

# Erie County Regional Planning Commission Metropolitan Planning Organization Limited English Proficiency Plan



**February 2021**

**Limited English Proficiency Plan Policy:** “It is the policy of the ERPC MPO to provide meaningful access to all individuals participating in services and/or benefits provided. ERPC strives to promote effective communication to LEP populations with this plan specifically providing necessary assurances and tools utilized to implement this goal. “

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**Metropolitan Planning Organization (MPO) History and Planning Area:** The Erie County Regional Planning Commission (ERPC) is the handling agency for the MPO. The ERPC MPO was created as a result of a Federal statute that states every urbanized area with a population of more than 50,000 must establish the MPO. The 2000 Census revealed that the Sandusky Urbanized Area had a population of over 50,000 people, and as a result, the ERPC MPO was created in 2003. During the next decennial Census in 2010, the MPO area's population fell to just under 50,000 people, but due to the support by local, state, and federal agencies ERPC has been able to maintain its designation. Currently, the 2020 Census results are still being tabulated.

**Services Provided:** The MPO staff services include providing transportation planning assistance for local jurisdictions, coordinating federal transportation program requirements, and/or assisting with project funding selection and programming for eligible projects.

**Purpose and Legal Basis:** The purpose of this plan is to ensure LEP persons have meaningful resources and access to ERPC's programs and activities. It is noted that the Limited English Proficiency Plan works in concert with the organization's other programs including the Public Involvement Plan and the ERPC MPO Title VI Plan.

This plan was written in compliance with legal civil rights laws, including Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, and national origin in the programs and activities receiving federal financial assistance. Additionally, also applicable is Executive Order 13166 (2000) which ensures accessibility to programs and services to eligible persons who are not proficient in the English language by examining services provided, identifying specific needs to provide meaningful access for Limited English Proficiency (LEP) persons, and implementing a system to provide meaningful access to such services. Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance, but recipients also have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided. This guidance identifies (MPOs) as organizations that must also follow this guidance.

**Who is a Limited English Proficient (LEP) Individual?** The LEP Plan applies to individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. As defined by the United States Census: American Community Survey, LEP refers to any individual who speaks a language at home other than English as their primary language, and who speaks or understands English "not well" or "not at all." ERPC staff has identified where LEP populations are in the planning area (**Appendix F**).

**Limitations:** This LEP Plan applies to individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English well. The limitations of this plan do not extend to illiterate individuals. To be considered an LEP person under Title VI a person cannot speak, read, or write English, but primarily speaks, reads, or writes in a language other than English.

**Designated Staff Coordinator:** ERPC MPO designates Nicole Grohe, Planner, as the individual responsible for oversight and implementation of the LEP Plan. The coordinator will consult with the Planning Director as needed for concurrence and consul regarding LEP-related activities. Responsibilities include coordinating and facilitating the delivery of related services, staff training on the plan's policies and procedures, and ongoing monitoring and assessment of the plan's effectiveness. Ms. Grohe can be reached at (419) 627.7793 or at [NGrohe@ErieCounty.OH.Gov](mailto:NGrohe@ErieCounty.OH.Gov)

**Methods of Providing Service:** The Limited English Proficiency Plan policy and procedures are considered throughout the transportation planning process. To ensure that Limited English Proficient clients are served an *Initial Contact Form* is required to be filled out during each encounter. A contact form will be filled out and signed by the employee handling the request (**Appendix A**). To date, there have been no such requests or occurrences since the MPO's establishment in 2003.

**Communication Procedure:** Staff members are trained in how they should handle an encounter with an LEP person through required LEP training. All staff members are required to review the LEP training materials and sign an acknowledgment form, which is kept on file by the Title VI Coordinator. All the procedures listed below are listed within the employee-training packet (**Appendix C**).

Through the training, the staff is instructed that if they are unable to communicate with an LEP client they are to use the language identification poster to identify what language the client understands. Posters are included within training packets and posted in the office's lobby.

Online translation service may also be used as a channel of communication if the above method fails. The Erie County website has translation software available through Google. As a last resort, staff will attempt to obtain contact information and contact the Title VI Coordinator who may then involve a translator.

The Title VI Coordinator has conducted a Four-Factor Analysis. The analysis ensures that the obligation to provide meaningful access is fact-dependent. The assessment consists of four- factors: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) The frequency with

which LEP individuals come into contact with the program; (3) The nature and importance of the program, activity, or service provided by the recipient to its beneficiaries; and (4) The resources available to the grantee/recipient and the costs of interpretation/translation services. After reviewing the analysis conducted in 2021, the Title VI Coordinator has determined that at this time documents will not be translated unless circumstances change due to the low LEP populations within the planning area (**Appendix E**).

**Interpreting Services:** An interpreting service will be utilized only if needed. Volunteer interpreters will be sought as applicable. There will be no charge to a client for these services under any circumstances. ERPC will utilize verbal or written language translation services through the International Language Bank, or similar business (**Appendix B**).

**Complaint Procedure:** If there is a complaint about ERPC's LEP procedure, a person(s) may be advised of the opportunity to file a discrimination complaint according to federal regulations through translation services using the Title VI form (**Appendix D**).

**Plan Updates and Review:** ERPC will update the LEP Plan and procedures as required by US DOT. At a minimum, the plan and the Four Factor Analysis will be reviewed, and if needed updated when data from the US Census is updated, or when it is clear that higher concentrations of LEP individuals are present in the region.

The plan has been presented and formally adopted by the MPO Policy Committee through *Resolution 2021-04*.

Questions regarding this plan should be submitted to:

Attn: Title VI Coordinator  
Erie County Regional Planning  
Metropolitan Planning Organization  
2900 Columbus Avenue  
Sandusky, Ohio 44870

Or via Ph: 419.627.7792 E-mail: [Planning@ErieCounty.OH.Gov](mailto:Planning@ErieCounty.OH.Gov)

**ERPC LEP Plan**

**Appendix A: Contact Form**

*Initial Contact with a Limited English Proficiency Client:*

This form is to be completed and used when a staff member is approached by a Limited English Proficient client.

Date: \_\_\_\_\_ Employee Name: \_\_\_\_\_

Client Name: \_\_\_\_\_

Client Contact  
Information: \_\_\_\_\_

Language identified: \_\_\_\_\_

Assistance Requested: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Was the issue resolved? Yes \_\_\_\_\_ No \_\_\_\_\_ (see below)


Future Assistance/Resolution:  
\_\_\_\_\_  
\_\_\_\_\_

\*\*\*This form will be returned to the Title VI Coordinator and kept on file.\*\*\*

# I Speak...

## LANGUAGE IDENTIFICATION GUIDE

For more information on providing language assistance, contact the ODOT Division of Opportunity, Diversity and Inclusion at (614) 466-3264

<b>A</b> <b>Amharic</b> እኔ አማርኛ ነው ምናገረው. <b>Arabic</b> أنا أتحدث اللغة العربية <b>Armenian</b> Ես խոսում եմ հայերեն	<b>D</b> <b>Danish</b> Jeg taler dansk <b>Dari</b> من دری حرف می زنم <b>Dutch</b> Ik spreek het Nederlands	<b>I</b> <b>Icelandic</b> Èg tala íslensku <b>Ilocano</b> Agsaonak ti Ilokano <b>Indonesian</b> syay bisa berbahsa Indonesia <b>Italian</b> Parlo italiano	<b>M</b> <b>Mandarin</b> 我講國語 (Traditional) 我讲国语/普通话 (Simplified) <b>Mam</b> Bán chiyola tuj kíyol mam <b>Mon</b> ဒါပဲခေါင်စကားပြောတာမို့	<b>R</b> <b>Romanian</b> Vorbesc românește <b>Russian</b> Я говорю по-русски	<b>T</b> <b>Tagalog</b> Marunong akong mag-Tagalog <b>Tamil</b> நான் தமிழ் பேசுவேன் <b>Thai</b> พูดภาษาไทย <b>Turkish</b> Türkçe konuşurum
<b>B</b> <b>Bengali</b> আমি বাংলা কথা বলতে পারি <b>Bosnian</b> Ja govorim bosanski <b>Bulgarian</b> Аз говоря български <b>Burmese</b> ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်။	<b>E</b> <b>Estonian</b> Ma räägin eesti keelt	<b>J</b> <b>Japanese</b> 私は日本語を話す	<b>N</b> <b>Norwegian</b> Jeg snakker norsk	<b>S</b> <b>Serbian</b> Ja govorim српски <b>Sign Language (American)</b> 	<b>U</b> <b>Ukrainian</b> Я розмовляю українською мовою <b>Urdu</b> میں اردو بولتا ہوں
<b>C</b> <b>Cambodian</b> ខ្ញុំនិយាយភាសាខ្មែរ <b>Cantonese</b> 我講廣東話 (Traditional) 我讲广东话 (Simplified) <b>Catalan</b> Parlo català <b>Croatian</b> Govorim hrvatski <b>Czech</b> Mluvím česky	<b>G</b> <b>German</b> Ich spreche Deutsch <b>Greek</b> Μιλώ τα ελληνικά <b>Gujarati</b> હું ગુજરાતી બોલુ છું	<b>K</b> <b>Kackchiquel</b> Quin chagüic'ká chábal' ruin' rí tzújon cakchiquel <b>Korean</b> 한국어 합니다 <b>Kurdish</b> man Kurdii zaanim <b>Kurmanci</b> man Kurmaanjiî zaanim	<b>P</b> <b>Persian</b> من فارسی صحبت می کنم. <b>Polish</b> Mówię po polsku <b>Portuguese</b> Eu falo português do Brasil (for Brazil) Eu falo português de Portugal (for Portugal) <b>Punjabi</b> ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।	<b>Slovak</b> Hovorím po slovensky <b>Slovenian</b> Govorim slovensko <b>Somali</b> Waxaan ku hadlaa af-Soomaali <b>Spanish</b> Yo hablo español <b>Swahili</b> Ninaongea Kiswahili <b>Swedish</b> Jag talar svenska	<b>V</b> <b>Vietnamese</b> Tôi nói tiếng Việt <b>W</b> <b>Welsh</b> Dwi'n siarad
	<b>H</b> <b>Haitian Creole</b> M pale kreyòl ayisyen <b>Hebrew</b> אני מדבר עברית <b>Hindi</b> मैं हिंदी बोलता हूँ । <b>Hmong</b> Kuv has lug Moob <b>Hungarian</b> Beszélek magyarul	<b>L</b> <b>Laotian</b> ຂ້ອຍປາກົດພາສາລາວ <b>Latvian</b> Es runāju latviski <b>Lithuanian</b> Aš kalbu lietuvių kalbą	<b>Q</b> <b>Qanjobal</b> Ayin tí chí walq' anjob' al <b>Quiche</b> In kinch'aw k'uin ch'e quiche	<b>X</b> <b>Xhosa</b> Ndithetha isiXhosa	<b>Y</b> <b>Yiddish</b> איך רעד יידיש <b>Yoruba</b> Mo nso Yooba
				<b>Z</b> <b>Zulu</b> Ngiyasikhuluma isiZulu	

Special thanks to the Department of Justice Bureau of Justice Assistance and the Ohio Office of Criminal Justice Services for inspiration and permission to use their I Speak guide

This poster assists literate individuals who are not proficient in English to identify a preferred language.

**ERPC LEP Plan**

**Appendix A: Contact Form**

*Limited English Proficiency Client Interpretation Request:*

This form is to be completed by the Title VI Coordinator with the Planning Director's approval for the completion of billing records.

Date: \_\_\_\_\_ Title VI Coordinator Name: \_\_\_\_\_

Client Name/Reason for Request: \_\_\_\_\_

Interpretation Company/Contact Information: \_\_\_\_\_

\_\_\_\_ Oral translation services (staff must stay on the phone with the client and interpreter)

\_\_\_\_ Written interpretation

\_\_\_\_ Mixed services

Description of Services: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Planning Director Name: \_\_\_\_\_

Consent given to the Title VI Coordinator to pursue services as described above:

Signature/Date: \_\_\_\_\_

PO Number: \_\_\_\_\_ Payment Total/Requested Amount: \_\_\_\_\_

\*\*\*This form will be returned to the Title VI Coordinator and kept on file.\*\*\*

# THE LANGUAGE BANK

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The Language Bank management has been in business for over 30 years and has established wonderful relationships with our clients that prove our dedication and commitment to excellent customer service. We welcome you to try our services if you are not already one of our clients. We are confident that you will not be disappointed.

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# International Language Bank Inc.

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Professional Translating and Interpreting Services

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A Language Bank of over 200 languages and dialects

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International Language Bank's main goal and purpose is to help you communicate in any language and give you the power to understand by offering you a full range of professional foreign language translation and interpreting services.

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The Language Bank is a professional translation company with clients all over the world. We take great pleasure in working one-on-one with our clients to insure that our service is tailored to fit your needs.

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Our Language Bank translators are experts in both the target and the source languages of the translation. We make sure that our translations recognize the religious, cultural, social and political sensitivities of their intended audience.

We enthusiastically offer our services so that we can help your business meet the challenges of a multi-lingual society. As the United States welcomes people from all corners of the globe, businesses with multilingual capabilities and accommodations will continue to have advantages.

When you work with us at the Language Bank, you have our commitment that we will provide you with competitive rates and unparalleled service.

Call us for more information on your specific project or need.

You may call anytime:

(440) 599-9999 or toll free 888-599-9777

If you are calling after normal business hours then please leave your name and a telephone number including your area code. We will always return your call quickly.



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[www.internationallanguagebank.com](http://www.internationallanguagebank.com)

Phone: (440) 599-9999

Phone: (216) 759-6871

Phone: (888) 599-9777

Fax: (440) 599-9777

Fax: (866) 560-9777

Email: [languagebank@adelphia.net](mailto:languagebank@adelphia.net)

**For a free, no obligation, more exact and accurate quote, please fax your document 24 hours a day - 7 days a week to either one of the following numbers:**

**440-599-9777 or 1-866-560-9777**

**Every document remains confidential and your documents are not shared with anyone other than the sworn translator and a supervisor who approves the price.**

**Please do not forget to include your name and a telephone number including your area code or your email so that we can reach you !**

**You may reach us anytime by dialing one of the telephone numbers listed at the top of this page. If it is after hours your call will either be automatically forwarded to a supervisor or you will hear another number to dial. Your call will be returned quickly - especially if you indicate that it is urgent.**

**You may also send your request by filling out the form below. Please expect an answer within 1 business day.**

Name:

Address:

City:

State:

Zip:

Phone:

Fax:

E-mail Address:

Questions/Comments:

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LANGUAGE GROUPS	Starting price per word
Spanish, French, Canadian French, Italian, Portuguese, Brazilian Portuguese	\$0.30
Arabic, Chinese, German, Mandarin, Romanian, Russian, Ukrainian	\$0.35
Bosnian, Croatian, Hungarian, Ilocano, Philipino, Polish, Serbian, Tagalog	\$0.40
Albanian, Bulgarian, Cantonese, Czech, Greek, Gujarati, Hindi, Japanese, Korean, Marathi, Punjabi, Taiwanese, Thai, Urdu, Vietnamese	\$0.45
Armenian, Belorussian, Bengali, Burmese, Cambodian, Catalan, Creole, Estonian, Danish, Dutch, Farsi, Finnish, Georgian, Hebrew, Indonesian, Latin, Malay, Norwegian, Slovak, Slovene, Swedish, Turkish, Uzbek	\$0.50
Afrikaans, Ahmaric, Amak, Assamese, Azerbaijani, Bahasa, Baluchi, Bangladeshi, Chuukese, Dari, Fijian, Flemish, Fukiense, Gaelic, Gio, Hausa, Hindko, Hmien, Hmong, Indonesian, Kannada, Kapelle, Karen, Kazakh, Khmer, Kru-Bassa, Kurdish, Lao, Latvian, Lithuanian, Luo, Macedonian, Malayalam, Mandinga, Marshallese, Mende, Mizo, Mongolian, Ndebele, Nepalese, Oriya, Oromo, Papiamentu, Pashto, Patois, Samoan, Sanskrit, Shanghaiese, Sindhi, Singhaiese, Swahili, Tajik, Tamil, Telugu, Temne, Tongan, Welsh, Yiddish, Zulu	\$0.55

These are estimates. Actual rate depends on the subject matter, the format, the volume and the delivery dates.

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There are no refunds for translations or interpreting services. For interpreting assignments there is a 2-3 hour minimum charge depending on the language requested. Expenses such as travel, parking and mileage are charged separate. For interpreting services a cancellation must be received before 48 hours of appointment time not counting the weekend or a holiday or the minimum charge will still apply. Rates for written translation services vary between .25 and .75 a word depending on factors such as the language, subject matter, deadline and the layout and format of the document. All payments are due within 30 days of the first invoice date. A monthly late charge of 3% will be applied to any outstanding balances until payment is received in full. ILB assumes no liability or responsibility for any damages that may occur as a result of any unforeseen occurrence or of the interpreting and-or translating services provided. In the event of an unresolved dispute between the parties the consumer-client agrees that all matters must be resolved in Ashtabula County, Ohio at the sole expense of the consumer-client including but not limited to any and all legal fees, expenses and-or costs incurred by ILB. This disclaimer applies to all 50 states and territories and every and anywhere else that ILB provides services.

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**ERPC LEP Plan**

**Appendix C: Employee Training**

## **Limited English Proficiency (LEP) Interaction Employee Training:**

Erie County Regional Planning Commission (ERPC) Metropolitan Planning Organization (MPO) employees are required to go through training on how to serve and interact with LEP populations to be compliant with Federal Title VI laws. The training applies to all current and future staff within the department. The present Title VI Coordinator for ERPC is Nicole Grohe. If you have any questions please contact her. All documents needed to conduct these actions are attached to this packet. For interactions with LEP, persons please follow the procedures below:

### **What is the process to serve LEP individuals when they call, walk-in, and/or attend a public meeting hosted by ERPC?**

-First, identify the language the LEP person speaks using the *Language Poster*. If this method does not work try to use an online translation service to understand what language the LEP person speaks.

-Next, fill out the *Initial Contact Form*. Please include, if possible what the person is requesting, in what format, and their contact information.

-Then provide this information to the Title VI Coordinator who may then assist you and the client with obtaining further translation services if needed.

### **How to respond to written communications from LEP persons.**

-First, fill out the *Initial Contact Form*.

-Next, notify the Title VI Coordinator and provide this information to them so they may assist with the preparation of obtaining further translation services if needed.

### **How to assist with filing a potential Title VI/LEP complaint.**

-First, provide the client a *Title VI Complaint Form*. This form is also available online on ERPC's website.

-Then notify the Title VI Coordinator so they are aware of the situation.

### **What if I have another question?**

-Contact the Title VI Coordinator or Planning Director.

*Initial Contact with a Limited English Proficiency Client:*

This form is to be completed and used when a staff member is approached by a Limited English Proficient client.

Date: \_\_\_\_\_ Employee Name: \_\_\_\_\_

Client Name: \_\_\_\_\_

Client Contact  
Information: \_\_\_\_\_

Language identified: \_\_\_\_\_

Assistance Requested: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Was the issue resolved? Yes \_\_\_\_\_ No \_\_\_\_\_ (see below)

Future Assistance/Resolution:

\_\_\_\_\_


\_\_\_\_\_

\*\*\*This form will be returned to the Title VI Coordinator and kept on file.\*\*\*

# I Speak...

## LANGUAGE IDENTIFICATION GUIDE

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<b>A</b> <b>Amharic</b> እኔ አማርኛ ነው ምናገረው. <b>Arabic</b> أنا أتحدث اللغة العربية <b>Armenian</b> Ես խոսում եմ հայերեն	<b>D</b> <b>Danish</b> Jeg taler dansk <b>Dari</b> من دری حرف می زنم <b>Dutch</b> Ik spreek het Nederlands	<b>I</b> <b>Icelandic</b> Èg tala íslensku <b>Ilocano</b> Agsaonak ti Ilokano <b>Indonesian</b> syay bisa berbahsa Indonesia <b>Italian</b> Parlo italiano	<b>M</b> <b>Mandarin</b> 我講國語 (Traditional) 我讲国语/普通话 (Simplified) <b>Mam</b> Bán chiyola tuj kíyol mam <b>Mon</b> ဒါပဲခေါင်စကားပြောတာမို့	<b>R</b> <b>Romanian</b> Vorbesc românește <b>Russian</b> Я говорю по-русски	<b>T</b> <b>Tagalog</b> Marunong akong mag-Tagalog <b>Tamil</b> நான் தமிழ் பேசுவேன் <b>Thai</b> พูดภาษาไทย <b>Turkish</b> Türkçe konuşurum
<b>B</b> <b>Bengali</b> আমি বাংলা কথা বলতে পারি <b>Bosnian</b> Ja govorim bosanski <b>Bulgarian</b> Аз говоря български <b>Burmese</b> ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်။	<b>E</b> <b>Estonian</b> Ma räägin eesti keelt	<b>J</b> <b>Japanese</b> 私は日本語を話す	<b>N</b> <b>Norwegian</b> Jeg snakker norsk	<b>S</b> <b>Serbian</b> Ja govorim српски <b>Sign Language (American)</b> 	<b>U</b> <b>Ukrainian</b> Я розмовляю українською мовою <b>Urdu</b> میں اردو بولتا ہوں
<b>C</b> <b>Cambodian</b> ខ្ញុំនិយាយភាសាខ្មែរ <b>Cantonese</b> 我講廣東話 (Traditional) 我讲广东话 (Simplified) <b>Catalan</b> Parlo català <b>Croatian</b> Govorim hrvatski <b>Czech</b> Mluvím česky	<b>G</b> <b>German</b> Ich spreche Deutsch <b>Greek</b> Μιλώ τα ελληνικά <b>Gujarati</b> હું ગુજરાતી બોલુ છું	<b>K</b> <b>Kackchiquel</b> Quin chagüic'ká chábal' ruin' rí tzújon cakchiquel <b>Korean</b> 한국어 합니다 <b>Kurdish</b> man Kurdii zaanim <b>Kurmanci</b> man Kurmaanjiî zaanim	<b>P</b> <b>Persian</b> من فارسی صحبت می کنم. <b>Polish</b> Mówię po polsku <b>Portuguese</b> Eu falo português do Brasil (for Brazil) Eu falo português de Portugal (for Portugal) <b>Punjabi</b> ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।	<b>Slovak</b> Hovorím po slovensky <b>Slovenian</b> Govorim slovensko <b>Somali</b> Waxaan ku hadlaa af-Soomaali <b>Spanish</b> Yo hablo español <b>Swahili</b> Ninaongea Kiswahili <b>Swedish</b> Jag talar svenska	<b>V</b> <b>Vietnamese</b> Tôi nói tiếng Việt <b>W</b> <b>Welsh</b> Dwi'n siarad
	<b>H</b> <b>Haitian Creole</b> M pale kreyòl ayisyen <b>Hebrew</b> אני מדבר עברית <b>Hindi</b> मैं हिंदी बोलता हूँ । <b>Hmong</b> Kuv has lug Moob <b>Hungarian</b> Beszélek magyarul	<b>L</b> <b>Laotian</b> ຂ້ອຍປາກົດພາສາລາວ <b>Latvian</b> Es runāju latviski <b>Lithuanian</b> Aš kalbu lietuvių kalbą	<b>Q</b> <b>Qanjobal</b> Ayin tí chí walq' anjob' al <b>Quiche</b> In kinch'aw k'uin ch'e quiche	<b>X</b> <b>Xhosa</b> Ndithetha isiXhosa	<b>Y</b> <b>Yiddish</b> איך רעד יידיש <b>Yoruba</b> Mo nso Yooba
				<b>Z</b> <b>Zulu</b> Ngiyasikhuluma isiZulu	

Special thanks to the Department of Justice Bureau of Justice Assistance and the Ohio Office of Criminal Justice Services for inspiration and permission to use their I Speak guide

This poster assists literate individuals who are not proficient in English to identify a preferred language.

## Title VI Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact \_\_\_\_\_.

Name \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Phone: Home \_\_\_\_\_ Work \_\_\_\_\_ Mobile \_\_\_\_\_

Email: \_\_\_\_\_

*Basis of Complaint (circle all that apply):*

Race	Color
National Origin	Sex/Gender
Age	Disability
Retaliation	Other:

*Who discriminated against you?*

Name \_\_\_\_\_

Name of Organization \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Telephone \_\_\_\_\_

*How were you discriminated against? (Attach additional pages if more space is needed)*

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*Where did the discrimination occur?*

---

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\_\_\_\_\_

*Dates and times discrimination occurred?*

\_\_\_\_\_

\_\_\_\_\_

*Were there any other witnesses to the discrimination?*

Name	Organization/Title	Work Telephone	Home Telephone

*How would you like to see this situation resolved?*

\_\_\_\_\_

\_\_\_\_\_

*Have you filed your complaint, grievance, or lawsuit with any other agency or court?*

Who \_\_\_\_\_ When \_\_\_\_\_

Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_

Complaint number, if known \_\_\_\_\_

*Do you have an attorney in this matter?*

Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

*Limited English Proficiency Plan Acknowledgment Form:*

By my signature, I have acknowledged that I have read and understand the procedure on approaching and providing service to Limited English Proficient clients as outlined in the Limited English Proficiency Plan and training provided by the Title VI Coordinator. I understand that if there are any questions regarding this plan or what actions to take regarding communicating with a Limited English Proficiency client, the Title VI Coordinator or Planning Director may be consulted.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

\*\*\*This form is circulated to all existing employees and presented to all new employee during orientation. The coordinated will keep a file of completed training records.\*\*\*

**ERPC LEP Plan Appendix D:**

**Compliant Form**

## Title VI Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact \_\_\_\_\_.

Name \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Phone: Home \_\_\_\_\_ Work \_\_\_\_\_ Mobile \_\_\_\_\_

Email: \_\_\_\_\_

*Basis of Complaint (circle all that apply):*

Race	Color
National Origin	Sex/Gender
Age	Disability
Retaliation	Other:

*Who discriminated against you?*

Name \_\_\_\_\_

Name of Organization \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Telephone \_\_\_\_\_

*How were you discriminated against? (Attach additional pages if more space is needed)*

---

---

*Where did the discrimination occur?*

---

---

\_\_\_\_\_

*Dates and times discrimination occurred?*

\_\_\_\_\_

\_\_\_\_\_

*Were there any other witnesses to the discrimination?*

Name	Organization/Title	Work Telephone	Home Telephone

*How would you like to see this situation resolved?*

\_\_\_\_\_

\_\_\_\_\_

*Have you filed your complaint, grievance, or lawsuit with any other agency or court?*

Who \_\_\_\_\_ When \_\_\_\_\_

Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_

Complaint number, if known \_\_\_\_\_

*Do you have an attorney in this matter?*

Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

**ERPC LEP Plan**

**Appendix E: Four-  
Factor Analysis**



## Erie County Regional Planning Commission (ERPC) Metropolitan Planning Organization (MPO)

### Four-Factor Analysis

#### Introduction:

As a recipient of federal funds, the ERPC MPO must take reasonable steps to ensure meaningful access to the information and services it provides. As part of the MPO certification by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), the LEP Plan will be assessed and evaluated. By providing language assistance to persons with limited English proficiency, the MPO will help to ensure that the services are safe, reliable, convenient, and accessible. LEP services can be provided in two ways: verbal interpretation and written translation of vital documents. There are four factors for consideration when deciding what reasonable steps should be taken to ensure access for LEP persons.

ERPC collaborates with the general public, local communities, transit agencies, county engineers, and the Ohio Department of Transportation to conduct the federally required metropolitan planning process for the region and to identify transportation projects for funding. ERPC does not directly provide bus service, rail service, or other transportation services to the public.

All data reported was utilized in this analysis is from the 2019 Census Worksheet C16001-LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Staff categorized LEP persons as those that self-reported that they do not “speak English well”.

#### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee**

In the MPO area, the total number of LEP persons is 4.9% (733) of the total MPO area population (77,097) with the area’s average LEP person concentration per census tract being 1.1%. Any census tract that had a percentage larger than 1.1% of LEP persons was considered “above average” and mapped accordingly. The majority of above-average LEP persons were located within the northern portions of the City of Sandusky and Perkins Township (**Appendix F**).

Within the MPO area, the three largest LEP group’s language is respectively listed below<sup>1</sup>:

-**Spanish**-speaking persons consisting of 45% (331). This population is located throughout the MPO area.

-**Chinese**-speaking persons consisting of 13% (95). This population is located in the north-west portion of the planning area.

-**Russian, Polish, and Slavic**-speaking persons consisting of 11% (78). This population is located in the north-west portion of the planning area.

#### **Factor 2: The frequency that LEP individuals come in contact with the program**

Historically, the MPO has not encountered any non-English-speaking individuals requesting services since its establishment in 2003. LEP persons may encounter MPO activities, services, and personnel in a variety of locations. The most frequent ways would be through public meetings, events, articles posted in local newspapers, the MPO website, social media, and office settings. Due to the pandemic COVID-19,

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<sup>1</sup> ACS 2019 5-Year, C16001



## **Erie County Regional Planning Commission (ERPC) Metropolitan Planning Organization (MPO)**

### **Four-Factor Analysis**

the majority of MPO activities are now carried out electronically and virtually. It is unknown when other styles of interaction will resume.

LEP groups located within the MPO planning area are small. The largest LEP group consists of persons who speak Spanish (331) equates to only .43% of the total planning area population (77,097).

#### **Factor 3: The Nature and Importance of the Program, Activity, or Services Provided**

Establishing the level of the MPO's importance to the LEP population is difficult. The MPO's program is designed primarily to work with transportation professionals, elected officials, and community stakeholders. The MPO staff assists its stakeholders with the administration of transportation system maintenance, new infrastructure projects, grant applications, and other like activities. ERPC has a Public Involvement Plan (PIP), 2019. The PIP outlines ERPC's policies concerning public involvement, outreach, and comments.

The MPO does acknowledge that the public participation process is important to all residents. Public meetings are scheduled to collect input from the public when transportation plans, programs, or services are developed, or if a major change in the transportation system is proposed. An ability to speak and understand English is needed to participate in these public meetings, but there are alternative ways to submit comments and suggestions including comment cards, online surveys, and e-mail.

#### **Factor 4: Resources Available**

The ERPC MPO will translate vital documents into each LEP language group comprising of at least five percent or 1,000, whichever is less, of persons eligible for or likely to be affected by the agency's services. Currently, there are no LEP language groups in the area meeting these criteria.

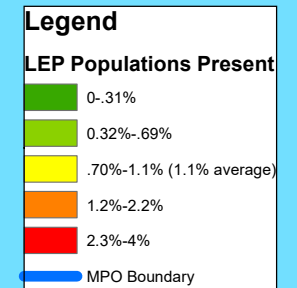
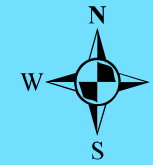
To conclude, the MPO has not received any requests for translated materials and is reluctant to underwrite the costs of such activity if it is not needed/used. The MPO will not prepare planning documents in non-English languages unless there is a request, or there is a significant increase in LEP persons. If requests are received in the future they will be handled through the process outlined in the LEP Plan.

**ERPC LEP Plan**

**Appendix F: LEP Population**

**Maps**

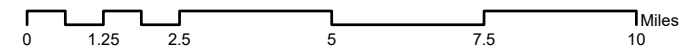
# Limited English Proficiency Areas



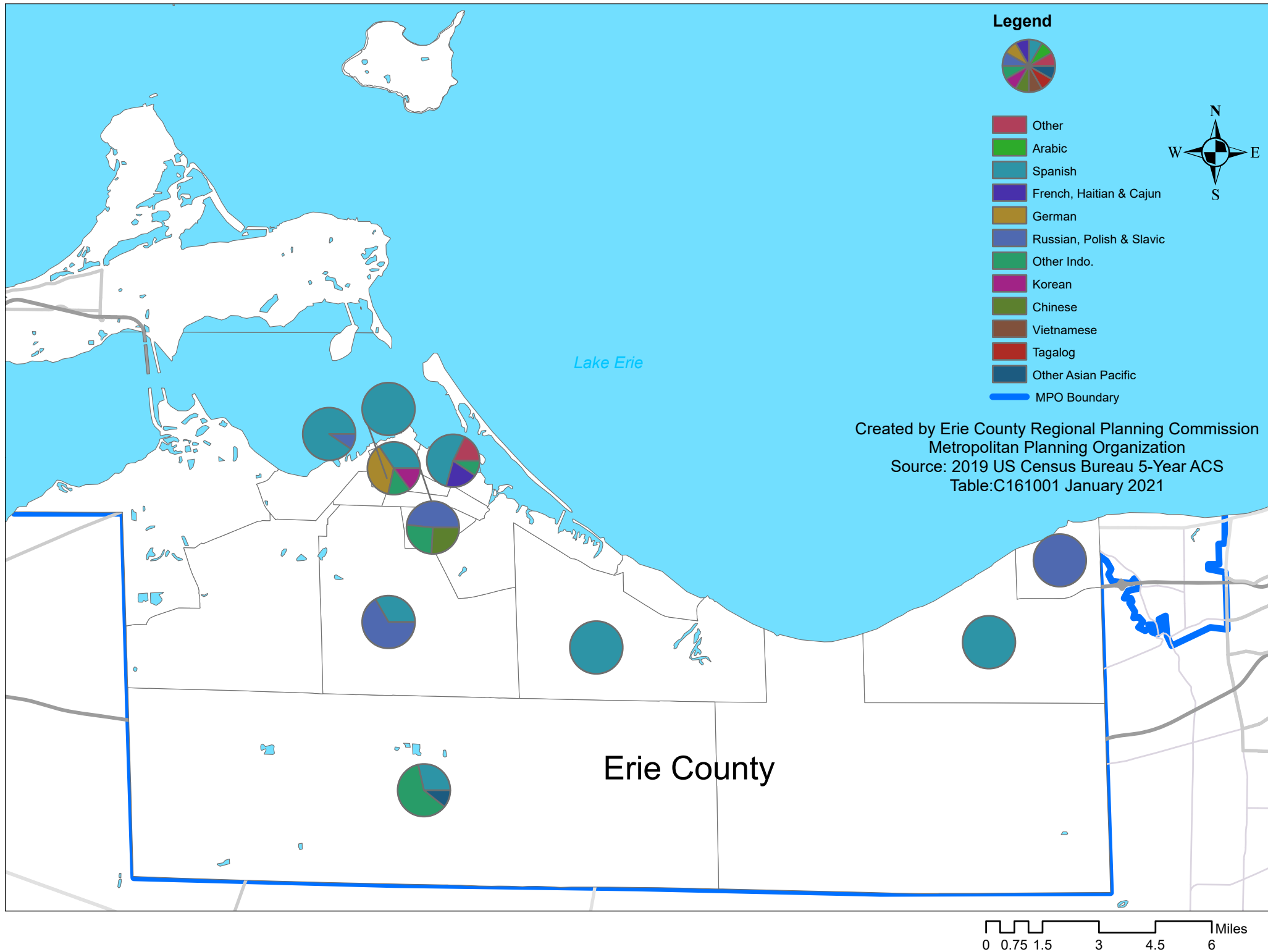
Created by Erie County Regional Planning Commission  
Metropolitan Planning Organization  
Source: 2019 US Census Bureau 5-Year ACS  
Table: S1602 January 2021

Lake Erie

Erie County



# LEP Persons by Language Spoken



# LEP Persons by Language Spoken Proportionately Reflected

## Legend



- Other
- Arabic
- Spanish
- French, Haitian & Cajun
- German
- Russian, Polish & Slavic
- Other Indo.
- Korean
- Chinese
- Vietnamese
- Tagalog
- Other Asian Pacific

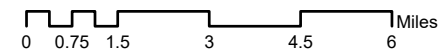
MPO Boundary



Created by Erie County Regional Planning Commission  
Metropolitan Planning Organization  
Source: 2019 US Census Bureau 5-Year ACS  
Table: C161001 January 2021

Erie County

Lake Erie



ERPC LEP Plan  
Appendix G: Resolution

**RESOLUTION NUMBER 2021-04**

**OF THE METROPOLITAN PLANNING ORGANIZATION POLICY COMMITTEE OF THE  
ERIE REGIONAL PLANNING COMMISSION APPROVING A RESOLUTION TO APPROVE  
THE 2021 LIMITED ENGLISH PROFICIENCY PLAN**

**WHEREAS**, the Erie Regional Planning Commission is designated as the Metropolitan Planning Organization by the Governor, acting through the Ohio Department of Transportation in cooperation with local officials in Erie and a portion of Lorain Counties; and

**WHEREAS**, this Committee is the Metropolitan Planning Organization (MPO) for Erie County and the Lorain County portion of the City of Vermilion; and

**WHEREAS**, the Metropolitan Planning Organization refers to a forum for cooperative transportation decision making for the metropolitan planning area; and

**WHEREAS**, it is the responsibility of this Committee to approve federally-funded transportation projects from Erie County which appear on the TIP; and

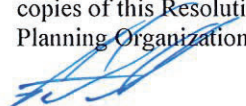
**WHEREAS**, Erie Regional Planning has prepared the 2021 Limited English Proficiency Plan as part of the transportation planning process; and

**WHEREAS**, the 2021 Limited English Proficiency Plan guarantees continued compliance with state laws governing open meetings and public access to MPO documents; and

**WHEREAS**, the 2021 Limited English Proficiency Plan has been submitted to and reviewed by the Technical Advisory Committee and Policy Committee;

**NOW THEREFORE BE IT RESOLVED:**

- 1) That this Policy Committee recognizes the importance of public involvement in the MPO process and does hereby approve the 2021 Limited English Proficiency Plan as an important MPO document.
- 2) That this Committee authorizes the Erie County Regional Planning Commission staff to provide copies of this Resolution to the appropriate agencies as evidence of action by the Metropolitan Planning Organization.

  
\_\_\_\_\_  
Patrick Shenigo, 2021 Chairperson  
Metropolitan Planning Organization Policy Committee  
Erie Regional Planning Commission

March 25th, 2021