

# **TxDOT's Statewide Language Assistance Plan**

Civil Rights Division January 2025

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# **Plan Purpose**

The purpose of the Texas Department of Transportation's (TxDOT) Language Assistance Plan (Plan) is to ensure that TxDOT communicates effectively with Limited English Proficient (LEP) individuals. An LEP individual is a person who does not speak English as his or her primary language and who has a limited ability to speak, read, write, or understand English. This Plan will provide guidelines and requirements for implementing the language assistance Program and assisting those with limited English proficiency.

TxDOT's Civil Right Division (CIV) developed the Plan to assist the Districts and Divisions (DDs) in their efforts to ensure information and services are accessible to LEP individuals by providing guidance on translation, interpretation, and outreach services for LEP individuals seeking access to TxDOT programs. CIV is responsible for development of and update of the Plan and provides guidance on TxDOT's non-discrimination policies; however, all directors, managers, and Title VI program liaisons are responsible for ensuring that meaningful services to LEP persons are provided in their respective districts and divisions. Additionally, CIV continuously monitors the DDs to ensure LEP requirements are met and reported annually to the Federal Highway Administration (FHWA).

To further assist Districts, a District Language Assistance Plan template has been developed. Districts will use this template to create their own unique Plan with demographic information and resources for the counties they serve.

#### **Nondiscrimination Statement**

The Texas Department of Transportation, as a recipient of federal financial assistance and under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person shall on the grounds of race, religion (where the primary objective of the financial assistance is to provide employment per 42 U.S.C. §2000d-3), color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Department programs or activities.

Any interaction with the public has the potential to affect LEP individuals. These could include, but are not limited to, program applications; hotline or information line calls; outreach programs; public meetings and hearings; public access to agency websites; complaint forms; brochures intended for public distribution; providing notice to people potentially impacted by project development; right-of-way acquisition; and other activities. It is important to examine the manner in which the agency interacts with the public or LEP

individuals (e.g., in-person consultations versus correspondence) as this can dictate the type of language assistance services provided.

## **Limited English Proficiency Policy Statement**

It is the policy of TxDOT to provide timely, accurate, and meaningful access to all agency programs and activities for persons with limited English proficiency. TxDOT shall provide free language assistance services to persons with LEP whom they encounter or whenever a person with LEP requests language assistance for services and/or activities which TxDOT provides, is in control of, or is a sponsor of. TxDOT personnel will inform members of the public that TxDOT will provide language assistance services free of charge to persons with LEP.

# **Federal Authorities**

The following are the relevant federal authorities that require TxDOT to provide LEP persons with meaningful access to programs, activities, information, benefits, and services:

Title VI of the Civil Rights Act of 1964, as amended, provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of an entity receiving Federal financial assistance."

TxDOT's Title VI program is informed by regulations from the U.S. Department of Transportation (49 CFR Part 21) and the Federal Highway Administration (23 CFR Part 200). The purpose of 49 CFR Part 21, is to effectuate Title VI of the Civil Rights Act for any program or activity receiving Federal financial assistance from the Department of Transportation.-Likewise, 23 CFR Part 200 provides guidelines for: (a) Implementing the Federal Highway Administration (FHWA) Title VI compliance program under Title VI of the Civil Rights Act of 1964 and related civil rights laws and regulations, and (b) Conducting Title VI program compliance reviews relative to the Federal-aid highway program.

Executive Order 13166, entitled "Improving Access to Services for Persons with Limited English Proficiency," is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. It directs Federal agencies to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. Guidance issued by the U.S Department of Transportation in 2005 under EO 13166 (70 Fed. Reg. 74,087 (Dec. 14, 2005)) sets forth considerations and criteria that recipients should follow to ensure that the programs and activities they normally provide in

English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations. This means that although EO 13166 is an Executive Order and not a law, it provides guidance to ensure our day-to-day operations are in compliance with the law which is Title VI of the Civil Rights Act

# **Communicating with the Public**

To establish good communication with LEP populations, TxDOT has produced materials to advertise its Title VI and LEP programs and services. Posters, postcards, and rack-cards advertising TxDOT's commitment to comply with Title VI of the Civil Rights Act can be downloaded and printed as well as "I-Speak" posters and stickers which allow TxDOT employees to identify what type of interpretation is needed. These materials should be posted at district, area, and maintenance offices or any other TxDOT facility where the public may enter. These materials should also be distributed at all public involvement events (in person, virtual and hybrid). Additionally, TxDOT's public facing website can be translated into Spanish using the dropdown menu located in the top right-hand corner of each page.

All of these resources, and other information, is available on the <u>TxDOT's Title VI SharePoint Site</u>. Districts and Divisions may contact Creative Services for print requests and CIV can also mail hard copies of these materials to the District or Division. For information on effective communication with the deaf and hearing-impaired community please see the ADA SharePoint page.

# **Translation and Interpretation Resources**

TxDOT has access to both internal and external resources for translating and/or interpreting information into languages other than English. Internal resources at TxDOT include: The "I Speak" posters and stickers to determine what language is needed; a list of TxDOT employees who speak languages other than English which can be found on the <a href="IxDOT's Title">IxDOT's Title</a> VI SharePoint Site; and Google Translate or other translation app for introductory communication.

External resources can be accessed through the Blanket Purchase Orders (BPOs) found on the <u>Procurement Division Strategic BPO SharePoint site</u>. TxDOT has BPOs with multiple vendors to provide translation and interpretation services including Communication Access Realtime Translation (CART) services, American Sign Language (ASL), Accessible Video Production (AVP), Video Remote Interpreting (VRI), Over-the-Phone Interpreting (OPI) and

Braille. While the BPOs are managed by the Procurement Division, each DD is financially responsible for the language services it provides to the public. While most vendors provide live interpretation, many also can conduct on-demand interpretation over the phone or via video call (for sign language). This allows TxDOT to provide interpretation at any location with no prior notice and at a lower cost than live interpretation.

Guidance on determining what and when to translate and/or interpret and detailed information on how to access language services can be found later in this document.

## **Providing Service to LEP Individuals**

At TxDOT offices, the poster advertising TxDOT's Title VI policy and the "I-Speak" sticker or poster must be posted in the reception area and easily visible. Dependent on the location and available staff, the office may also choose to advertise if there are staff that speak a language other than English that are available to assist.

During the preparation for Meetings with Affected Property Owners, public meetings, public hearings or any other public events, advertising for language accommodations should be posted in locations and non-English media most likely to be seen by LEP populations. Translated materials should not be distributed in English language publications but rather in other language newspapers, websites, social media, radio, direct mail, or in locations that serve that population. If there is a need to publish in a newspaper, utilize radio or television but when only English media outlets are available, then translated/interpreted notifications may be published there. Work with stakeholders to inform LEP individuals of TxDOT services, including the availability of language assistance services. This could include faithbased organizations that serve specific communities and markets that cater to specific ethnicities which would have a higher potential for non-English speaking members and or patrons. When providing notice, make clear that translation and interpretation services will be provided free of charge. Standardized Accommodations Statements are available on TxDOT's Title VI SharePoint Site to be copied and pasted as necessary. Both a full statement, for use when announcing a public meeting, and a summary statement offering assistance are provided in Spanish, Vietnamese, Chinese, and Arabic. Statements are readily available in these languages as they are the top four language spoken in Texas other than English.

In addition to advertising the availability of language services, a four-factor analysis should be conducted prior to a public event to determine if translation and interpretation services should be prepared in advance. If the four-factor analysis indicates the need for language services then handouts, sign-in sheets, comment cards, displays, etc., should be translated. If there is a very high likelihood of LEP person's attending, then an interpreter should be hired to be present at the event. If there is not a high likelihood, but only a chance of LEP persons attending the event, have an on-demand phone or video option ready to use.

At all in-person public events, post materials at intake areas and other entry points so LEP individuals can learn how to access language services. This would include:

- Posting a sign at the sign-in table advertising what language other than English is provided.
- Assigning a staff person who speaks that language to the sign-in table.
- Have any translated materials or forms at the table.
- For any bilingual employees staffing the event, indicate on their name tags that they are available to interpret.
- "I Speak" poster to identify language needs other than what has been already provided.

TxDOT aims to provide prompt service to all its customers; however, in the case that an LEP person requires assistance and did not notify the DD prior to the event or walks into a TxDOT office, that may not be possible. Districts have the ability to set up access to ondemand interpretation services (more details in a later section); however, if they have not done so and TxDOT does not have a fluent staff member or translator on site, Google translate, or similar means, may be used to take the person's contact information and question(s) and a response(s) in the appropriate language will be provided as soon as possible.

For virtual events, the types of translation and interpretation provided will depend on the format of the event. If the event is a pre-recorded presentation and the four-factor analysis indicated additional languages are needed, then slides, voice-over, and downloadable flyers should be provided in the necessary language. If a live event is being streamed, TxDOT is capable of hosting on Zoom which is capable of transcribing verbal presentations into other languages. Zoom Workplace, can provide captions in the following languages:

- English
- Arabic
- Chinese
- Czech
- Danish
- Dutch
- Estonian
- Finnish
- French
- German

- Hebrew
- Hindi
- Hungarian
- Indonesian
- Italian
- Japanese
- Korean
- Malay
- Persian
- Polish

- Portuguese
- Romanian
- Russian
- Spanish
- Swedish
- Tagalog
- Tamil
- Telugu
- Thai
- Turkish

For languages that are currently not supported by Zoom Workplace TxDOT will make note of the requested language, gather contact information from the requestor (using Google Translate), and obtain an interpreter in the appropriate language. The interpreter and a TxDOT employee will contact the requestor within 5 days after the request.

In almost all cases, a mix of several types of outreach will be used. Regardless of the types of public involvement conducted, TxDOT will provide consistent service such that an LEP individual is able to receive information and provide feedback in the same ways an English proficient person would. This means, if it determined that another language is needed, translation and interpretation must be provided in that language across all platforms. For example, if the four-factor analysis shows the need for Vietnamese translation then translated materials must be provided at the live event and at the virtual event. If comment cards are provided in Vietnamese than prompts to leave comments in Vietnamese on the call-in comment line must also be provided.

## **Complaints**

LEP individuals can submit complaints regarding LEP services. DDs will inform CIV of any complaints received and document actions taken to resolve each complaint in a timely manner. The complainant may, at his or her option, report the LEP complaint directly to CIV or FHWA.

Anyone who believes that he/she has been discriminated against because of race, color, national origin, or disability may file a complaint within 180 days of the date on which the discrimination took place. TxDOT's External Discrimination Complaint Form is located on TxDOT's public facing Title VI page. TxDOT provides the External Discrimination Complaint form in English, Spanish, Vietnamese, Chinese, and Arabic as these are the top five Statewide languages. TxDOT will provide accommodations for other languages, as needed.

All complaints filed against TxDOT will be forwarded to FHWA for investigation. More details on FHWA's processes and procedures in investigating complaints can be found on <u>FHWA's</u> Civil Rights program page.

# **Determining the Need – Four Factor Analysis**

Per USDOT LEP guidance, as outlined on FHWA's Civil Rights website, recipients of federal funds are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- 1. Number or proportion of LEP persons eligible to be served or likely to be encountered by the program: The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. For the assessment to be accurate it must also include all communities that are eligible for services or are likely directly affected by the DD's programs or activities, not only those that live next to a project.
- 2. Frequency with which LEP individuals come in contact with the program:

  Consider how frequently encounters with LEP individuals may occur. Encounters with

  LEP individuals are documented by the district Title VI liaison in quarterly reports to
  the Civil Rights Division. Additionally, consider events or work projects in the next
  year, which may increase the frequency with which LEP encounters may occur.
- 3. Nature and importance of the program, activity, or service provided by the program to people's lives: Some consideration should be given to TxDOT policies, programs, events and projects planned for the next year but generally the nature and importance of LEP encounters should be considered on a project-by-project basis.
- 4. **Resources available to the grantee/recipient or agency, and costs:** TxDOT has both internal and external resources available to assist with translation and interpretation services.

The following is a statewide four-factor analysis for TxDOT operations regarding language access. This analysis will be reviewed annually and updated as needed. This will be used for Statewide TxDOT policies, campaigns, announcements, notices, or any information that will be distributed across the state. Each district will conduct its own four-factor analysis as part of its district specific language assistance plan which will likewise be reviewed annually and updated as needed. This should be used for district wide events like meetings for long-range planning, job fairs, or any other information that affects the public. When a district or division begins a new project, a four-factor analysis should be conducted with data specific to the effort. This will be used to determine the language needs of the specific community potentially affected by the project.

 According to ACS table B16001 (2022 5-yr estimate) the following languages meet the Safe Harbor standard (5% of the population or 1000 persons) for translation.
 According to this table, the total population of Texas is 27,319,920. The top five languages spoken in Texas other than English, in order of prevalence, are Spanish, Vietnamese, Chinese, Arabic, and Korean.

Language	Number LEP Persons
Cajun)	18,778
Haitian	1,678
Italian	2,558
Portuguese	7,289
German	10,537
Greek	1,148
Russian	8,315
Polish	1,565
Serbo-Croatian	2,762
Ukrainian or other Slavic languages	2,389
Persian (incl. Farsi, Dari)	13,489
Gujarati	12,827
Hindi	15,567
Urdu	21,764
Cajun)	18,778
Punjabi	3,562
Bengali	7,354
Nepali, Marathi, or other Indic languages	15,345
Other Indo-European languages	8,555
Telugu	11,846
Tamil	6,470
Malayalam, Kannada, or other Dravidian languages	12,933
Chinese (incl. Mandarin, Cantonese)	82,311
Japanese	9,060
Korean	32,431
Vietnamese	129,857
Khmer	6,440
Thai, Lao, or other Tai-Kadai languages	10,531
Other languages of Asia	17,763

Tagalog (incl. Filipino)	20,764
Ilocano, Samoan, Hawaiian, or other Austronesian languages	7,010
Arabic	33,105
Amharic, Somali, or other Afro-Asiatic languages	14,852
Yoruba, Twi, Igbo, or other languages of Western Africa	12,813
Swahili or other languages of Central, Eastern, and Southern Africa	10,306
Ilocano, Samoan, Hawaiian, or other Austronesian languages	7,010

2. The frequency with which TxDOT staff encounters LEP persons can vary widely among the various districts and divisions. Each quarter, the Civil Rights Division collects data from each division and district on the number and type of interactions they have had with LEP persons. Based on data collected by Title VI liaisons for fiscal year 2024, the following is a list of the frequency with which interaction with LEP persons occurred. Divisions not represented in this table do not have frequent, if any, contact with the public and therefore do not receive requests for language accommodations.

District	Language	Encounters
Abilene	Spanish	1
Amarillo	Spanish	58
Austin	Spanish	11
	Mandarin	1
Atlanta	Spanish	18
Beaumont	Spanish	28
Bryan	Spanish	2
Brownwood	Spanish	9
Childress	Spanish	2
Corpus Christi	Spanish	153
Dallas	Spanish	8
El Paso	Spanish	516
Fort Worth	Spanish	22
Houston	Spanish	9
Laredo	Spanish	960
Lubbock	Spanish	21
Lufkin	Spanish	21

Odessa	Spanish	10
Paris	Spanish	1
Pharr	Spanish	778
San Antonio	Spanish	13
San Angelo	Spanish	33
Tyler	Spanish	8
Waco	Spanish	4
Wichita Falls	Spanish	12

Division	Language	Encounters
Civil Rights	Spanish	4
Communications	Spanish	368
Finance	Spanish	762
Human Resources	Spanish	37
Occupational Safety	Spanish	1
Public Transportation	Spanish	24
	Spanish	194
Right-Of-Way	Hindi	7
	Mandarin	1
	Arabic	1
Travel	Spanish	1,615
	German	5
	Russian	1
	French	5
Transportation Planning	Spanish	7
Traffic Safety	Spanish	664
Toll	Spanish	393,392

This table will be updated annually using cumulative data collected during the fiscal year. Along with number and types of requests, Title VI liaisons have been instructed to note what, if any, specific forms, or documents have been requested and the specific language in which they have been requested. During the annual review of

- this Plan, any notes provided along with the LEP encounter numbers will be examined by CIV to identify any patterns or recurring requests and determine if any materials should be considered for translation and into what languages.
- 3. TxDOT conducts a wide array of business ranging from acquiring property to build projects to anti-littering campaigns. To date, TxDOT has translated many vital documents such as the Land Owner Bill of Rights, accommodation statement offering language assistance at public meetings, Title VI/ADA Complaint form, and others. Per LEP.gov a document will be considered vital if it contains information that is critical for obtaining the federal services and/or benefits or is required by law. Vital documents include, for example: applications; consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; prison rule books; and written tests that do not assess English language competency, but rather competency for a particular license, job, or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client. A comprehensive list of translated documents is available on TxDOT's Title VI SharePoint Site. There are approximately 105 documents available in other languages. While most documents are in Spanish, many are also available in Vietnamese.

To determine if a document is considered vital and must be translated or interpreted, the DD should ask the following questions.

- a) Does it pertain to a person's legal rights?
  - i) If yes, translation should be provided.
  - ii) If no, move to the next question.
- b) Does it pertain to a person's safety?
  - i) If yes, translation should be provided.
  - ii) If no, move to the next question.
- c) Does it pertain to a person's ability to obtain benefits, financial or otherwise?
  - i) If yes, translation should be provided.
  - ii) If no, move to the next question.
- d) Does it pertain to a person's ability to participate in a planning/advisory board or decision-making process?
  - i) If yes, translation should be provided.
  - ii) If no, the event or document would likely not be considered vital. Translation would not be required. It is still advisable to consult with the project team

and/or CIV to determine if some translation and/or interpretation would be beneficial to the project.

4. TxDOT has access to both internal and external resources for translating and/or interpreting information into languages other than English.

#### Internal Resources

A list of TxDOT employees who speak languages other than English can be found on the TxDOT's Title VI SharePoint Site. District employee lists can also be found in the district specific Plan (Note: this list should be updated regularly by the DD liaison and information is shared by employees voluntarily). For many public events TxDOT can plan for translation and interpretation needs; however, on occasion an LEP person may unexpectedly walk into a public event or TxDOT office. In these cases, a TxDOT employee who speaks the language being requested can be contacted to assist. TxDOT employees, a member of the LEP individual's family, or Google Translate can be utilized to provide quick introductory services but a professional translator and/or interpreter should be contacted if technical or detailed information needs to be communicated.

#### External Resources

TxDOT has BPOs with multiple vendors to provide translation and interpretation services including Communication Access Realtime Translation (CART) services, American Sign Language (ASL), Accessible Video Production (AVP), Video Remote Interpreting (VRI), Over-the-Phone Interpreting (OPI) and Braille. You can access the blanket purchase orders at the Procurement Division Strategic BPO SharePoint site. Contact PRO or CIV for additional assistance in procuring these services. All language service contractors have been vetted prior to signing the BPO. Each contract includes a Statement of Work which details the required skills and knowledge for any person working on TxDOT projects. By signing the contract, with this Statement of Work, each contractor is assuring that translations and interpretations will be accurate and professional.

If material needs to be translated for an event and will require an interpreter, follow the instructions provided on the Public Involvement Section's Crossroads page and choose any vendor that provides the needed services. If an LEP person needs assistance, and no live interpreter is present, there are multiple vendors available for on-demand interpretation over video or phone. To prepare for this, your DD requisitioners will open a BPO release for a small amount (\$500 for example) with one of the two vendors. After the release is completed the services can be accessed at any time for a wide variety of languages. Detailed instructions for how to acquire services from each vender, such as the necessary links, passwords, and PIN numbers, are available on the Title VI SharePoint Site.

While the BPOs are managed by the Procurement Division, each DD is financially responsible for the language services it provides to the public. At any time, a user can access free Video Relay Services (VRS) through the Federal Communications Commission (FCC) for interpreting service. More information about VRS is located on the FCC website.

A general four-factor analysis will help anticipate and prepare for what may be needed; however meaningful four-factor analysis can only occur on a project-by-project basis. When preparing to publish a document, launch a campaign, hold a public meeting, etc., a focused four-factor analysis should be conducted to determine what type of language assistance is needed.

In most situations, this may be accomplished informally. The project team can discuss the four factors as they pertain to the project and present a summary of the discussion and the conclusion documented as appropriate for the situation. This could mean an email to the team and memo to the project file stating who participated in the discussion, what data was used, and what decision was made on translation and/or interpretation. For bigger projects and projects that directly involve the public (like a public hearing and public meeting), this process should be fully documented and included in the project file. This could mean a section in the Community Impacts Analysis or Public Involvement Plan for an Environmental Impact Statement or Environmental Assessment that walks through each factor detailing what data sets and criteria were looked at and how the four factors were weighed. A fully documented four-factor analysis should always be completed for:

- The district Language Assistance Plan. This should be reviewed annually and updated as needed.
- Any project undergoing environmental review with a "disproportionately adverse" impact finding. The document should be included as part of the Community Impact Analysis
- Any formal Public Involvement Plan

## Other Considerations for Providing Language Accommodations

- If a specific request for accommodations is received, per EO 13166 TxDOT "will provide for such meaningful access consistent with, and without burdening, the fundamental mission of the agency."
- In order to prevent any bias or misinformation, TxDOT employees or an LEP person's
  family member can serve as interpreters or translators for initial interactions but
  ultimately a professional interpreter or translator must be utilized for subsequent
  interactions.
- Some important and commonly used TxDOT statements, forms, and documents, including some right-of-way forms and contractor training among other things, have already been translated into Spanish, and other languages in some cases, and are available for use by any district. A statement advertising TxDOT's offer to provide language and disability accommodations at public events has been translated into Spanish, Vietnamese, Chinese, and Arabic and is available to be copied and pasted into public meeting announcements.
- It may not be necessary to translate full documents. If a translation is requested, consider beginning with the translation of an Executive Summary. If more specific information is needed, then more translations can be completed.

# **Implementing The Plan**

Districts will develop their own unique language assistance plan based on data in that region (which should be updated annually, but must be updated every 5 years at minimum).

TxDOT will update their Statewide data annually. A template for creating a District language assistance plan has been developed and can be found on TxDOT's Title VI SharePoint Site.

The district plan largely mirrors this statewide Plan but provides space for details specific to the counties in each district. As part of their Plan, each District will complete a Four Factor Analysis and use the results of the analysis to determine which language assistance services are appropriate. The analysis will help each District address the needs of the LEP population(s) it serves. A district wide four- factor analysis will help anticipate and prepare for what may be needed; however meaningful four-factor analysis can only occur on a project-by-project basis. When preparing to publish a document, launch a campaign, hold a public meeting, etc. a focused four-factor analysis should be conducted to determine what type of language assistance is needed.

While it is not necessary to create a Division wide LEP Plan, a four-factor analysis should be completed prior to a specific public event or campaign. Divisions will use this Statewide Plan

for campaigns, announcements, notices, or any information that will be distributed across the State. However, if a division is holding the public event or distributing information that is unique to a specific district than the District Plan should be used to create a meaningful outreach plan.

## **Demographics**

Understanding who lives in your community is the first step to determining what, if any, language accommodations are needed. Demographic information will need to be revised and updated regularly as it will change, especially in large urban areas with rapid development. It should be noted that census and American Community Survey data provide a good baseline of information but does not necessarily accurately reflect current conditions. Additional data and/or a field visit is necessary to confirm if information is accurate.

Each District and Division may determine the linguistic characteristics of an LEP population in its service area by:

- Examining prior experiences with LEP individuals
- Analyzing the information available from a variety of resources such as:
  - Federal Interagency Working Group on Limited English Proficiency
  - U.S. Census Bureau
  - U.S. Department of Education
  - National Center for Education Statistics
  - TxDOT's Community Impacts Data Tool
  - Texas Education Agency "Texas Academic Performance Reports
  - State and local government agencies
  - Local community based and religious organizations
- Windshield survey

The two points of data which will be of most use when determining language assistance needs are the language spoken in the home (American Community Survey Table C16001) and race/ethnicity (US Census Table P2). Other data points such as internet access in the home, education and zero-car household can assist when planning successful public outreach. Consult <a href="IxxDOT's Community Impacts Assessment Tool">IxxDOT's Community Impacts Assessment Tool</a> to obtain additional demographic data sets. For assistance obtaining Census data, please contact the Title VI section in CIV.

#### **Local Contacts and Resources**

TxDOT's Public Involvement Section of TPP, provides guidance and resources to assist Districts and Divisions in effectively engaging the public. Districts and Divisions should work with Public Involvement staff for guidance on best management practices and effective strategies to encourage broad participation reflective of the needs of the state's population.

The Public Involvement Section of TPP, through its Strategic Public Engagement Guidance effort has compiled a list of community resources, by county, which may be helpful to identifying and subsequently reaching out to LEP populations. When performing the annual review of the Statewide and district Language Assistance Plans or conducting a project specific four-factor analysis, this list can be paired with census data, to aid with identifying what languages other than English are spoken in the area. If there are community resources that serve specific racial or ethnic populations, they may be able to provide more specific information about what languages other than English, if any, are spoken in the area and what types of outreach would be most helpful. Prior to contacting the resource, confirm that the contact information listed below is valid. This list is available on the TxDOT's Title VI Liaison Resources SharePoint Site.

It should be noted that this information is provided at a county wide level. As specific projects or events arise, a more detailed search for local resources should be conducted. This can be done through desk top research as well as driving through the project area and looking for community resources, in addition to the ones listed here, and businesses that serve specific populations. This will provide current and local information about what populations live, work, worship, play, etc. in the area and what language accommodations may be needed.

Additionally, the project team and your TPP Public Involvement Section Planner should be consulted to make a project specific LAP as part of an overall project Public Involvement Plan if one is planned.

# **Monitoring and Updating the LEP Plan**

Annually, each DD will re-evaluate the changes in demographics, services and programs, and other factors that shall be considered when determining LEP needs. Monitoring and evaluating the accessibility and quality of language assistance needs of LEP persons ensures that LEP persons can meaningfully access agency programs and activities.

Additionally, the Title VI liaison for each DD will collect and report on encounters with and services provided to LEP persons. The data is requested quarterly by CIV and is collected on

the <u>LEP Reporting Dashboard</u>. This data helps CIV and all DDs more accurately identify and address the changing profile and needs of their LEP customers. At a minimum, data collected must include:

- Number of LEP encounters (add in notes the language of the customers).
- Number of translation services provided.
- Number of interpreter services provided.
- Number and type of complaints received by the DD or against its subrecipients alleging lack of provision of services due to limited English proficiency.
- Cost of translation and interpreter services provided.

This Plan will be reevaluated and updated by CIV on an annual basis.

# **Staff Training**

CIV meets quarterly with Title VI Liaisons to discuss various issues surrounding Title VI at TxDOT included language assistance. During meetings, language assistance policy, guidance, new tools, and data are presented, and liaisons have opportunity to ask questions of Title VI subject matter experts. Additionally, any DD may request training on LEP or any Title VI issue from CIV that can be tailored to a specific group.