

**Southwestern Pennsylvania Commission**  
**Limited English Proficiency Assessment**

Title VI of the 1964 Civil Rights Act states that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, or denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Federal Executive Order 13166 of 2001 “Improving Access to Services for Persons with Limited English Proficiency” directed federal agencies to: a) publish guidance on how their recipients can provide access to persons with limited English proficiency; b) improve the language accessibility of their own federal programs; and c) break down language barriers by implementing consistent standards of language assistance across federal agencies and amongst all recipients of federal financial assistance.

“Limited English Proficient” or “LEP” persons are those individuals who do not speak English as their primary language, and who have a limited ability to read, speak, write or understand English. The key commonality among all LEP persons is their inability to communicate effectively in the English language, regardless of their native tongue. Persons who are multi-lingual, in that they speak a language *in addition to English*, are not considered to be Limited English Proficient.

As a recipient of federal financial assistance, the Southwestern Pennsylvania Commission has an obligation to reduce language barriers that can preclude meaningful access to SPC’s programs, information and services by non-English speakers. The first step is the completion of a “Limited English Proficiency Self-Assessment” or LEP Assessment.

This self-assessment is designed to balance four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or service,
2. The frequency with which LEP individuals come in contact with the program and/or activities,
3. The nature and importance of the program, activity or service provided to people’s lives, and
4. The resources available to the federal financial recipient and costs.

## ***LEP Population***

The LEP self-assessment begins with the identification of the potential LEP population through a demographic analysis to determine the number or proportion of LEP persons from a particular language group served or likely to be encountered in the eligible service area. The greater the number or the higher the proportion of LEP persons served or encountered, the more likely language services are needed.

## ***The SPC Region***

The “service area” for the Southwestern Pennsylvania Commission is the ten county MPO region. According to the 2000 US Census, the population of this service area was 2.66 million.

Information on the ability of residents of the SPC region to speak English was obtained from the Modern Language Association ([www.mla.org](http://www.mla.org)). The MLA’s Language Maps use data from the 2000 United States Census to display the locations and numbers of speakers of more than languages other than English in the United States. The data is based on responses to the question, "Does this person speak a language other than English at home?" on the 2000 US Bureau of the Census long form, which was distributed to approximately one in six United States households. Respondents who answered in the affirmative were then asked to name the language they spoke. The Language Maps illustrates the concentration of language speakers by state, municipality, zip codes and counties. Data used in the by the Modern Language Association (with the exception of zip code data) are drawn from a special tabulation (STP 258) of Census 2000 data commissioned by the Modern Language Association in 2005.

County level data from the Modern Language Association indicate that approximately 125,000 residents of the ten county region spoke a language other than English at home at the time of the 2000 US Census. The vast majority of these individuals were *multi-lingual* in that they indicated that they spoke English “Well” or “Very Well” in addition to speaking another language. These persons are not Limited English Proficient, or LEP, and were excluded from further analysis based on their ability to communicate effectively in English.

A total of 12,000 individuals who spoke a language other than English at home but who indicated that they spoke English “Less than Well” or “Not at All” are Limited English Proficient, or LEP. These 12,000 LEP individuals represent .05 percent of the region’s total population of 2.66 million. The County of residence of these 12,000 persons is identified in Table I, on the following page.

The region’s LEP persons speak more than 30 different languages, with Spanish, Italian, French and German being the most commonly spoken. Table II identifies the number individuals in the region speaking Spanish, Italian, German and French. As indicated, the language most commonly spoken by LEP persons is Spanish, with 4,417 speakers or one tenth of one percent of the region’s total population.

The Modern Language Association completed an assessment of the languages spoken in the region, and found that approximately 12,000 residents of the region speak English “less than well” or “not at all” and that these non-English speakers are fluent in 36 different languages.

Exhibit I			
Limited English Proficient Population in the SPC Region By County of Residence All Languages			
County	Total Population	Number of Non-English Speakers	Percent of Non-English Speakers
Allegheny	1,209,476	6,951	0.575%
Armstrong	68,311	187	0.274%
Beaver	171,138	708	0.414%
Butler	162,409	497	0.306%
Fayette	139,839	462	0.330%
Greene	38,412	254	0.661%
Indiana	84,737	560	0.661%
Lawrence	89,005	319	0.358%
Washington	191,133	671	0.351%
Westmoreland	350,109	1416	0.404%
Region	2,504,569	12,025	0.480%

The languages most frequently spoken by Non-English speakers in the region, according to the Modern Language Association are identified in Exhibit II, Limited English Proficient Population in SPC Region, below.

Exhibit II	
Limited English Proficient Population in SPC Region By Language Spoken	
<i>Language</i>	<i>Number of Non-English Speakers</i>
Spanish	4,417
Italian	2,020
German	1,122
French	1,070

Analysis of the concentrations of non-English speakers in the region reveal that more non-English speakers live in Allegheny County than any other county. The greatest concentrations of Limited English Proficient population are in Indiana and Greene

Counties, where .66% of the county population identifies themselves as speaking English “less than well” or “not at all.” Regionally, .48% of the region’s residents speak English “less than well” or “not at all.” This .48% of the regional population represents the Limited English Proficient population in the SPC region.

The individual counties within the region show tremendous variation in the numbers and native languages of the LEP persons in each county. Exhibit III presents the concentrations of LEP persons in the region’s counties and municipalities.

Based in a thorough demographic analysis of the region, it has been determined that the LEP population in Southwestern Pennsylvania is 12,000 persons, or .05 percent of the total regional population. More LEP persons reside in Allegheny County than in any other county.

### ***Frequency of Contact***

The more frequent the contact with a particular language group, the more likely that enhanced language services are needed. If an LEP person from a specific language group contacts accesses a program or service on a daily basis, the federally funded agency has greater language assistance requirements than if the same person’s frequency of contact with the program or service is unpredictable or infrequent. However, federal aid recipients must bear in mind the possibility that the frequency of contact with LEP populations could increase when appropriate outreach to those LEP populations is enhanced.

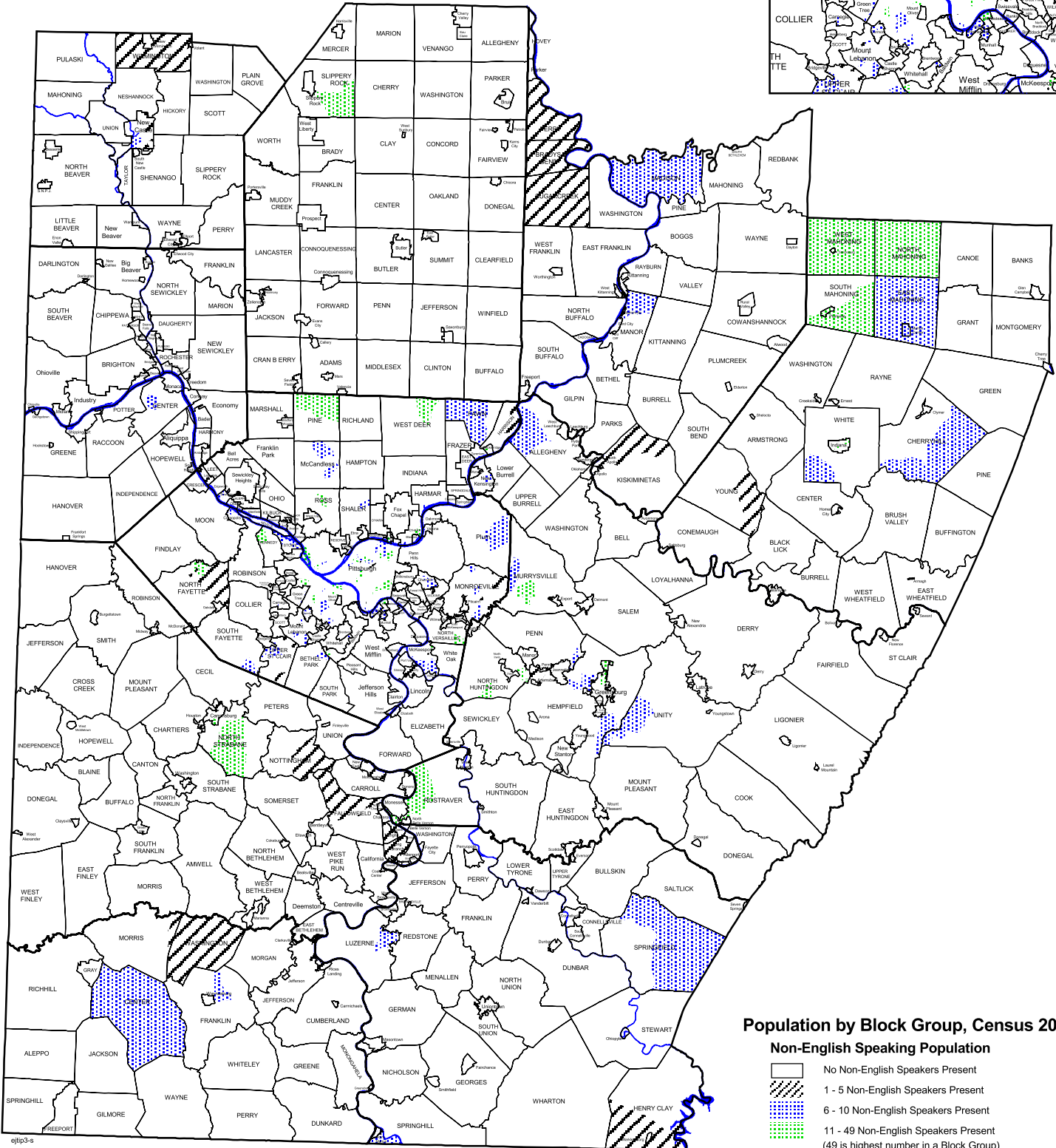
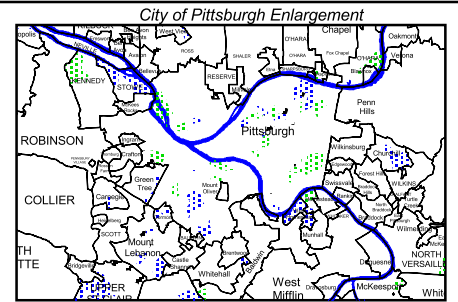
The next factor to be considered in the LEP Assessment is the frequency with which LEP persons encounter the services and programs of the Southwestern Pennsylvania Commission.

The Southwestern Pennsylvania Commission provides transportation planning and programming services on behalf of the ten county region, and serves as the regional forum for transportation decision making. Decisions made by the Commission affect all residents of the ten county service area. As residents of the region, LEP persons may be affected by the decisions, services and programs of the Commission. Public input is routinely sought in the development and advancement of key planning processes, including the Long Range Plan, Transportation Improvement Program, Public Involvement Plan and other key initiatives. During these public comment periods, comments are solicited from any interested party. To date, no comments or requests for information have been received in a language other than English, nor has any advocacy group informed SPC of the need for expanded outreach in any language other than English.

Exhibit III



# Non-English Speaking Population by US Census Block Group

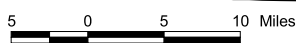


### Population by Block Group, Census 2000

#### Non-English Speaking Population

- No Non-English Speakers Present
- 1 - 5 Non-English Speakers Present
- 6 - 10 Non-English Speakers Present
- 11 - 49 Non-English Speakers Present (49 is highest number in a Block Group)

\*The Total Population, Aged 5 Years or Older, that Speak English "Not at All" for the Four Different Language Categories



### ***Importance of Services Provided***

Once the languages spoken by LEP persons in the service area have been identified, and the frequency of contact has been analyzed, the nature and importance of the services provided must be assessed. As a rule of thumb, the more important the activity, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The key question to be addressed is “will the denial or delay of access to services have serious implications for the LEP individual?”

The nature of the programs and services provided by SPC affect the mobility and quality of life for area residents. No element of the SPC program requires the compulsory participation of area residents, nor does SPC administer or oversee any programs or services that impose involuntary restrictions on area residents. Finally, the delay or denial of SPC services or participation in any SPC program is unlikely to result in a detrimental effect on the health or well-being of any individual.

However, SPC will take reasonable steps to ensure that LEP persons have meaningful access to key transportation planning decisions and have opportunities to become involved in the regional transportation planning process.

### ***Resource Availability and Cost***

Finally, the assessment of language service provisions has to assess the costs of providing such services, and the resources available to the agency. SPC has assessed its available resources that could be used for providing language assistance. This included identifying what staff language interpreters are readily available and how much a professional interpreter and translation service would cost.

### ***Language Assistance Obligations by SPC***

#### **Language Assistance Measures**

There are two language assistance services that SPC will provide: translation and interpretation. These terms are often used interchangeably; however, they are actually quite distinct and there are different rules for each.

- ***Translation*** refers to the process of transferring information expressed in writing from one language to another language.

- ***Interpretation*** is the process by which the spoken word is used when transferring meaning between languages.

In order to determine in which languages these assistance measures will be provided by SPC depends on the results of data that was analyzed as part of the 4-Factor LEP Assessment. The results of this assessment are shown in Exhibits I and II, and indicate that there are approximately 12,000 residents of the region speak English “less than well” or “not at all” and that these non-English speakers are fluent in 36 different languages.

While the number and percentage of LEP individuals is not high, the fact that there is the potential need to provide services in as many as 36 languages could be problematic. To help agencies such as SPC who serve large areas with multiple language needs, the Department of Justice and the Department of Transportation have guidance on serving LEP populations that identify “safe harbor” provisions that recommend that language assistance be provided when the LEP population reaches one percent of the population in the service area, or when the number of non-English speakers with a common native language reach 1,000 persons, whichever is less. At these levels, the federal guidance recommends that written translation of vital documents be available upon request, and that the agency have plans to address the potential need for oral translation services.

Review of Census data and Modern Language Association (MLA) research for the region’s LEP analysis shows that there are four language groups in the SPC region that meet Department of Justice “safe harbor” thresholds. Spanish estimated by MLA at approximately 4400 LEP persons; Italian at approximately 1900; French at approximately 1200; and German at approximately 1100. More detailed analysis showing LEP populations by County and municipality are available in the region’s Limited English Proficiency Report available on the SPC website [www.spcregion.org](http://www.spcregion.org) or at the SPC office. Municipal estimates can vary nominally from county totals due to the estimation methodology of the sub-county MLA estimates. However, where there is a difference in the MLA data in the sum of the municipal totals and the county totals, SPC will use the higher total for planning purposes to ensure inclusion of potential LEP persons in its service area.

### ***Written Translation***

SPC provides written translations of its Public Participation Plan in Spanish, Italian, French and German on its website and upon request. SPC also translates notices of public comment periods for the vital documents identified in the Public Participation Plan: the long range transportation plan, Transportation Improvement Plan, and Public Participation Plan. SPC currently contracts with Applied Language Solutions, Inc. for written translation services.

SPC provides written translations of vital documents upon request. The frontpiece of SPC documents will include language, in the four most commonly spoken languages other than English, that the document is available in other languages upon request. SPC also provides language translations via its website, which has the capability of translating any SPC web page or documents linked to the website instantly into one of eight languages (Spanish, Italian, French, German, Portuguese, Japanese, Chinese or Korean).

The language translation feature of the SPC website has the ability to translate any webpage linked through the SPC website into those same eight languages.

### ***Oral Interpretation***

Oral interpretation services are appropriate for a number of situations, including routine inquiries from citizens who call SPC or come into our offices, as well as public meetings and events. SPC will utilize telephonic and in-person interpretation services to provide oral interpretation assistance to LEP individuals.

### ***Telephonic Interpretation Service***

SPC has contracted with Language Line to provide telephonic interpretation services to assist LEP callers, walk-ins, and in cases where requests for an in-person interpret were either not made or where insufficient notice was given to allow SPC to arrange for an interpreter.

### ***In-Person Interpretation Services***

SPC has contracted with Orogol Associates to provide in-person interpretation services to respond to requests for language assistance. Meeting notices for public meetings include language requesting that SPC be notified in advance of any specialized services.

SPC has identified a third party telephone interpretation service provider (LanguageLine) that may be used in the event that oral translation services are needed during normal business operations. Meeting notices for public meetings include language requesting that SPC be notified in advance of any specialized services. A database of community resource persons and professional interpretation firms able to assist in the provision of such services is under development. In the event that a qualified interpreter cannot be identified in a timely fashion, efforts will be made to work with the LEP individual(s) to identify a family member or community member capable of assisting with their language needs, in compliance with FHWA Guidance on outreach to LEP individuals.

SPC has provided Press Releases to local minority media outlets and community service organization regarding the availability of language translation services. The frontpiece of future SPC documents will include language, in the four most commonly spoken languages other than English, that language translation services are available.

### ***Outreach to LEP Populations***

Detailed maps identifying the geographic location of non-English speaking residents have been created using data provided by the Modern Language Association. These maps will be used to assess the need for non-English meeting materials and interpretation services during project level or neighborhood level community meetings.



### ***SPC Limited English Proficient Policy***

SPC has completed its assessment of LEP Proficient Population in the ten county region, and has identified Spanish, French, German and Italian as the languages most frequently spoken by non-English speakers in the region.

SPC has identified and implemented mechanisms for the translation of vital documents and program information into the four most frequently spoken languages in the region, as well as four additional languages. SPC has also identified mechanisms for the oral interpretation of telephone inquiries via a third party interpretation service capable of providing interpretation services in more than 80 languages 24 hours a day, 7 days a week.

SPC has issued press releases to local minority media outlets, including television and radio stations and newspapers with information regarding SPC's language translation services. In addition, SPC has made personal contact with a number of community service providers in the region, including the Hispanic Center, the Center for Immigrants and Refugees, the Catholic Archdiocese, the Jewish Community Center and other organizations to inform them of these language translation services. English as a Second Language Service providers in Allegheny County, the county with the largest concentration of non-English speakers, have also been informed of the language translation services provided by SPC.

In our outreach to these organizations, SPC has also worked to identify other, emerging language needs among residents of the region. Arabic, Chinese and Japanese were identified as "growing languages" in the region, although documentation as to the numbers of these residents is not currently available.