

# Western Connecticut Council of Governments

## Language Assistance Policy

AUGUST 2025

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# INTRODUCTION

WestCOG has developed this Policy to assess the need for language services and detail what services will be offered throughout the planning process. Limited English Proficiency (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. A four-factor analysis was used to determine what languages are likely to be encountered in the region to inform the types of services that are offered.

## 1. FOUR FACTOR ANALYSIS

### **Factor One: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population:**

An analysis of the data available from the U.S. Census Bureau's American Community Survey (ACS) was conducted to determine the number and proportion of LEP persons in each MPO. The ACS reports the total population by census tract that speak English "less than very well, not very well, or not at all" for the following twelve languages and language groups:

- Spanish
- French, Haitian, or Cajun
- German or other West Germanic Languages
- Russian, Polish, or other Slavic Languages
- Other Indo-European Languages
- Korean
- Chinese (including Mandarin and Cantonese)
- Vietnamese
- Tagalog (including Filipino)
- Other Asian and Pacific Island Languages
- Arabic
- Other and Unspecified Languages

Table 1 and Table 2 show all twelve language and language groups by MPO with the Proportion and Number of the Population that Speaks English.

In 2015, Portuguese speakers who speak English "less than very well, not very well or not at all" made up 1.96% of the total HV Population (2011-2015 ACS 5-year Estimates, Table B16001), the second most common LEP language in the MPO. However, in 2016 the U.S. Census Bureau ceased reporting the detailed 42 languages and started grouping several languages together. Unfortunately, the twelve language and language groups no longer include Portuguese or Polish as an isolated group. Portuguese is grouped into the "Other Indo-European Languages" category and Polish into "Russian, Polish and other Slavic Languages". Based on historic data indicating a relatively high proportion of Portuguese and Polish speaking LEP populations in the region and confirmation from the Connecticut Department of Transportation, for the purposes of LEP identification "Other Indo-European Languages" are assumed to be Portuguese speaking and "Russian, Polish and other Slavic Languages" are assumed to be mostly Polish speaking.

Table 1: HVMPO Language and Language Groups: Speaks English Less than Very Well

Language	Percent Speaks English Less than Very Well (Proportion)	Speaks English Less than Very Well (Number)
Spanish	5.47%	12,084
Other Indo-European Languages	2.83%	6,258
Chinese (including Mandarin and Cantonese)	0.39%	871
Other Asian and Pacific Island Languages	0.28%	611
Russian, Polish, and other Slavic Languages	0.26%	572
French, Haitian, or Cajun	0.18%	400
Arabic	0.10%	225
Vietnamese	0.10%	214
German or other West Germanic Languages	0.04%	94
Other and Unspecified Language	0.02%	49
Korean	0.02%	43
Tagalog (including Filipino)	0.00%	10
<b>Total HVMPO LEP Population</b>	<b>9.70%</b>	<b>21,431</b>
<b>Total HVMPO Population</b>		<b>220,867</b>

Source: 2017-2021 ACS 5-year Estimates, Table C16002.

Table 2: SWRMPO Language and Language Groups: Speaks English Less than Very Well

Language	Percent Speaks English Less than Very Well (Proportion)	Speaks English Less than Very Well (Number)
Spanish	7.95%	29,109
Other Indo-European Languages	1.26%	4,601
Russian, Polish, and other Slavic Languages	0.98%	3,590
Chinese (including Mandarin and Cantonese)	0.68%	2,477
French, Haitian, or Cajun	0.66%	2,402
Other Asian	0.34%	1,231
Tagalog (including Filipino)	0.11%	412
Other and Unspecified Language	0.11%	397
Arabic	0.07%	241
Korean	0.07%	240
German or other West Germanic Languages	0.04%	162
Vietnamese	0.03%	96
<b>Total SWMPO LEP Population</b>	<b>12.28%</b>	<b>44,958</b>
<b>Total SWMPO Population</b>		<b>365,961</b>

Source: 2017-2021 ACS 5-year Estimates, Table C16002.

**Factor Two: The Frequency with Which LEP Individuals Come in Contact with the Program, Activity, or Service**

Within their quarterly transportation reports, staff record the frequency with which LEP persons encounter SWRMPO and HVMPO programs. Over the past three years, there have been no requests for translation services or interpretation services. During outreach conducted for the 2023-2050 Metropolitan Transportation Plan, staff encountered five individuals that could not speak English or speak English very well during pop-up events in downtown Stamford and Danbury. It is presumed that the individuals spoke Spanish and Spanish outreach materials describing the purpose of the event were distributed. 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, outreach events, office visits, or phone calls.

**Factor Three: The Nature and Importance of the Program, Activity, or Service Provided by the Program.**

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 have the opportunity to participate in the planning process of these projects, particularly during public meetings or public comment periods. Additional outreach, in appropriate languages, is needed before the implementation or construction of projects or programs recommended by the MPO.

**Factor Four: The Resources Available to the Recipient and Costs.**

WestCOG has a variety of resources available to conduct outreach activities. There is more opportunity than in earlier years to maximize flexibility in the distribution of documents utilizing social media, the WestCOG website, email distribution listing, and other digital documents, as well as traditional hard copy posters, flyers, and newspaper notices. WestCOG has sufficient financial resources to provide the LEP services and assistance outlined in the Language Assistance Policy.

## 2. LANGUAGE ASSISTANCE POLICY

WestCOG has determined through the four-factor analysis that there is a need for LEP services in Spanish in both MPOs and Portuguese in HVMPO.

### VITAL DOCUMENTS

The following vital documents are deemed points of entry into the WestCOG federal transportation planning programs:

- Transportation Improvement Program (TIP)
- Metropolitan Transportation Plan (MTP)
- Public Involvement Plan (PIP)
- Title VI Compliance Plan

Executive summaries of these vital documents will be posted on the WestCOG website which has been equipped with a web translation tool. This gives members of the public with limited English proficiency the option to translate any part of the website. The WestCOG website currently offers automatic translation into the following languages, as of the publication of this document:

- Arabic
- Chinese (Simplified)
- French
- German
- Italian
- Polish
- Portuguese
- Russian
- Spanish
- English

These documents, especially the TIP, are regularly updated when amendments are made to specific projects. Using a web translation tool allows these updates to be translated quickly, expanding the reach of the transportation planning process.

WestCOG will continue to translate documents and outreach materials in languages where the need exists. Other methods for engaging LEP people in the transportation planning process for these vital documents include:

- Public/Legal Notices in Spanish and Portuguese
- Outreach materials in Spanish and Portuguese

### TRANSLATED TEXT TO APPEAR ON AGENDAS, PUBLIC MEETING NOTICES OR OTHER DOCUMENTS

Interpreter and translator services will be provided in Spanish and Portuguese, upon request, for all meetings of WestCOG, SWRMPO and HVMPO. This service is indicated on the WestCOG website and meeting agendas. Other language interpretation and translation requests will be made on a case-by-case basis, depending on resources.

The following statement is included on all regular meeting agendas of the COG and TAG; on outreach materials for public meetings; and other documents to ensure members of the public needing language assistance have an equal opportunity to participate in the public participation process.

**ENGLISH:** For language assistance or other accommodations, contact Western Connecticut Council of Governments at least five business days prior to the meeting at [help@westcog.org](mailto:help@westcog.org).

**ENGLISH:** For language assistance or other accommodations, contact Western Connecticut Council of Governments at [help@westcog.org](mailto:help@westcog.org).

**ESPAÑOL:** Para asistencia con el idioma y otras adaptaciones, por favor póngase en contacto con WestCOG por lo menos cinco días hábiles antes de la reunión al [help@westcog.org](mailto:help@westcog.org).

**ESPAÑOL:** Para asistencia con el idioma y otras adaptaciones, por favor póngase en contacto con WestCOG al [help@westcog.org](mailto:help@westcog.org).

**PORTUGUÊS:** Para obter assistência língua ou outras acomodações, entre em contato com WestCOG pelo menos cinco dias úteis antes da reunião em [help@westcog.org](mailto:help@westcog.org).

**PORTUGUÊS:** Para obter assistência língua ou outras acomodações, entre em contato com WestCOG em [help@westcog.org](mailto:help@westcog.org).

### **ADDITIONAL LANGUAGE SERVICES**

The analysis also showed there are several census tracts in the SWRMPO with populations of at least 5% or 1000 individuals who speak English “less than very well” for additional languages. The languages identified include Polish; Chinese; French, Haitian, or Cajun; and other Asian.

WestCOG will provide written translations of vital documents for these additional language groups and translations of other documents, if needed, can be provided orally. Both are by request only.

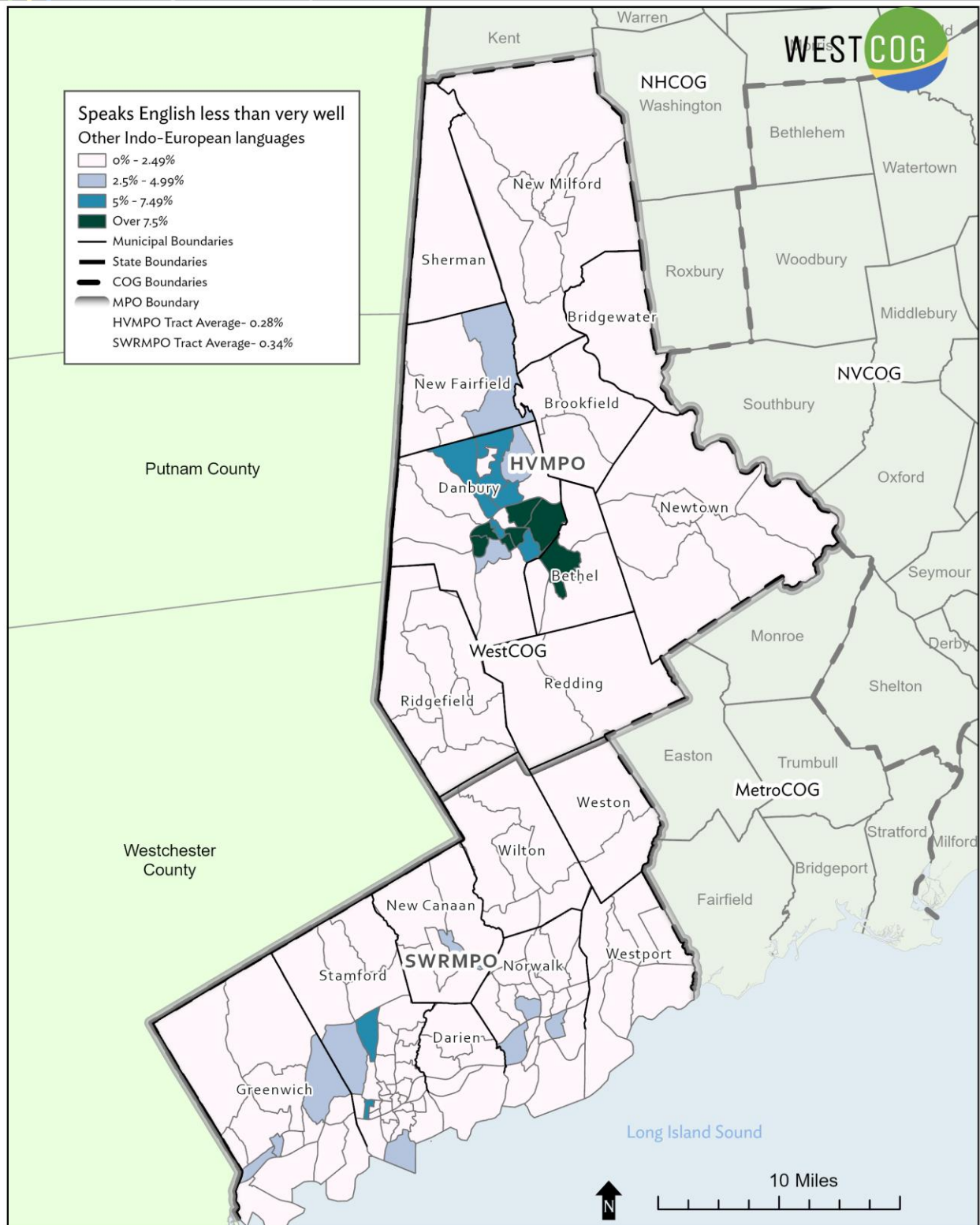
A series of maps in Appendix A indicate census tracts that have 2.5% or more of the population that can speak English “less than very well”, by language or language group. These maps will be used on a per project basis for spatially specific planning studies to tailor outreach measures, as appropriate.

“I Speak” cards with Spanish, Portuguese and other languages are available to help visiting LEP persons indicate which language they require assistance in.

## APPENDIX A

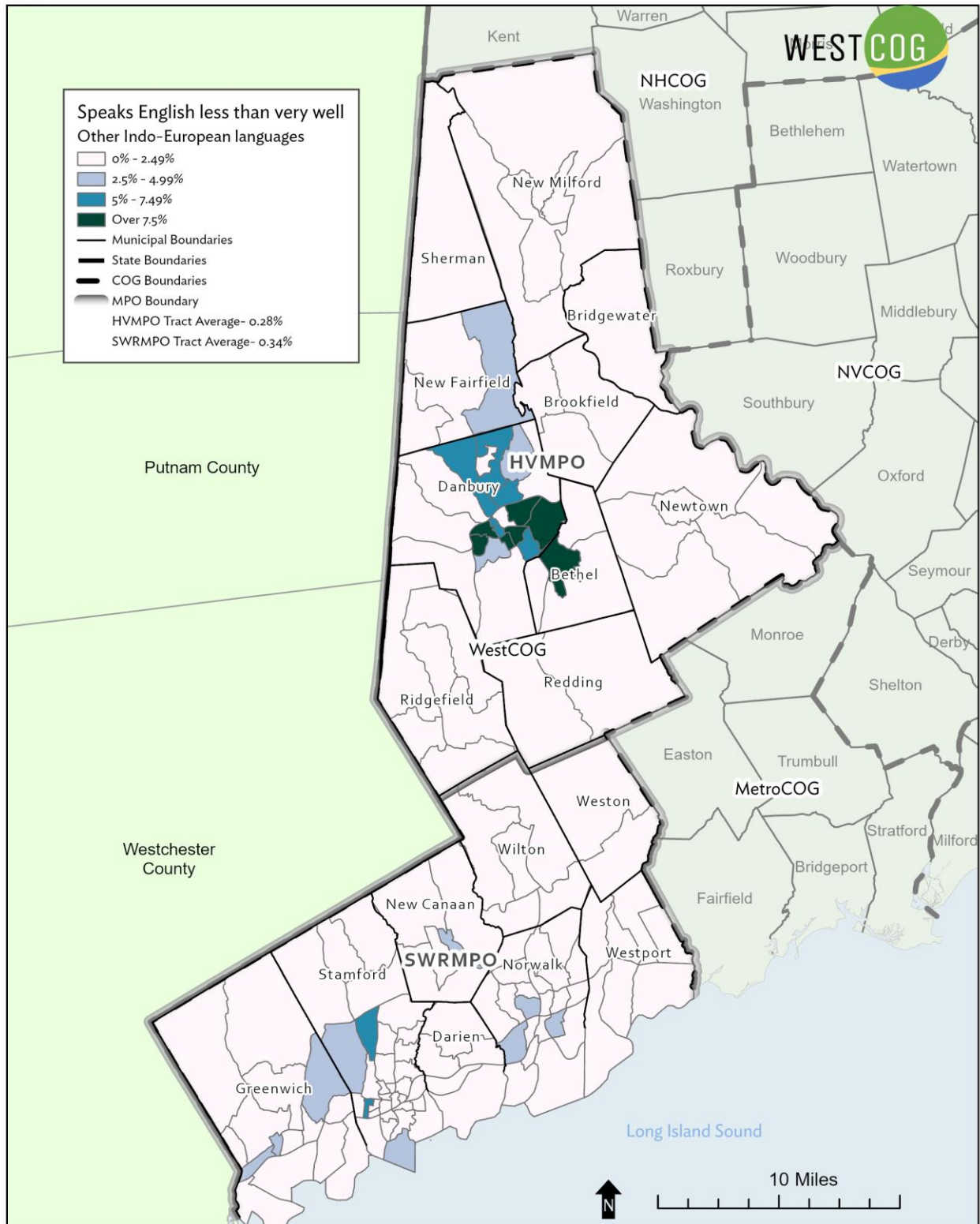






Other Indo-European Languages include most languages of Europe and the Indic languages of India. These include the Scandinavian languages such as Swedish and Norwegian; the Romance languages such as Portuguese and Italian; the Indic languages such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.

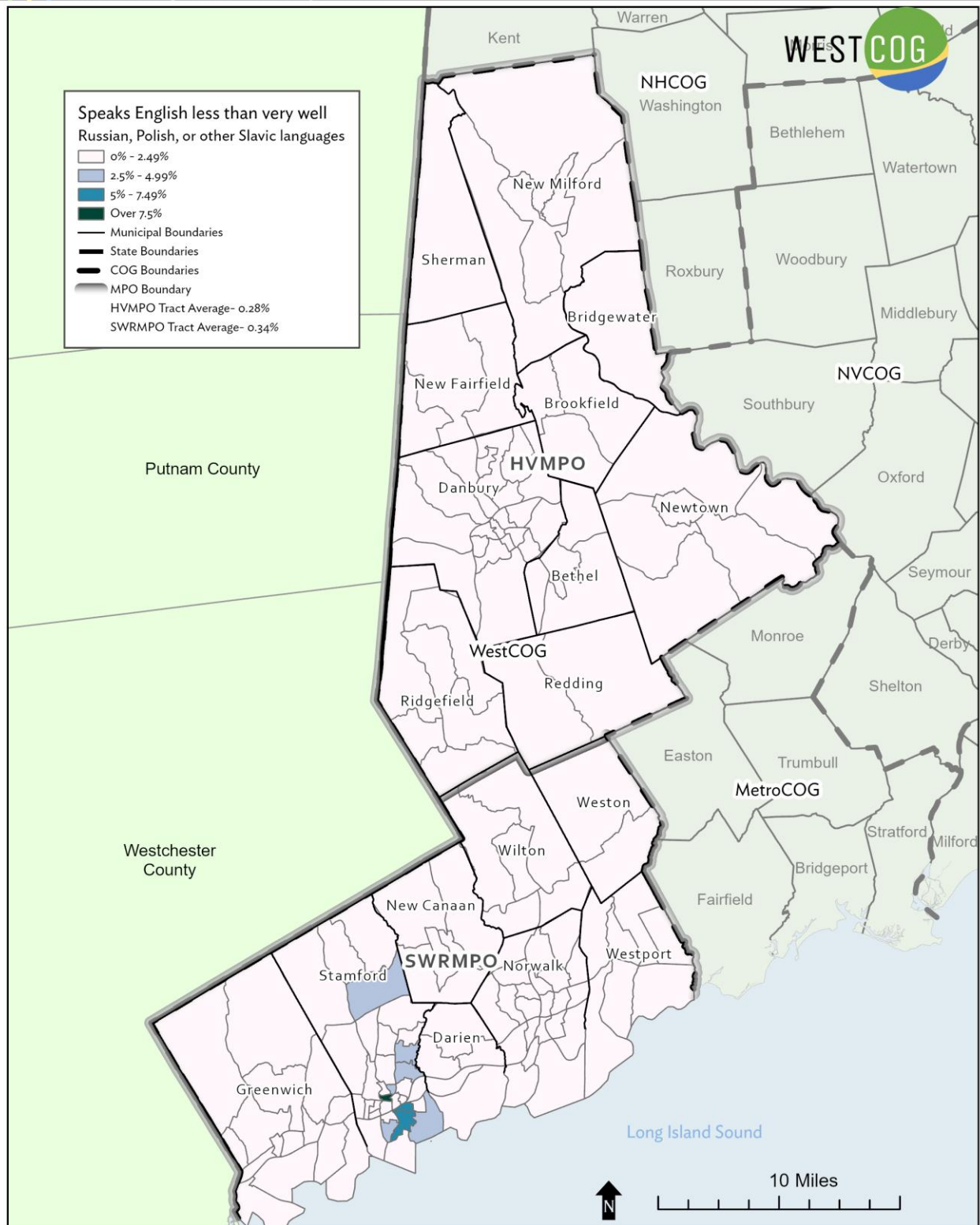
Source: U.S. Census, American Community Survey 2021  
ACSDT5Y2021.C16001



Other Indo-European Languages include most languages of Europe and the Indic languages of India. These include the Germanic languages such as German, Yiddish, and Dutch; the Scandinavian languages such as Swedish and Norwegian; the Romance languages such as French, Italian, and Portuguese; the Slavic languages such as Russian, Polish, and Serbo-Croatian; the Indic languages such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.

Source: U.S. Census, American Community Survey 2021

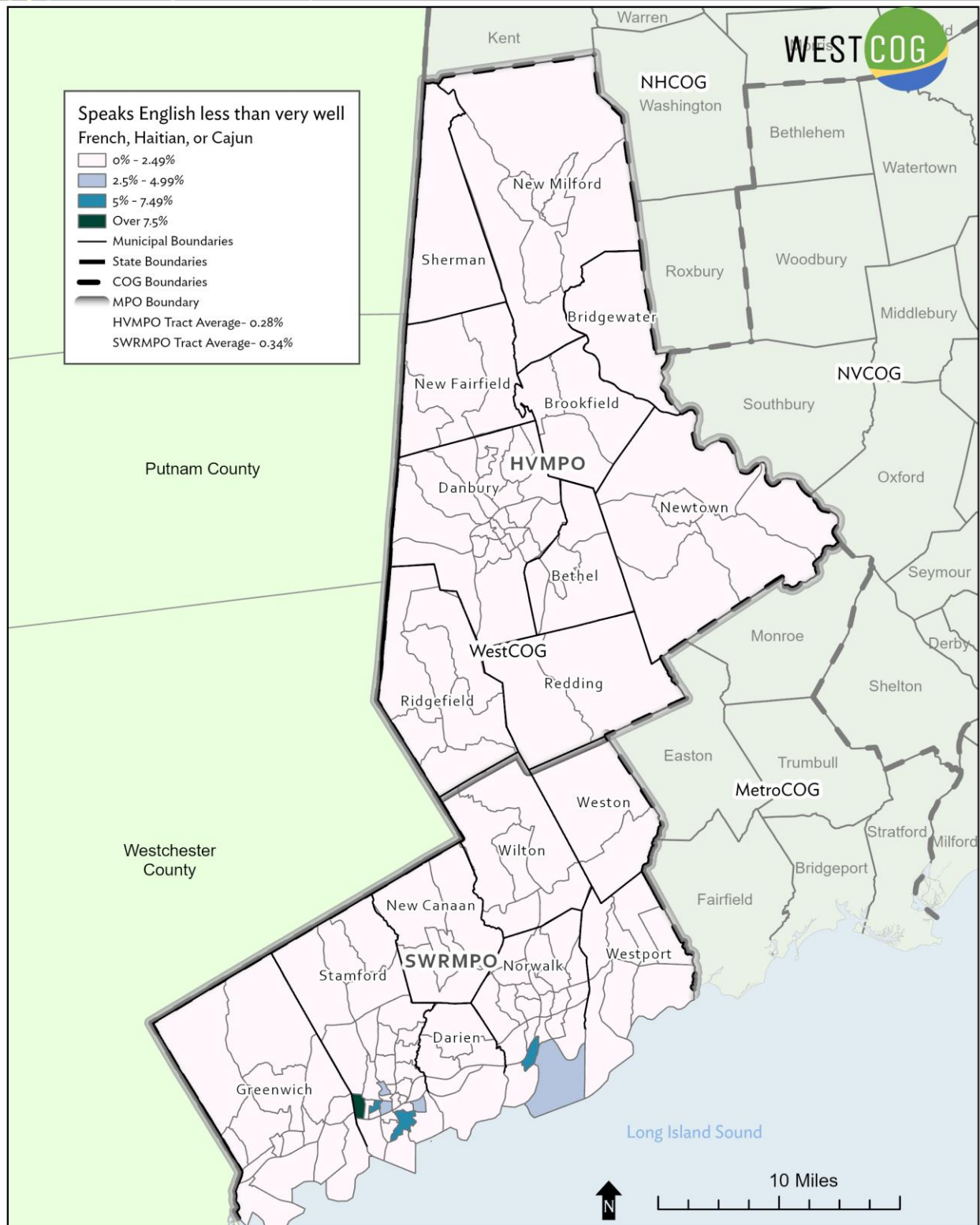
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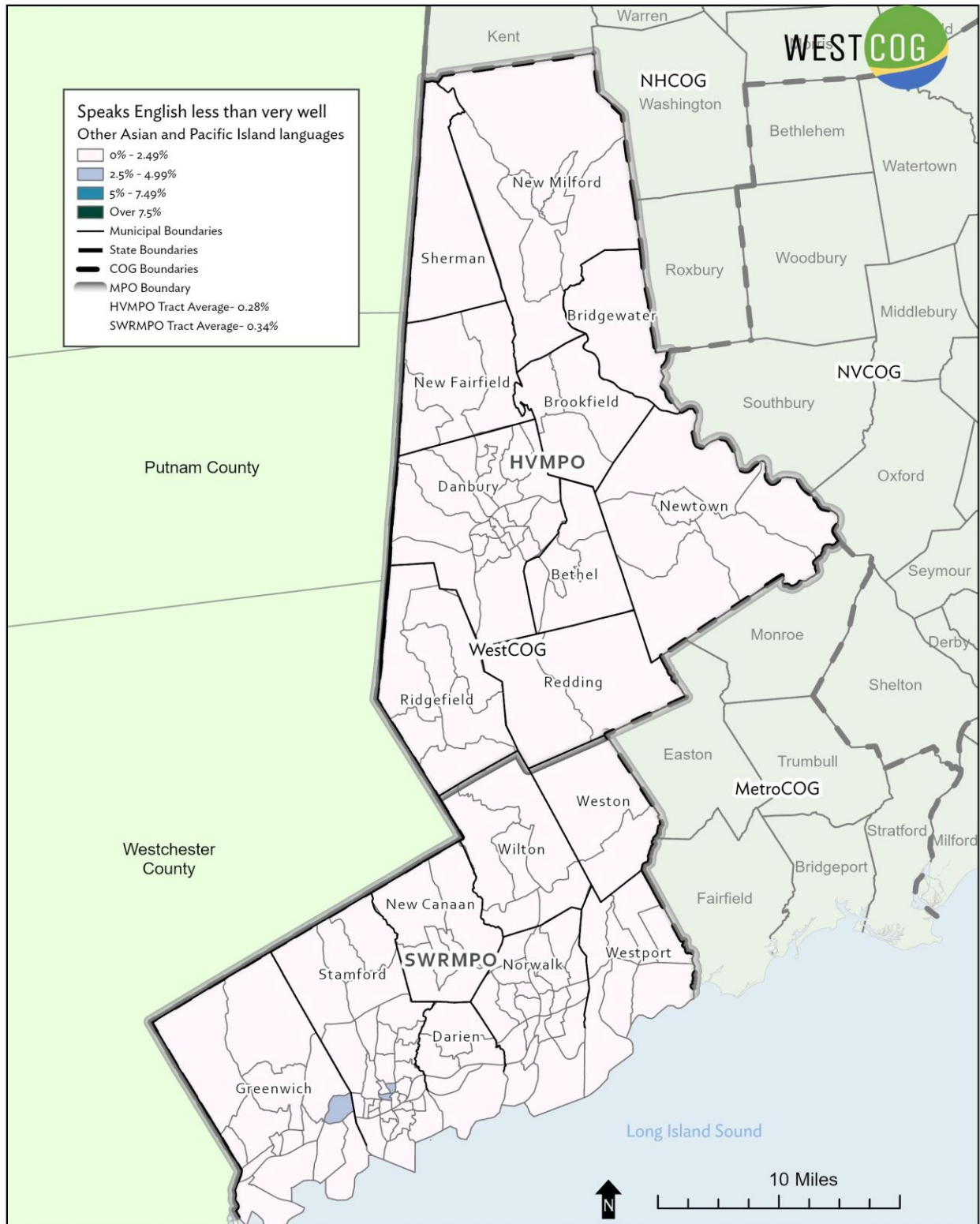
Source: U.S. Census, American Community Survey 2011  
ACSDT5Y2011.C16001







Source: U.S. Census, American Community Survey 2021  
ACSDT5Y2021.C16001



Asian and Pacific Island Languages include; Japanese; Hmong; Khmer; Lao; Thai; the Dravidian languages of India such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.

Source: U.S. Census, American Community Survey 2021  
ACSDT5Y2021.C16001