

LANGUAGE ASSISTANCE PLAN: A Subset of the Title VI
Portion of the *Title VI Civil Rights and Public Participation Plan*



**FOR THE WESTERN CT COUNCIL OF
GOVERNMENTS, THE SOUTH WESTERN REGION AND
HOUSATONIC VALLEY METROPOLITAN PLANNING ORGANIZATIONS**

SERVING BETHEL, BRIDGEWATER, BROOKFIELD,
DANBURY, DARIEN, GREENWICH, NEW CANAAN, NEW FAIRFIELD,
NEW MILFORD, NEWTOWN, NORWALK, REDDING, RIDGEFIELD,
SHERMAN, STAMFORD, WESTON, WESTPORT, AND WILTON, CONNECTICUT

ENGLISH: For language assistance or other accommodations, contact Western Connecticut Council of Governments at help@westcog.org / ESPAÑOL: Para asistencia con el idioma y otras adaptaciones, por favor póngase en contacto con WestCOG al help@westcog.org / PORTUGUÊS: Para obter assistência língua ou outras acomodações, entre em contato com WestCOG em help@westcog.org / FRANÇAIS: Pour obtenir de l'aide linguistique ou d'autres mesures d'adaptation, contactez WestCOG à help@westcog.org / POLSKI: Aby uzyskać pomoc językową lub inne zakwaterowanie, skontaktuj się z firmą WestCOG pod adresem help@westcog.org.

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1. LANGUAGE ASSISTANCE MEASURES

Recipients of federal financial assistance are given an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important benefits, programs, information, and services.

The guidelines on LEP are within Executive Order 13166 issued in 2000 and entitled “Improving Access to Services for Persons with Limited English Proficiency.” The federal LEP definition refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

As this includes those who have reported to the U.S. Census that they speak English “less than very well, not well, or not at all”, American Community Survey data sets are available for analysis thru WestCOG GIS services.

The starting point is an individualized assessment that balances the following nationally standardized four factors as defined below:

Factor 1) The Number or Proportion of LEP Persons Eligible to be Served or Likely to Be Encountered: The U.S. Department of Justice has recommended the following two criteria to identify LEP populations:

FEDERAL STANDARD FOR IDENTIFYING AREAS OF LIMITED ENGLISH PROFICIENCY: A language is considered an LEP language if the language group in a federally defined census tract constitutes 5% or more of total population and speaks English as federally defined “less than very well.”

FEDERAL STANDARD FOR IDENTIFYING “SAFE HARBOR” SUBSET OF LIMITED ENGLISH PROFICIENCY: A language falls under the Safe Harbor provision if the language group in a federally defined census tract reaches the 5% threshold or 1000 individuals, whichever is less, and speaks English as federally defined “less than very well.”

As U. S. DOT funding recipients WestCOG, SWRMPO and HVMPO will provide 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 to be served by regional transportation planning.

Using the Census Bureau’s American Community Survey (ACS) resources, WestCOG measured Limited English Proficiency for each municipality in the SWRMPO and HVMPO federally designated

transportation planning regions. In addition, WestCOG also calculated Limited English Proficiency for the region as a whole.

Table “B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” was analyzed at the municipal and then regional level. The most recent data available by municipality for Table B16001 was 2015 ACS 5-year estimates.

Using the LEP standards above, municipalities were then identified based on the following criteria: 1) 1,000 people speaking an identified non-English language who have limited English proficiency, and 2) 5% of people speaking an identified non-English language who have limited English proficiency.

Note that the Census Bureau’s American Community Survey provides consolidated numeration of Spanish and Spanish Creole speakers, also Portuguese and Portuguese Creole speakers. However, the ACS does not consolidate numeration of French and French Creole speakers. In order to provide compatible identification of languages which met the specified criteria, French and French Creole speakers were combined.

The results for the two federal MPO areas is as follows:

SWRMPO LIMITED ENGLISH PROFICIENCY AREAS:

Three Census identified “Safe Harbor” Subset of Limited English Proficiency languages met the criteria within the SWRMPO area. These are Spanish or Spanish Creole, French or French Creole, and Polish, as follows:

Municipality	Total Population (5 Years and Over)	Safe Harbor Language	Population over 1,000 individuals who speak English as federally defined “less than very well.”
Greenwich	58049	Spanish or Spanish Creole	2145
Norwalk	82825	Spanish or Spanish Creole	8863
Stamford	118171	Spanish or Spanish Creole	14066
Stamford	118171	French or French Creole	1968
Stamford	118171	Polish	1082

One Census identified Limited English Proficiency language met the criteria within the SWRMPO area. This is Spanish or Spanish Creole, as follows:

Municipality	Total Population (5 Years and Over)	5% of Total Population (5 Years and Over)	Limited English Proficiency Language	Percentage of Total Population that is 5% or more of total population and speaks English as federally defined “less than very well.”
Norwalk	82825	4141.25	Spanish or Spanish Creole	8863 individuals, or 10.70% of total population
Stamford	118171	5908.55	Spanish or Spanish Creole	14066 individuals, or 11.90% of total population

The following municipalities did not reach the threshold for Safe Harbor or Limited English Proficiency languages for the SWRMPO: Darien, New Canaan, Weston, Westport, and Wilton.

HVMPO LIMITED ENGLISH PROFICIENCY AREAS:

Two Census identified “Safe Harbor” Subset of Limited English Proficiency languages met the criteria within the HVMPO area. These are Spanish or Spanish Creole and Portuguese or Portuguese Creole, as follows:

Municipality	Total Population (5 Years and Over)	Safe Harbor Language	Population over 1,000 individuals who speak English as federally defined “less than very well.”
Danbury	78553	Spanish or Spanish Creole	11589
Danbury	78553	Portuguese or Portuguese Creole	3775

One Census identified Limited English Proficiency language met the criteria within the HVMPO area. This is Spanish or Spanish Creole, as follows:

Municipality	Total Population (5 Years and Over)	5% of Total Population (5 Years and Over)	Limited English Proficiency Language	Percentage of Total Population that is 5% or more of total population and speaks English as federally defined “less than very well.”
Danbury	78553	3927.65	Spanish or Spanish Creole	11589 individuals, or 14.75% of total population

The following municipalities did not reach the threshold for Safe Harbor or Limited English Proficiency languages for the HVMPO: Bethel, Bridgewater, Brookfield, New Fairfield, New Milford, Newtown, Redding, Ridgefield, and Sherman.

According to the USDOT document “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons”, appearing in the Federal Register Volume 70, No. 239, translations of other documents, if needed, can be provided orally.

Further, the Safe Harbor standards should be viewed as minimums when conducting an assessment of language access needs. That is, there may be smaller language groups that need assistance in some transportation study project areas.

SWRMPO and HVMPO will assess language access needs on a per project basis to determine the LEP populations likely to be affected and which outreach measures are appropriate. WestCOG has the GIS mapping and analytical capability in place to accomplish this.

LIMITED ENGLISH PROFICIENCY AREAS IN THE REGION:

Additionally, using the Census Bureau’s ACS resources and LEP standards above, WestCOG measured Limited English Proficiency across its eighteen municipalities. This includes both the SWRMPO and HVMPO federally designated transportation planning regions.

Eight Census identified “Safe Harbor” Subset of Limited English Proficiency languages met the criteria within the region (WestCOG Total Population [5 Years and Over]: 569,361). These are Spanish or Spanish Creole, French or French Creole, Italian, Portuguese or Portuguese Creole, Russian, Polish, and Chinese, as follows:

Safe Harbor Language	Population over 1,000 individuals who speak English as federally defined “less than very well.”
Spanish or Spanish Creole	38868
French or French Creole	3217
Italian	1889
Portuguese or Portuguese Creole	4916
Russian	1164
Polish	1793
Chinese	2856

One Census identified Limited English Proficiency language met the criteria within the region, with WestCOG’s total population (5 Years and Over) being 569,361 and 5% of the total population (5 Years and Over) being 28,468 based on Table B16001 2015 ACS 5-year estimates. This is Spanish or Spanish Creole, as follows:

WestCOG Total Population (5 Years and Over)	5% of Total Population (5 Years and Over)	Limited English Proficiency Language	Percentage of Total Population that is 5% or more of total population and speaks English as federally defined “less than very well.”
569,361	28,468.5	Spanish or Spanish Creole	38,868 individuals, or 6.8% of total population

WestCOG will perform language assistance based on the Safe Harbor and LEP languages at the municipal level.

Factor 2. The Frequency with Which LEP Individuals Come in Contact with the Planning Program:

Within their quarterly transportation reports, staff record the frequency with which LEP persons come into contact with SWRMPO and HVMPO programs. Over the past three years, there have been no requests for translation services or interpretation services. Given the record of requests received, frequency is best categorized as “very limited.” But it is expected that contact with LEP persons can occur at any time via public meetings, office visits, or phone calls.

Factor 3. The Nature and Importance of the Program, Activity, or Service Provided by the Program to People’s Lives. SWRMPO and HVMPO use federal and state funding to plan for future transportation projects that can have an impact on the lives of all residents of the two MPO regions.

It is important for LEP persons to be able to participate in the planning process of these projects, particularly during public meetings or public comment periods. Given the record of requests received, frequency is best categorized as “very limited.”

The following additional methods are utilized to assist LEP individuals that need language assistance:

-- An “I Speak” card with Spanish, Portuguese and 36 languages is available in the WestCOG office to help visiting LEP persons indicate which language they require assistance in.

-- Interpreter and translator services will be provided, upon request, for all meetings of WestCOG, SWRMPO and HVMPO.

-- WestCOG will translate published materials into another language upon request.

-- The WestCOG web site offers automatic translation into the following languages: Afrikaans, Albanian, Arabic, Armenian, Azerbaijani, Basque, Belarusian, Bengali, Bosnian, Bulgarian, Catalan, Cebuano, Chichewa, Chinese, Croatian, Czech, Danish, Dutch, Esperanto, Estonian, Filipino, Finnish, French, Galician, Georgian, German, Greek, Gujarati, Haitian Creole, Hausa, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Igbo, Indonesian, Irish and Italian.

Also, translation into Japanese, Javanese, Kannada, Kazakh, Khmer, Korean, Lao, Latin, Latvian, Lithuanian, Macedonian, Malagasy, Malay, Malayalam, Maltese, Maori, Marathi, Mongolian, Myanmar Burmese, Nepali, Norwegian, Persian, Polish, Portuguese, Punjabi, Romanian, Russian, Serbian, Sesotho, Sinhala, Slovak, Slovenian, Somali, Spanish, Sundanese, Swahili, Swedish, Tajik, Tamil, Telugu, Thai, Turkish, Ukrainian, Urdu, Uzbek, Vietnamese, Welsh, Yiddish, Yoruba and Zulu.

Factor 4. The Resources Available to the Grantee/Recipient and Costs. The resources available for assisting LEP populations are further described in Factor 3. Interpretation and translation are available upon demand. Other accommodations are available upon request.

WestCOG, SWRMPO and HVMPO have sufficient financial resources to provide the LEP services and assistance they propose to offer.

Current and Future Language Assistance Measures

To ensure media flexibility in their use, staff will copy and insert translated text as needed into the digital or hard copy media appropriate for their Title VI Plan objective. There is more need than in earlier years to maximize flexibility in the distribution of Title VI documents utilizing PowerPoint formats, graphics, web site formats, emails, other digital documents, as well as traditional hard copy posters and flyers. Future language assistance measures include internal administrative review of the translated texts and plan for potential updates.

2. LISTING OF VITAL DOCUMENTS

The following federally required “multilingual vital documents” are points of entry into the region’s federally sponsored transportation planning program. Vital documents are defined as those “critical for ensuring meaningful access to the recipient’s major activities” and are as follows:

- 6A. TRANSLATED TEXT TO ACCESS SWRMPO TRANSPORTATION PLAN
in English, Spanish, Portuguese, French, and Polish
 - 6B. TRANSLATED TEXT TO ACCESS HVMPO TRANSPORTATION PLAN
in English, Spanish, Portuguese, French, and Polish
 - 6C. TRANSLATED TEXT TO ACCESS TRANSPORTATION IMPROVEMENT PROGRAMS
in English, Spanish, Portuguese, French, and Polish
 - 6D. TRANSLATED TEXT TO ACCESS METROPOLITAN PLANNING ORGANIZATIONS
in English, Spanish, Portuguese, French, and Polish
 - 6E. TRANSLATED TEXT TO APPEAR ON MPO AND WESTCOG AGENDAS OR OTHER DOCUMENTS
in English, Spanish, Portuguese, French, and Polish
 - 6F. NOTICE OF COMPLAINT PROCEDURE
in English, Spanish, Portuguese, French, and Polish
 - 6G. TITLE VI COMPLAINT FORM
in English, Spanish, Portuguese, French and Polish
 - 6H. TITLE VI NOTICE TO THE PUBLIC
in English, Spanish, Portuguese, French, and Polish
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3. TRAINING AND OUTREACH

Title VI Program implementation responsibilities have been delegated by the Executive Director to WestCOG’s Title VI Coordinator, who will be responsible for the day-to-day collection, analysis, and reporting of Title VI related data. The Title VI Coordinator will regularly conduct a compliance and program review to ensure that SWRMPO, HVMPO and WestCOG adhere to the procedures outlined in this plan. The Title VI Coordinator conducted a Title VI program and compliance review with the WestCOG staff at the March 20, 2019 staff meeting. Title VI & EJ application to WestCOG, FHWA Title VI program requirements, and WestCOG obligations under Title VI & EJ were discussed. WestCOG staff are trained at hire, during the annual refresher training, and when new language assistance measures are implemented.

WestCOG informs the public of the option to request language assistance through the WestCOG website and translated text that appear on agendas. As a subset of the Title VI portion of the Title VI Civil Rights and Public Participation Plan, the Language Assistance Plan is reviewed annually and updated every three years if needed by an internal administrative review.