

LIMITED ENGLISH PROFICIENCY PLAN
COMMUNITY PLANNING ASSOCIATION
OF SOUTHWEST IDAHO
(COMPASS)

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INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Community Planning Association of Southwest Idaho's (COMPASS') responsibilities as a recipient of federal financial assistance as related to the needs of individuals with limited English language skills (Limited English Proficiency [LEP]). The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state 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 receiving federal financial assistance.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. This order applies to all state and local entities that receive federal funding.

PLAN SUMMARY

As a recipient of federal funding, COMPASS will use the following four-factor analysis to determine the extent of obligation and take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

1. The number or proportion of LEP persons eligible to be served by or likely to encounter a program, activity, or service of COMPASS.
2. The frequency with which LEP individuals come in contact with COMPASS services.
3. The nature and importance of the program, activity, or service provided by COMPASS to people's lives.
4. The resources available to COMPASS and costs.

The data and analyses apply to the COMPASS planning area of Ada and Canyon Counties, Idaho.

FOUR-FACTOR ANALYSIS

1. *The number or proportion of LEP persons eligible to be served by or likely to encounter a program, activity, or service of COMPASS.*

According to 2015-2019 American Community Survey data, 3.0% of Ada County residents age 5 and older and 6.8% of Canyon County residents age 5 and older speak English less than "very well¹." Similarly, 2% of Ada County households and 3% of Canyon County households are considered "linguistically isolated," reflecting the percent of households in which no one over the age of 14 speaks English "very well."² Spanish is the most common language spoken in the two counties other than English (Table 1).

Table 1. Language spoken at home, Ada and Canyon Counties, Idaho³

Language Spoken at Home*	Ada County		Canyon County	
	Number of People	Percent of Population	Number of People	Percent of Population
English	392,747	91.3%	163,651	81.3%
Language other than English	37,379	8.7%	37,575	18.7%
Spanish	18,426	4.3%	33,699	16.7%
Other Indo-European	7,886	1.8%	2,219	1.1%
Asian/Pacific Island	6,926	1.6%	1,293	0.6%

¹ American Community Survey, 2015-2019, Percent speak English less than "very well." Accessed 1/29/2021.

² US Environmental Protection Agency "EJSCREEN," calculated from American Community Survey, 2015-2019. Accessed 2/18/2021.

³ American Community Survey, 2015-2019, Language Spoken at Home. Accessed 1/29/2021.

2. The frequency with which LEP individuals come in contact with COMPASS services.

COMPASS staff reviewed the frequency of contact with LEP persons through public meetings, open houses, committee meetings, and public outreach, including the frequency of responses received on Spanish language public surveys and comment forms (Table 2). COMPASS promotes these opportunities to participate in Spanish and offers assistance, including language assistance, in both English and Spanish in its print advertising and on its website. Despite ongoing efforts to improve and expand methods for reaching Spanish-speaking individuals, the number of residents providing feedback to COMPASS in Spanish remains extremely small.

Table 2. Number of responses received via Spanish language surveys and comment forms, 2016-2020

Type of Form	Year	Total Responses	Number English	Number Spanish	Percent Spanish
<u>Comment Form:</u> FY2021-2027 Transportation Improvement Program (TIP) and associated air quality conformity	2020	57	57	0	0%
<u>Survey:</u> Growth	2020	3,146	3,137	9	0.28%
<u>Survey:</u> Future Trends	2019	3,706	3,705	1	0.03%
<u>Comment Form:</u> FY2020-2026 TIP and associated air quality conformity	2019	25	25	0	0%
<u>Comment Form:</u> <i>Communities in Motion 2040 2.0</i> (long-range plan) draft plan (additional projects)	2018	59	59	0	0%
<u>Comment Form:</u> <i>Communities in Motion 2040 2.0</i> (long-range plan) draft plan	2018	67	67	0	0%
<u>Comment Form:</u> FY2019-2023 TIP and associated air quality conformity	2018	73	72	1	1.36%
<u>Comment Form:</u> Public Participation Plan	2018	18	18	0	0%
<u>Comment Form:</u> Amendment to FY2018-2022 TIP and <i>Communities in Motion 2040</i>	2018	493	493	0	0%
<u>Comment Form:</u> FY2018-2022 TIP and associated air quality conformity	2017	55	55	0	0%
<u>Comment Form:</u> Amendment to FY2017-2021 TIP and <i>Communities in Motion 2040</i>	2017	758	758	0	0%
<u>Comment Form:</u> FY2017-2021 TIP and associated air quality conformity	2016	17	17	0	0%

No requests for interpreters or translators have been received by COMPASS. However, COMPASS has initiated and conducted discussion groups in Spanish using bilingual COMPASS staff and volunteer interpreters, and initiated similar discussion groups with members of the refugee community in which it was specifically requested by the participants that the discussion be conducted solely in English to assist in mastering language skills.

3. The nature and importance of the program, activity, or service provided by COMPASS to people's lives.

It is critical to COMPASS and the success of its programs to have as many participants as possible involved in the planning and decision-making processes. It is also critical to all individuals who live in the Treasure Valley (LEP and not LEP) to have a say in the future of their transportation system, as it affects where they live, the types of jobs they have access to, and their quality of life. Projects include updates to the regional long range transportation plan, *Communities in Motion*, the transportation improvement program, and special studies that impact the way people live, work, and play.

The direct relevance of any specific COMPASS project or plan to specific individuals varies greatly. The long-range transportation plan, *Communities in Motion*, plans for 20+ years for the two-county area. It impacts future growth patterns and transportation decisions. While its long-term impact is significant, the direct short-term impact on an individual's daily life is less so.

Conversely, other plans and programs managed by COMPASS, such as the transportation improvement program and other plans and studies, are more project focused, and thus have the potential to have a more immediate impact.

4. The resources available to COMPASS and costs.

COMPASS staff prepare an annual budget that identifies programs and projects that will include public outreach and commits the funding necessary to translate documents into Spanish, develop Spanish language promotional materials, promote opportunities through Spanish language media outlets, and otherwise reach those that have limited English proficiency. These projects, and the costs associated with translation and Spanish language promotion, vary greatly; costs for projects conducted from 2016 – 2020 have ranged from less than \$100 per project to approximately \$6,000.

IMPLEMENTATION

Based on the four-factor analysis, COMPASS will continue its efforts in reaching LEP individuals by focusing on Spanish speakers, while remaining cognizant of other languages spoken in the valley, and being prepared to provide assistance for them upon request or when identified as a need based on the impact, geography, or type of a specific project or program. COMPASS efforts will focus on translation and language assistance, outreach, staff training, notice of access, and monitoring, as outlined below.

Translation and Language Assistance

COMPASS works with a translator to translate key documents into Spanish. Those documents include comment forms and surveys, promotional materials for public comment opportunities and surveys, COMPASS's participation plan, and brochures describing the transportation improvement program and long-range transportation plan. In addition, COMPASS' website content can be translated to a myriad of languages by selecting a preferred language on the home page.

In addition, COMPASS communication staff all keep a set of "I speak" cards at their desks, to use to help identify the type of language assistance needed. As needs are requested or identified, COMPASS will identify appropriate resources to meet the need, including using bilingual staff, volunteer or consultant interpreters, or translation of additional documents, or documents in additional languages, as needed.

COMPASS has identified BOINT (<http://www.boiseinterpreters.com/>) as a local source of interpreters and translators to call upon as consultants when additional assistance is needed. COMPASS also draws from a list of volunteers when possible.

Outreach

COMPASS translates outreach materials, such as postcards and fliers, into Spanish for large public engagement efforts, such as surveys and public comment periods on draft plans and programs. COMPASS also uses Spanish language media, such as radio stations, newspapers, magazines, banner ads, and social media channels to promote public involvement opportunities in Spanish to the Latino community. Some media outlets, particularly Spanish language radio, will translate COMPASS' English materials to Spanish as part of their service; for others, COMPASS is responsible for providing the materials already translated. Spanish language radio stations, and newspapers when they are available, are also included on COMPASS' news release email list.

Staff Training

The following training will be provided periodically to all staff:

1. Information on COMPASS' Title VI Policy and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of the "I Speak" cards.
4. How to respond to and document language assistance requests.
5. How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for COMPASS will be required to follow the Title VI/LEP guidelines and work with COMPASS staff to assure compliance.

Notice of Access

Notice of access for LEP persons is highlighted in public notices, newspaper advertisements, meeting agendas, and throughout the COMPASS website.

Monitoring

COMPASS will document activities and requests and evaluate current processes. COMPASS' Title VI, LEP, and Environmental Justice data and plans will be updated as appropriate, using the most recent decennial Census and/or American Community Survey data.