



**Sun Corridor Metropolitan Planning Organization**  
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# Limited English Proficiency Plan (LEP)

Endorsed and Approved on **January 8, 2019** by the:  
Sun Corridor Metropolitan Planning Organization  
Executive Board

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Sun Corridor Metropolitan Planning Organization  
Technical Advisory Committee

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**En Española:**

Para más información, o si está interesado en participar en el planeamiento del proceso de transporte en su comunidad y necesita asistencia con el idioma, por favor comuníquese:

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## Introduction

The Sun Corridor Metropolitan Planning Organization (MPO) is responsible for transportation planning within the regional area encompassing the cities of Casa Grande, Coolidge, Eloy, and portions of Pinal County. Sun Corridor MPO's transportation planning area covers 1,155 square miles within Pinal County.

The planning process guidelines for the use of federal and state funds spent for existing and future transportation projects and programs require the Limited English Proficiency (LEP) Plan to play an essential role in the process.

## What is Limited English Proficiency

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient (LEP).

Limited English Proficiency is a term used to describe individuals who are not proficient in the English language. Arizona's diverse population makes it critically important the Sun Corridor MPO be innovative and proactive in engaging individuals from different cultures, backgrounds and businesses in planning, project development, and other program areas.

## Laws and Policy

Executive Order (EO) 13166 - Improving Access to Services for Persons with Limited English Proficiency is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are LEP. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

The following matrix illustrates legal and policy considerations:

### **Title VI of the Civil Rights Act of 1964**

Federal law  
Enacted July 2, 1964  
Considers all persons  
Contains monitoring and oversight compliance review requirements  
Factor criteria is required, no numerical or percentage thresholds  
Provides protection on the basis of race, color, and national origin. Focuses on eliminating discrimination in federally-funded programs

### **Limited English Proficiency Executive Order 13166**

Federal policy  
Signed August 11, 2000  
Considers eligible population  
Contains monitoring and oversight requirements  
Factor criteria is required, no numerical or percentage thresholds  
Provides protection on the basis of national origin; focuses on providing LEP persons' federally-funded programs with meaningful access to

Annual Accomplishments and Upcoming Goals Report to FHWA  
Provides protection on the bases of age, sex, and disability

services using factor criteria  
Annual Accomplishments and Upcoming Goals Report to FHWA  
Provides protection on the bases of age, sex, and disability

*The Sun Corridor MPO* will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits. The policy of Sun Corridor MPO is to ensure meaningful communication with LEP individuals involving transportation issues. All interpreters, translators, and other aids needed to comply with this policy shall be provided to the person being served free of charge.

Language assistance will be provided through use of informal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

Sun Corridor MPO will conduct a regular review of the language access needs of our population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

## **Program Responsibility**

Executive Order (EO) 13166 directs recipients of Federal financial assistance to take reasonable steps to provide LEP individuals with meaningful access to their programs, activities, and services.

### ***Notify LEP customers of the availability of language assistance services***

LEP persons have the right to language assistance at no cost to them in their spoken language. Language identification cards or posting signs in public areas are methods that can be used to provide notice of the service.

### ***Translation of vital documents in languages other than English***

It is appropriate to have written materials that have been historically provided in English to applicants, customers, and the general public translated into languages that are regularly encountered. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Written materials include electronic documents and websites. Sun Corridor MPO will indicate on its website and newspaper publications that translation can be provided, with appropriate notice.

Vital Documents are documents that convey information that critically affects the ability of the recipient/customer to make decisions about his/or her participation in the program or

activity. Examples of vital documents include, but are not limited to: applications, public notices, consent forms, letters containing important information regarding participation in a program, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, notices advising of the availability of language assistance and outreach and community education materials. It is recommended that divisions/programs develop criteria for deciding which documents are vital thereby subject to translation.

Translating documents for LEP to a fourth (4th) grade literacy level ensures the targeted audience understands the information. Community based organizations or focus groups can assist with testing translations for language and literacy level appropriateness.

## **Sun Corridor MPO LEP Four Factor Analysis**

Section Five of the US Department of Transportation guidance on LEP requires a four-factor analysis to determine the need for translation services in order to ensure LEP populations are able to receive information about and can participate in the planning process in the language they best understand.

Based on the four factor analysis, the Sun Corridor MPO will continue to provide public notices in English and Spanish. Translation and interpretation services will be provided through public online translation sites, bilingual community members and, if not cost prohibit and funds permit, through a language interpretation and translation service. The goal of the Sun Corridor MPO is to engage all community members in the planning process.

***Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.***

According to the U.S. Census Bureau, 2012-2016, American Community Survey five year estimates, 30% of the Sun Corridor MPO population speaks languages other than English. Of these, 10%, or 10,118, of the Sun Corridor MPO area population is considered to be Limited English Proficient. This equates to 21,516 individuals of the population five years of age or older who report speaking English “very well”. The predominate language spoken by these individuals is Spanish. Under the Department of Justice’s (DOJ) Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than “very well”.

**Sun Corridor MPO Region  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b>Population 5 years and over</b>	<b>105,606</b>	<b>-</b>
Speak Only English	73,972	70.0%
Speak Other Languages	31,634	30.0%
Speak English "very well"	21,516	-
Persons with Limited English Proficiency (LEP)	10,118	-
Speak English "well"	4,441	-
Speak English "not well"	3,269	-
Speak English "not at all"	2,408	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**City of Casa Grande  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b>Population 5 years and over</b>	<b>47,711</b>	<b>-</b>
Speak Only English	36,237	76.0%
Speak Other Languages	11,474	24.0%
Speak English "very well"	8,311	-
Persons with Limited English Proficiency (LEP)	3,163	-
Speak English "well"	1,592	-
Speak English "not well"	1,178	-
Speak English "not at all"	393	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**City of Coolidge  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b>Population 5 years and over</b>	<b>11,152</b>	<b>-</b>
Speak Only English	8,111	72.7%
Speak Other Languages	3,041	27.3%
Speak English "very well"	2,454	-
Persons with Limited English Proficiency (LEP)	587	-
Speak English "well"	241	-
Speak English "not well"	232	-
Speak English "not at all"	114	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**City of Eloy  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b><i>Population 5 years and over</i></b>	<b>16,364</b>	
Speak Only English	7,905	48.3%
Speak Other Languages	8,459	51.7%
Speak English "very well"	4,996	-
Persons with Limited English Proficiency (LEP)	3,463	-
Speak English "well"	1,137	-
Speak English "not well"	1,237	-
Speak English "not at all"	1,089	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**Arizona City  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b><i>Population 5 years and over</i></b>	<b>9,632</b>	
Speak Only English	7,791	80.9%
Speak Other Languages	1,841	19.1%
Speak English "very well"	1,540	-
Persons with Limited English Proficiency (LEP)	301	-
Speak English "well"	174	-
Speak English "not well"	15	-
Speak English "not at all"	112	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**Pinal County  
Ability to Speak English**

<i>Topic</i>	<i>Estimate</i>	<i>Percent</i>
<b><i>Population 5 years and over</i></b>	<b>372,539</b>	
Speak Only English	295,513	79.3%
Speak Other Languages	77,026	20.7%
Speak English "very well"	52,977	-
Persons with Limited English Proficiency (LEP)	24,049	-
Speak English "well"	10,711	-
Speak English "not well"	8,228	-
Speak English "not at all"	5,110	-

*Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.*

**Factor 2: The Frequency in which LEP Persons Encounter Sun Corridor MPO Programs**

Some government offices provide materials in English and Spanish but, because the general public comes in contact with the Sun Corridor MPO on an infrequent basis, only public notices and certain vital materials are available in both English and Spanish.

**Factor 3: The Importance of Services Provided by Sun Corridor MPO Programs**

Transportation planning is an important facet of the community and affects all residents. All residents are encouraged to participate in public meetings.

**Factor 4: Available resources, including language assistance services varying from limited to wide ranging with varying costs.**

Due to fiscal constraints and limited resources and small staff, interpretation and translation services are not available without advance notice; however, public notices are available in English and Spanish.

## **Program Areas**

- Long Range Transportation Plan
- Transportation Improvement Program (TIP)
- Public Participation Plan (PPP)
- Coordinated Public Transit-Human Services Transportation Plan
- Unified Planning Work Program (UPWP)

All persons living, working, conducting business, and visiting the region are beneficiaries of the planning, coordination, and construction activities of the Sun Corridor MPO. The Sun Corridor MPO does not construct projects; albeit, this activity is accorded to member agencies. The safe movement of goods and people is supported by providing and maintaining a transportation network and facilities.

The Title VI Coordinator provides oversight to the program areas through contract reviews and personal interaction in an effort to ensure their compliance with Title VI and other nondiscrimination related authorities.

## **Population and Demographic Profile**

The Sun Corridor MPO collects a range of data, including demographic data from the U.S. Census Bureau. In addition to general population concertation, the Sun Corridor MPO also collects data regarding minorities, age, poverty level, and Limited English Proficiency. The data collection allows for the analysis to determine if Title VI neighborhoods are receiving equal benefit and not a disproportionate burden.



Demographic data obtained from the US Census Bureau, LEP.gov, and collected during public meetings will be analyzed and used to ensure the minority and low income populations are considered in the planning process.

Sun Corridor MPO 2012-2016 5-Year Estimates		
Topic	Estimate	Percent
<b>Race and Ethnicity</b>		
<b>Total Population</b>	<b>113,259</b>	<b>-</b>
Hispanic	51,755	45.7%
<b>Non-Hispanic</b>		
White, Non-Hispanic	48,524	42.8%
Black, Non-Hispanic	4,830	4.3%
Native American, Non-Hispanic	4,158	3.7%
Asian, Non-Hispanic	1,666	1.5%
Pacific Islander, Non-Hispanic	478	0.4%
Other, Non-Hispanic	177	0.2%
Two or More, Non-Hispanic	1,670	1.5%
Minority (1)	64,734	57.2%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

Title VI Data for Sun Corridor MPO						
Category	Population and Households		Census Block Groups			
	Total	Percent	Number of block groups >= Area Percentage	% Blocks	Affected Population	Population Captured in Census Block Groups
Population Base	113,259	N/A	76	100%	N/A	N/A
Minority	64,734	57%	32	42%	42,479	66%
Age 65+	17,888	16%	32	42%	11,076	62%
Below Poverty Level	22,560	22%	29	38%	15,112	67%
Population with a Disability	13,187	13%	28	37%	7,236	55%
Limited English Proficient Persons (LEP)	10,118	10%	22	29%	6,934	69%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

Title VI Data for Casa Grande						
Category	Population and Households		Census Block Groups			
	Total	Percent	Number of block groups >= Area Percentage	% Blocks	Affected Population	% of Affected Population Captured in Census Block Groups
Population Base	51,571	N/A	43	100%	N/A	N/A
Minority	26,816	52%	22	51%	18,879	70%
Age 65+	9,623	19%	14	33%	5,574	58%
Below Poverty Level	9,473	19%	18	42%	6,516	69%
Population with a Disability	6,807	14%	15	35%	3,098	46%
Limited English Proficient Persons (LEP)	3,163	7%	17	40%	1,917	61%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

Title VI Data for Coolidge						
Population and Households			Census Block Groups			
Category	Total	Percent	Number of block groups >= Area		Affected Population	% of Affected Population Captured in Census Block Groups
			Percentage	% Blocks		
Population Base	12,073	N/A	11	100%	N/A	N/A
Minority	7,101	59%	4	36%	4,413	62%
Age 65+	1,435	12%	6	55%	1,168	81%
Below Poverty Level	3,243	27%	5	45%	2,573	79%
Population with a Disability	1,805	15%	5	45%	913	51%
Limited English Proficient Persons (LEP)	587	5%	8	73%	592	101%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

Title VI Data for Eloy						
Population and Households			Census Block Groups			
Category	Total	Percent	Number of block groups >= Area		Affected Population	% of Affected Population Captured in Census Block Groups
			Percentage	% Blocks		
Population Base	17,128	N/A	14	100%	N/A	N/A
Minority	13,499	79%	5	36%	10,683	79%
Age 65+	1,622	9%	10	71%	1,371	85%
Below Poverty Level	3,294	36%	5	36%	1,609	49%
Population with a Disability	1,116	11%	6	43%	717	64%
Limited English Proficient Persons (LEP)	3,463	21%	4	29%	2,702	78%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

Title VI Data for Arizona City						
Population and Households			Census Block Groups			
Category	Total	Percent	Number of block groups >= Area		Affected Population	% of Affected Population Captured in Census Block Groups
			Percentage	% Blocks		
Population Base	10,489	N/A	6	100%	N/A	N/A
Minority	5,380	51%	4	67%	4,836	90%
Age 65+	1,694	16%	3	50%	947	56%
Below Poverty Level	1,935	18%	4	67%	1,423	74%
Population with a Disability	715	8%	3	50%	269	38%
Limited English Proficient Persons (LEP)	301	3%	2	33%	235	78%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

## Title VI Data for Pinal County

Category	Population and Households		Census Block Groups			
	Total	Percent	Number of block groups ≥ Area Percentage	% Blocks	Affected Population	% of Affected Population Captured in Census Block Groups
Population Base	397,604	N/A	200	100%	N/A	N/A
Minority	167,448	42%	98	49%	118,221	71%
Age 65+	72,473	18%	78	39%	46,866	65%
Below Poverty Level	61,430	16%	90	45%	43,415	71%
Population with a Disability	46,667	13%	99	50%	28,104	60%
Limited English Proficient Persons (LEP)	24,049	6%	73	37%	18,038	75%

Source: U.S. Census Bureau, 2012-2016 American Community Survey (ACS) 5-Year Estimates.

# PROCEDURES

## 1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

The Sun Corridor MPO will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or “I speak cards,” available online at [www.lep.gov](http://www.lep.gov)) or posters to determine the language. In addition, when records are kept of past interactions with individuals, the language used to communicate with the LEP person will be included as part of the record.

## 2. OBTAINING A QUALIFIED INTEPRETER

*Irene Higgs, Executive Director/Title VI Coordinator for the Sun Corridor MPO* is responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff (the City of Casa Grande’s list will be utilized for this purpose);
- (b) Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- (c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

The City of Casa Grande has agreed to provide qualified interpreter service lists. The contact for providing services is; Janisha Hackett, Human Resource Manager, 520-421-8600, and the hours of availability are 8 to 5, Monday through Friday, or upon 24 hours’ notice.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the Sun Corridor MPO. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children and other residents will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

### **3. PROVIDING WRITTEN TRANSLATIONS**

(a) When translation of vital documents is required the Sun Corridor MPO will submit documents for translation into frequently-encountered languages to either the City of Casa Grande, or a professional translator.

(b) The Sun Corridor MPO will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

(c) The Sun Corridor MPO will set benchmarks for translation of vital documents into additional languages over time.

### **4. PROVIDING NOTICE TO LEP PERSONS**

The Sun Corridor MPO will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand.

### **5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION**

On an ongoing basis, the Sun Corridor MPO will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, The Sun Corridor MPO will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from member entities and community organizations, etc.