



Grand Forks - East Grand Forks

# METROPOLITAN PLANNING ORGANIZATION

## Updated 2019 Limited English Proficiency Plan



### TITLE VI/ADA COORDINATOR

**Stephanie Halford, MPO Executive Director**  
**255 North 4th Street, Grand Forks, ND 58203**  
**600 DeMers Avenue, East Grand Forks, MN 56721**  
**(701) 746-2660**

The preparation of this Report was financed, in part, through the U.S. Department of Transportation's Federal Highway Administration, and through local contributions from the Governments of Grand Forks, North Dakota, and East Grand Forks, Minnesota.

**TABLE OF CONTENTS**

	<u><b>Page</b></u>
<b>Introduction .....</b>	<b>3</b>
<b>Plan Summary .....</b>	<b>3</b>
<b>Meaningful Access: Four-Factor Analysis.....</b>	<b>4</b>
<b>Language Assistance .....</b>	<b>9</b>
<b>Language Assistance Measures.....</b>	<b>9</b>
<b>Staff Training.....</b>	<b>10</b>
<b>Translation Of Documents .....</b>	<b>10</b>
<b>Monitoring.....</b>	<b>11</b>
<b>Dissemination Of The GF-EGF LEP Plan.....</b>	<b>12</b>

## INTRODUCTION

This *Limited English Proficiency (LEP) Plan* has been prepared to address the **Grand Forks-East Grand Forks Metropolitan Planning Organization (MPO)** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicated that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the Grand Forks-East Grand Forks MPO which receives federal grant funds.

## PLAN SUMMARY

The MPO has developed this *LEP Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the Grand Forks-East Grand Forks MPO used the four-factor LEP analysis which considers the following factors:

- The number or proportion of LEP persons in the service area who may be served by the MPO.
- The frequency with which LEP persons come in contact with the services.
- The nature and importance of services provide by the MPO to the LDP population.

- The interpretation services available to the MPO and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

### **MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS**

#### **1. The number or proportion of LEP persons in the service area who may be served or are likely to require Grand Forks-East Grand Forks MPO services.**

The MPO staff examined the U.S. Census Bureau American Community Survey 5-Year Estimates from 2013-2017 using the Age by Language Spoken at Home by Ability to Speak English for the Populations 5 Years and Over table. Staff was able to determine that approximately 6.2% or 4,044 people spoke a language other than English in the Grand Forks-East Grand Forks MPO area. Of the 4,044 people reporting they speak languages other than English, 1,465 or 2.2% of respondents speak English “less than very well”.

<b>MPO Area ACS* Data 2013-2017</b>			
	<b>MPO Area</b>	<b>Grand Forks</b>	<b>East Grand Forks</b>
<b>Total Population Age 5+ Years</b>	65,679	56,533	9,146
<b>Population Speaking English Less Than Very Well</b>	1,465	1,209	256
<b>Percent</b>	2.2%	2.1%	2.8%
<b>2 Times Percent</b>	4.5%	4.3%	5.6%

\*American Community Survey Census Block Group

#### **2. The frequency which LEP persons come in contact with Grand Forks-East Grand Forks MPO services.**

The MPO staff reviewed the frequency with which the Executive Policy Board, Technical Advisory Committee (TAC), and office staff have, or could have,

contact with LEP persons. This includes documenting phone inquiries or office visits. To-date, the MPO has received **NO** requests for interpreters and **NO** requests for translated program documents. The MPO Executive Policy Board, Technical Advisory Committee (TAC), and office staff are mostly likely to encounter LEP individuals through office visits, phone conversations, and attendance at Executive Policy Board/Technical Advisory Committee (TAC) meetings.

### **3. The Nature and importance of services provided by the Grand Forks-East Grand Forks MPO to the LEP population.**

The Grand Forks-East Grand Forks MPO adheres to the concept of “meaningfully greater” areas in its determination of the thresholds of populations of interest. A population is of a “meaningfully greater” interest, if it is two times the total percent population within the metropolitan boundary or if the geographic unit exceeds 50% of the minority population. These areas with “meaningfully greater” interest are identified as areas of high concentration. Meaningfully greater is a detailed screening “threshold level” analysis technique used to support transportation long range, improvement, and state strategic improvement plans. The “threshold level” analysis does require a robust knowledge of Geographic Information System; coupled with a sound understanding of Census data. It does not require an intense data collection.

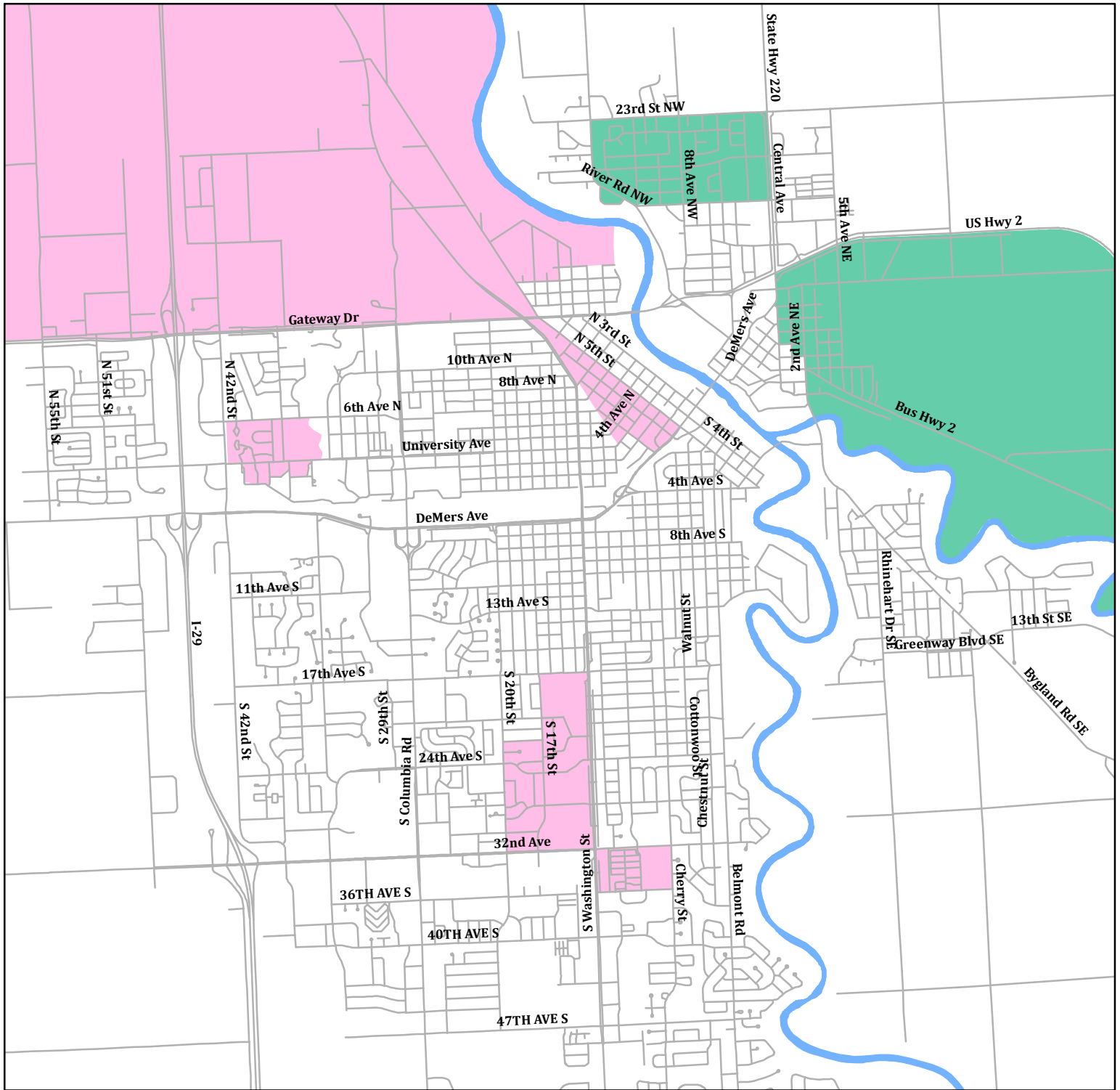
Data from the American Community Survey (ACS) at the Block group level (2013-2017) was used for the creation of the high concentration LEP map. All data from the ACS is estimated; thus, there are margins of error that were not taken into consideration. The U.S. Census Block Group is an appropriate geographic unit level of analysis to address MPO’s requirements.

The overwhelming majority of the population, 93.8% speaks only English. As a result, there are a few social, services, or professional and leadership organizations within the MPO service area that focus on outreach to LEP individuals. The MPO staff is most likely to encounter LEP individuals through office visits, phone conversations, notifications from maintenance staff of impacts on MPO service area services and attendance at meetings. With the areas identified as having “meaningfully greater” proportion of LEP population, MPO staff will examine in greater detail the necessity of distributing notices and other information in another language. The ACS Urban Area Data does breakdown the languages spoken in the Grand Forks-East Grand Forks Urban Area.

<b>Language Spoken At Home By Ability to Speak English For Age 5 Years &amp; Older ACS* Data 2013-2017</b>						
	<b>MPO Area</b>		<b>Grand Forks</b>		<b>East Grand Forks</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
<b>Speaks English</b>	61,635	93.8%	52,998	93.7%	8,637	94.4%
<b>Speaks Spanish</b>	856	1.3%	682	1.2%	174	1.9%
<b>Speaks Other Indo-European</b>	1,319	2.0%	1,220	2.2%	99	1.1%
<b>Speaks Asian &amp; Pacific Island</b>	977	1.5%	916	1.6%	61	0.7%
<b>Speaks Other</b>	892	1.4%	717	1.3%	175	1.9%
<b>Total Non-English Speakers</b>	4,044	6.2%	3,535	6.3%	509	5.6%
<b>Total Population</b>	65,679		56,533		9,146	

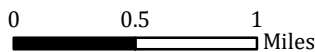
\*American Community Survey Census Block Groups

# High Concentration of Limited English Proficiency



## Limited English Proficiency

- EGF: 6% or Higher
- GF: 4% or Higher



MPO Area ACS* Data 2013-2017			
	MPO Area	Grand Forks	East Grand Forks
<b>Total Population Age 5+ Years</b>	65,679	56,533	9,146
<b>Population Speaking English Less Than Very Well</b>	1,465	1,209	256
<b>Percent</b>	2%	2%	3%
<b>2 Times Percent</b>	4%	4%	6%
<small>*American Community Survey</small>			

<b>Language Spoken At Home For Population 5 Years And Over</b>		
	<b>Total</b>	<b>Percentages</b>
All populations	60,311	
English Speakers	56,407	93.5%
Non-English Speakers	3,904	6.5%
Speaks Very Well	2,473	4.1%
Speaks Less Than Well	1,431	2.4%
Spanish Speakers	810	1.3%
French, Haitian, or Cajun Speakers	246	0.4%
German Or Other West Germanic Speakers	267	0.4%
Russian, Polish, Or Other Slavic Speakers	163	0.3%
Other Indo-European Speakers	608	1.0%
Korean Speakers	45	0.1%
Chinese (Incl. Mandarin, Cantonese) Speakers	479	0.8%
Vietnamese Speakers	50	0.1%
Tagalog (Inc. Filipino)	103	0.2%
Other Asian And Pacific Island Speakers	241	0.4%
Arabic Speakers	155	0.3%
Other And Unspecified Speakers	737	1.2%

Note: American Communities Survey Census Urban Area

**4. The resources available to the Grand Forks-East Grand Forks MPO and overall cost to provide LEP assistance.**

The MPO reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contact local citizens that would be willing to provide voluntary Spanish (the most common language spoken after English) translation if needed within a reasonable time period. Other language translation, if needed, would be provided through a telephone interpreter line for which the MPO would pay a fee.



## *LANGUAGE ASSISTANCE*

A person who does not speak English as their primary language and who has limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the MPO services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language to another language.

How the MPO staff may identify an LEP person who needs language assistance:

- Post notice of LEP plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All MPO staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All MPO staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year. Any contacts will be formally documented on a form and evaluated for frequency.
- When the MPO sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

### *Language Assistance Measures*

Although there are a very low percentage of LEP individuals in the MPO service area, that is, persons who speak English “not well” or “not at all”, the MPO will strive to offer the following measures:

- The MPO staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
- The following resources will be available to accommodate LEP persons at **NO CHARGE**:
  - The MPO website will have translation capability to convert from English to other languages.

- Language interpretation/translations services will be pursued to accommodate the LEP request within a reasonable time period.
- Language interpretation will be accessed for all other languages through a telephone interpretation services.

For assistance please contact the Grand Forks-East Grand Forks Metropolitan Planning Organization's ADA Coordinator, Stephanie Halford, at (701) 746-26i60 or Peggy McNelis, Office Manager, at (701) 746-2660.

## **STAFF TRAINING**

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public
- Use the "I speak" cards.
- Documentation of language assistance request.
- Title VI Complaint Process.

*All contractors or subcontractors performing work for the Grand Forks-East Grand Forks MPO will be required to follow the LEP guidelines.*

## **TRANSLATION OF DOCUMENTS**

As stated earlier, the MPO website has the capability to translate from English to other languages. When it comes to printed items, the MPO weighed the cost and benefits of translating the documents, the likelihood of frequent changes in documents and other relevant factors, and at this time it is an unnecessary burden to have any documents translated.

Due to the very small LEP population, the Grand Forks-East Grand Forks MPO does not have a formal outreach procedure in place. Translation services have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the MPO will consider the following options:

- The Grand Forks-East Grand Forks MPO has an outreach process including a Request for Reasonable Accommodations procedure that refers all request to the Grand Forks-East Grand Forks MPO ADA Coordinator for processing. The Grand Forks-East Grand Forks MPO has translation

services identified and notices of accommodation are placed in public ads, meeting notices, flyers, and agendas.

- The Grand Forks-East Grand Forks MPO ADA Coordinator will assess requests for translation of documents based on the possible impacts and known LEP population using the Four Factor Analysis.
- The Grand Forks-East Grand Forks MPO will make every effort to provide the services in a timely manner.
- The Grand Forks-East Grand Forks MPO will pay for interpreter services and translation of vital documents when necessary.

The Grand Forks-East Grand Forks MPO has identified vital documents as those documents that are critical for obtaining the federal services and/or benefits, or that is required by law. These may include:

- Applications
- Consent and Complaint Forms
- Notices of Rights and Disciplinary Actions
- Notices advising LEP persons of the availability of free language assistance
- Letters or Notices that require a response

A “safe harbor” provision regarding the translation of documents is provided by the Department of Justice. The DOJ suggest providing written translations of vital documents for each eligible LEP language group that constitutes five percent of 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. The safe harbor provision applies to the translation of written documents only.

The Grand Forks-East Grand Forks MPO will make every effort to translate vital documents, as practicable, upon receipt of request for reasonable accommodations for translation. Written translation of the Grand Forks-East Grand Forks documents can range from translation of an entire document to translation of a short description of the document.

## **MONITORING**

**Monitoring and Updating the LDP Plan** – The Grand Forks-East Grand Forks MPO will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every four years using the most current American Community Survey data. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of the LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the MPO financial resources are sufficient to fund language assistance resources needed.
- Determine whether the MP fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

### **DISSEMINATION OF THE GRAND FORKS-EAST GRAND FORKS MPO LEP PLAN**

- Post signs in the MPO service area notifying LEP persons of the LEP Plan and how to access language services.
- Post on the MPO website the LEP Plan and how to access language services.
- State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request within 5 business days at (701) 746-2660.
- Based on the limited LEP population and request for translation services, all initial documents will be published in English with the availability to translate upon request.
- Publish Press Releases
- Send copy of press release to advocacy groups and other agencies serving LEP populations.

## **APPENDIX A: LANGUAGE INDEX CARDS**

To be able to communicate with LEP persons, the Grand Forks-East Grand Forks MPO staff will make the following identification flashcards available at public meetings and other community input events.

Developed by the U.S. Census Bureau, these cards have the phrase “Mark this box if you read or speak “name of language”, translated into 38 languages. They were designed for use by government and non-government agencies to identify the primary language of LEP individuals during face-to-face contacts.

Once a language is identified, a relevant point of contact will be notified to assess feasible translation or oral interpretation assistance.

See Language Index Cards on the following pages.

Language Identification Flashcard ✓

Arabic

أنا أتحدث اللغة العربية

Armenian

Ես խոսում եմ հայերեն

Bengali

আমি বাংলা কথা বলতে পারি।

Cambodian

ខ្ញុំនិយាយភាសាខ្មែរ

Chamorro

Motka i kahhon ya yangin ûntûngnu' manitai pat  
ûntûngnu' kumentos Chamorro

Dinka

Rinṗ êkēnē yic tē yījam nē thunjäy ye tök, ku kor raan  
Bī yī geer thok.

Simplified Chinese

如果你能读中文或讲中文，请选择此框。

Traditional Chinese

如果你能讀中文或講中文，請選擇此框。

Croatian

Govorim hrvatski

Czech

Mluvím česky

Dutch

Ik spreek het Nederlands

English

I speak English

Language Identification Flashcard ✓

Farsi

من فارسی صحبت می کنم

French

Je parle français|

German

Ich spreche Deutsch|

Greek

Μιλώ τα ελληνικά

Haitian Creole

M pale kreyòl ayisyen

Hindi

मैं हिंदी बोलता हूँ ।

Hmong

Kuv has lug Moob

Hungarian

Beszélek magyarul|

Ilocano

Agsaonak ti Ilokano

Italian

Parlo italiano|

Japanese

私は日本語を話す

Korean

한국어 합니다

Language Identification Flashcard ✓

Laotian

ຂ້ອຍປາກພາສາລາວ

Polish

Mówię po polsku

Portuguese

Eu falo português do Brasil  
*(for Brazil)*

Portuguese

Eu falo português de Portugal  
*(for Portugal)*

Romanian

Vorbesc românește

Russian

Я говорю по-русски

Serbian

Ja говорим српски

Slovak

Hovorím po slovensky

Spanish

Yo hablo español

Somali

Waxaan ku hadlaa af-Soomaali

Tagalog

Marunong akong mag-Tagalog

Thai

พูดภาษาไทย



Language Identification Flashcard ✓

Tongan

Maaka 'i he puha ni kapau 'oku ke lau  
pe lea fakatonga

Ukrainian

Я розмовляю українською мовою

Urdu

میں اردو بولتا ہوں

Vietnamese

Tôi nói tiếng Việt

Yiddish

איך רעד יידיש

American Sign Language



I, ME



SIGN, SIGN LANGUAGE