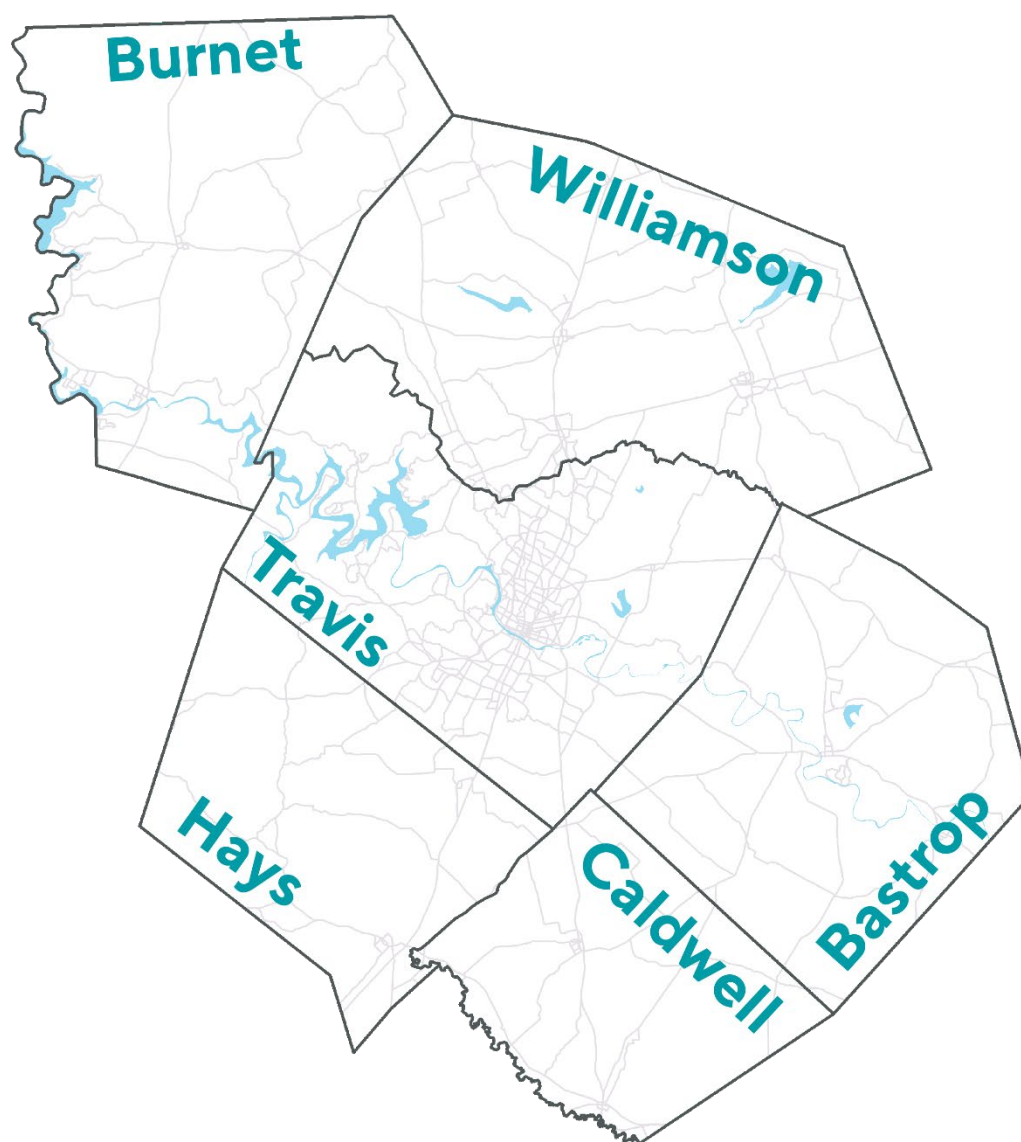




CAPITAL AREA METROPOLITAN
PLANNING ORGANIZATION

Limited English Proficiency Plan



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INTRODUCTION

This *Limited English Proficiency (LEP) Plan* has been prepared to address the responsibilities of the Capital Area Metropolitan Planning Organization (CAMPO), as a recipient of federal funding, to accommodate the needs of individuals with limited English language proficiency skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq, and its implementing regulations, which requires that no person shall be subjected to discrimination based on race, color or national origin by programs that receive federal funding.

This plan also considers Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*. E.O. 13166 indicates that differing treatment based upon a person's inability to speak, read or understand English is a type of national origin discrimination. E.O. 13166 defines Limited English Proficiency (LEP) persons, as those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. The Executive Order directs each agency to publish guidance clarifying that organization's obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds, including metropolitan planning organizations.

The *Limited English Proficiency Plan* will outline the LEP current population in the CAMPO region and help to identify reasonable steps to provide language assistance to persons with limited English proficiency who wish to access services that CAMPO provides.

U.S. Department of Transportation (US DOT) offers guidance which outlines four factors that recipients of federal funding should use to assess LEP needs and create a framework with which to define and address solutions for those needs, to ensure engagement of LEP persons during transportation planning and program implementation.¹ These four factors are:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP persons come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

As the metropolitan planning organization encompassing Bastrop, Burnet, Caldwell, Hays, Travis, and Williamson counties, the Capital Area Metropolitan Planning Organization (CAMPO) has a responsibility to serve the community and its stakeholders by providing equitable access to participate and provide input in the decision-making process. Governed by the 22-member Transportation Policy Board representing local governments and agencies in the region,

¹ <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

CAMPO believes that conversation, engagement, and transparency among stakeholders is key to meaningful and lasting mobility changes across its six counties. This conversation and engagement must not ignore the diverse population living in the six-county region, and CAMPO must exhibit due diligence to equitably engage as many persons as reasonably possible that are affected by CAMPO's services and programs.

Using U.S. DOT's four-factor LEP analysis method, this Limited English Proficiency Plan will describe the region's LEP population and CAMPO's strategy and role in equitably engaging persons within. This four-factor analysis allows recipients of federal funding to assess their role and determine an appropriate "mix" of LEP services that work best based on their organization's role and scope within the community they serve. Recipients have two main ways to provide language services: oral interpretation (in person or via telephone interpretation service), and written translation. The correct mix should be based on what is "both necessary and reasonable" as determined by the four-factor analysis, as well as the financial and general capacity of the organization.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by CAMPO

Demographic data was compiled using the U.S. Census Bureau's 2020 American Community Survey (ACS) 5-year estimates, as it is the most recently complete data set for the region. This data determined that 235,336 persons in the CAMPO region speak a language other than English and have limited English proficiency; this means they self-reported that they speak English "less than very well" or "not at all." This number represents approximately 10.59% of the overall population in the CAMPO planning area, a 0.41% decrease in estimated persons from the last LEP Plan update in 2013, using 2011 ACS 5-year estimated data. Table 1 breaks down the LEP populations by each county as well as the population change.

Table 1: Limited English Proficiency Population in the CAMPO Planning Area (2020 ACS 5-yr)

County	Population 5 yrs and older	All LEP Populations		Change in LEP Population % from 2011 ACS
Bastrop	86,839	6,329	7.29%	-2.21%
Burnet	47,548	2,461	5.18%	-1.22%
Caldwell	42,817	5,913	13.81%	6.41%
Hays	222,827	22,588	10.14%	3.74%
Travis	1,250,884	149,804	11.98%	-2.02%
Williamson	570,437	48,241	8.46%	2.06%
CAMPO Region	2,221,352	235,336	10.59%	-0.41%



Limited English Proficiency Plan

The top language spoken by those with limited English proficiency in the CAMPO region is Spanish (166,504). In addition, Asian Languages also account for a large portion of the population with limited English proficiency. There are a variety of other languages spoken within the CAMPO region, but these languages represent statistically significant amounts. Table 2 outlines the top LEP populations and their percentages, compared to Texas and the U.S.

Table 2: Comparing Non-English Languages Spoken in the CAMPO Planning Area (2020 ACS 5-yr)

	Pop. 5 years and older	LEP Population	LEP % of Pop.	Spanish LEP	Spanish LEP %	Asian Languages LEP	Asian Languages LEP %
CAMPO	2,221,352	235,336	10.59%	166,504	70.75%	31,194	13.26%
Texas	28,365,442	9,906,070	34.59%	2,858,193	28.85%	334,543	3.38%
USA	326,569,308	129,870,928	39.77%	16,893,857	13.01%	5,100,108	3.93%

Often overlooked as members of LEP populations are disabled persons who are limited visually and/or audibly. CAMPO's region and more specifically, Austin, is home to the Texas School for the Blind and Visually Impaired, as well as the Texas School for the Deaf, meaning a larger population with these disabilities. Table 3 shows population with visual and auditory disabilities comparing the CAMPO region, Texas, and the U.S.

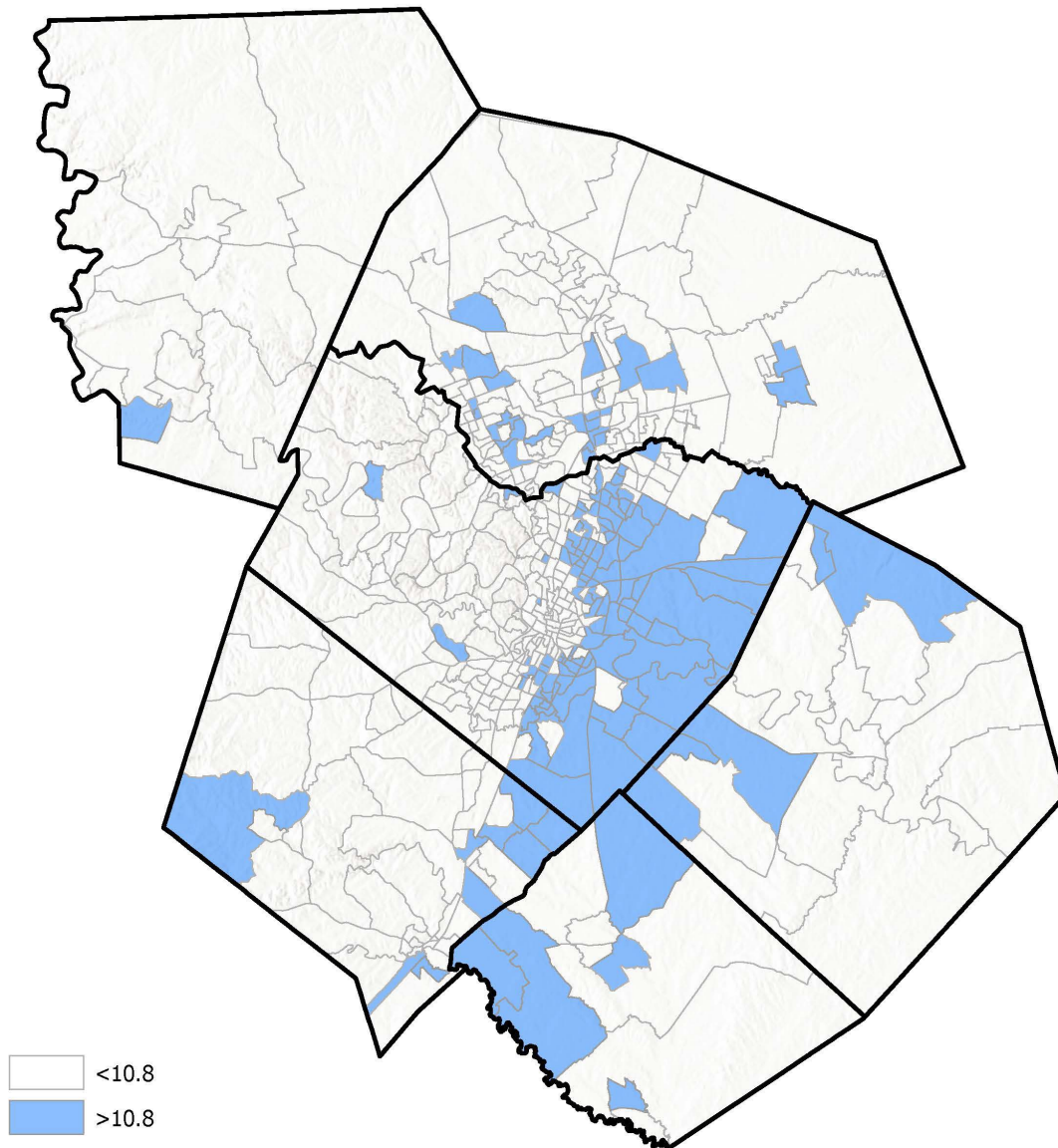
Table 3: Population with Hearing and Vision Difficulties (2020 ACS 5-yr)

	Pop. 5 years and older	Pop. With Hearing Difficulty	Pop. With Hearing Difficulty %	Pop. With Vision Difficulty	Pop. With Vision Difficulty %
CAMPO	2,221,352	212,131	9.55%	216,199	9.73%
Texas	28,635,442	2,362,511	8.25%	2,416,693	8.44%
USA	326,569,308	38,387,736	11.75%	27,971,743	8.57%



Attachment 1 – EJ Areas, Limited English

Environmental Justice Areas, by LEP



In the CAMPO region, 10.8% of population is LEP.
Census tracts shown have a greater population of
LEP people. ACS 2020 data.

Esri, NASA, NGA, USGS



Factor 2: The frequency with which LEP persons come in contact with CAMPO

In all planning processes, CAMPO considers the audience of a particular plan or study and works to compile feedback that is representative of the area's demographics thorough out the planning process. As the CAMPO region continues to grow, and the population served by CAMPO continues to change, steps must be taken to ensure a representative population is engaged. Typically, LEP interaction is infrequent, so CAMPO takes steps to ensure hard to reach populations are equitably engaged.

CAMPO works diligently to engage traditionally underserved populations. Examples include partnerships with the Texas School for the Blind and Visually Impaired (TSBVI) for open houses that specifically accommodated persons with visual impairments, as well as targeted survey collections in underrepresented zip codes across the region.

Beyond archiving survey responses and public involvement for each plan and study, CAMPO staff records public requests for translated documents, or other service requests from the public to staff, the Technical Advisory Committee (TAC), or Transportation Policy Board. These records include documenting phone inquiries, office visits, and responses to surveys in a language other than English.

In the past year, CAMPO has not received any contact from LEP persons, outside of targeted outreach, or any requests for translated materials.

Factor 3: The nature and importance of CAMPO to the LEP population

As the Metropolitan Planning Organization (MPO) for the Capital Area of Texas, CAMPO serves the citizens in the region by studying and supporting implementation of transportation planning programs and services for Bastrop, Burnet, Caldwell, Hays, Travis, and Williamson counties. These plans include the Regional Transportation Plan (RTP), the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), as well as other plans and studies.

The RTP is CAMPO's long-range transportation plan, which outlines investment priorities for transportation projects and initiatives across the six-county region. This plan is updated every five years, covers a 20-year span, and is multimodal, meaning it focuses on more than just auto-oriented transportation, to also focus on outlining solutions for transit, cycling, and pedestrian transportation.

The TIP is updated every two years, and focuses on projects that will take place within a four-year window and are receiving federal or select state funding. Projects within the TIP must be consistent with projects that are listed in the long-range plan (RTP), and vice versa.

The UPWP, outlines CAMPO's work requirements for a two-year period, which includes all studies and initiatives, as well as their work products, budgets, and funding sources. The UPWP may also include some key studies from other jurisdictions in the CAMPO region.

CAMPO also conducts planning work in partnership with local government entities that make up the CAMPO planning area. These supplemental studies work to support larger plans and/or future planning programs, allowing the Transportation Policy Board to make more informed decisions about specific transportation circumstances in specific areas.

As mentioned above, CAMPO's 22-member Transportation Policy Board, which is comprised of elected officials and transportation agencies from the six-region, ultimately decides what transportation projects to prioritize across the region, affecting each citizen within the six-county region. Simply, transportation impacts people because of its key role in connecting people, daily. These are connections to employment, housing, social and civil services, education, and recreation. It is important that underrepresented persons are included in planning decisions and allowed equal opportunities to participate in CAMPO processes.

Factor 4: Resources available to CAMPO and overall cost to provide LEP assistance

Since CAMPO's planning work and studies affect the daily lives of everyone living within the CAMPO region, it is important for CAMPO to exhaustively pursue options that encourage the inclusion of all citizens, despite their English-language proficiency, in our public involvement process.

For CAMPO, this means accessibility options are provided in-person and online, and for a myriad of different language abilities and preferences. This also means setting a standard strategy for engaging with LEP persons when they ask for assistance, as well as targeting outreach during public involvement periods.

Language Assistance

CAMPO has coordinated strategies for offering language assistance depending on the type of assistance needed and the request. These different requests, as well as the venue at which they are being requested, have different tools that can be used. These tools include:

- "I Speak" cards
- Translation Services
 - In-person
 - Written Translation Services
- CAMPO "Translation Services Request" document

An important part of understanding the needs of LEP persons in the region is keeping track of language assistance requests. Each request should be recorded by CAMPO staff using the "CAMPO Translation Services Request" document. This allows staff to record the number of requests CAMPO receives and to track the needs of the community CAMPO serves, in an effort to better understand and serve LEP needs.

➤ In-person

CAMPO has a Spanish-language translation of its document explaining the Title VI complaint process. CAMPO provides a Spanish-language translation of its procedure for accessing language assistance or special accommodations.



- As the need arises for LEP outreach, CAMPO 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, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
 - Additional planning documents and public outreach surveys will be provided in Spanish where appropriate.

If a person comes to CAMPO offices with a formal request, a staff member will work with the requestor to determine:

- What language they speak
 - Using “I Speak” cards or Google Translate to communicate
- What they are requesting (translated document, explanation of services)
- Method of contact
 - The requestor should submit their contact information, either telephone number, email address or physical address, so CAMPO can complete their request

➤ **Over the Telephone**

The staff member should work with the requestor to:

- Assess English language skills, and be prepared to ask if they would prefer to communicate in another language
- Direct them online, or to send in a written request in their preferred language
- Collect contact information

Once this has been done, during initial contact, CAMPO staff can then contact the requestor with an over the phone translator, to complete the requested service.

➤ **Online/Translated Documents**

CAMPO has a Spanish-language translation of its document explaining the Title VI complaint process. CAMPO provides a Spanish-language translation of its procedure for accessing language assistance or special accommodations.

As the need arises for LEP outreach, CAMPO 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, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Additional planning documents and public outreach surveys will be provided in Spanish where appropriate.

The CAMPO website can be translated into any language using the drop-down “select language” tab, which is available on any page within www.campotexas.org.



Specific planning documents produced by CAMPO, such as the RTP, may be translated into Spanish and Vietnamese as needed and requested, the two most prevalent languages spoken in the CAMPO region besides English.

Upon request, CAMPO may translate other plans or studies using a written-document translation service.

Staff Training

CAMPO Staff must be fully trained and prepared to offer language assistance when needed. This is especially important during public meetings, and staff must be ready to identify LEP persons and offer solutions for equitable engagement. The following training is provided to staff:

- Guidance documents explaining the Title VI Policy and LEP responsibilities are made available to staff members and be periodically reviewed at staff meetings.
- Staff is briefed on the language assistance services offered to the public.
- Staff is trained on the use of the “I Speak” cards.
- Staff is briefed on how to respond to language assistance requests. Staff is briefed on how to respond to a potential Title VI LEP complaint.
- All contractors or subcontractors performing work for CAMPO will be contractually required to follow the Title VI LEP guidelines.

A large part of equitable engagement involves early preparation and a thorough understanding of population demographics. Often, targeted outreach results in the highest engagement levels; these outreach opportunities also allow CAMPO to ensure the proper services are available, such as in-person translators and prior translated documents.

Staff will keep a detailed list of services on file and, as needed, update available options by seeking out the highest quality and most cost-effective translation services and methods to communicate with the region’s LEP population.

Targeted Outreach

As covered in the *Public Participation Plan*, CAMPO works to ensure thorough public engagement throughout the region by tracking engagement numbers, and conducting targeted outreach in zip codes that have low response rates. This targeted outreach, in the past, has included Spanish language surveys, Spanish language Social Media ads, and outreach teams at bus stops in neighborhoods. Targeted outreach is an important tool that ensures that truly exhaustive efforts have been employed.

Monitoring and Updating the LEP Plan

CAMPO will update the LEP Plan periodically. At a minimum, the plan will be reviewed every five years, or as noted demographic changes indicate a need to update the Plan. Updates will include the following, and below updates since the previous LEP Plan are recorded:

- The number of documented LEP person contacts encountered annually. Update: 1 LEP person has contacted CAMPO staff.
- How the needs of LEP persons have been addressed. Update: The LEP contact did not require CAMPO services and was directed to the appropriate agency. Staff implemented a phone based translation service, and potential ideas for the future include adding a translation feature to the CAMPO website.
- An analysis of the current LEP population in the service area. Update: The LEP population has not changed significantly. Trends include increased LEP population that is proportional to overall population growth. Spanish and Vietnamese are the most common preferred languages of LEP persons.
- A determination as to whether the need for translation services has changed. Update: The need for translation services has not changed. The rates at which LEP persons contact the CAMPO offices or attend CAMPO events remains the same.
- A determination, based on performance measures to be developed, as to whether the language assistance programs have been effective and sufficient to meet the needs. Update: Performance measures were created and used to evaluate progress as seen in Appendix B. Due to limited contact from LEP persons, it is difficult to gauge the effectiveness of CAMPO's language assistance program. Staff has implemented measures according to Federal guidance, and continues to consider tools and techniques to help engage LEP persons.
- A determination as to whether CAMPO's financial resources are sufficient to fund language assistance resources needed. Update: CAMPO has financial resources to maintain current language assistance resources.
- A determination as to whether CAMPO fully complies with the goals of this LEP plan. CAMPO has taken measures to comply with the goals of the LEP Plan and Federal guidance regarding providing services to Limited English Proficiency persons. Based on a review of CAMPO's LEP Plan performance measures (Appendix B), CAMPO has complied with the goals of the LEP Plan.
- A determination as to whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals and if so, documentation of CAMPO's response. Update: CAMPO has not received an LEP Title VI complaint, however a Title VI process and directions on how to navigate the Title VI process are in place and available.

Dissemination of CAMPO's LEP Plan

- Post signs at conspicuous and accessible locations in the CAMPO offices notifying LEP persons of the LEP Plan and how to access language services. CAMPO posts the LEP Plan, Title VI Complaint Process and related guidance documents online and at the front of CAMPO's office.
- State on agendas, public notices, and the CAMPO website that language assistance is available to LEP persons upon request at 737.226.4840.

ADDENDUM: Capital Area Regional Transit Coordination Committee and Initiative

CAMPO serves as the administrative lead agency for the Capital Area Regional Transit Coordination Committee (RTCC). The Regional Transit Coordination Committee (RTCC) provides coordination support for transportation organizations, health and human service agencies, and other transit providers. The vision of the RTCC is to provide full mobility and access to healthcare, human services, employment, education, commerce, and social/community services for all persons in the region by fostering the development of a seamless public transportation system that achieves efficiencies, eliminates duplication, increases coordination and addresses service gaps. This vision is outlined in the "[Coordinated Public Transit- Health and Human Services Transportation Plan](#)," within which is a complete demographic breakdown of vulnerable populations, including LEP populations, in the 10-county region which is served by the plan. The RTCC must also follow LEP guidelines outlined in this document.



Appendix B

Monitoring LEP Contacts

Monitoring Criteria	Measures	Accomplished	Goal
Recording LEP contacts	Complete		
	LEP Contacts were recorded in the office and at public meetings	Yes	Recorded Contact with LEP Persons
How LEP needs were addressed	Complete		
	LEP contacts were recorded included comments about how LEP persons contacts' needs were addressed	Yes	Record how all LEP persons' needs were addressed
	LEP program staff solicited comments from CAMPO staff about the adequacy of LEP materials and services for individual LEP persons		LEP staff asks CAMPO staff periodically for feedback regarding materials
Mapping the current LEP population	Complete		
	Map of existing LEP populations with updated ACS data	Yes	LEP staff creates map for most common preferred languages for the LEP persons for CAMPO and RTCC areas.

LEP Plan Compliance

LEP Program Finance	
○ CAMPO had sufficient funds to maintain the LEP Plan processes	Yes
○ Cost of LEP Program	Cost are appropriate and not excessive
Staff Time	
• Hours and Task	Not Excessive
Materials	
• Printing	Not Excessive
Consultants & Services	
• Translation	Not Excessive
• Interpretation	Not Excessive

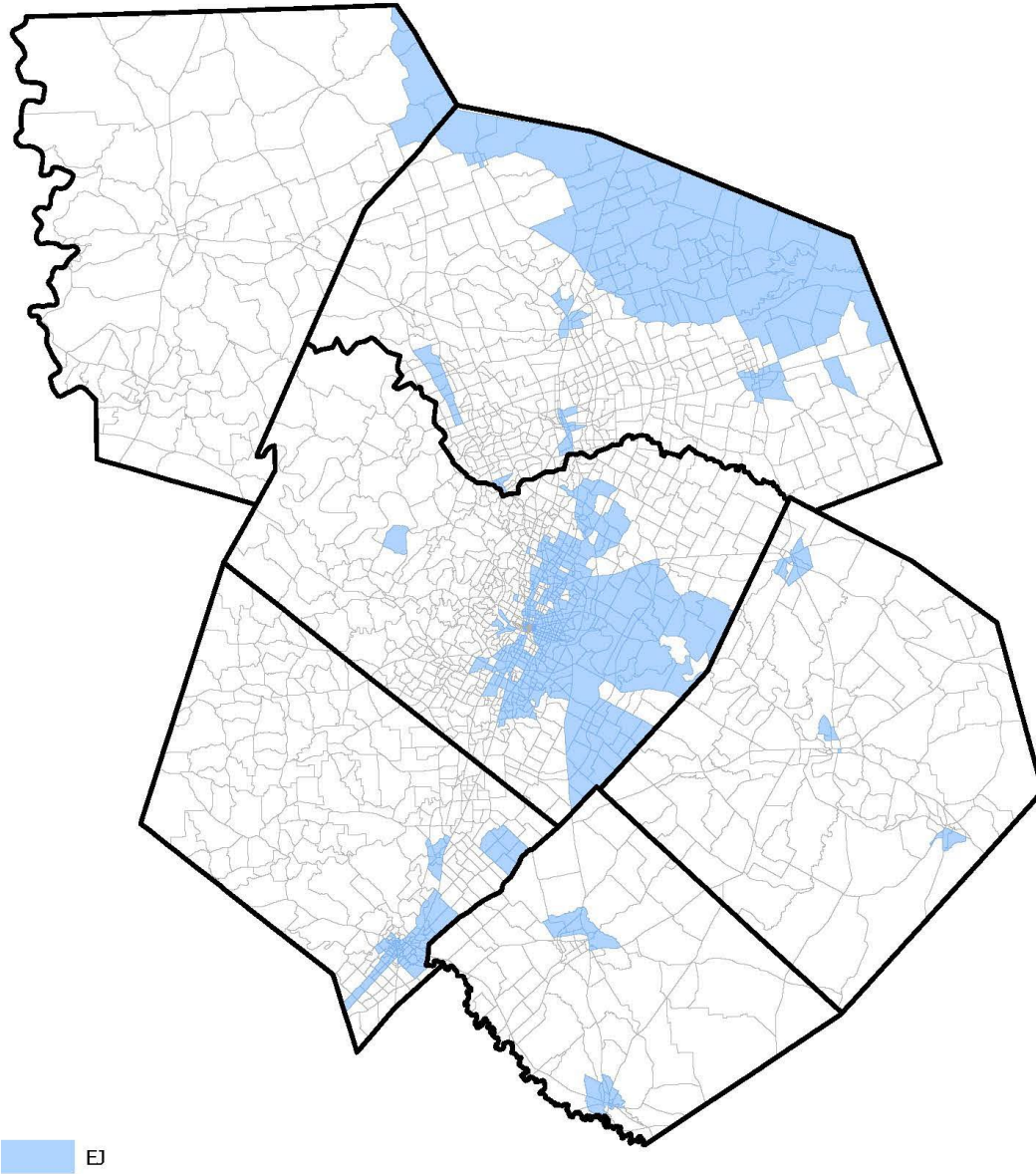
The Following processes were in place:	
On-site Interpretation Services	Complete
• Spanish	Yes- Phone Based
• Other languages	Yes- Phone Based
EJ Review built into PPP	Complete
• Interpretation Services Necessary at Public Meetings	As Needed
• Translation of outreach and informational materials	Spanish, as needed and as a standard for 2050 plan process outreach
• Staff maintains awareness at public meetings	Yes
Title VI LEP Complaint Process	Complete
• Information posted on website	Yes
• Information provided in Languages likely to be understood by LEP persons	Yes, Spanish
Staff was trained on LEP processes and LEP responsibilities	Complete
• Staff reminded regularly of LEP duties	Yes
• LEP program staff followed up with co-workers concerning LEP contacts	Yes
Dissemination of the LEP Plan	Complete

Limited English Proficiency Plan

<ul style="list-style-type: none"> Post the plan in conspicuous locations at the office 	Yes
<ul style="list-style-type: none"> Place notice on agendas, flyers, etc. of language services 	Complete
How were the needs of LEP Persons Addressed	
Office LEP Contacts	Complete
<ul style="list-style-type: none"> Number of Contacts 	Complete – No Requests Received
<ul style="list-style-type: none"> A summary of interactions with LEP persons who contact the CAMPO office 	Complete – No Requests Received
Complaint Log	
List of complaints	Complete – No Complaints
<ul style="list-style-type: none"> Complainant's name 	Process in place
<ul style="list-style-type: none"> Complainant's race, color, gender, and national origin 	Process in place
<ul style="list-style-type: none"> Respondent's name 	Process in place
<ul style="list-style-type: none"> Basis(es) of the discrimination complaint 	Process in place
<ul style="list-style-type: none"> Issue(s) surrounding the discrimination complaint 	Process in place
<ul style="list-style-type: none"> Date the discrimination complaint was filed 	Process in place
<ul style="list-style-type: none"> Date the investigation was completed 	Process in place
<ul style="list-style-type: none"> Disposition 	Process in place
<ul style="list-style-type: none"> Disposition date 	Process in place
<ul style="list-style-type: none"> Other pertinent information 	Process in place

Attachment 2 – EJ Areas

2045 Environmental Justice area (TAZ)

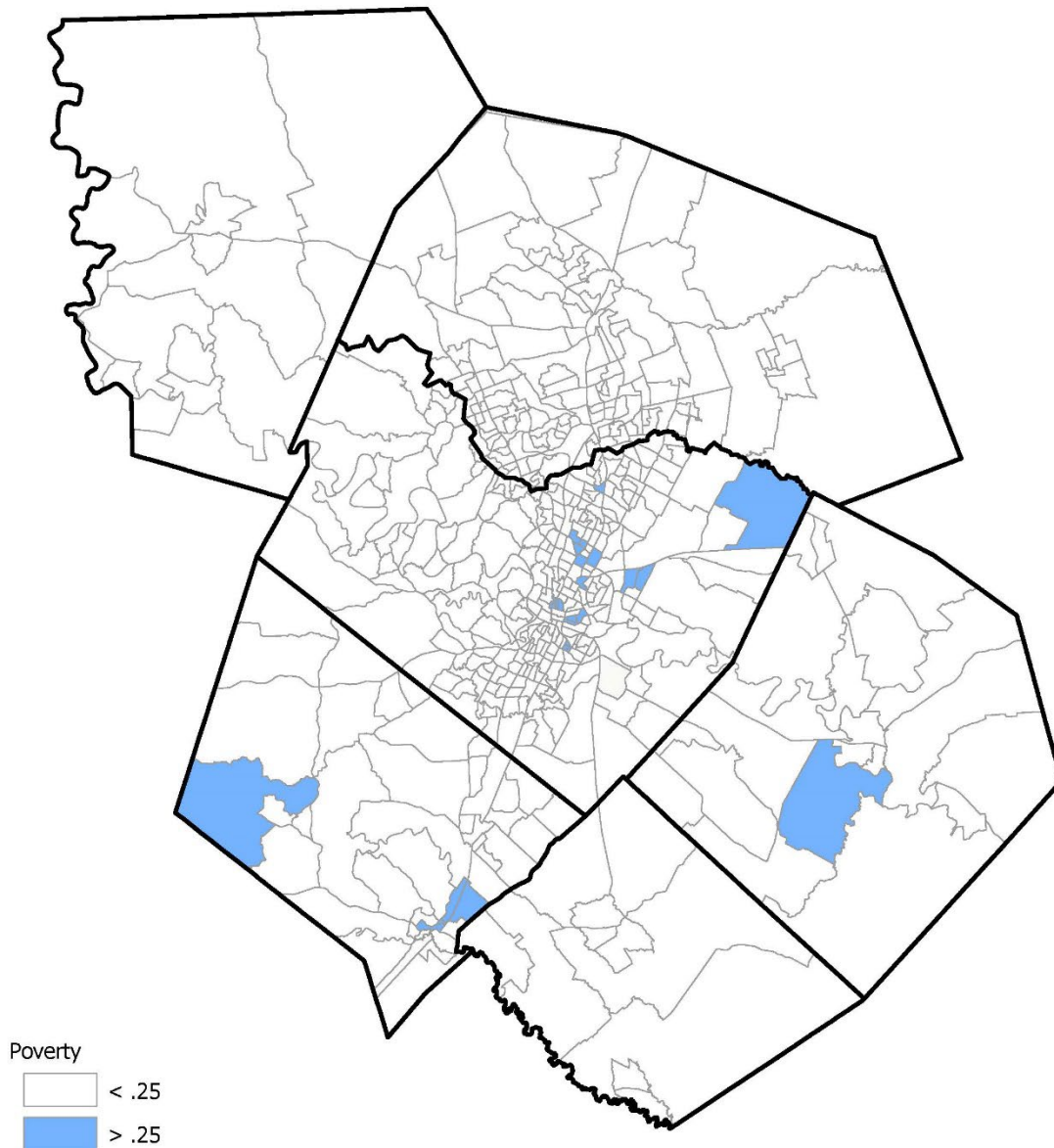


CAMPO 2045 environmental justice analysis.
EJ populations as traffic analysis zones (TAZ) that meet
one or more of the following criteria: low income or minority.

Attachment 3 – EJ Areas, Poverty



Environmental Justice Areas, Poverty

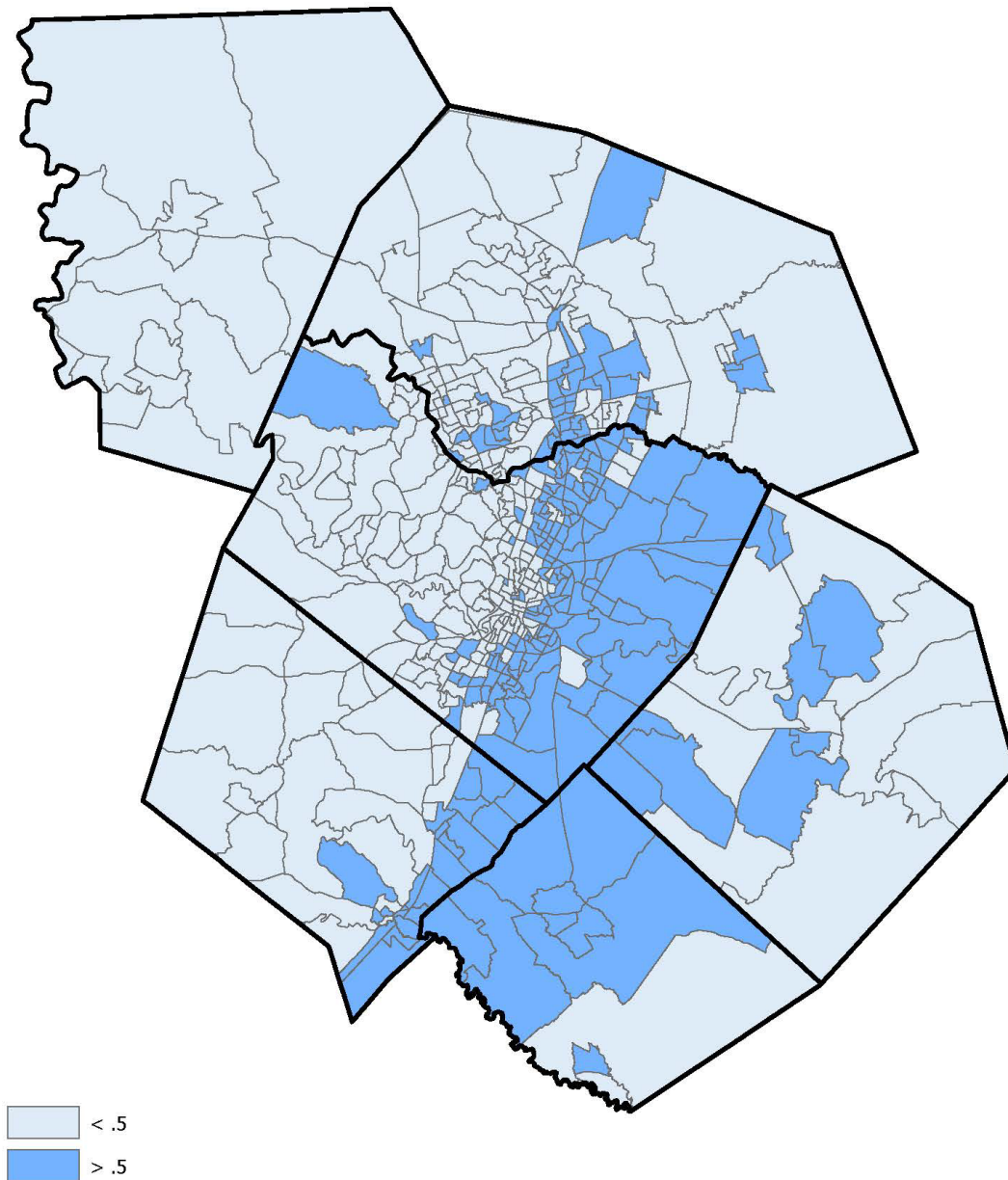


At least 25 % of population is falling below federal poverty line.

Esri, NASA, NGA, USGS

Attachment 4 – EJ Areas, Minority

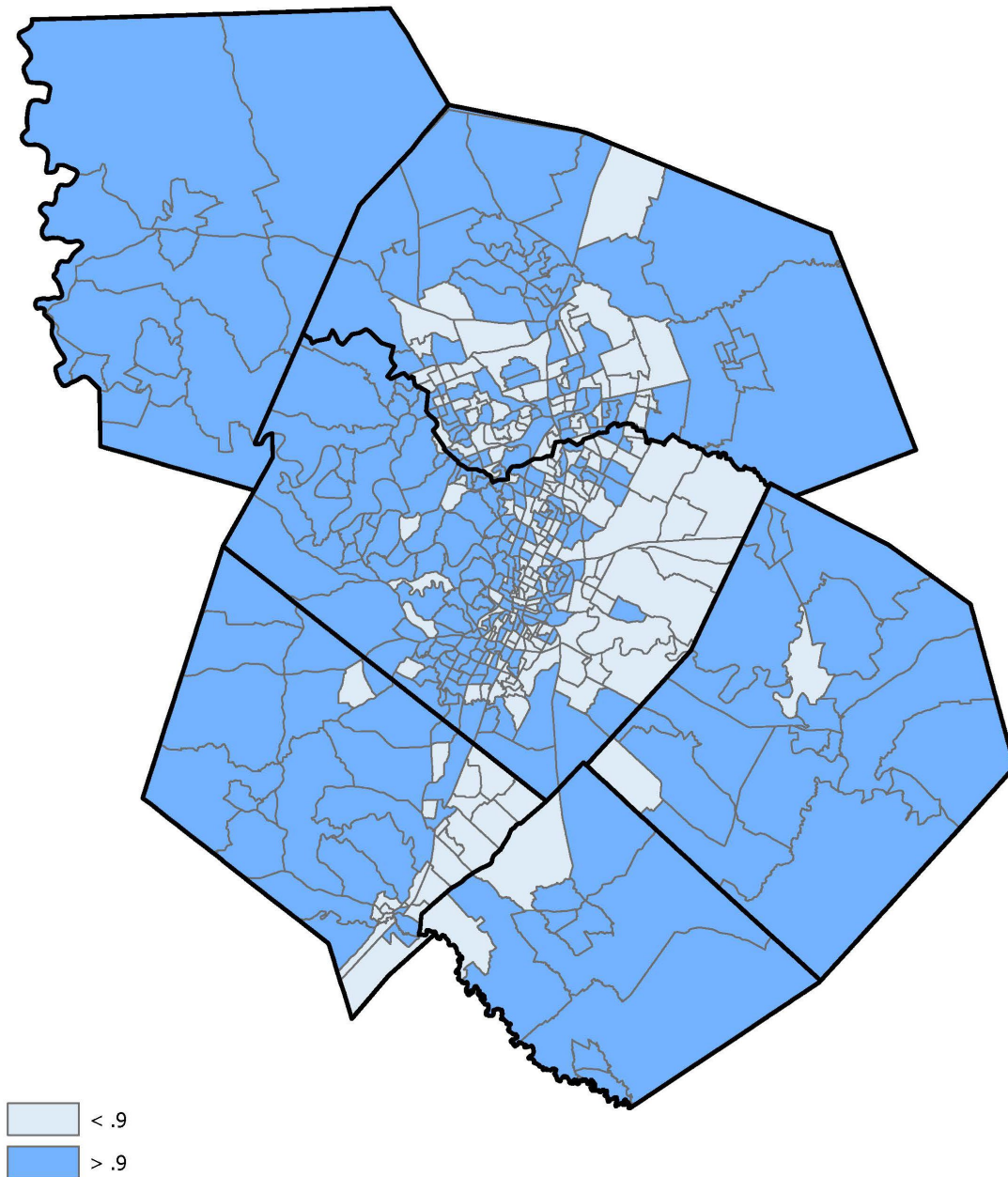
Environmental Justice Areas, Minority



More than 50% of population does not identify as "White, non-Hispanic" per census tract. ACS 2020.

Attachment 5 – EJ Areas, Aging

Environmental Justice Areas, Aging (65+)



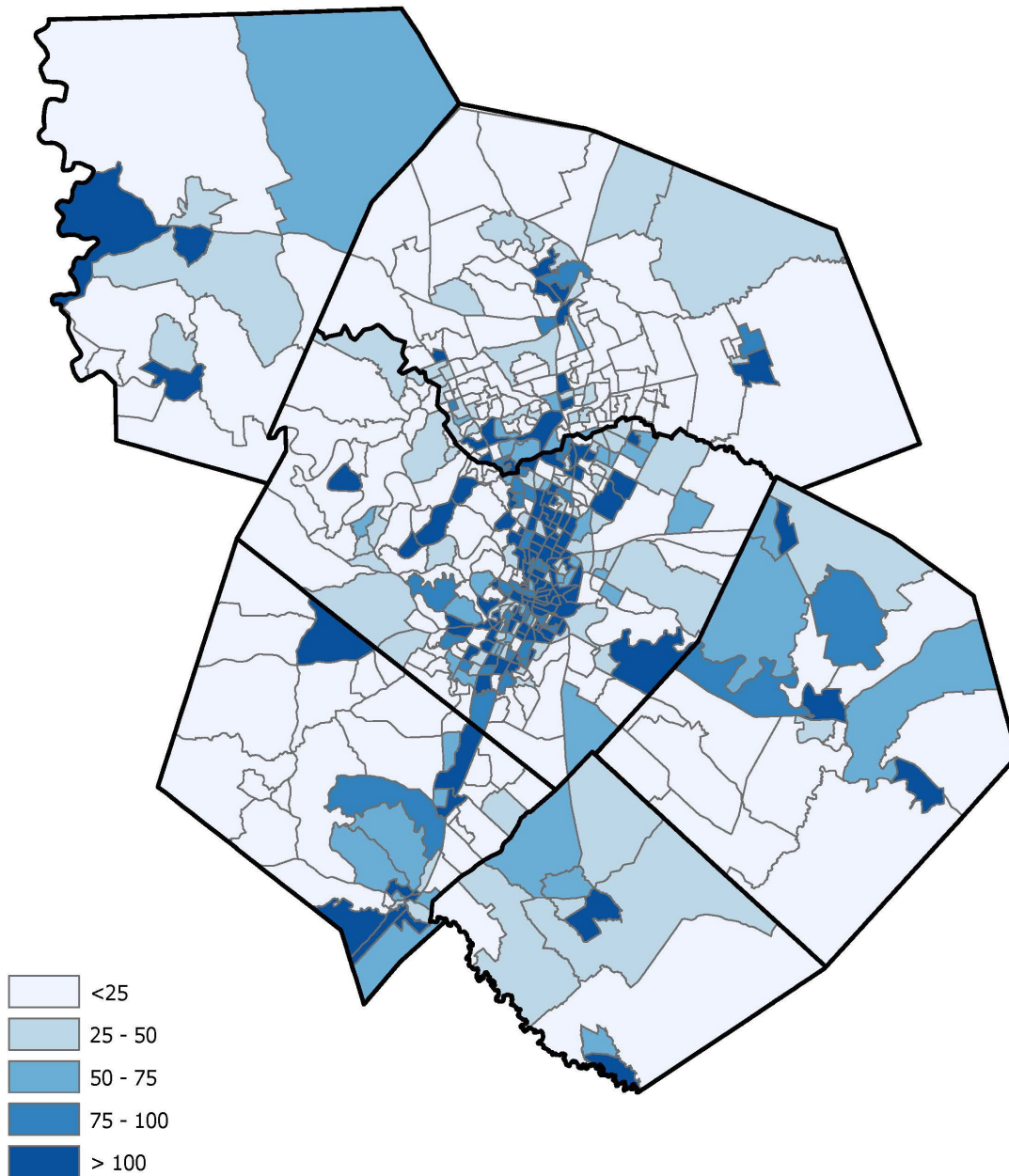
*Referencing 2040 baseline. Regional total percentage of population per census tract of over 65 year = 9%.

Esri, NASA, NGA, USG

Attachment 6 – EJ Areas, Zero Car Households



Environmental Justice Areas, Zero Car Household



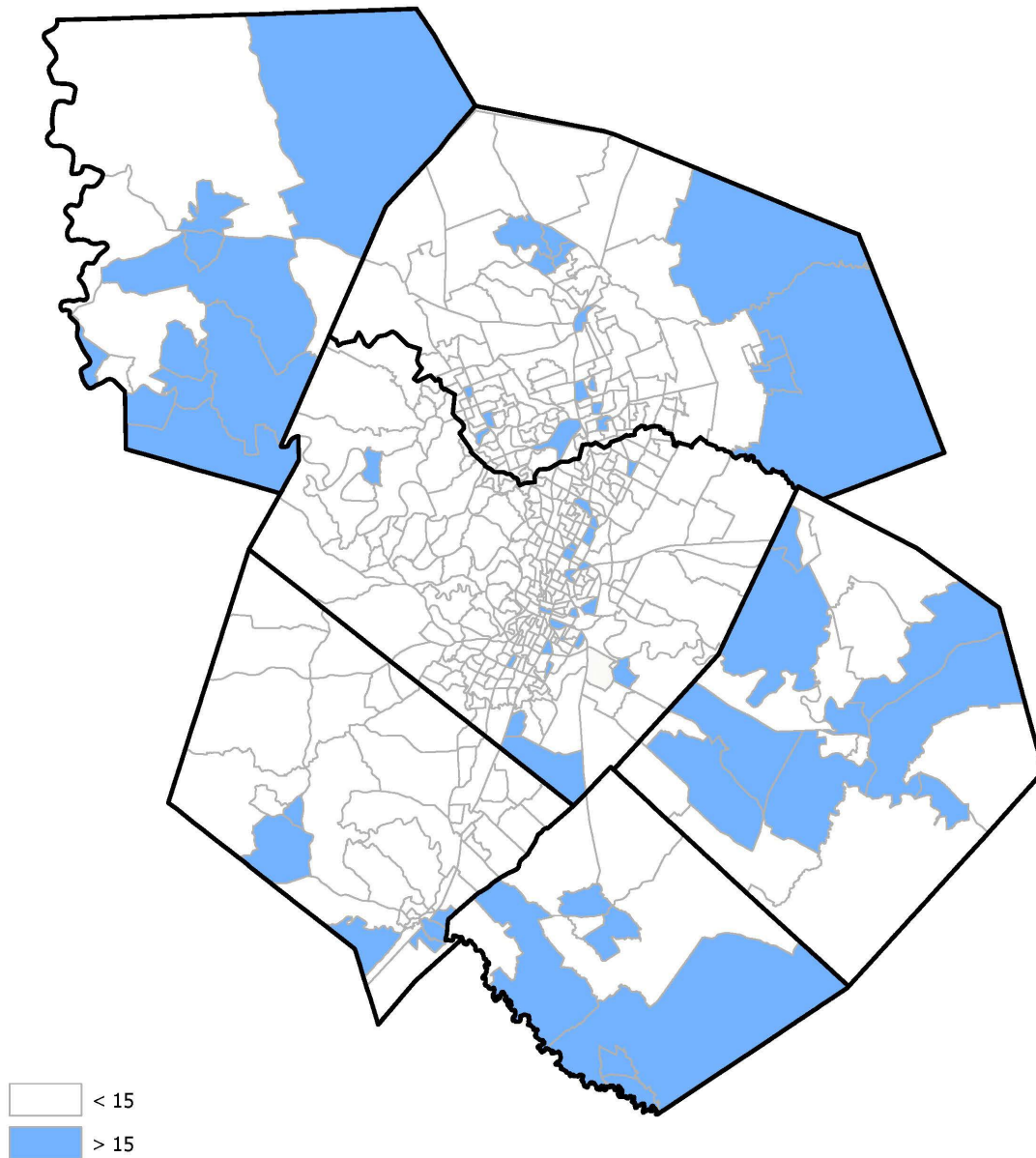
Number of households with zero cars by census tract.

Esri, NASA, NGA, USGS

Attachment 7 – EJ Areas, Disability



Environmental Justice Areas, Disability

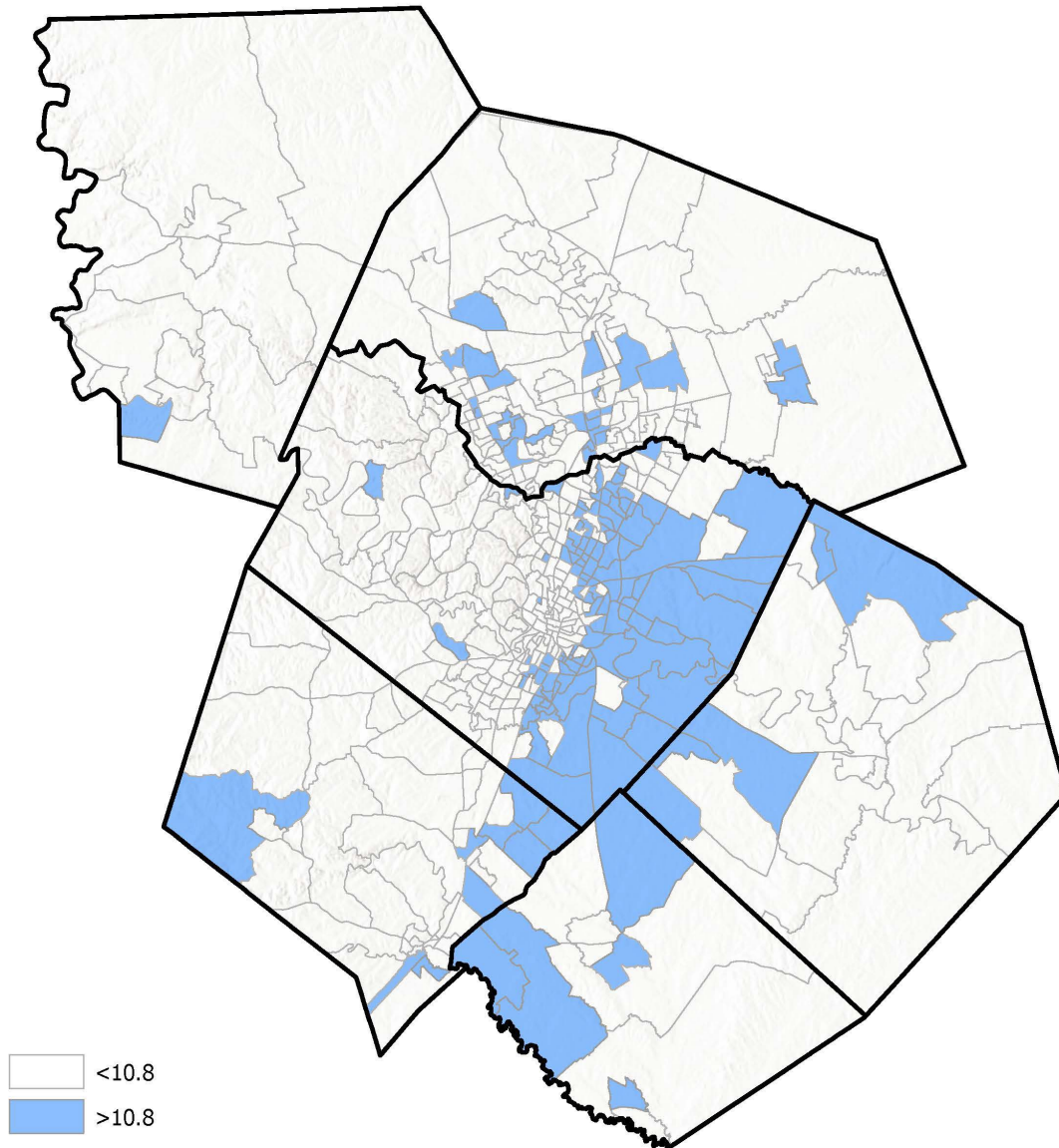


Percentage of people with disabilities (non-institutionalized) by census tract, 2020 ACS.

Esri, NASA, NGA, USGS

Attachment 8 – EJ Areas, Limited English Proficiency

Environmental Justice Areas, by LEP



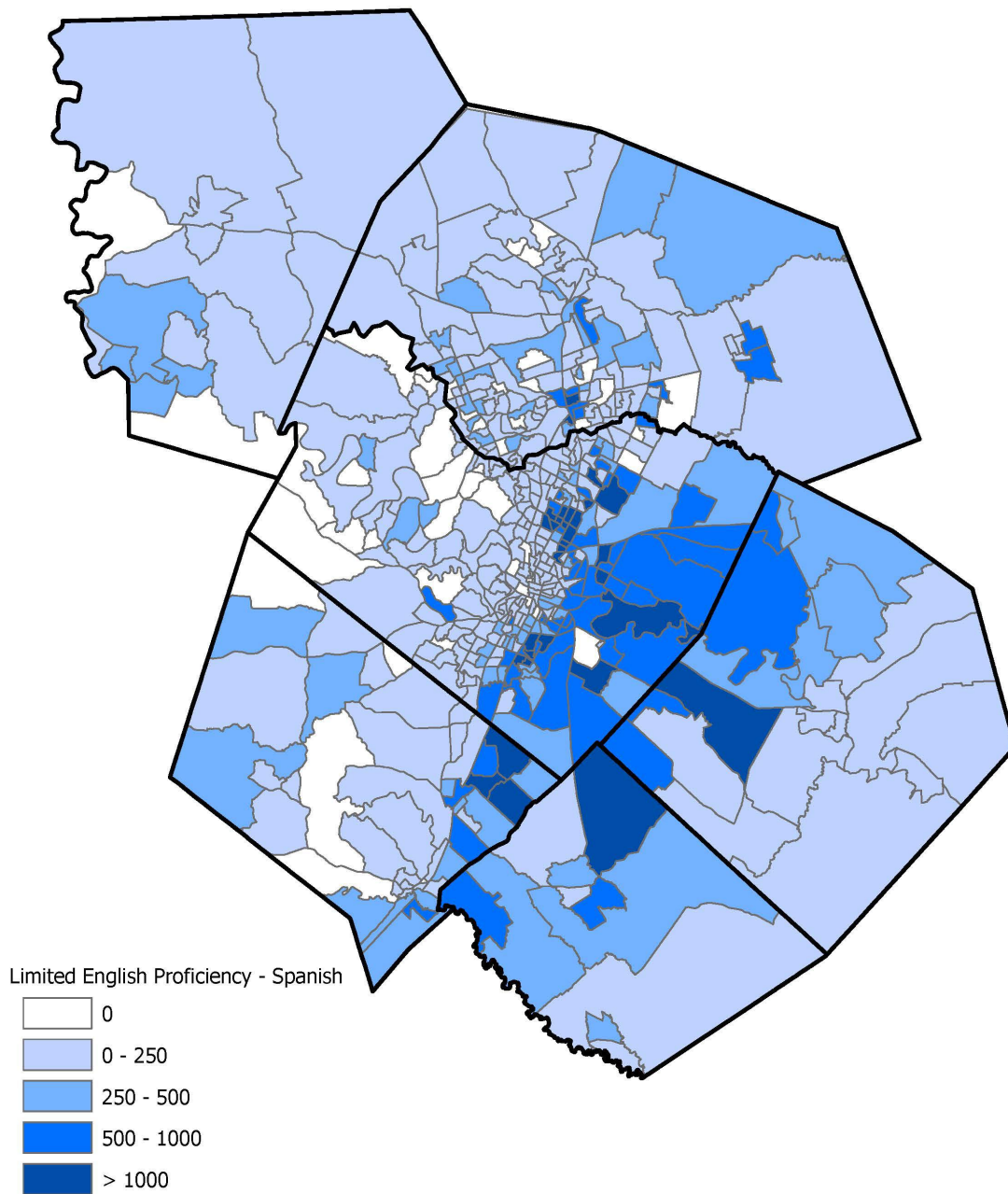
In the CAMPO region, 10.8% of population is LEP.
Census tracts shown have a greater population of
LEP people. ACS 2020 data.

Esri, NASA, NGA, USGS

Attachment 9 – EJ Areas, LEP Spanish



Limited English Proficiency, Spanish

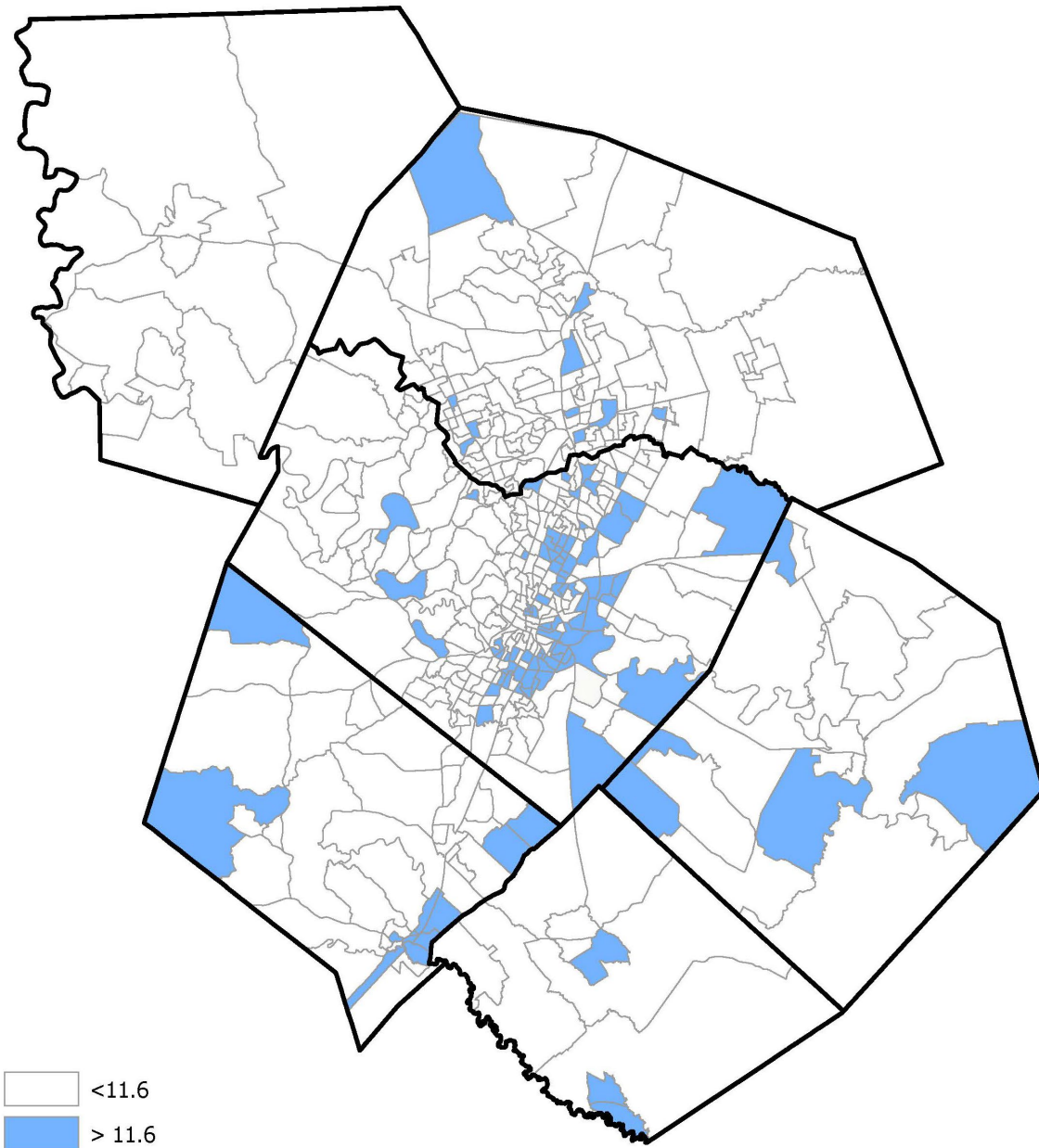


Number of people with limited English proficiency that are Spanish speaking.

Esri, NASA, NGA, USGS

Attachment 10 – EJ Areas, Limited Poverty

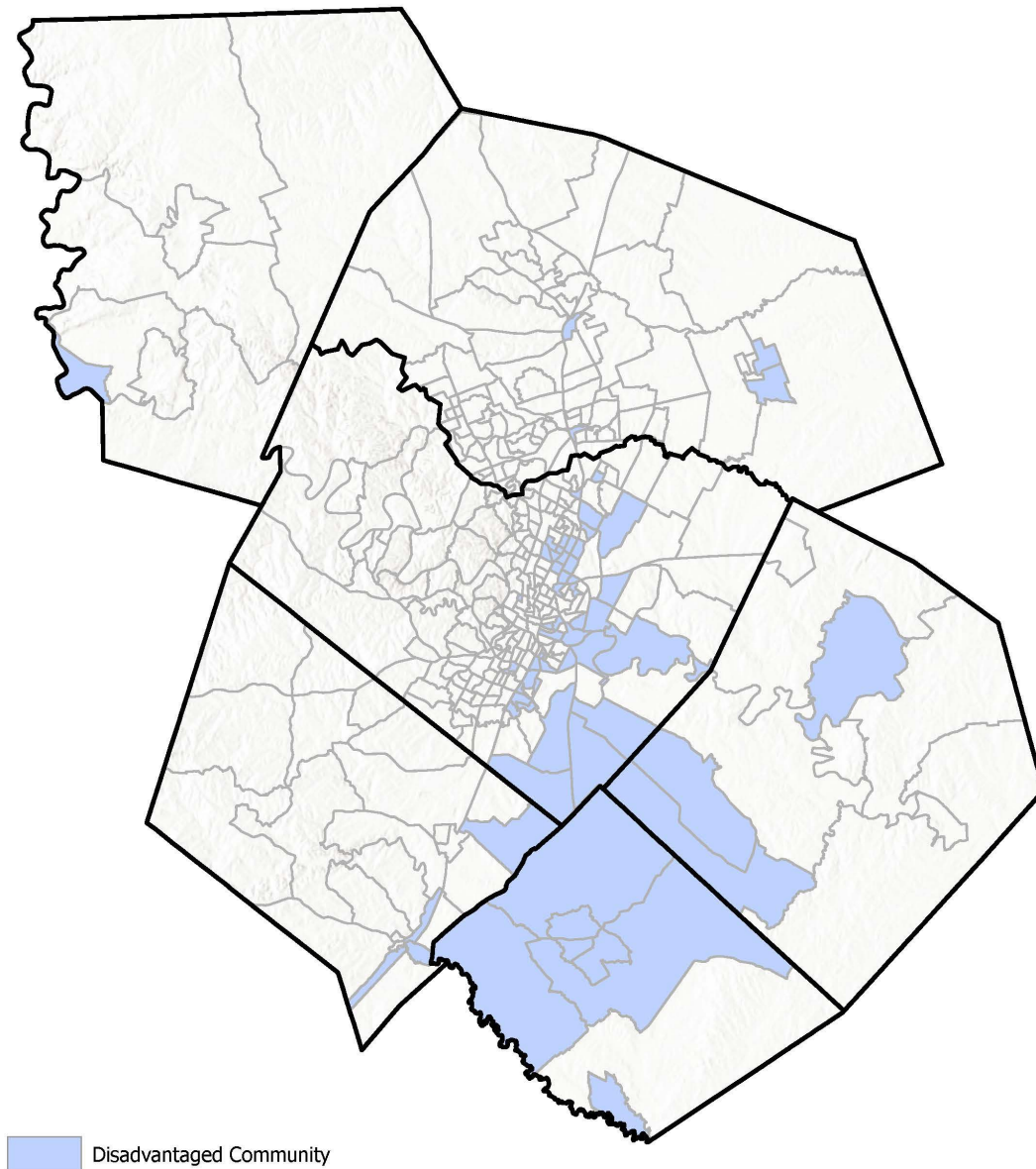
Environmental Justice Areas, Poverty



Esri, CGIAR, USGS

Attachment 11 – Disadvantaged Communities

USDOT Disadvantage Communities (National)

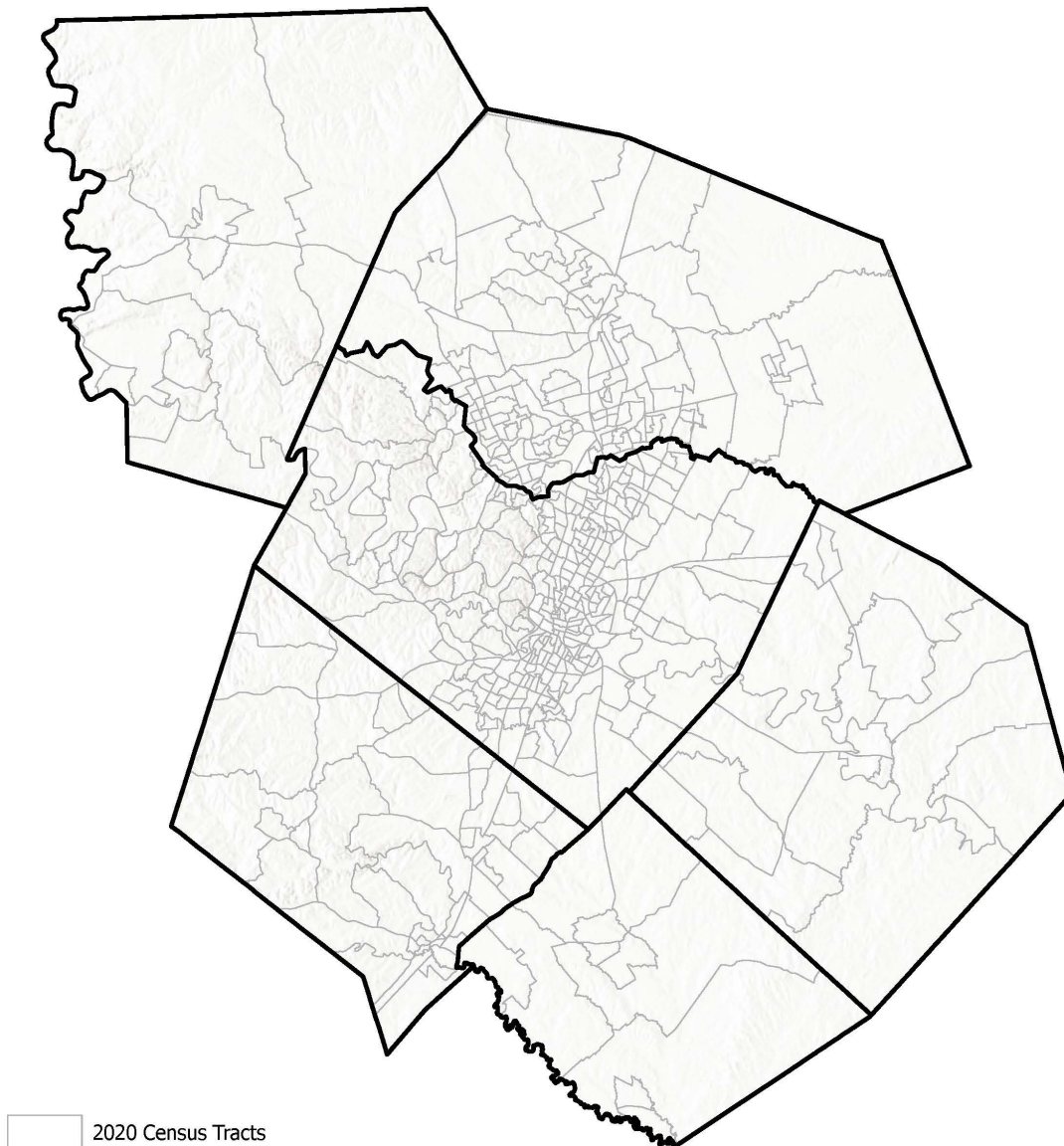


Data compiled by USDOT and comprehensively incorporates environmental justice considerations based on national datasets.

Esri, CGIAR, USGS

Attachment 12 – Census Tract Reference

2020 Census Tract Reference



Esri, NASA, NGA, USGS