Limited English Proficiency Plan

Southwest Washington Regional Transportation Council

Clark County
Skamania County
Klickitat County
City of Vancouver
City of Camas
City of Washougal
City of Battle Ground
City of Ridgefield
City of La Center
Town of Yacolt
City of Stevenson
City of North Bonneville
City of White Salmon
City of Bingen
City of Goldendale
C-TRAN
Washington DOT
Port of Vancouver
Port of Camas-Washougal
Port of Ridgefield
Port of Skamania County
Port of Klickitat
Metro
Oregon DOT
14th Legislative District
17th Legislative District
18th Legislative District
20th Legislative District
49th Legislative District

Adopted: May 2014

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RTC complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information see http://www.rtc.wa.gov/info/title6/, call (360) 397-6067, (TTY) 711 or email info@rtc.wa.gov.

Persons with disabilities may request this information be supplied in alternate formats and those who do not read or speak English well may request language assistance, oral interpretation and/or written translation. Contact RTC at 360.397.6067 (TTY) 711 or email info@rtc.wa.gov.

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Limited English Proficiency Plan

Most persons living in the United States read, write, speak, and understand English. There are many persons, however, for whom English is not their primary language. If those persons have a limited ability to read, write, speak or understand English, they are considered limited English proficient, or "LEP." Language barriers often inhibit, or prohibit, LEP persons from accessing benefits and services, from understanding and exercising rights, from fulfilling responsibilities and obligations, and from understanding information provided to them regarding federally funded programs, activities, and services.

The Southwest Washington Regional Transportation Council (RTC) is designated under federal law as the Metropolitan Planning Organization (MPO) for Clark County, and under state law as the Regional Transportation Planning Organization (RTPO), for Clark, Skamania and Klickitat counties. RTC conducts and supports numerous state and federal planning, compliance and certification programs which enable members and other jurisdictions and entities in the region to obtain state and federal funding. RTC receives federal funding for its activities and plays a significant role in disbursement of federal transportation funding to member jurisdictions.

RTC is committed to engaging and involving all residents of Southwest Washington, including those with LEP, in its activities. Therefore, in accordance with the best practice standards for public involvement, together with assistance from the Washington State Department of Transportation (WSDOT) and other federal agencies, RTC has developed this Language Implementation Plan for Limited English Proficiency Persons. The LEP Plan outlines:

- how persons who may need language assistance are identified;
- the ways in which assistance is provided;
- staff training required; and
- how LEP persons are notified assistance is available.

The goal of the LEP Plan is to ensure all residents of the RTC region can, to the fullest extent practicable, participate in RTC activities.

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Title VI and Executive Order 13166

Section 601 of Title VI of the Civil Rights Act of 1964, codified as amended (42 U.S.C. § 2000d), provides that no person in the United States shall "on the grounds 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 receiving Federal financial assistance." Consistent therewith, and in accordance with section 602 of Title VI, (42 U.S.C. § 2000d-1), the Department of Justice promulgated regulations prohibiting recipients of federal funds from "utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin." The USDOT later promulgated nearly identical regulations (See 49 C.F.R. § 21.5(b) (vii) (2).

To further clarify rights protected by Title VI, President William J. Clinton, on August 11, 2000, issued Executive Order 13166, Improving Access to Service for Persons with Limited English Proficiency. The order requires each federal agency to examine its programs and activities and to develop and implement plans so LEP persons can meaningfully access those programs and activities. That Executive Order includes the following statement.

> *Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

In conjunction with Executive Order 13166, the Department of Justice issued a general guidance document setting forth various principles for agencies to consider in developing guidance documents for recipients of federal funds (*See Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination against Persons with Limited English Proficiency*, 65 Fed. Reg. 50123).

USDOT and LEP Policy Guidance

In accordance with Executive Order 13166, the USDOT, on December 14, 2005, issued its *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons*. Adopting the framework established by the Department of Justice in its August 11, 2000, Guidance, the USDOT identifies four factors that should be considered by a recipient of federal funds in assessing the needs of LEP persons and implementing a plan to address those needs.

The four factors include:

1) the number or proportion of LEP persons served or encountered in the eligible service population;

2) the frequency with which LEP individuals come in contact with the programs, activities, or services;

3) the nature and importance to LEP persons of your programs, activities, and services; and

4) the resources available to the recipient and costs

The greater the number or proportion of eligible LEP persons, the greater the frequency with which they will have contact with a program, activity, or service and the more likely enhanced language services will be needed. The intent is to strike a balance ensuring LEP persons have meaningful access to critical services without unduly burdening the local agency.

LEP Assessment for the RTC Planning Area

Factor 1: The number or proportion of LEP persons served or encountered in the eligible service population of the RTC region

The RTC region consists of Clark, Skamania and Klickitat counties. To understand the profile of persons that may participate in RTC activities, the most recent United States Census data was used. For the purposes of this LEP Plan, persons who identified themselves as speaking English less than "very well" are considered LEP persons. Tables 1 through 3, below, summarize the relevant information derived from the United States Census Bureau 2008-2012 American Community Survey (ACS) 5-year Estimates – Table b16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years of Age and Over.

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Table 1: Clark County - Individual Language Spoken at Home by LEP Persons (5 years and older), 2007-2011 (LEP = Speak English less than "very well")

Language Spoken at Home Clark County, WA	Total Persons	MoE +/-	% of Total Population	MoE +/-
Spanish or Spanish Creole	7,706	712	1.94%	0.18%
Russian	5,630	784	1.42%	0.20%
Other Slavic	2,403	534	0.60%	0.13%
Vietnamese	2,254	473	0.57%	0.12%
Chinese	1,297	284	0.33%	0.07%
Other non-English	5,657	746	1.42%	0.19%
Total LEP Population	24,947	1506	6.27%	0.38%
Total Population	397,749	-		

Notes: Prepared by RTC staff based on data from the 2008-2012 ACS (Table B16001). "MoE" stands for margin of error based on the sampled data.

Table 2: Skamania County - Individual Language Spoken at Home by LEP Persons (5 years and older), 2007-2011 (LEP = Speak English less than "very well")

Language Spoken at Home Skamania County, WA	Total Persons	MoE +/-	% of Total Population	MoE +/-
Spanish or Spanish Creole	75	57	0.71%	0.51%
Russian	6	11	0.06%	0.10%
Other Slavic	0	19	0.00%	0.18%
Vietnamese	0	19	0.00%	0.18%
Chinese	3	5	0.03%	0.05%
Other non-English	66	104	0.63%	0.99%
Total LEP Population	150	122	1.43%	1.16%
Total Population	10,507	41		

Notes: Prepared by RTC staff based on data from the 2008-2012 ACS (Table B16001). "MoE" stands for margin of error based on the sampled data.

In Skamania County (Table 2), Spanish or Spanish Creole is the most common non-English language spoken at home, accounting for half of the estimated 150 persons that speak English less than "very well." The estimated LEP population of 150 represents about 1.5% of total 10,507 persons age 5 or over that reside in Skamania County.

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Table 3: Klickitat County - Individual Language Spoken at Home by LEP Persons (5 years and older), 2007-2011 (LEP = Speak English less than "very well")

Language Spoken at Home Klickitat County, WA	Total Persons	MoE +/-	% of Total Population	MoE +/-
Spanish or Spanish Creole	672	152	3.49%	0.79%
Russian	0	22	0.00%	0.11%
Other Slavic	0	22	0.00%	0.11%
Vietnamese	0	22	0.00%	0.11%
Chinese	6	10	0.03%	0.02%
Other non-English	41	126	0.21%	0.65%
Total LEP Population	719	201	3.74%	1.04%
Total Population	19,246	31		

Notes: Prepared by RTC staff based on data from the 2008-2012 ACS (Table B16001). "MoE" stands for margin of error based on the sampled data.

Spanish or Spanish Creole is also the most common non-English language spoken at home in Klickitat County (Table 3). The estimated 672 Spanish speakers who speak English less than "very well," represent over 90% of the 719 Klickitat residents age 5 or over who speak English less than "very well." Over all about 3.75% of KlickitatCounty's 19,246 persons age 5 or over are LEP persons.

Factor 2: The frequency with which LEP individuals come in contact with RTC programs, activities, or services

The previous analysis showed that approximately 6 percent of Clark County's population is LEP persons, with the majority speaking Spanish or Spanish Creole (about 2%) and Russian (about 1.5%). Interpretation and translation for these languages are the most likely to be requested. To date, RTC has received no requests, formal or otherwise, by LEP persons seeking the translation of documents, interpreters at public meetings or other language assistance. RTC staff does not provide direct critical services to individuals. Activities are focused on regional planning efforts and allocation of funds to transportation projects to be implemented by other agencies and local governments. Thus, there is limited contact with the general public at large (e.g., as compared to a public transit agency, school district, public health agencies, public safety agencies or other direct providers of social services).

In 2009, RTC conducted a regional household travel behavior survey in Clark County. The telephone recruitment of surveyed households was conducted by a bilingual call center, and all survey documents were prepared in Spanish as well as English. Over 30,000 telephone numbers were called to recruit 2,332 households to

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participate in the survey. None of the recruited households requested survey diaries or other survey materials in Spanish.

While RTC contact with LEP individuals has been limited, RTC remains committed to engaging and involving all residents of Southwest Washington, including those with LEP and seeking to remove linguistic barriers to full participation.

Factor 3: The nature and importance of the program, activity, or service provided by RTC

RTC works with the Southwest Washington counties (Clark, Skamania, and Klickitat), cities and towns, ports, tribes, transit agencies, and the state to develop policies and make decisions about long-term regional issues on land use, transportation, and the economy. RTC does not provide any direct projects or services to the population of the Southwest Washington region. However, RTC does distribute funds through several transportation programs, including funds for those with special transportation needs, who may include LEP persons. All funds RTC distributes are to eligible recipients and must be consistent with adopted regional plans, the approval and adoption process of which are guided by RTC's Public Participation Plan and all other applicable laws and regulations.

RTC encourages public input and involvement from all residents or their representatives. RTC posts agendas for all meetings, which are open to the public, on the RTC website. RTC staff is available to address community organizations as requested. RTC staff fields inquiries from the public regarding transportation projects, other planning activities, and aging services. RTC frequently updates its website to allow residents to learn about and follow RTC activities. While LEP persons are encouraged to participate directly in RTC's regional activities, they are often more engaged at the local level with RTC member governments or in association with local projects. This type of engagement is critical, as the feedback received at the local level can then be communicated to RTC's regional programs.

Factor 4: The resources available to RTC and costs of providing language assistance

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

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LEP Implementation Plan

The key to providing meaningful access to LEP persons is to ensure that RTC and LEP persons and can communicate effectively and act appropriately based on that communication. RTC will take reasonable steps to ensure that LEP persons are given adequate information, are able to understand that information, and are able to participate fully and effectively in RTC programs and activities.

Needs Assessment

The LEP Assessment for the RTC planning area indicates that Spanish and Russian speakers are the most likely LEP persons RTC staff will encounter. However, these are not the only languages, and when RTC staff encounter a LEP person, often the language will not be known. RTC staff will use *Language Identification Flashcards* to identify a person's primary language (see Appendix A). Copies will be kept with reception staff and brought to every public meeting. *Language Identification Flashcards,* as developed by the United States Census Bureau, bear the phrase "Mark this box if you read or speak [name of language]" translated into 38 different languages. The LEP person can then denote the language, and staff can respond as appropriate to provide or obtain assistance. The *Language Identification Flashcards* may be downloaded at: http://www.lep.gov/ISpeakCards2004.pdf. Once a LEP person's primary language is identified using the flashcards, RTC staff will assess which language assistance measures would be most appropriate to assist the person to participate fully and effectively in RTC programs and activities.

Language Assistance Plan

RTC uses Language Assistance Measures to provide meaningful, early and continuous opportunities for all interested residents to participate in the dialogue that informs key decisions, regardless of language barriers. These creative, low-cost solutions include:

Measures for Written Documents

Much of the public's interaction with RTC is through its website: www.rtc.wa.gov. In the website footer, RTC provides continuous access to Google Translate, which provides translation into over 80 languages. Additionally, in the footer are links in Spanish and Russian to Title VI and LEP notifications in Spanish and Russian.

RTC's main documents include the Regional Transportation Plan (RTP), Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP). All of these documents exceed 40 pages, with the full RTP nearly 300 pages with the appendices. RTC will provide oral interpretation of these documents and consider written translation of parts of interest when appropriate.

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Measures for Oral Communication

- When RTC receives a request for oral language assistance, staff members will follow these steps, as needed.
- Take the person's name and contact information.
- Use the *Language Identification Flashcards*, if needed, to determine the person's primary language. These cards are available at the front desk and are brought to every public meeting.
- Use the telephone interpreter service RTC contracts with to provide telephone-based interpreter services. If a request for interpretation is made in advance, RTC will utilize the Washington Courts web site (http://www.courts.wa.gov/programs_orgs/pos_interpret/), which provides a directory of certified interpreters by location, to arrange for services.
- The offer of a certified interpreter will always be made, regardless of the availability of a family member, friend or volunteer for interpretation.

Visualization

Visualization techniques are one way to communicate with LEP or low-literacy persons. RTC uses visualization techniques such as maps, charts, graphs, illustrations, presentations and videos at all types of meetings and in all types of print materials to explain concepts behind actions and decision-making. RTC may also use handouts and posters to display visual information. RTC's meeting rooms are equipped with computers, projectors, and sound systems for displaying visual and audio information.

Agendas

The agendas for all RTC meeting include civil instruction on how to get materials and services in alternative formats and nondiscrimination notifications. The notification reads:

> For special accommodations or translation services, call (360) 397.6067, (TTY) 711 or email info@rtc.wa.gov, 3 business days in advance.
>
> RTC assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964, Washington State discrimination laws in RCW 49.60 and the Americans with Disabilities Act.

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Staff Training

In order to establish meaningful access to information and services for LEP individuals, RTC will train its employees to assist in person, and /or by telephone, LEP individuals who request assistance using the assistance measures outlined above.

Monitoring

This LEP Plan will be incorporated in to RTC's Title VI Plan, and RTC's Title VI Coordinator will report on requests for language assistance in RTC's annual Title VI Report to the Washington State Department of Transportation. RTC will adjust practices to meet language assistance needs and demand and periodically update this plan to reflect any changes.

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2004 Census Test

United States Census 2010

LANGUAGE IDENTIFICATION FLASHCARD

☐ ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
☐ Խնդրում ենք նշում կատարեք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
☐ যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
☐ ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
☐ Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
☐ 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
☐ 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
☐ Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
☐ Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
☐ Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
☐ Mark this box if you read or speak English.	11. English
☐ اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi

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☐ Cocher ici si vous lisez ou parlez le français.	13. French
☐ Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
☐ Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
☐ Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
☐ अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
☐ Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
☐ Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
☐ Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
☐ Marchi questa casella se legge o parla italiano.	21. Italian
☐ 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
☐ 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
☐ ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
☐ Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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☐ Assinale este quadrado se você lê ou fala português.	26. Portuguese
☐ Însemnaţi această căsuţă dacă citiţi sau vorbiţi româneşte.	27. Romanian
☐ Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
☐ Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
☐ Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
☐ Marque esta casilla si lee o habla español.	31. Spanish
☐ Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
☐ ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
☐ Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
☐ Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
☐ اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
☐ Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
☐ באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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