

LIMITED ENGLISH PROFICIENCY PLAN

*Pikes Peak
Area
Council of
Governments*

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Limited English Proficiency Plan

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Introduction

Serving the Pikes Peak region for over 50 years, the Pikes Peak Area Council of Governments (PPACG) is the federally designated Metropolitan Planning Organization (MPO) for the region. Established in 1967, PPACG provides comprehensive, coordinated transportation planning in two counties and seven municipalities.

The PPACG Board of Directors provides policy guidance and direction for the regional planning process. This Board is comprised of elected officials from local member governments, representatives from state and federal agencies, and military installations. The MPO serves the following communities:

- El Paso County
- Teller County
- Colorado Springs
- Fountain
- Green Mountain Falls
- Monument
- Palmer Lake
- Woodland Park
- Manitou Springs

The PPACG uses a committee structure that provides subject matter knowledge, citizen and stakeholder participation, project guidance, and decision support.

The **Transportation Advisory Committee (TAC)** provides technical advice on transportation issues, goals, plans, and programs to the PPACG Board of Directors and staff.

The **Citizens Advisory Committee (CAC)** committee is a nontechnical committee made up of volunteers who offer a citizen's perspective on issues such as transportation, the environment, economic development, and military impact planning in the Pikes Peak region.

The **Mobility Coordinating Committee (MCC)** coordinates transit grants and other resources and advises the PPACG board on current emerging issues related to public human service and job-access transit services in the region.

The **Board of Directors (BOD)** sets agency policy and serves as the decision-making body.

Figure 1: Metropolitan Planning Organization boundary



Title VI and Executive Order 13166

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. This is an extension of the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964.

Federal regulations require agencies and others receiving federal funds to provide a fully coordinated process which includes analysis of the LEP community and public involvement that considers the needs of the LEP population.

Four-Factor Analysis

The DOT guidance outlines four factors that funding recipients should apply to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

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 individuals encounter 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.

After completing four-factor analysis, the appropriate "mix" of LEP services and outreach can be determined. Overall, PPACG's approach will focus on translation services, accessible documents, our website, and working with community partners.

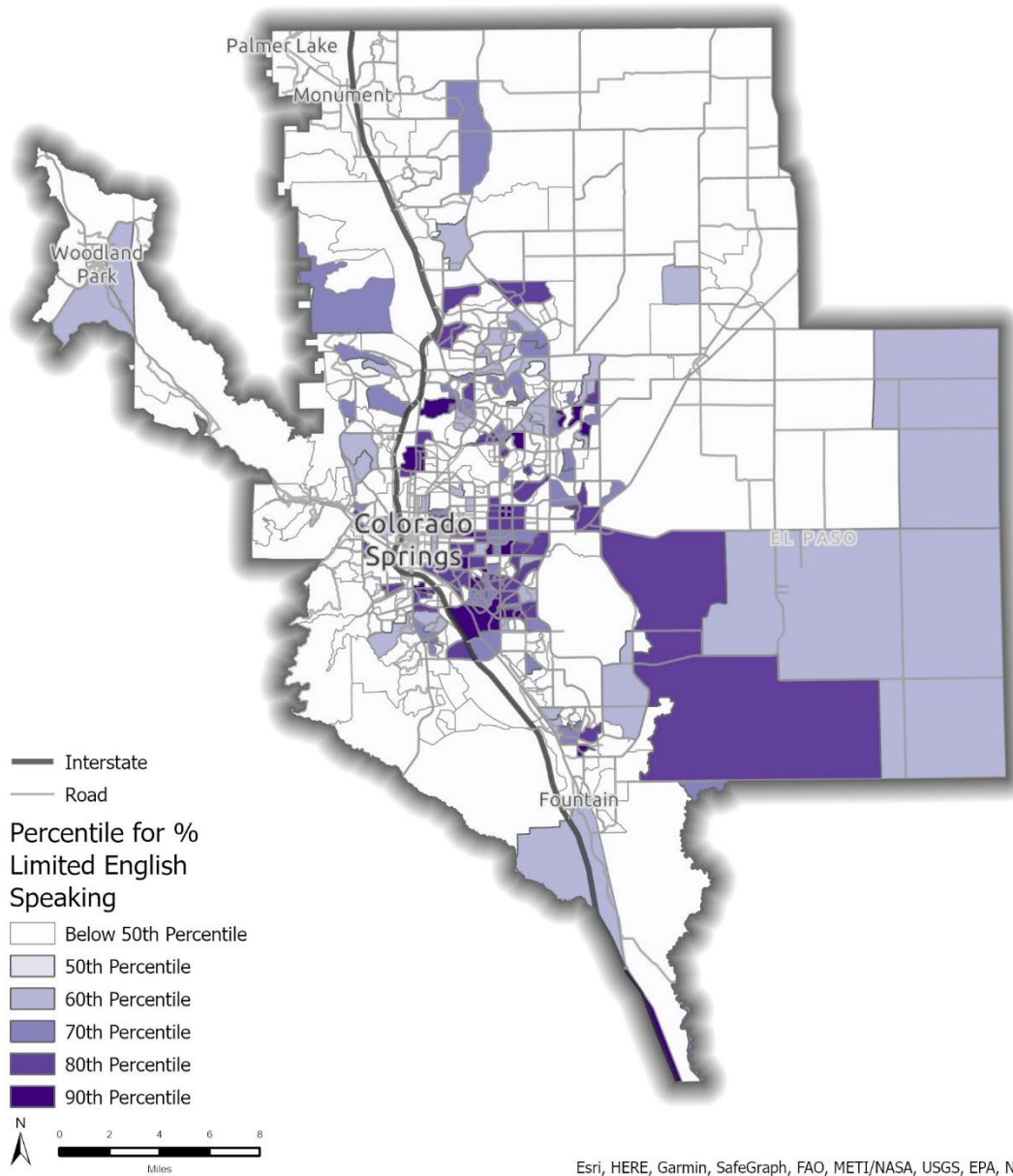
Factor 1 Analysis – The number and proportion of LEP persons in the service area

The following map provides information about limited English-speaking households. Although the LEP population represents a small proportion of the overall population, the proportion may be dramatically higher in certain areas. The data depicted in the figure comes from the Environmental Protection Agency's (EPA) Environmental Justice Screening and Mapping Tool (EJScreen) (Version 2.11) website. EJScreen is a screening and mapping tool that utilizes standard and nationally consistent data to highlight places that may have higher environmental burdens and vulnerable populations.

It should be noted that the tool records the percentile of each Census block group, and not the actual percentage. Percentiles express all the observations of a given occurrence, below a certain percentage of that occurrence. For example, if an area is at

the 57th Percentile in the nation, this means that for the average person the block group score is greater than (or equal to) 57% of the national population. The map below compares Census block groups within the MPO to the state of Colorado.

Figure 1: Percentile of Limited English-Speaking Households for the PPACG MPO, per the EJSscreen Tool*



** Limited English Speaking: Percentile for the percent of people in a block group living in limited English-speaking households. A household in which all members age 14 years*

and over speak a non-English language and also speak English less than "very well" (have difficulty with English) is limited English speaking.

The 2021 five-year estimate of the American Community Survey (ACS) provides information about Limited English Proficiency in the Pikes Peak area. In the Colorado Springs Metro area, the ACS data estimates 699,717 citizens 5 years and over. The following table illustrates the percentages of that population that identified as speaking only English or speaking a language other than English. It also identifies the percentages of the population that reported that they speak English "very well" or "less than very well." Although this is a subjective measurement, it can provide information that will help better support citizens.

Table 1: Languages Spoken in the Household, Colorado Springs Metro Area, ACS 2017-2021

Population Group	Percent of Population (rounded)	Speak English "Very Well"	Speak English "Less Than Very Well"
General Population (5 years and over)	N/A	96.9%	3.1%
Speaks only English	89.0%	N/A	N/A
Speaks a language other than English	11.0%	71.4%	28.6%
Speaks Spanish	7.0%	71.1%	28.9%
Speaks Other Indo-European languages	2.1%	81.8%	18.2%
Speaks Asian and Pacific Island languages	1.5%	57.3%	42.7%
Speaks Other languages	0.4%	77.9%	22.1%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, <https://data.census.gov/table?q=language&tid=ACST5Y2021.S1601>

By comparison, El Paso County as a whole is very similar to the Colorado Springs Metro area. A much lower percentage of the population of Teller County reported speaking a language other than English, and a lower percentage of those reported speaking English "less than very well." Although portions of El Paso and Teller Counties are outside the MPO boundary within which PPACG's transportation efforts are focused, populations from the larger counties may be impacted by projects within the MPO.

Table 2: Languages Spoken in the Household, El Paso and Teller Counties, ACS 2017-2021

Population Group	El Paso County			Teller County		
	Percent of Population (rounded)	Speak English only or Speak English "Very Well"	Speak English "Less than Very Well"	Percent of Population (rounded)	Speak English only or Speak English "Very Well"	Speak English "Less than Very Well"
General Population (5 years and over)	N/A	96.8%	3.2%	N/A	99.3%	0.7%
Speaks only English	88.8%	N/A	N/A	96.8%	N/A	N/A
Speaks a language other than English	11.2%	71.3%	28.7%	3.2%	77.0%	23.0%
Speaks Spanish	7.2%	70.9%	29.1%	1.2%	100.0%	0.0%
Speaks Other Indo-European languages	2.1%	82.2%	17.8%	1.7%	68.1%	31.9%
Speaks Asian and Pacific Island languages	1.6%	57.3%	42.7%	0.2%	52.4%	47.6%
Speaks Other languages	0.4%	78.7%	21.3%	0.1%	0.0%	100.0%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, <https://data.census.gov/table?q=language&tid=ACSSST5Y2021.S1601>

Given the tables above, it may be particularly important to reach out to the Spanish-speaking community and make sure that adequate Spanish translations and translation services are available. Similar outreach and services for Asian and Pacific Island languages may become important for plans expected to have substantial impacts in specific areas where those populations are present in larger numbers.

It is noteworthy that for each language category, people aged 65 and over reported that they speak English “less than very well” at a higher rate than younger people. For certain plans, therefore, translation services should be most available where there are elderly populations of people who speak a language other than English. Although these numbers have decreased from the 2016 ACS 5-year estimates, it is still important to ensure proper language services to ensure people are not barred from participating. Specifically, nearly 60% of those 65 and over who speak Asian and Pacific Island language reported that they speak English “less than very well.” To be clear, this group is present in smaller numbers than Spanish speakers, but their rate of speaking English “less than very well” is higher.

The most common languages in the region other than English are Spanish (by a large margin), German, and Korean, in that order. Note that due to data availability, these percentages are from the 2015 ACS five-year estimates. Also note that the table does not specify whether those who speak languages other than English also speak English.

Table 3: Top Ten Languages Spoken within the PPACG Region, ACS 2011-2015

Language Spoken	Colorado Springs Metro Area	El Paso and Teller Counties (Combined)
English Only	78.18%	88.44%
Spanish or Spanish Creole	7.60%	7.08%
German	0.89%	0.91%
Korean	0.65%	0.59%
Tagalog	0.29%	0.34%
Chinese	0.32%	0.33%
French (incl. Patois, Cajun)	0.26%	0.29%
Vietnamese	0.19%	0.21%
Russian	0.11%	0.20%
Arabic	0.18%	0.16%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates; [https://data.census.gov/table?q=b16001&g=050XX00US08041,08041\\$1400000,08119,08119\\$1400000_310XX00US17820&tid=ACSDT5Y2015.B16001](https://data.census.gov/table?q=b16001&g=050XX00US08041,08041$1400000,08119,08119$1400000_310XX00US17820&tid=ACSDT5Y2015.B16001)

Factor 2 Analysis – The frequency in which LEP persons encounter the MPO programs

Documented interactions with LEP persons are rare. PPACG develops new transportation plans and improvement programs every four years and develops planning work programs annually. Amendments that require public input to these documents are irregular.

Factor 3 Analysis – The importance of the service provided by PPACG

As the federally designated MPO, PPACG must produce and maintain two major products that include transportation projects that have both beneficial and adverse impacts:

- Regional Long Range Transportation Plan
- Transportation Improvement Program

These products must conform to a “3C” planning process (continuing, cooperative, and comprehensive), to determine investment priorities for billions of dollars in federal, state, and local funds.

While involvement by any citizen with the transportation planning process is voluntary, PPACG must ensure all segments of the population, including LEP persons, have had the opportunity to be involved. One of PPACG’s core public involvement objectives is to ensure all citizens have the opportunity for public input. PPACG strives to make the planning process as inclusive and accessible as possible.

While the importance of the regularly occurring RTP and TIP is clear, some type of Factor 3 analysis should be performed for each plan or project conducted by PPACG. It should consider both the nature and the location of the project or plan in question.

Factor 4 Analysis – The resources available and overall cost

The fourth factor assesses the needs of LEP persons within the region against the resources and costs available to PPACG in addressing such needs. To meet PPACG’s goal to provide a cooperative transportation planning process, it is essential that information be disseminated in multiple formats to encourage a high level of participation.

The Public Participation Plan (PPP), which can be found on PPACG’s website, lists the appropriate public involvement procedures and formats. Any of the communication methods listed might be made available in Spanish or another language, as appropriate.

The PPP also lists the following methods for better engaging traditionally underserved communities:

- A. Hold public meetings or events at locations that are accessible to persons with disabilities and near transit routes;
- B. Hold public meetings at times when the working and non-working public can attend;
- C. Provide ample advanced notice of public meetings and events;
- D. Perform targeted outreach to community associations, churches and/or faith-based organizations, and other organizations that provide support for traditionally underserved communities;
- E. Provide translated documents for limited English speakers and in-person language and deaf translators as needed or requested, with adequate notice;
- F. Provide any other assistance that is requested, within reason and with adequate notice of the need for assistance.

PPACG's website contains timely information with upcoming meetings and posted agendas, schedules, comment boxes, maps, and surveys. Meetings are open to the public and staff is always available to address diverse groups and various organizations and to field inquiries from citizens. Continued public involvement is encouraged throughout the process.

In addition to PPACG's major recurring plan and program, the RTP and the TIP, some type of Factor 4 analysis should be conducted for each plan or project conducted by the agency, with consideration given to the size and cost of the plan or project.

Meaningful Access – Current and Upcoming Plans and Programs

Translation Services

For those with Limited English proficiency (LEP), inclusion means providing both spoken and written translations of program materials and presentations. Translation will be provided for workshops, open-houses, and public meetings when requested, with 7 days' notice.

Korean translation may be provided if practical; Korean is the third most common language in Colorado Springs, and those who speak Asian and Pacific Island languages reported the highest rates of speaking English "less than very well" in the 2021 American Community Survey.

For communications concerning plans which will substantially impact areas where there is an identified LEP population, translated materials and/or translation services may be offered even if not requested. In this situation, planning staff will proactively attempt to engage support organizations and to discover advertising channels likely to reach persons in the area who speak limited English.

The procedure for requesting Spanish translation services for PPACG's regularly occurring committee and Board meetings will appear (in Spanish) on all meeting agendas as of the adoption of this plan.

Accessible Documents and Website

Per PPACG's Title VI & Environmental Justice Plan, a brief "primer" will be developed that will offer a simple and easy-to-understand point of entry into PPACG's planning process and give detailed information about upcoming public involvement opportunities. This primer will be available in English and Spanish, and a special effort will be made during Long Range Plan updates to distribute the primer to Spanish-speaking community leaders and support organizations.

Due to limited budget and resources, however, PPACG is unable to translate all documents. It may translate core documents, or portions thereof, as suggested by four-factor analysis. Spanish translations of documents such as the "Title VI Complaint Form" and the "Notice to Beneficiaries of Protection Under Title VI" will be provided in English and Spanish. Executive summaries for the Long Range Transportation Plan and Transportation Improvement Program will also be provided in Spanish and English. Other plans and program documents may be translated if they are likely to have disproportionate impacts on an identified LEP population.

PPACG's website will feature an easy-to-use translate button made available by Google, which can instantly translate the site into numerous languages. This add-on program also offers the benefit of tracking the number and language of translation requests: this data can then be used to help determine the demand for translations of PPACG's documents and other website content.

Community Outreach

As stated in the Title VI and Environmental Justice Plan, PPACG will rely upon community partners to gain the fullest reach to underserved communities and to help overcome barriers of communication and trust. Planners and committee and Board members will reach out to organizations such as community centers, minority chambers of commerce, churches, and other support organizations to request help in sharing PPACG's meeting notices and notices of public comment, distributing surveys, directing members and clients to our website, and describing and interpreting our mission and services. This includes the Spanish-speaking community (others where appropriate). Their feedback on our engagement process and materials will also be sought along with advice on how to make improvements for the next planning cycle.

Along with enlisting the aid of community partners, planners and committee and Board members will attend community events such as farmer's markets, luncheons, and conferences where they can introduce the organization and discuss opportunities for

engagement. In the past, this approach has been found to be far more effective than traditional public meetings or open houses hosted by PPACG alone.

As with Environmental Justice, PPACG's committees and Board can draw on their own experiences and language issues in their communities to provide needed perspectives on the LEP process. Traditionally, these groups have been underused. It will be a goal moving forward to involve the committees and the Board more meaningfully and *earlier* in the LEP process, and to seek and provide feedback as each plan or TIP is wrapping up to achieve ongoing improvement.

To further improve diversity for the purpose of achieving a better understanding of language considerations, PPACG will explore expanding the Citizen's Advisory Committee (CAC) to include representatives of the Spanish-speaking community. The CAC is the body most involved in the development and improvement of PPACG's overall public involvement processes.

Monitoring and Updates

PPACG will update the LEP Plan at the beginning of each long range transportation plan development cycle, if not more frequently. Updates will include the following:

- How the needs of LEP persons have been addressed;
- Determination of the current LEP population and population distribution within the PPACG metropolitan area;
- Determination of whether the need for translation services has changed;
- Determination of whether language assistance programs have been sufficient and appropriate;
- Determination of whether PPACG's financial resources are sufficient to fund additional or other language assistance resources when needed;
- Determination as to whether PPACG fully complies with the goals of the LEP Plan (includes review of any complaints that have been received);

As with Environmental Justice, little LEP-related data has been collected and retained during PPACG's previous planning cycles. Future plan efforts will establish the pattern of collecting and reviewing data and comments as part of a continual feedback process for improving access for those with limited English proficiency.

Some of the EJ-specific metrics and other feedback that will be tracked as part of future LRTP development include:

- The number and proportion of public meetings/open houses held in or convenient to target EJ areas during the LRTP process, and attendance rates at those meetings (includes events hosted or attended by PPACG)
- Diversity of advertising placements

- Comments received about the public process from members of LEP populations and/or representatives of LEP communities
- Responses to LEP-related questions on surveys completed for the long-range plan, beginning with the 2050 plan
- Website analytics, including some powerful new features

As described previously, the Google translation feature on our website tracks the number and language of translation requests: this data will be used to help determine the demand for translations of PPACG's documents and other website content.

There will also be a sustained effort to increase PPACG's list of LEP contacts and community leaders, and to grow our LEP email/contact list and grow the number of appropriate advertising channels with each planning cycle. With each planning cycle, PPACG will review why this did or did not happen successfully.

Where to Find the Plan

The Plan is posted on the PPACG website at www.ppacg.org. Copies of the Plan have been provided to the Colorado Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration.

Any questions or comments regarding this plan should be directed to:

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