

4205 N. Lincoln Blvd. | OKC

ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS

LIMITED ENGLISH PROFICIENCY PLAN

2020
acog

ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS

Mark W. Sweeney, AICPExecutive Director

John M. SharpDeputy Director

Beverly GarnerExecutive Assistant

TRANSPORTATION PLANNING SERVICES

Jennifer SebestaManager

Hayden HarrisonProgram Coordinator

Hannah NolenPrincipal Author, Projects Coordinator II

Jordan EvansAssociate Transportation Planner – Multimodal

Lauren WoodAssociate Transportation Planner – Performance

Eric PollardAir Quality & Clean Cities Coordinator

Angela HankinsSpecial Projects Planner

Gwendolyn GordonAdministrative Assistant

Association of Central Oklahoma Governments

4205 North Lincoln Blvd

Oklahoma City, OK 73105

Telephone: (405) 234- 2264

www.acogok.org

This report is the product of a project (study) financed in part by the Federal Transit Administration and the Federal Highway Administration of the U.S. Department of Transportation.

The contents of this report reflect the views of the Association of Central Oklahoma Governments (ACOG), the Metropolitan Planning Organization for the Oklahoma City Area Regional Transportation Study (OCARTS) Transportation Management Area. ACOG is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect official views or policy of the U.S. Department of Transportation. This report does not constitute a standard, specification, or regulation.




TABLE OF CONTENTS

Introduction.....	1
Metropolitan Planning Organization.....	1
FIGURE 1: Oklahoma City Area Regional Transportation Study Area (OCARTS).....	2
Metropolitan Transportation Plan.....	3
Transportation Improvement Program	3
Unified Planning Work Program.....	3
Public Participation Plan.....	3
Limited English Proficiency Overview	4
Federal Requirements.....	4
Safe Harbor Stipulation.....	4
Providing Notice	5
Limited English Proficiency Assessment.....	6
Four Factor Analysis	6
Factor 1: Number and Proportion of LEP Individuals	6
Factor 2: Frequency of Encounters with LEP Individuals.....	7
Factor 3: Importance of Service Provided	7
Factor 4: Resources Available and Costs	7
Language Assistance Strategies	8
Translation of Written Materials	8
Oral Language Services	8
Outreach and Engagement Efforts	9
Staff Training	10
Title VI Complaint Process.....	10
Conclusion	10
Appendix I.....	12
Language Spoken and LEP Populations in the OCARTS Area	12
Language Spoken by County	13
Limited English Proficiency Maps.....	15
Appendix II	18
Survey: Contact with LEP Individuals	18
Appendix III	19
Survey: Employee Language Skills Database.....	19
Appendix IV.....	20
Employee Guide: Assisting an LEP Individual	20
In Person	20
Translation via phone	20
Translation for written documents.....	21

Document Links	21
Appendix V	22
LEP Reporting Form	22
Appendix VI	23
Title VI Complaint Form	23

Non-Discrimination Policy

It is the policy of the Association of Central Oklahoma Governments (ACOG), under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1968; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, religion, sex, disability, age, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally of non-federally funded program or activity administered by ACOG or its subrecipients.

Maps and Data Disclaimer

Maps/data presented in this report were created and assembled by the Association of Central Oklahoma Governments (ACOG) for informational, planning reference, and guidance only. You are admonished to use these materials only as a starting point and not a final product or document. None of these materials should be utilized by you or other parties without the benefit of advice and instruction from appropriate professional services. These materials are not verified by a Registered Professional Land Surveyor for the State of Oklahoma and are not intended to be used as such. ACOG makes no warranty, express or implied, related to the accuracy or content of these materials and data.

INTRODUCTION

METROPOLITAN PLANNING ORGANIZATION

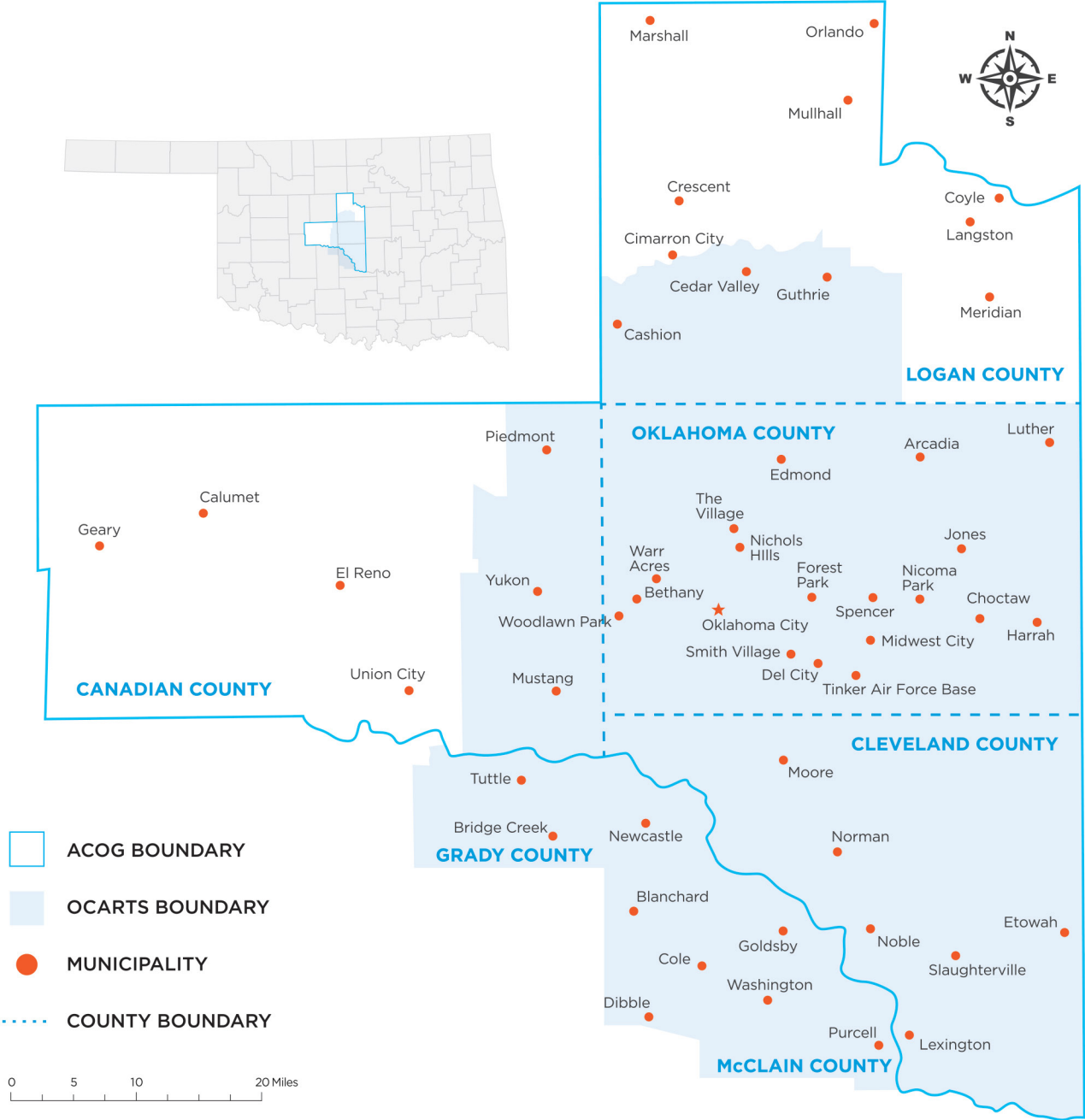
The Association of Central Oklahoma Governments (ACOG) serves as the Metropolitan Planning Organization (MPO) for the Central Oklahoma region. This is in compliance with the provisions of the Federal Highway and Federal Transit Acts of 1962, as amended by the Fixing America's Surface Transportation (FAST) Act, signed into law December 4, 2015. ACOG is a voluntary association of city, town, and county governments within the Central Oklahoma region. Established in 1966, ACOG's purpose is to aid local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. Key functions of the MPO include:

- Establish a setting for effective regional decision-making
- Identify and evaluate alternative transportation improvement options
- Prepare and maintain the Metropolitan Transportation Plan (MTP)
- Prepare and maintain the Transportation Improvement Program (TIP)
- Implement Performance-based Planning and Programming (PBPP) initiatives in the MTP and TIP
- Involve the public

ACOG is responsible for transportation planning throughout the Oklahoma City Area Regional Transportation Study (OCARTS) area, containing all of Oklahoma County and Cleveland County and portions of Logan County, McClain County, Grady County, and Canadian County. See [Figure I](#) for a map of the OCARTS area.

ACOG supports and manages a variety of missions aimed at improving the lives of Central Oklahomans by serving as the MPO for the region. In this capacity, ACOG's primary role is to lead comprehensive, coordinated, and continuous transportation planning. As such, ACOG works with Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Oklahoma Department of Transportation (ODOT), area transit providers, local governments, the public, and other stakeholders to prepare the MTP and TIP. The MPO planning process and planning products are prerequisites for Central Oklahoma to receive federal transportation funding. The subsequent sections highlight a few of the major activities ACOG is involved with.

Figure 1: Oklahoma City Area Regional Transportation Study Area (OCARTS)



METROPOLITAN TRANSPORTATION PLAN

The Metropolitan Transportation Plan (MTP) is developed every five years by ACOG and includes priorities for the next 30 years. The MTP is a fiscally constrained plan that outlines future investment in highway and transit improvements to support regional growth and ACOG goals. The plan includes recommendations for streets and highways, airport access, transit, freight movement, and bicycle and pedestrian ways. Encompass 2040, the current MTP for the OCARTS area, was adopted by the MPO in October 2016. As of December 20, 2017, the OCARTS area is an air quality attainment area, and therefore the MTP for Central Oklahoma is updated every five years. Encompass 2040 includes over \$10 billion in multimodal transportation investment projects, including preservation of the existing system.

TRANSPORTATION IMPROVEMENT PROGRAM

The Transportation Improvement Program (TIP) is a cooperatively developed four-year program outlining multimodal transportation improvements and services to be implemented within the OCARTS area. The improvements and services implemented work towards achieving the goals of the MTP. Selected projects must receive ACOG committee approvals before they are forwarded onto ODOT and then to FHWA for approval. The TIP is also responsible for implementing and monitoring Performance-based Planning and Programming initiatives.

UNIFIED PLANNING WORK PROGRAM

The Unified Planning Work Program (UPWP) is a description of the proposed multimodal transportation planning activities to be conducted in the ACOG region during the fiscal year. The UPWP is prepared annually and serves as a basis for requesting federal planning funds from the U.S. Department of Transportation (USDOT), as well as a management tool for scheduling, budgeting, and monitoring the planning activities of the participating entities. The UPWP presents the scope and direction of all transportation planning activities in the region and specifies which work program tasks will be accomplished during the fiscal year.

PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is routinely updated by ACOG to document guidelines and standards when soliciting public comments on local transportation plans and programs. The plan includes descriptions of the public participation tools ACOG utilizes, the strategies and guidelines that are essential to public participation, and a series of performance measurements to be used to evaluate the effectiveness of the plan. ACOG's Public Participation Plan is available on ACOG's website.

LIMITED ENGLISH PROFICIENCY OVERVIEW

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be considered limited English proficient, or LEP. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. According to the USDOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons: "Title VI and its implementing regulations require that recipients take responsible steps to ensure meaningful access to LEP persons. Recipients should use the guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP."

FEDERAL REQUIREMENTS

Title VI of the Civil Rights Act explicitly prohibits discrimination on the basis of race, color, and national origin in programs and activities that receive federal financial assistance. 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, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Executive Order indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination, which is prohibited under Title VI.

Pursuant to Executive Order 13166, the meaningful access requirements of Title VI and other Title VI regulations apply to the programs and activities of federal agencies and those that operate with federal funds, including ACOG as Central Oklahoma's MPO. It is the policy of ACOG to ensure compliance with Title VI and related statutes or regulations in all programs and activities. The ACOG Title VI Coordinator is granted the authority to administer and monitor the Title VI and nondiscrimination program as promulgated under Title VI and any subsequent legislation.

ACOG will take all steps to ensure that no person or groups of persons shall, on the grounds of race, color, sex, age, national origin, disability, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by ACOG, its recipients, sub-recipients, and contractors.

SAFE HARBOR STIPULATION

Federal law provides a "Safe Harbor" stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. Safe Harbor means that as long as a recipient has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

Evidence of compliance with the recipient's written translation obligations under Safe Harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation can also be provided orally. See the below table for other requirements:

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

The safe harbor provision applies only to the translation of written documents. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters, where oral language services are needed and reasonable to provide.

PROVIDING NOTICE

USDOT guidance indicates that once an agency has decided to provide language services, it is important to notify LEP persons of services available free of charge in a language the LEP persons would understand. Example methods for notification include:

- Signage that indicates when free language assistance is available with advance notice
- Stating in outreach documents that language services are available
- Working with community-based organizations and other stakeholders to inform LEP individuals of ACOG's MPO services and the availability of language assistance
- Using automated telephone voice mail or menu to provide information about available language assistance services
- Including notices in local newspapers in languages other than English
- Providing notices on non-English-language radio and television about ACOG's MPO services and the availability of language assistance
- Providing presentations and/or notices at schools and community-based organizations about available language services

LIMITED ENGLISH PROFICIENCY ASSESSMENT

Federal agencies and recipients of federal funds shall provide meaningful access to programs and activities to LEP persons. The following Four-Factor Analysis set forth by the Department of Justice should be considered when administering an LEP assessment and creating an LEP plan:

1. The number and proportion of LEP persons served or encountered in the eligible service population
2. The frequency the LEP individuals come into contact with programs, activities, and services
3. The importance of programs, activities, and services to LEP persons
4. Resources available to the recipient and costs for the organization

The specific steps taken in creating an LEP plan will depend on the information gathered from the Four-Factor Analysis, including Census data, fieldwork with LEP individuals and the organizations that serve them, analyses of agency resources, and the costs of providing language assistance. ACOG will make responsible efforts to provide language assistance to ensure meaningful access for LEP individuals by conducting a Four-Factor Analysis to assess need.

FOUR FACTOR ANALYSIS

Factor 1: Number and Proportion of LEP Individuals

The first step in understanding the profile of individuals that could participate in the transportation planning process is a review of U.S. Census data, the American Community Survey (ACS) in particular, in order to identify LEP populations. For planning purposes, any person age 5 or older who reports that they speak English less than “very well” (meaning they reported that they spoke English “well”, “not well”, or “not at all”) are considered LEP persons. [Appendix I](#) displays the primary language spoken and number of individuals that are LEP in the OCARTS area. According to the 2012-2016 ACS five-year average, 5.97 percent of the population in the OCARTS area speaks English less than very well. Using the language spoken at home as a surrogate for English proficiency suggests that the majority of the non-English speaking persons speak Spanish (approximately 49,369 of the 67,703 non-English speaking persons). Further analysis at the county level¹ shows that the two most common languages spoken after English and Spanish are Chinese and Vietnamese.

Conclusion: Spanish is the most dominant language spoken by LEP individuals in the OCARTS area and should be the focus of any translation or language assistance activities. However, LEP individuals who speak Chinese and Vietnamese are substantial enough to warrant the availability of written translations. See [Appendix I](#) for summary tables and maps.

¹ Canadian, Cleveland, Grady, Logan, McClain, and Oklahoma counties.

Factor 2: Frequency of Encounters with LEP Individuals

In order to capture data for the Four-Factor Analysis, all ACOG staff were surveyed ([Appendix II](#)). Various questions were asked to determine the frequency of LEP individuals contacting ACOG in person, by telephone, and/or by written methods, and the reasons for contact. Staff were also asked to respond on any language barrier issues that could not be resolved.

Conclusion: Analysis of the 2015 ACS data revealed that LEP individuals comprised 5.89 percent of the six-county area's 1.1 million population, compared to 5.46 percent in 2010. The growing size of the LEP population in the region will likely increase the probability of future contact with the MPO. To date, however, no requests for language assistance services have been made by LEP individuals at ACOG.

Factor 3: Importance of Service Provided

ACOG's MPO programs use federal funds to plan for future transportation projects, but do not include any direct service or program that requires vital, immediate, or emergency assistance, such as medical treatment or services for basic needs. Furthermore, the MPO does not conduct required activities such as applications, interviews, or other activities prior to participation in its programs or events. Involvement by any citizen with the MPO or its committees is voluntary. However, ACOG must ensure that all segments of the population, including LEP persons, have the opportunity to be involved in the transportation planning process, including the MPO's MTP, TIP, UPWP, and other programs and activities.

Inclusive public participation is a priority consideration by the MPO in other plans, studies, and programs as well. Transportation improvements resulting from these planning activities have an impact on all residents. Continued involvement is encouraged throughout the process. The MPO encourages input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible. As a result of the transportation planning process, selected projects receive approval for federal funding and progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own policies to ensure LEP individuals can participate in the process that shapes where, how, and when a specific transportation project is implemented.

Factor 4: Resources Available and Costs

The fourth factor of the analysis weighs the preceding three factors to assess the needs of LEP persons within the region compared with the resources available to ACOG and the costs of providing access. ACOG is committed to offering all residents in the region the opportunity to participate in and receive services from ACOG's activities. The strategies described in subsequent sections use cost-efficient and productive measures to ensure language barriers are not preventing LEP persons from participating meaningfully in ACOG's activities.

To date, there have been no requests for ACOG to provide language services to LEP individuals in the OCARTS area. Given the size of the LEP population in the region and current financial constraints, full multilanguage translations of large transportation planning documents are not warranted at this time. However, ACOG will attempt to provide translated documents on a case-by-case, on-demand basis. ACOG will remain apprised of changes in the Census data and will revisit this plan's policies as LEP populations grow.

LANGUAGE ASSISTANCE STRATEGIES

Although survey responses from ACOG staff indicate that LEP individuals do contact ACOG ([Appendix II](#)), ACOG has developed a list of language assistance strategies to enact in order to ensure meaningful access to all individuals in the event the situation arises.

After analyzing data from the Census Bureau ([Appendix I](#)), the following languages have reached the thresholds for language assistance:

- Spanish
- Chinese
- Vietnamese

Language assistance will be provided for LEP individuals through the translation of some key materials, as well as through oral interpretation when necessary and possible.

TRANSLATION OF WRITTEN MATERIALS

The Google Translate program allows users to view HTML content in other languages. ACOG is in the process of adding Google Translate to the ACOG website so that content can be viewed in other languages.

ACOG has access to trifold brochures, developed by ODOT in both English and Spanish, informing the public of their rights under Title VI. These brochures are available at the ACOG office, at public meetings held by ACOG, and on the ACOG website.

ACOG has adopted the Safe Harbor Provisions and determined that the following documents are considered vital for the public from this agency:

- Title VI complaint form
- Title VI complaint process

These documents will be translated for LEP individuals into Spanish, Chinese, or Vietnamese, upon request.

ORAL LANGUAGE SERVICES

ACOG has developed the following for oral language assistance services:

- ACOG maintains a list of internal points of contact that are most likely to interact with LEP individuals. Currently the anticipated key point of contact for LEP individuals is the front desk receptionist. As interaction with LEP individuals increases, additional points of contact should be identified.
- A language ability survey has been distributed to all ACOG staff in order to create a database of employees that can either assist in translating and/or interpreting in the event that an LEP individual contacts ACOG ([Appendix III](#)).

- Based on the results of the language ability survey, ACOG maintains an inventory of staff language capabilities. Employees that speak and/or write a language other than English are noted, along with whether they are able to act as interpreters.
- The reception desk has the Census Bureau's Language Identification Flashcards for individuals to identify their language needs. These cards have the phrase "Mark this box if you read or speak [name of language]" translated into 38 different languages. Once a language is identified, the LEP coordinator or relevant point of contact will be notified to assess feasible translation or oral interpretation assistance. These cards can also be made available at public meetings.
- ACOG has established a process for staff to assist LEP persons (Appendix IV) which includes completing a LEP Reporting Form (Appendix V) after any contact with an LEP individual.
- ACOG maintains a list of outside sources that can provide oral translation services. The list includes both paid and unpaid translation services as well as any associated costs. The list is updated periodically and identifies any budgetary or personnel limitations. A database is available from ODOT listing all current state approved vendors that can either assist in translating and/or interpreting.
- Press releases, news, letters, and announcements will include ethnic media, radio, television, newspapers, magazines, and community-based organizations, when appropriate.

OUTREACH AND ENGAGEMENT EFFORTS

ACOG has established the following methods to inform LEP individuals, supporting organizations, as well as the general public, of available no-fee LEP services:

- Posting information – ACOG posts information at the front-desk reception area to notify LEP individuals of any available translation services
- Outreach documents – Key outreach documents include a notice that some language assistance services are available.
- Outreach events – In the development of ACOG's MTP, Encompass 2040, staff conducted a series of public outreach activities. At each event, ACOG provided materials in multiple languages: English, Spanish, and Vietnamese. A Spanish speaking translator was also present at one of the outreach events.

Current budget and staff limitations preclude ACOG from implementing all available notification techniques. However, in the future, ACOG may consider additional notification methods, such as:

- Community organizations – ACOG shall notify area community-based organizations and other stakeholders of available language-assistance services.
- Public notices – ACOG could periodically issue notices, in Spanish and English, about available LEP services to translate MPO oral or written program material in local Spanish-language newspapers in the region.
- Automated telephone voice mail attendant or menu system – provides information about available language-assistance services and how LEP individuals can obtain access.

- Radio announcements – provide notices on area Spanish-language radio stations about available language-assistance services and how to obtain access
- Community presentations – provide presentations and/or notices in Spanish at schools and religious organizations

STAFF TRAINING

In order to establish meaningful access to information and services for LEP individuals, staff that regularly interact with the public, and those who will serve as translators or interpreters, should be trained on ACOG's LEP policies and procedures. Training ensures that staff members are effectively able to work in person and/or by telephone with LEP individuals. ACOG senior staff should be included in this training, even if they do not interact regularly with LEP persons, to ensure that they fully understand the plan, reinforce its importance, and ensure its implementation by staff. See [Appendix IV](#) for ACOG's procedures for assisting an LEP individual.

TITLE VI COMPLAINT PROCESS

Any LEP individual has the right to file a complaint against ACOG if they believe that the agency did not provide necessary LEP services as appropriate. These complaints include those available under Title VI of the Civil Rights Acts of 1964. The Title VI complaint forms are available on [ACOG's website](#) or by contacting the Title VI Coordinator. [Appendix VI](#) includes a copy of ACOG's Title VI Complaint form.

CONCLUSION

ACOG will monitor changing population levels and the language needs of LEP individuals in the region. Periodic review of this LEP plan will coincide with evaluations of the Public Participation Plan and the Title VI Plan. Evaluation results and recommended changes will be shared with ACOG's Intermodal Transportation Policy Committee (ITPC). The agency will also keep a record of any LEP services provided and make this information available during the review process. ACOG may use the following tools to conduct further assessment:

- Conduct surveys or focus groups
- Develop an evaluation process to assess LEP service provision
- Establish a tracking system to collect primary-language data for individuals that participate in programs and activities

ACOG is committed to monitoring and updating their language assistance strategies by conducting the following:

- Have staff submit an LEP Reporting form each time there is an encounter with an LEP individual
- Determine how the needs of LEP persons have been addressed
- Determine the current LEP population in the service area and whether the area for translation services has changed

- Continually update the database of ACOG employees who can assist in interpreting and/or translating
- If necessary, train individuals who frequently interact with LEP individuals

ACOG will determine the appropriate mix of written and oral language communications and seek out the appropriate resources in order to better serve LEP individuals in Central Oklahoma.

APPENDIX I

LANGUAGE SPOKEN AND LEP POPULATIONS IN THE OCARTS AREA

	OCARTS TOTAL	PERCENT OF POPULATION	LEP TOTAL	PERCENT LEP
Total Population, 5 years and over	1,133,235			
Speak only English	977,281	86.24%		
Speak Spanish	107,255	9.46%	49,369	4.36%
Speak other Indio-European language	13,588	1.20%	3,204	0.28%
Speak Asian and Pacific Island language	27,868	2.46%	13,623	1.20%
Speak other language	7,243	0.64%	1,507	0.13%
OCARTS Total			67,703	5.97%

ACS 2012 - 2016 ACS 5-year estimates by block group

Table B16004 "Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over"

LANGUAGE SPOKEN BY COUNTY

	CANADIAN CO.	CLEVELAND CO.	GRADY CO.	LOGAN CO.	MCCLAIN CO.	OKLAHOMA CO.	TOTAL	PERCENT OF POPULATION	LEP TOTAL	PERCENT LEP
Total Population, 5 years and	117,367	252,393	50,267	41,878	34,138	695,175	1,191,218			
Speak only English	106,884	227,063	48,216	39,936	31,887	578,325	1,032,311	86.66%		
Spanish or Spanish Creole	6,230	11,299	1,508	1,380	1,893	86,911	109,221	9.17%	51,582	4.33%
French (incl. Patois, Cajun)	287	863	27	19	31	1,378	2,605	0.22%	394	0.03%
French Creole	20	0	0	0	0	140	160	0.01%	23	0.00%
Italian	50	61	4	13	0	189	317	0.03%	60	0.01%
Portuguese or Portuguese Creole	23	86	3	30	56	302	500	0.04%	125	0.01%
German	130	784	219	211	47	1,310	2,701	0.23%	336	0.03%
Yiddish	0	0	0	0	0	0	0	0.00%	0	0.00%
Other West Germanic languages	8	233	3	14	0	69	327	0.03%	69	0.01%
Scandinavian languages	0	79	34	0	0	78	191	0.02%	21	0.00%
Greek	0	56	0	0	0	93	149	0.01%	7	0.00%
Russian	124	210	0	25	4	339	702	0.06%	152	0.01%
Polish	19	141	0	0	0	347	507	0.04%	142	0.01%
Serbo-Croatian	0	65	0	0	0	152	217	0.02%	68	0.01%
Other Slavic languages	25	123	3	0	0	19	170	0.01%	0	0.00%
Armenian	0	9	0	0	0	59	68	0.01%	16	0.00%
Persian	102	325	0	0	0	918	1,345	0.11%	262	0.02%
Gujarati	29	274	0	0	0	146	449	0.04%	195	0.02%
Hindi	53	18	29	0	0	571	671	0.06%	141	0.01%
Urdu	0	127	0	6	0	888	1,021	0.09%	404	0.03%
Other Indic languages	167	310	0	57	0	1,100	1,634	0.14%	618	0.05%
Other Indo-European languages	65	215	68	0	0	185	533	0.04%	175	0.01%
Chinese	168	1,670	0	104	4	2,367	4,313	0.36%	2,198	0.18%
Japanese	81	420	4	0	0	262	767	0.06%	258	0.02%
Korean	0	867	33	0	0	993	1,893	0.16%	903	0.08%
Mon-Khmer, Cambodian	0	88	0	0	0	177	265	0.02%	126	0.01%
Hmong	97	19	0	0	0	345	461	0.04%	31	0.00%

Thai	20	88	0	0	0	402	510	0.04%	325	0.03%
Laotian	200	212	0	0	0	767	1,179	0.10%	728	0.06%
Vietnamese	1,358	3,970	9	0	0	7,072	12,409	1.04%	6,939	0.58%
Other Asian languages	789	611	0	40	0	2,515	3,955	0.33%	1,484	0.12%
Tagalog	107	246	12	3	73	1,103	1,544	0.13%	391	0.03%
Other Pacific Island languages	21	292	60	3	68	295	739	0.06%	277	0.02%
Navajo	13	4	0	0	0	19	36	0.00%	6	0.00%
Other Native North American languages	136	276	29	8	75	786	1,310	0.11%	126	0.01%
Hungarian	0	16	0	0	0	25	41	0.00%	18	0.00%
Arabic	77	499	0	0	0	1,898	2,474	0.21%	896	0.08%
Hebrew	0	166	0	0	0	184	350	0.03%	19	0.00%
African languages	58	575	6	29	0	2,329	2,997	0.25%	528	0.04%
Other and unspecified	26	33	0	0	0	117	176	0.01%	121	0.01%
Total										5.89%

U.S. Census Bureau ACS 2010 - 2015 5-year estimates by county

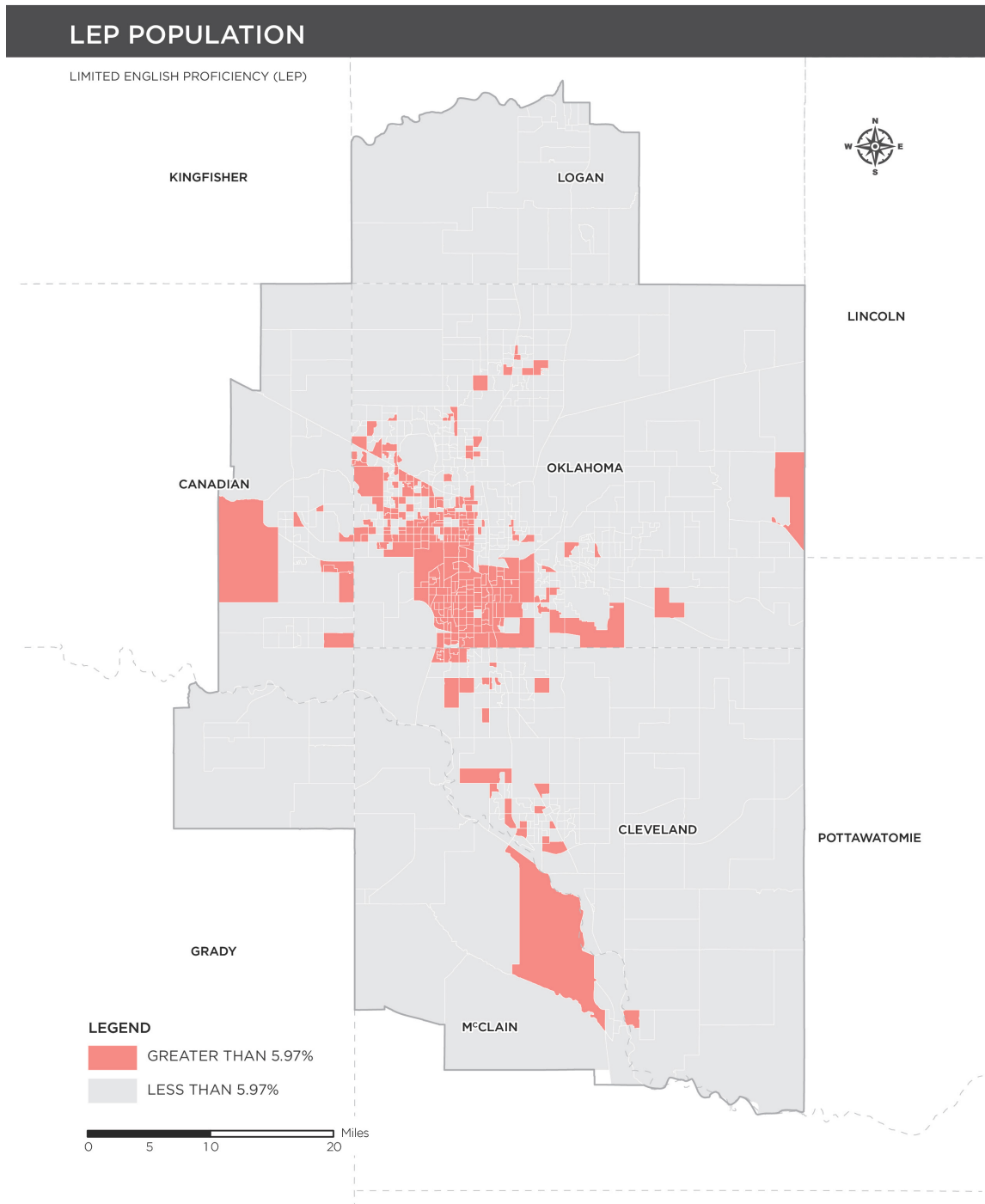
Table B16001 "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over"

RECOMMENDED PROVISION OF WRITTEN LANGUAGE ASSISTANCE BASED ON SIZE OF LANGUAGE GROUP RESULTS

Size of Language Group	Recommended Provision of Written Language Assistance	OCARTS Area
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents	Spanish, Chinese, Vietnamese
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents	N/A
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents	N/A
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required	N/A

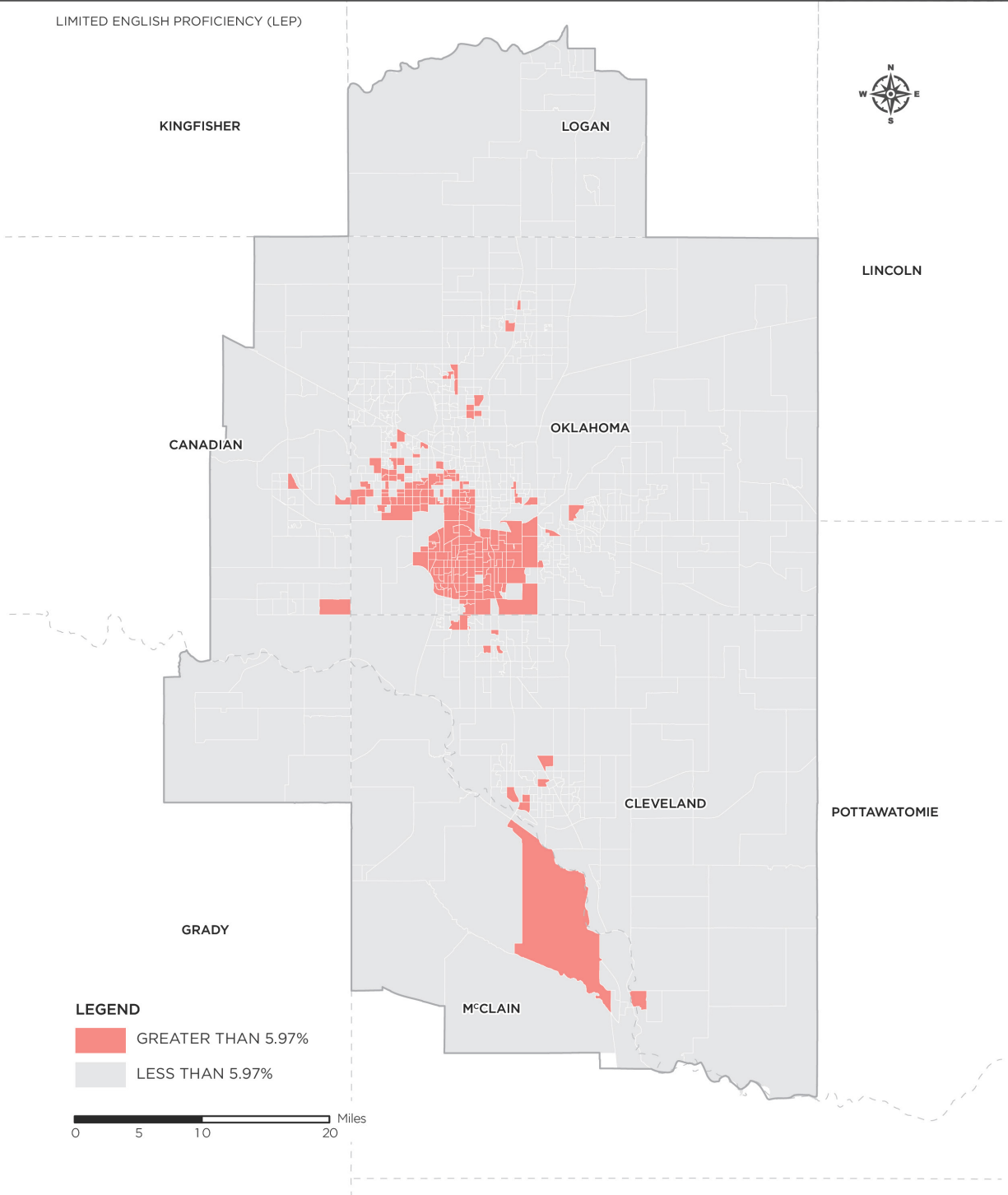
LIMITED ENGLISH PROFICIENCY MAPS

LEP populations according to the U.S. Census Bureau 2011 – 2016 ACS 5-year estimates for the table “Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” by block group. The OCARTS regional average for LEP populations is 5.97%. Block groups with an LEP population greater than 5.97% are displayed.



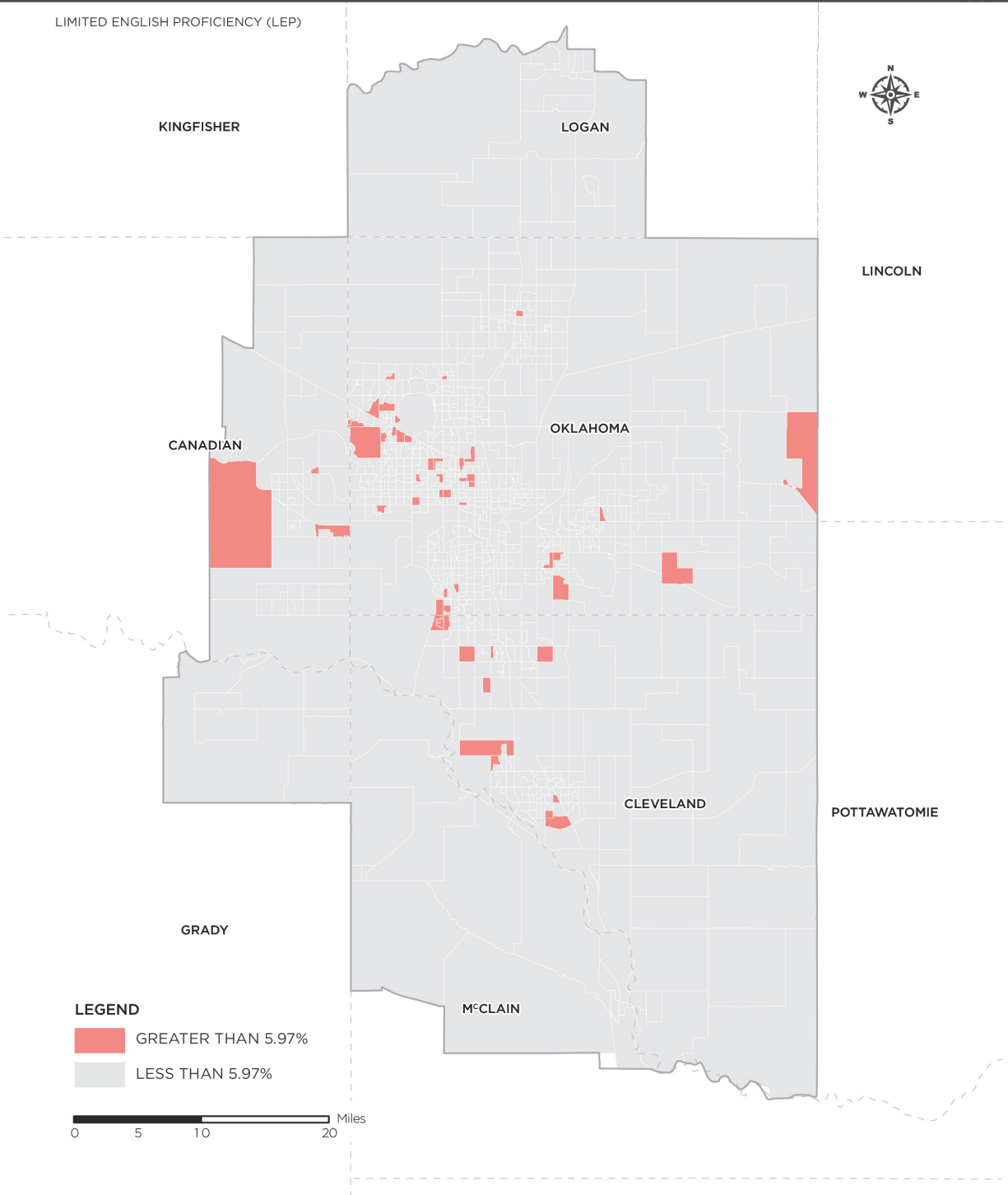
LEP SPEAKS SPANISH

LIMITED ENGLISH PROFICIENCY (LEP)




LEP OTHER LANGUAGE SPOKEN

LIMITED ENGLISH PROFICIENCY (LEP)



APPENDIX II

SURVEY: CONTACT WITH LEP INDIVIDUALS



Updated: 2/2020

Survey: Contact with Limited English Proficiency (LEP) Individuals

The Association of Central Oklahoma Governments is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Additionally, Executive Order 13166 requires Federal agencies and their subrecipients 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.

LEP definition: does not speak English as their primary language and has a limited ability to read, speak, write, or understand English. LEP individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Please answer the following questions:

About how many total individuals from the public do you deal with on a weekly basis, in person?

☐ 0 - 5
☐ 5 - 10
☐ 10 - 20
☐ 20 or more

What are the main reasons these individuals contact ACOG?

Do you ever deal with LEP individuals in person? If so, how frequently?

Have you encountered any issues in assisting LEP individuals in person? If so, please explain:

Submit completed form to Hannah Nolan or email to hnolan@acogok.org

Page 1 of 2

About how many total individuals from the public do you deal with on a weekly basis, on the telephone?

☐ 0 - 5
☐ 5 - 10
☐ 10 - 20
☐ 20 or more

What are the main reasons these individuals contact ACOG?

Do you ever deal with LEP individuals on the phone? If so, how frequently?

Have you encountered any issues in assisting LEP individuals on the phone? If so, please explain:

About how many total individuals from the public do you deal with on a weekly basis, by written methods (email, letter, fax, etc)?

☐ 0 - 5
☐ 5 - 10
☐ 10 - 20
☐ 20 or more

What are the main reasons these individuals contact ACOG?

Do you ever deal with LEP individuals by written methods? If so, how frequently?

Have you encountered any issues in assisting LEP individuals by written methods? If so, please explain:

Submit completed form to Hannah Nolan or email to hnolan@acogok.org

Page 2 of 2

A total of 19 survey responses were submitted.

Total individuals from the public you deal with on a weekly basis:	0 - 5	5 - 10	10 - 20	20 or more	Total
In person	17	2	1		20
On the telephone	13	4	2	1	
By written methods	13	5		2	

The respondents stated the following as main reasons for public contact:

- Obtain information on various ACOG programs as well as submission of paperwork
- Sell or provide services or products to ACOG
- Requests for data and 911 addressing
- Training and public education presentations

No issues were reported in assisting LEP individuals in person, on the telephone, or by written methods.

APPENDIX III

SURVEY: EMPLOYEE LANGUAGE SKILLS DATABASE



Updated: 2/2020

Survey: Employee Language Skills

ACOG is developing a database of ACOG employees that can help interpret, translate, or are bilingual (with English as one spoken language). In order to collect this information, please complete this survey. You may be contacted as needed for your services in the event there is a LEP individual at ACOG.

ACOG is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Additionally, Executive Order 13166 requires Federal agencies and their subrecipients 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.

LEP definition: does not speak English as their primary language and has a limited ability to read, speak, write, or understand English. LEP individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Employee Name:

☐ I cannot read, speak, write, or understand any language other than English; OR, I do not wish to provide services in the event there is an LEP individual at ACOG

☐ I can read, speak, write, or understand one or more languages other than English well; AND, I am willing to provide services in the event there is an LEP individual at ACOG

Language*:

Please check all that apply:

☐ I can interpret. I can listen to a communication or one language and orally convert to another language while retaining the same meaning.

☐ I can translate. I can replace written text from one language into an equivalent written text in another language.

☐ I am bilingual. I have the ability to use two languages. A bilingual person can learn to become a translator or an interpreter, but is not automatically so qualified by virtue of his or her language abilities.

Submit completed forms to Hannah Nolen or email to hnolen@acogok.org

*please fill out a separate form for each language spoken

APPENDIX IV

EMPLOYEE GUIDE: ASSISTING AN LEP INDIVIDUAL

This document provides guidelines on assisting a Limited English Proficient (LEP) individual that contacts ACOG for services or requests.

In Person

1. If you cannot identify the language spoken, use the “I Speak” cards and ask the individual to point to the language they speak.
2. Check the Interpreter-Translator Database and contact the individual that speaks the requested language. Check in this order:
 - ACOG employee
 - Volunteer
 - Vendor
3. If contacting a vendor, the operator can help you identify the language if you need assistance. Provide the vendor with your contact information and the contract information listed on the database sheet. The phone interpreter will ask to speak to the LEP individual and will speak with that person to determine the nature of the request. You may respond through the interpreter and ask follow-up questions of your own.
4. Following the phone conversation, complete the LEP Reporting Form to document the occurrence and how it was resolved.
5. Complete and submit the LEP Reporting Form to the Title VI Coordinator.

Translation via phone

1. Place the LEP caller on hold.
2. If you can determine the language being spoken, contact an ACOG employee or volunteer from the Interpreter-Translator Database and use the conference calling process to add the ACOG employee to the conversation.
3. If an ACOG employee or volunteer is not available OR you cannot determine the language spoken, contact the vendor from the Interpreter-Translator Database and use the conference calling process to add the vendor to the conversation.
4. If contacting the vendor, the operator can help you identify the language if you need assistance. Provide the vendor with your contact information and the contract information listed on the database sheet. The phone interpreter will ask to speak to the LEP individual and will speak with that person to determine the nature of the request. You may respond through the interpreter and ask follow-up questions of your own.
5. Following the phone conversation, complete the LEP Reporting Form to document the occurrence and how it was resolved.
6. Complete and submit the LEP Reporting Form to the Title VI Coordinator.

Translation for written documents

Any incoming correspondence (such as emails, faxes, or letters) that require translation should be forwarded to the Title VI Coordinator. Identified vital documents will be translated as required by the Title VI program and outlined in the LEP Plan.

Document Links

ISpeak Cards

\\srv-acog-file01\Files\TPDS\Title-VI\4 - LEP\1 - LEP Plan - Current\1 - LEP Assistance Guide\ISpeakCards2004.pdf

Interpreter-Translator Database


\\srv-acog-file01\Files\TPDS\Title-VI\4 - LEP\1 - LEP Plan - Current\1 - LEP Assistance Guide\Interpreter-Translator Database - 2020.pdf

LEP Reporting Form

\\srv-acog-file01\Files\TPDS\Title-VI\LEP4 - LEP\1 - LEP Plan - Current\1 - LEP Assistance Guide\LEP Reporting Form.pdf

APPENDIX V

LEP REPORTING FORM



Updated: 2/2020

LEP Reporting Form

The Limited English Proficient (LEP) form is to be filled out when an LEP individual contacts ACOG for services or resources. The reporting information is vital for the Title VI program's reporting requirements to the Oklahoma Department of Transportation and the Federal Highway Administration.

Name: _____ Date: _____

How did the LEP individual contact you?

☐ Telephone ☐ In Person ☐ In Writing

If other, please explain: _____

Reason for contacting ACOG: _____

Service(s) provided:

☐ Interpreter ☐ Translator

Service(s) conducted by:

☐ ACOG Employee ☐ Volunteer ☐ Vendor/Fee Service

Name: _____

Other, please explain: _____

Language spoken: _____


Length of time to provide service: _____

Submit completed forms to Hannah Nolen or email to hnolen@acogok.org

APPENDIX VI

TITLE VI COMPLAINT FORM

TITLE VI: COMPLAINT FORM



The Association of Central Oklahoma Governments is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

OFFICE
USE ONLY
DATE RECEIVED: _____

DATE OF FILING: _____

NAME: _____
ADDRESS: _____
CITY, STATE, ZIP: _____
PHONE NUMBER: _____
EMAIL ADDRESS: _____

INDICATE ON WHAT GROUND(S) YOU BELIEVE YOU HAVE BEEN DISCRIMINATED AGAINST (CHECK ALL THAT APPLY):
☐ RACE ☐ COLOR
☐ NATIONAL ORIGIN ☐ RELIGION
☐ SEX ☐ AGE
☐ DISABILITY ☐ OTHER

INDICATE THE PERSON(S) WHO YOU BELIEVE DISCRIMINATED AGAINST YOU:
NAME(S): _____
WORK LOCATION (IF KNOWN): _____
WORK PHONE: _____
DATE OF ALLEGED INCIDENT: _____

IF YOU HAVE AN ATTORNEY REPRESENTING YOU CONCERNING THE MATTERS RAISED IN THIS COMPLAINT, PLEASE PROVIDE THE FOLLOWING:
NAME: _____
ADDRESS: _____
WORK PHONE: _____
EMAIL ADDRESS: _____

REVISED 3/20

PAGE 1 OF 2

EXPLAIN WHY YOU BELIEVE DISCRIMINATION HAS OCCURRED. BE SURE TO INCLUDE HOW OTHER PERSONS WERE TREATED DIFFERENTLY THAN YOU. IF THERE ARE WITNESSES, PLEASE PROVIDE NAMES, ADDRESSES, AND TELEPHONE NUMBERS. ATTACH ADDITIONAL PAGES AS NECESSARY AND ANY WRITTEN MATERIAL PERTAINING TO YOUR CASE.

WHAT REMEDY ARE YOU REQUESTING? PLEASE BE SPECIFIC:

HAVE YOU FILED OR DO YOU INTEND TO FILE A CHARGE OR COMPLAINT CONCERNING THE MATTERS RAISED IN THIS COMPLAINT WITH ANY OTHER AGENCIES (FEDERAL, STATE, OR LOCAL)? ☐ YES ☐ NO

IF SO, PLEASE PROVIDE THE FOLLOWING INFORMATION:
AGENCY: _____
ADDRESS: _____
NAME OF INVESTIGATOR (IF KNOWN): _____
PHONE NUMBER: _____
EMAIL ADDRESS: _____
DATE FILED: _____
STATUS OF CASE: _____

I CONFIRM THAT I HAVE READ THE ABOVE CHARGE(S) AND IT IS TRUE TO THE BEST OF MY KNOWLEDGE. PRINT OR TYPED NAME OF COMPLAINANT: _____
SIGNATURE: _____ DATE: _____

COMPLETED FORMS MUST BE SUBMITTED TO THE ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS. IF YOU REQUIRE ANY ASSISTANCE IN FILLING OUT THIS FORM, PLEASE CONTACT THE TITLE VI COORDINATOR AT 405-234-2264.

association of central oklahoma governments
4205 N. Lincoln Blvd. | Oklahoma City, OK 73105 | 405.234.2264 | acogok.org

