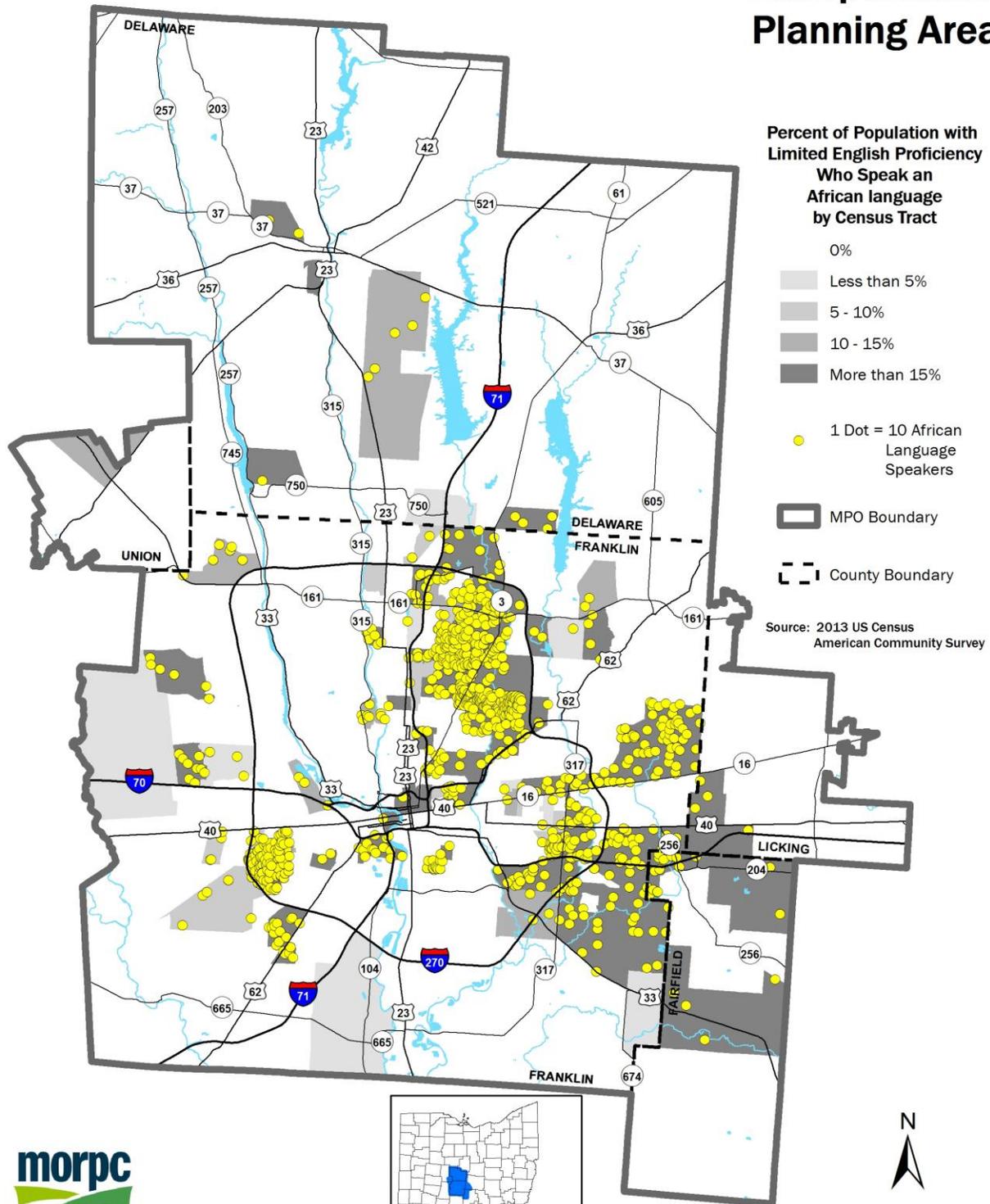
# Transportation Planning Area



The information shown on this map is compiled from various sources made available to us which we believe to be reliable.  
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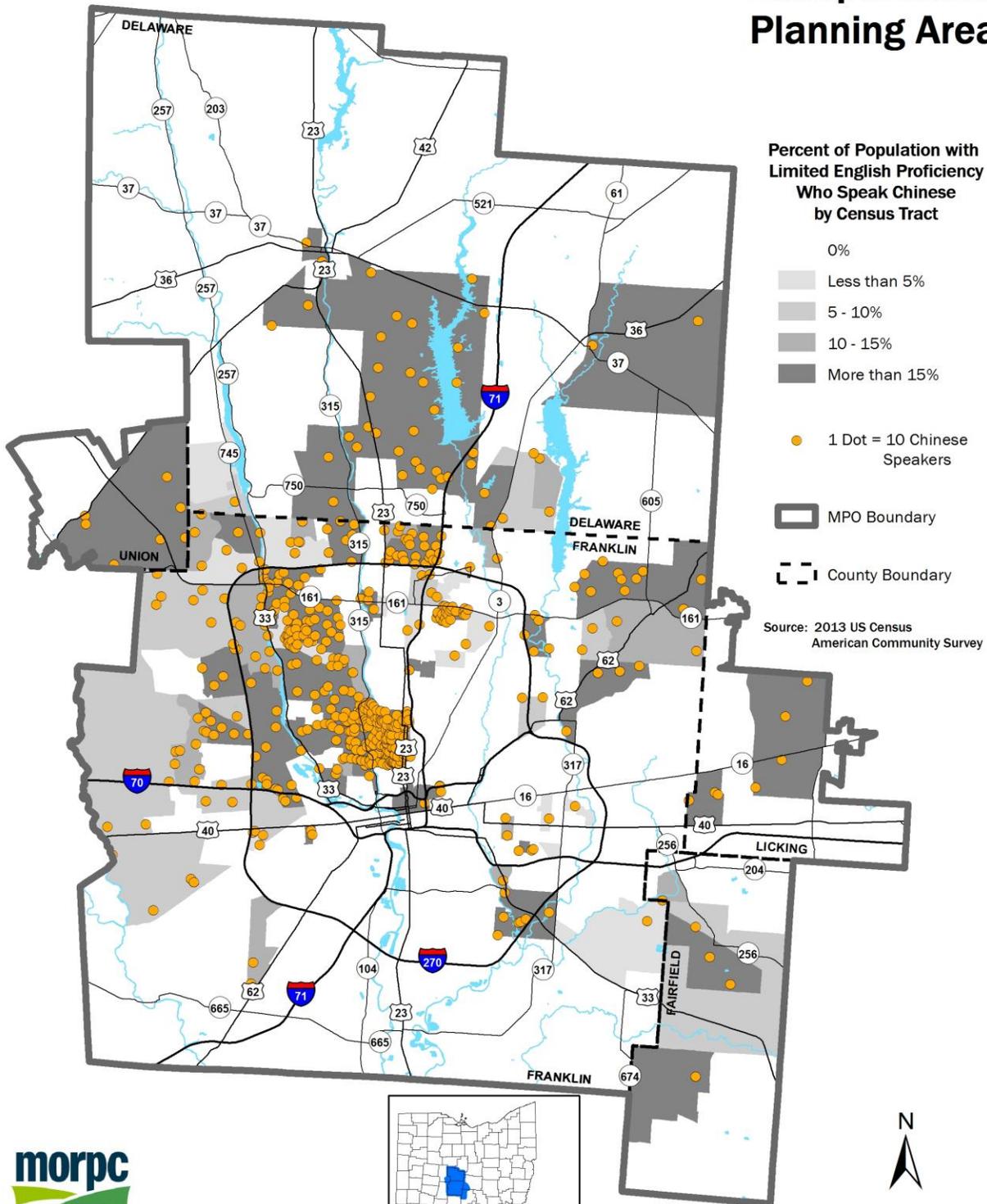
# Transportation Planning Area



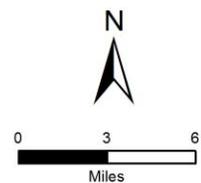
The information shown on this map is compiled from various sources made available to us which we believe to be reliable.  
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# Transportation Planning Area



The information shown on this map is compiled from various sources made available to us which we believe to be reliable.  
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## Language Assistance Measures

MORPC prides itself on reaching out to the public by attending their community and neighborhood meetings to present information on the transportation planning process. Before attending a community meeting to present the long-range transportation plan or the transportation improvement program, MORPC will determine if an interpreter and translation of the information is needed. With special projects or to gain access to LEP neighborhoods, MORPC utilized representatives from the City of Columbus's New Americans Initiative and utilized staffs who speak alternative languages when attending/hosting meetings in the region. To accommodate this population, staff has held meetings in the Somali Mall, Hispanic grocery store/restaurant, Hispanic churches, ESL schools and neighborhood centers.

MORPC pays particular attention at open houses or public meetings to determine who may exhibit low literacy skills. In the past, MORPC has asked participants to notify us when an interpreter was needed. While we have not needed an interpreter at MORPC open houses or public meetings, our Residential Energy and RideSolutions programs have utilized this service. MORPC's Air Quality Alert program's hotline is provided in English and Spanish.

MORPC has *Language Identification cards* available in its lobby for walk-ins. Interpreters can attend meetings to accommodate participants who don't speak English or speak English "less than very well." When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services at MORPC's Language line service. See attached written process.

MORPC continues to make every effort to arrange for translation, sign language or other special assistance at meetings for individuals with special needs who request them before the meeting. To date, there have been no such requests.

MORPC has in the past surveyed its employees to determine those who can fluently speak another language. We have from time to time utilized staff to record a hotline script in an alternative language. Due to changes in personnel, MORPC will conduct another survey to determine employees who are bilingual and include a request for this information in employee orientation.

Along with the annual tracking of diverse populations in the Diversity & Inclusion Plan, MORPC will track and monitor the efforts to serve LEP populations by the following:

- Frequency of encounters seeking interpreters or translation services
- Nature and importance of activity to LEP persons
- Agency documents translated into alternative languages
- Distribution of translated outreach material (location, frequency, number)

## Providing Notice to LEP Persons

When staff schedules a meeting for which the target audience is expected to include LEP individuals, outreach material will be printed in the alternative language and a request will be made for an interpreter. Brochures, maps, applications and other publications will be made available in an alternative language when a specific LEP population is identified. Information will also be distributed to area libraries within the targeted areas in alternative languages.

MORPC works closely with the City of Columbus neighborhood and civic organizations. We request that they inform us when translation or interpretation services are needed especially in targeted areas.

MORPC will let LEP persons know that language services are available free of charge by the following:

- Notice placed in outreach material
- Providing notices in newspapers, radio and television stations whose audiences are LEP populations about the availability of language assistance services
- Notice to contractors and subcontractors of their obligation to provide language assistance to LEP individuals who participate in their programs and services and/or to whom services are provided

## Employee LEP Training

Annually, MORPC employees go through a Diversity and Inclusion training to prepare and educate them on the region's changing population. MORPC also will provide training to include a process on how to serve people who speak English "less than very well." Many front-line employees are already familiar with a process on how to obtain interpretation services for that population. The training will be expanded to include other MORPC staff and all new hires.

The following training on MORPC's Title VI Policy and LEP responsibilities provided to MORPC's staff will include:

- Types of language services available.
- Process to serve LEP individuals when they call in, walk in or attend a public meeting hosted by MORPC.
- How to respond to written communications from LEP persons.
- Documentation of language assistance requests.
- The process to handle a potential Title VI/LEP complaint.

## Expansion of Outreach Efforts

MORPC will expand its LEP outreach efforts to also include:

- Posting a Title VI complaint form on MORPC's website in Spanish.
- Posting a Title VI notice to the public in Spanish on the website.
- Producing outreach material (applications, GRH, TIP Popular Summary, TIP brochure, printed newsletters and one-page fact sheets) in Spanish.
- MORPC will survey its employees to determine those who speak another language fluently. This request will be included in new employee orientations.
- The outreach material produced in alternative languages will be distributed to metropolitan libraries located in the target areas identified in the map. See Page 8.

## Evaluation and Update

MORPC will update the LEP Plan as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from current and future U.S. Censuses are available, or when it is clear that higher concentrations of LEP individuals are present in the region.

Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Update of LEP population in the region.
- 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 MORPC's financial resources are sufficient to fund language assistance resources needed.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Develop criteria for deciding which materials will be translated.
- Explore the feasibility of producing outreach material in languages other than English and Spanish.

Questions regarding this plan should be submitted to Bernice Cage, Public Information and Diversity Officer, Mid-Ohio Regional Planning Commission, 111 Liberty Street, Suite 100, Columbus, OH, 43215, [bcage@morpc.org](mailto:bcage@morpc.org), 614-233-4157.



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