



LIMITED ENGLISH PROFICIENCY (LEP) PLAN



March 2023



LAREDO & WEBB COUNTY
AREA **M**ETROPOLITAN **P**LANNING **O**RGANIZATION

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LIMITED ENGLISH PROFICIENCY PLAN

The purpose of the Limited English Proficiency (LEP) Plan is to address the responsibilities of the Laredo & Webb County Area Metropolitan Planning Organization (LWCAMPO) as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency skills.

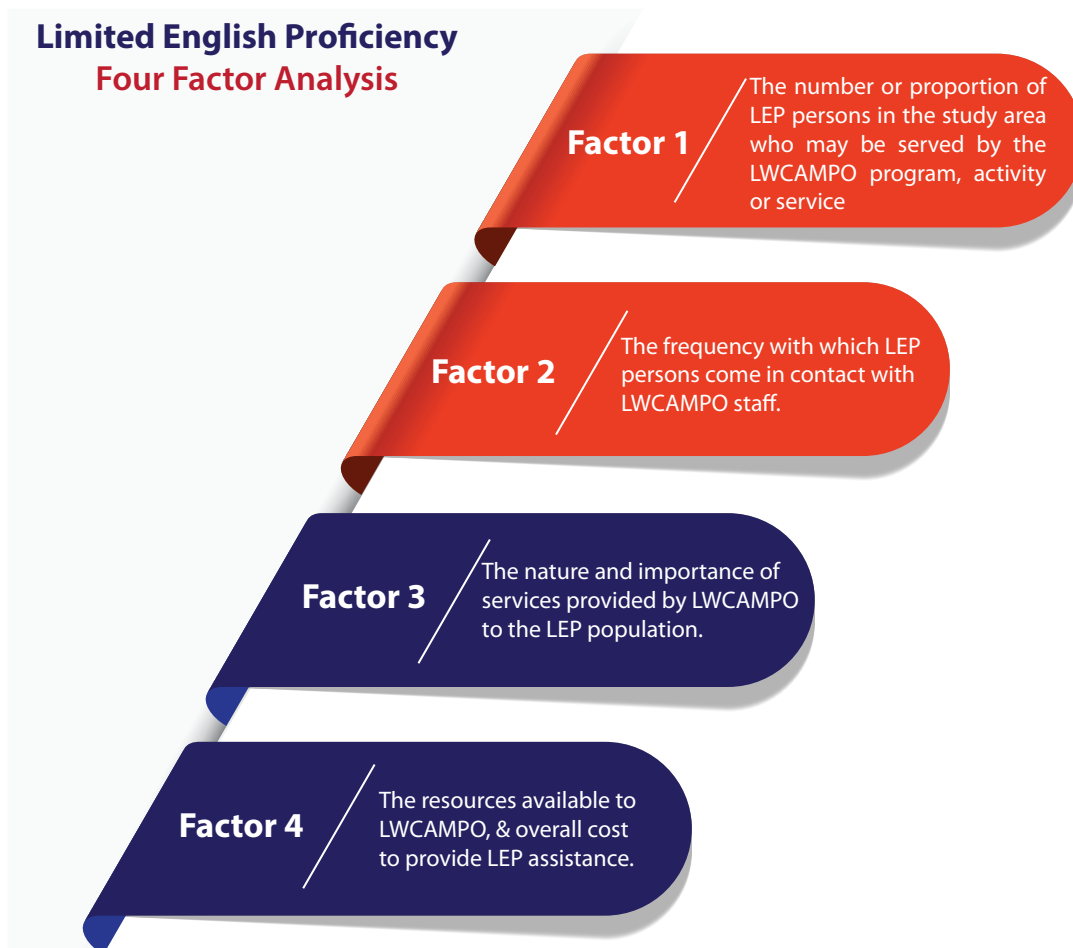
EXECUTIVE ORDER 13166

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state departments of transportation, metropolitan planning organizations (MPOs) including the Laredo & Webb County Area Metropolitan Planning Organization (LWCAMPO), regional transportation agencies, regional, state, and local transit operators. Federal financial assistance includes grants, cooperative agreements, training, use of equipment, donations of surplus property, and other assistance.

LEP PLAN SUMMARY

LWCAMPO 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 by 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 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, LWCAMPO used the four-factor LEP analysis which considers the following factors:



FOUR FACTOR ANALYSIS

This plan uses the recommended four-factor analysis of an individual assessment considering the four factors outlined above. LWCAMPO has examined each of the following factors to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to LWCAMPO’s resources. LWCAMPO based the recommendations on the results of the analysis.

FACTOR 1

The number or proportion of LEP persons in the study area who may be served by the LWCAMPO program, activity or service

U.S. Census Bureau, American Community Survey 5 Year Estimates 2016-2020 (Appendix A) categorizes speakers as those who speak English “very well” or “less than very well.” For our planning purposes, we are considering people who speak English “less than very well” as Limited English Proficient persons. Furthermore, the data reflects the approximate LEP population within Laredo, which covers the LWCAMPO study area and the surrounding rural areas within the county.

LWCAMPO staff reviewed the 2016-2020 American Community Survey 5-Year Estimates and determined that 236,347 persons in the Laredo Metro Area (90.4% of the population) speak a language other than English. Of those 236,347 41.3% have limited English proficiency; that is, they speak English “less than very well” (See ["Appendix A: Table 1 – American Community Survey \(ACS\) 5-year Estimates \(2016-2020\)"](#)).

Laredo, TX–Metro Area

Persons Who Speak a Language Other Than English at Home

90.4%

Source: ACS 5 Year Estimates (2016-2020)
Data Profiles/Social Characteristics

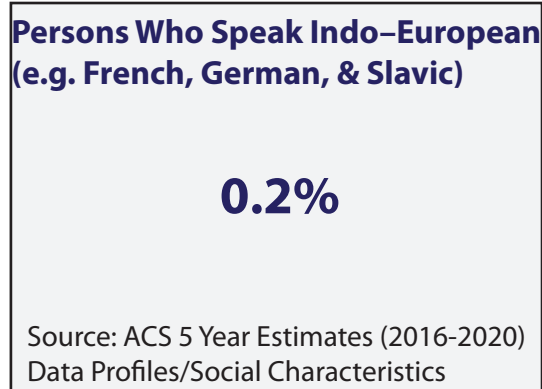
Persons Who Speak English Less Than Very Well

41.3%

Source: ACS 5 Year Estimates (2016-2020)
Data Profiles/Social Characteristics

Additionally, of those persons with limited English proficiency, within the LWCAMPO study area, 89.7% speak Spanish, 0.2% speak Indo-European (such as French, German, and Slavic), and 0.5% speaks Asian or other Pacific Islander Languages (including Korean, Chinese, Vietnamese, and Tagalog)(See [“Appendix B: Table 2 – American Community Survey \(ACS\) 5-year Estimates \(2016-2020\)”](#)).

Laredo, TX–Metro Area



FACTOR 2

The frequency with which LEP persons come in contact with the LWCAMPO.

LWCAMPO has served as the Metropolitan Planning Organization for the transportation needs of the Laredo Metropolitan Planning Area since 1979. Public meetings and workshops are held at the LWCAMPO’s office or in locations accessible by transit or bike routes.

LWCAMPO staff has contact with LEP persons at public meetings, community outreach events, and in day to day activities. Additionally, there are many LEP persons who come into contact with LWCAMPO partners, such as the Laredo El Metro.

FACTOR 3

The nature and importance of services provided by the LWCAMPO to the LEP population.

LWCAMPO is responsible for the regional planning process for all modes of transportation, and provides technical assistance to the local governments of Laredo in planning, coordinating, and implementing transportation decisions for the area. However, the LWCAMPO does not include any direct service or program that requires vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter).

As the agency responsible for administering all federal funds for urban transportation improvements within the urbanized area of Laredo, the LWCAMPO must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process for the use of federal funds in three major areas for the LWCAMPO:

- ◆ Metropolitan Transportation Plan (MTP)
- ◆ Transportation Improvement Program (TIP)
- ◆ Unified Planning Work Program (UPWP)

Inclusive public participation is a priority in other LAREDO MPO plans, studies and programs as well. Transportation improvements resulting from these planning activities have an impact on all residents in the region. Understanding and continued involvement are highly encouraged throughout the process. The LWCAMPO encourages input from all stakeholders, and every effort is made to insure the planning process is as inclusive as possible.

As a result of the long-range transportation planning process, selected projects receive approval for federal funding and progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have additional policies to ensure LEP individuals can participate in the process that shapes where, how and when a specific transportation project is implemented.

FACTOR 4

The resources available to LWCAMPO, & overall cost to provide LEP assistance.

LWCAMPO currently uses capable and competent bilingual staff members for in-house translation of documents for Spanish-speaking LEP persons. Additionally, bilingual staff has been utilized for Spanish interpretation at public meetings and community outreach events. The use of in-house translation and interpretation services functions as a cost-effective approach to accommodate the Spanish LEP language group. Although cost-effective, the use of translation services outside the MPO are used when in-house translations are constrained by limited staff time.

The use of translation/interpretation services for LEP groups other than Spanish has yet to become necessary. However, shall the need arise for these services, LWCAMPO will assess the costs to provide these services on an “as-needed” basis.

SAFE HARBOR STIPULATION

Federal law provides a “Safe Harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A “safe harbor” means that if a recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient’s written-obligations under “safe harbor” includes providing written translations of vital documents for each eligible LEP language group 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. Translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Within the LWCAMPO study area, approximately 41.3 percent of the total population is considered LEP. See Table 1. Of the total LEP population, only one LEP language group, Spanish-speaking individuals, meets the population threshold for which written translations of vital documents can be provided to meet the safe harbor standard.

The remaining three LEP language groups located within the LWCAMPO study area, however, do not constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents can be provided meet the safe harbor standard. Based on the LWCAMPO budget and the number of staff, it is deemed that written translations of core documents would be so burdensome as to defeat the legitimate objectives of our programs. It is more appropriate for the LWCAMPO to proceed with oral interpretation options for compliance with LEP regulations for the remaining LEP language groups. See Appendix.

LIMITED ENGLISH PROFICIENCY (LEP) IMPLEMENTATION PLAN

Based on the four-factor analysis above, LWCAMPO has decided to implement a plan to meet requirements under Title VI of the Civil rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP).

IDENTIFYING LEP INDIVIDUALS

Based on the aforementioned four-factor analysis, a large proportion of LEP persons are Spanish- speaking. In comparison, the remaining language groups combined equal approximately 1% of LEP persons within the LWCAMPO study area. All language assistance services for LEP individuals will be focused towards the Spanish-speaking LEP language group, however the LWCAMPO will continue to assess the need for language assistance to other LEP language groups by:

- ◆ Posting a notice of the LEP Plan and the availability of interpretation or translation services free of charge in languages LEP person would understand.
- ◆ All LWCAMPO staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.

- ◆ All LWCAMPO staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- ◆ When LWCAMPO sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals).

LANGUAGE ASSISTANCE MEASURES

Language measures currently used and planned to be used by the LAREDO MPO to address the needs of LEP persons include the following:

- ◆ Translation (in Summary) of vital documents in Spanish;
 - ◆ Unified Planning Work
 - ◆ Title VI Complaint Form
 - ◆ Public Participation Plan
 - ◆ Limited English Proficiency Plan
- ◆ Posting advertisements/public notices of public meetings in Spanish (includes posters, flyers, newspaper ads)
- ◆ Provide a Spanish version of all online surveys
- ◆ Posting public notices in Spanish in a local all-Spanish language newspaper
- ◆ Providing Outreach literature in Spanish (includes brochures, pamphlets, handouts, etc.)
- ◆ Translation of vital documents or other literature for other LEP language groups will be offered upon request at no cost
- ◆ Provide oral interpreter services at any meeting or public hearing, with advance notice of seven calendar days. Interpreter to include foreign language and the hearing impaired.
- ◆ Posting notices in appropriate languages informing LEP persons of available services on the LWCAMPO website and other social media sites
- ◆ Prepare printed information on where to obtain language assistance to give or send to individuals, if necessary

STAFF TRAINING

In order to establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public, and those who will serve as translators or interpreters, will be trained on the LWCAMPO's LEP policies and procedures. Training will ensure that staff members are effectively able to work in person and/or by telephone with LEP individuals.

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 of the "I speak" cards
- ◆ Documentation of language assistance requests
- ◆ How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for LWCAMPO will be required to follow the Title VI/LEP guidelines.

TITLE VI PROGRAM VISIBILITY: PROVIDING NOTICE TO LEP PERSONS

As per USDOT LEP guidance:

“Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.”

The guidance provides several examples of notification including:

1. Signage when free language assistance is available with advance notice.
2. Stating in outreach documents that language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individual of the recipient’s services, including the availability of language assistance services.
4. Including notices in local newspapers in languages other than English.
5. Providing notices on non-English-language including but no limited to, radio, television, and LWCAMPO’s website and social media accounts, about the availability and accessibility of language assistance services.
6. Providing presentations and/or notices at schools and religious organizations upon request.

LWCAMPO will provide statements in public information and public notices, as outlined in our Public Participation Plan, that persons requiring language assistance or special accommodations will be provided, with reasonable advance notice to the MPO.

MONITORING AND UPDATING THE LEP PLAN

LWCAMPO will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when new data from the U. S. Census becomes available, or when it is clear that higher concentrations of LEP individuals are present within the LWCAMPO service area. Updates will include the following:

- ◆ How the needs of the 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 the LWCAMPO’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.
- ◆ Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF THE LWCAMPO LEP PLAN

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to LWCAMPO.

Laredo & Webb County Area Metropolitan Planning Organization (LWCAMPO)

ATTN: LWCAMPO Director/Title VI Coordinator

1413 Houston Street

Laredo, Texas 78040

Email: jmendive@ci.laredo.tx.us

ENVIRONMENTAL JUSTICE (EJ)

As per federal requirements, LWCAMPO will appropriately identify and address disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations. This includes ensuring that underserved groups, such as low-income and minority populations, are identified and given increased opportunities for effective participation in the MPO's decision-making process (See ["Appendix C: Record of Contact with LEP Persons / ADA Accommodation Requests"](#)).

DATA COLLECTION AND ANALYSIS

Data collection is an important aspect of the LWCAMPO Title VI and EJ plan. Collection of demographic information will assist in transportation planning to determine impacts and benefits of potential projects. Demographic information can assist in identifying communities of concern as well as be used to develop outreach strategies and to monitor the effectiveness of outreach processes.

Maps that provide examples of the tools & techniques the MPO utilizes to fulfill the requirements outlined by federal legislation, identify public outreach strategies, and facilitate public participation activities can be found in ["Appendix D: Maps Relevant to Title VI & Related Statutes"](#).

APPENDIX A: TABLE 1 – AMERICAN COMMUNITY SURVEY (ACS) 5-YEAR ESTIMATES (2016-2020)

Persons in Laredo Metro Area that speak a language other than English / have limited English Proficiency

Label	Laredo, Texas			
	Estimate	Margin of Error	Percent	Percent Margin of Error
LANGUAGE SPOKEN AT HOME				
Population 5 years and over	236,347	±256	236,347	(X)
English only	22,741	±1,575	9.6%	±0.7
Language other than English	213,606	±1,550	90.4%	±0.7
Speak English less than "very well"	88,245	±2,984	37.3%	±1.3
Spanish	211,986	±1,482	89.7%	±0.6
Speak English less than "very well"	87,808	±2,992	37.2%	±1.3
Other Indo-European languages	407	±240	0.2%	±0.1
Speak English less than "very well"	144	±112	0.1%	±0.1
Asian and Pacific Islander languages	1,078	±195	0.5%	±0.1
Speak English less than "very well"	180	±114	0.1%	±0.1
Other languages	135	±117	0.1%	±0.1
Speak English less than "very well"	113	±114	0.0%	±0.1

APPENDIX B: TABLE 2 – AMERICAN COMMUNITY SURVEY (ACS) 5-YEAR ESTIMATES (2016-2020)

Laredo Metro Area: Languages spoken at home.

Laredo, Texas						
	Total	Percent	Percent of specified language speakers			
			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
Label	Population Estimate	Estimate	Population Estimate	Estimate	Population Estimate	Estimate
Speak a language other than English	213,606	90.4%	125,361	58.7%	88,245	41.3%
Spanish	211,986	89.7%	124,178	58.6%	87,808	41.4%
5 to 17 years old	51,791	21.9%	39,108	75.5%	12,683	24.5%
18 to 64 years old	138,176	58.5%	77,142	55.8%	61,034	44.2%
65 years old and over	22,019	9.3%	7,928	36.0%	14,091	64.0%
Other Indo-European languages	407	0.2%	263	64.6%	144	35.4%
5 to 17 years old	29	0.0%	29	100.0%	0	0.0%
18 to 64 years old	248	0.1%	204	82.3%	44	17.7%
65 years old and over	130	0.1%	30	23.1%	100	76.9%
Asian and Pacific Island languages	1,078	0.5%	898	83.3%	180	16.7%
5 to 17 years old	202	0.1%	184	91.1%	18	8.9%
18 to 64 years old	871	0.4%	711	81.6%	160	18.4%
65 years old and over	5	0.0%	3	60.0%	2	40.0%
Other languages	135	0.1%	22	16.3%	113	83.7%
5 to 17 years old	0	0.0%	0	-	0	-
18 to 64 years old	134	0.1%	21	15.7%	113	84.3%
65 years old and over	1	0.0%	1	100.0%	0	0.0%

APPENDIX C: RECORD OF CONTACT WITH LEP PERSONS / ADA ACCOMMODATION REQUESTS

A sample of the Record/Log of contact with LEP Persons as well as [ADA accommodation requests](#) received by MPO Staff can be found in the following pages:

LWCAMPO Limited English Proficiency (LEP) Encounters

To be filled by LWCAMPO Staff when an encounter, i.e. rendering of LEP assistance, occurs (for department LEP implementation records)

What is your first & last name?

Short answer text

What is your work title (e.g. Planner III)? *

Short answer text

What is your email address?

Short answer text

What month & year did you provide LEP assistance? (MM/YYYY) *

Short answer text

Timestamp						
A	B	C	D	E	F	G
Timestamp	What is your first & last name?	What is your work title (e.g. Planner III)?	What is your email address?	What month & year did you provide LEP assistance? (MM/YYYY)	Are you reporting on multiple LEP encounters for the month?	How many LEP encounters are you reporting for this month?

ADA Accommodation Request / Solicitud de Servicio(s) de Asistencia para las Personas con Discapacidad

If you require accommodations to permit your participation, please complete the following registration form: / Favor de llenar el formulario de solicitud de servicio(s) de asistencia para las personas con discapacidad:

Full Name / Nombre Completo
Short answer

Short answer text

Required

Email Address / Correo Electrónico *

Short answer text

Phone Number / Número de Teléfono

Short answer text

Name of Meeting or Event / Título de la Junta o de Evento *

Short answer text

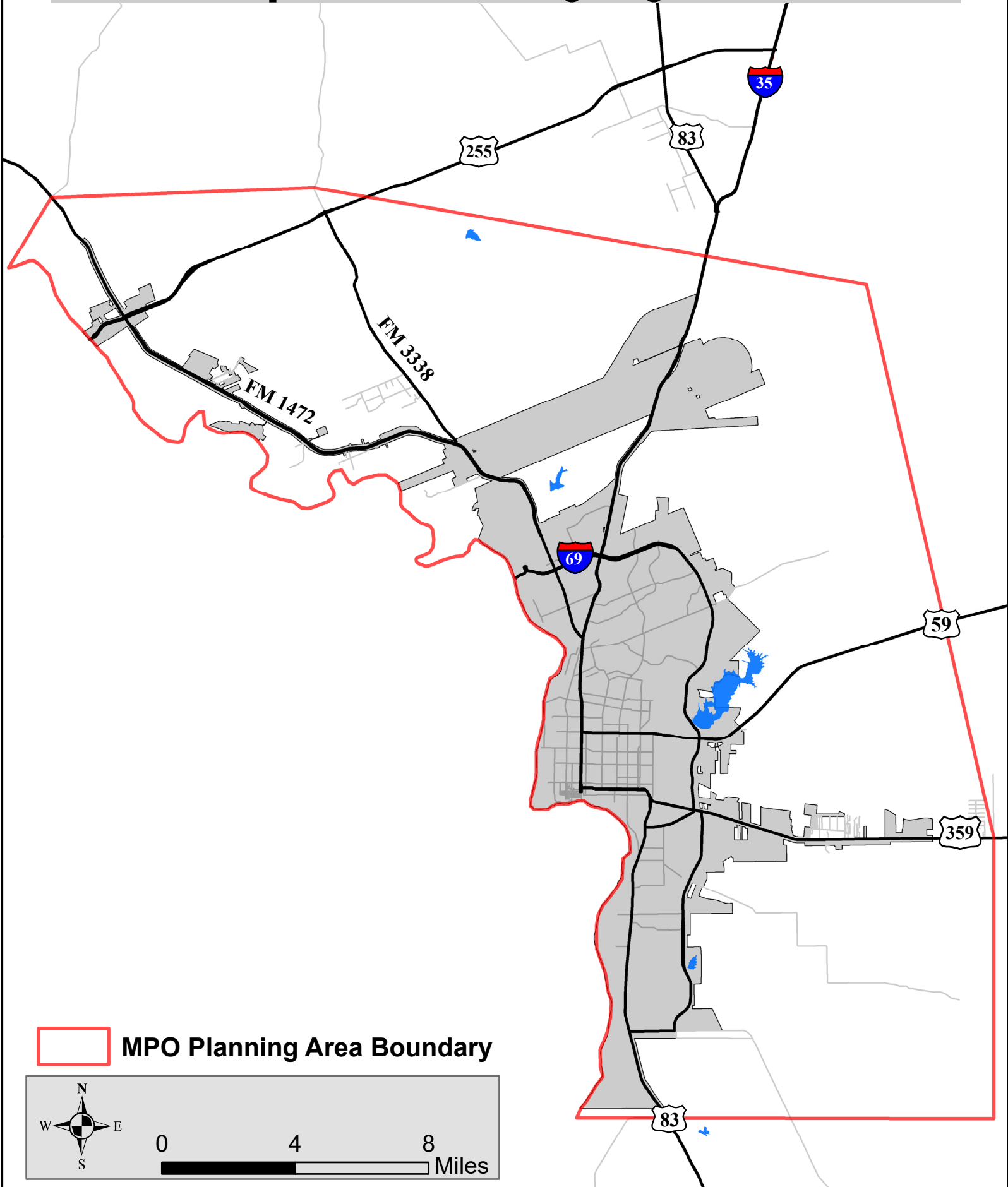
Meeting or Event Date / Fecha de la Junta o Evento *

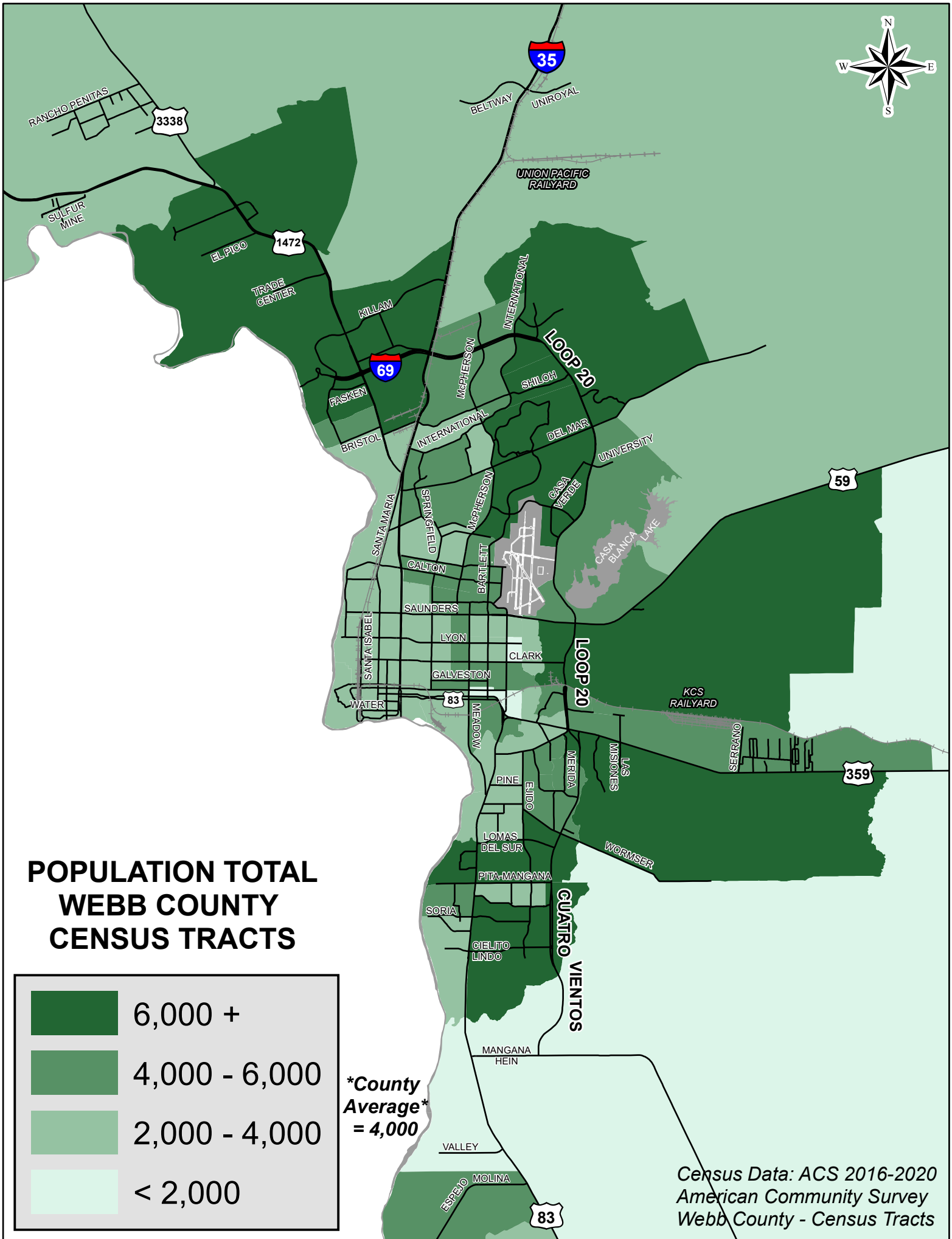
Month, day, year

APPENDIX D: MAPS RELEVANT TO TITLE VI & RELATED STATUTES

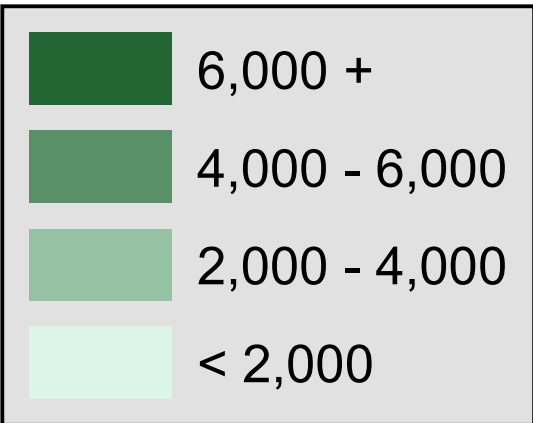
The following maps provide examples of the tools & techniques the MPO utilizes to fulfill the requirements outlined by federal legislation, appropriately identify and address disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations:

Laredo Webb County Area Metropolitan Planning Organization

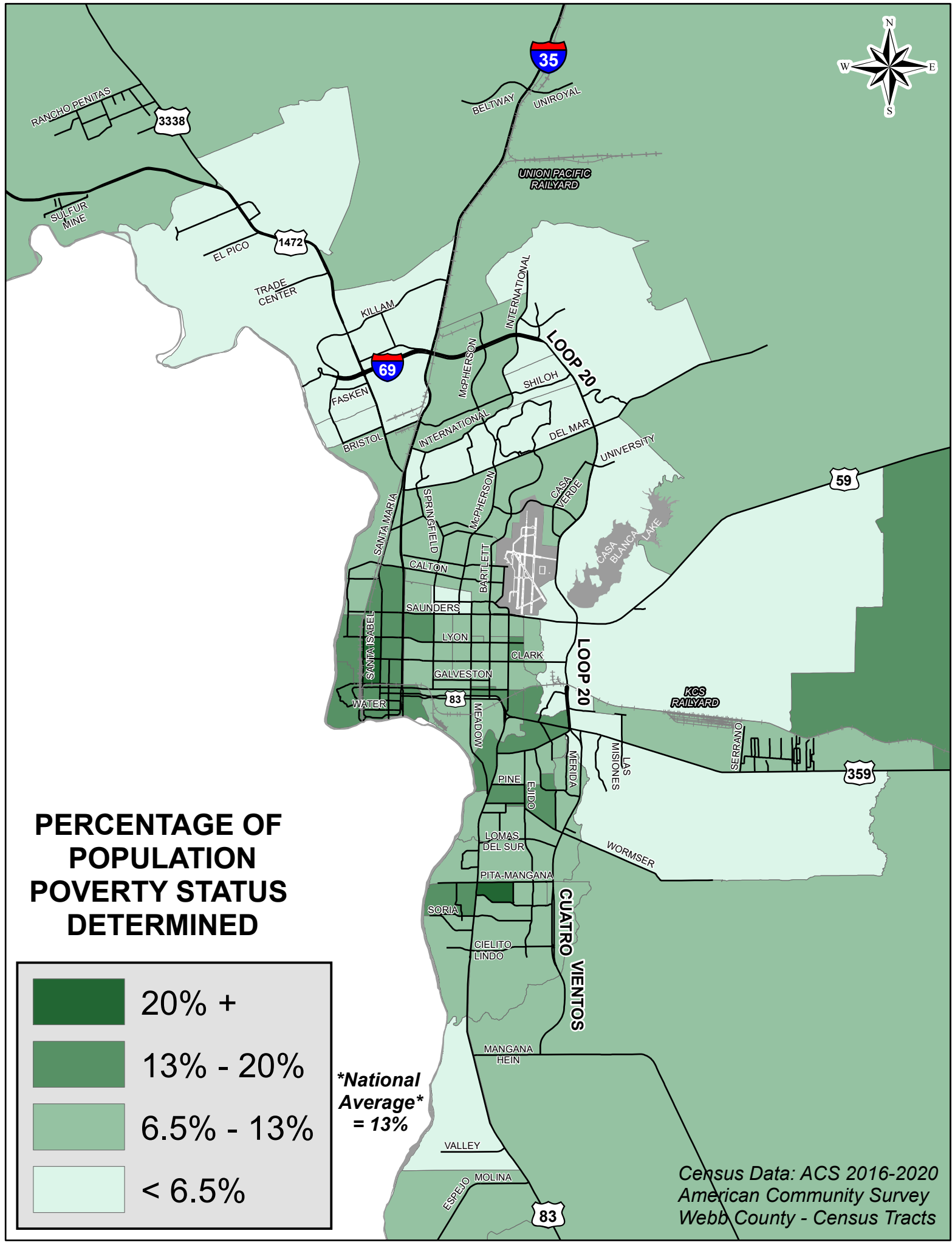
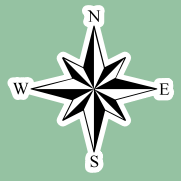




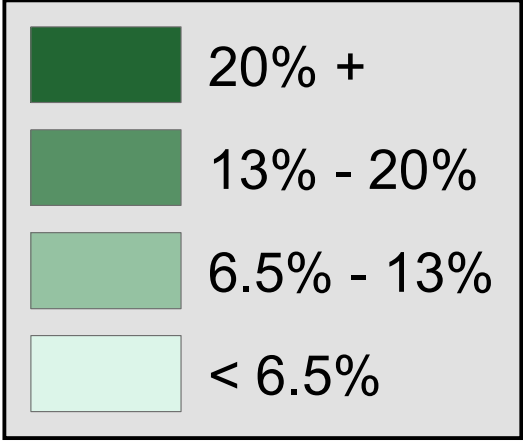
POPULATION TOTAL WEBB COUNTY CENSUS TRACTS



Census Data: ACS 2016-2020
American Community Survey
Webb County - Census Tracts



PERCENTAGE OF POPULATION POVERTY STATUS DETERMINED



National Average
= 13%

Census Data: ACS 2016-2020
American Community Survey
Webb County - Census Tracts



