

North Central Texas
Council of Governments

North Central Texas Council of Governments Language Assistance Plan

The North Central Texas Council of Governments (NCTCOG) is committed to incorporating environmental justice elements and Title VI considerations into the public participation process for all agency activities. Input and involvement from populations that have been traditionally underserved including, but not limited to, low-income and minority households, are sought out and their needs are considered based on the varying individual program and project needs. Various communication strategies and information formats seek to make information easily accessible and understandable.

Title VI states that no person shall be excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, national origin, age, sex, disability, or religion. Title VI prohibits discrimination whether intentional or where the unintended effect is unduly burdensome. The North Central Texas Council of Governments Title VI Complaint Procedures establishes a procedure under which complaints alleging discrimination in NCTCOG's provisions, services, or NCTCOG activities can be made by persons who are not employees of NCTCOG.

NCTCOG uses the U.S. Department of Transportation's definition of Limited English Proficiency (LEP) as persons who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English.

Executive Order 13166

In 2000, President William J. Clinton signed Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency." The order provided clarification of Title VI in the Civil Rights Act of 1964, stating that recipients of federal funds must "ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus do not discriminate on the basis of national origin."

The order also required federal agencies and recipients of federal financial assistance to examine the services they provide and develop an implementation plan to provide meaningful access to LEP persons.

Guidance from federal agencies stress the importance of reducing language barriers that can prevent meaningful access by LEP persons to important services. NCTCOG values public involvement and feedback and encourages participation by all communities.

To ensure all communities have meaningful access to information and opportunities to participate in the planning process, NCTCOG analyzes department activities and demographic information for the region in order to:

- Identify LEP persons who need language assistance and determine how these individuals are served or likely to be served by NCTCOG programs.
- Outline how language assistance will be available.
- Train staff to interact with and consider the needs of LEP persons.
- Provide notice to LEP persons.
- Monitor and update plans and strategies that address how LEP individuals have access to information and opportunities for program participation.

Because services provided by NCTCOG can be both a benefit and a burden to economic development, employment, housing, education, healthcare and social opportunities, NCTCOG staff is dedicated to assessing the location and needs of LEP communities and, consequently, the services NCTCOG provides to these communities.

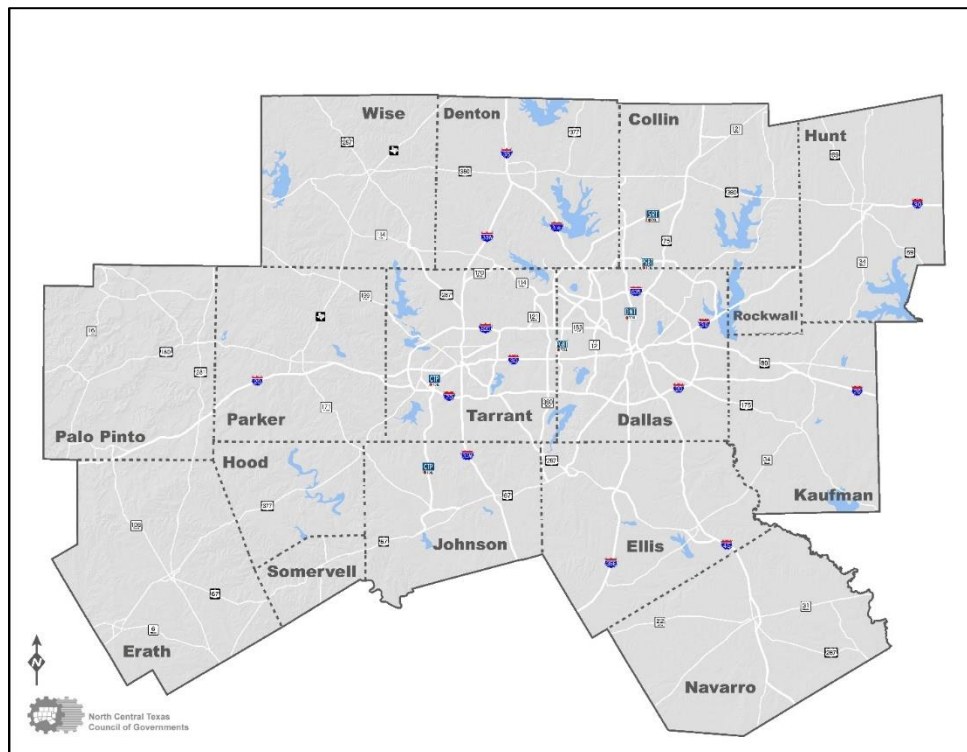
Identification of LEP Populations and Determination of How These Individuals Are Served or Likely to be Served by NCTCOG Programs

NCTCOG uses the federal four-factor analysis as an approach to evaluate the extent to which language assistance measures are required to ensure meaningful access to LEP persons.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient grantee.

The NCTCOG 16-county region encompasses the following counties: Collin, Dallas, Denton, Ellis, Erath, Hood, Hunt, Johnson, Kaufman, Navarro, Parker, Palo Pinto, Rockwall, Somervell, Tarrant, and Wise.

NCTCOG 16-County Limited English Proficiency Service Area



Data for the 16-county NCTCOG service area was gathered using the 2014-2018 American Community Survey dataset. LEP persons were classified as anyone age five and over who described their ability to speak English as less than 'very well' (i.e. 'well,' 'not well,' or 'not at all').

In 2014-2018, the LEP population was 930,469, 13.57% of the region's 6,854,866 residents age five and over. In 2014-2018, Spanish was the largest language represented among the LEP population, with 10.62% percent of the total population age five and over. Asian and Pacific Island languages were the second largest group among the LEP population, comprising 1.72 percent of the total population age five and over. LEP individuals speaking other Indo-European languages or other languages respectively comprised 0.80 percent and 0.43 percent of the total population age five and over.

This Language Assistance Plan outlines how the needs of the LEP population in the service area will be addressed, how language services will be made available, and how LEP persons will be notified of these services.

Factor 2: The frequency with which LEP individuals come in contact with the program.

The nature of the programs associated with the NCTCOG dictate that the majority of contact with the public and LEP persons is through inquiries submitted through the individual department through various activities including, but not limited to, public meetings, public outreach events, the NCTCOG website, and program implementation activities.

In order to better inform the frequency with which LEP individuals come in contact with NCTCOG programs, NCTCOG periodically conducts surveys of staff to determine the frequency in which staff encounter LEP individuals, what languages they had encountered, and what type of work activity they were conducting. In past surveys that have been conducted, Spanish was the most common language encountered in NCTCOG programs, followed by rare encounters of Vietnamese, Hindi, Arabic, Chinese and unspecified languages. The most frequent work activities in which staff encountered LEP individuals are typically phone calls, public meetings, workforce centers, and aging programs.

NCTCOG maintains a voluntary directory of employees who are able to communicate in languages other than English and are willing to provide assistance to LEP individuals. If an employee encounters a LEP individual with whom it is difficult to communicate, they may be able to refer the individual to an employee who can better assist them in another language. At present, approximately 13 languages are represented in this language assistance directory.

LEP Population for the 16-County NCTCOG Region

	Total Population Age 5 and Over	Spanish LEP Population	% Spanish LEP Population	Indo-European Languages LEP Population	% Indo-European Languages LEP Population	Asian and Pacific Island Languages LEP Population	% Asian and Pacific Island Languages LEP Population	Other Languages LEP Population	% Other Languages LEP Population
Collin County	884,492	37,277	4.21	15,110	1.71	27,716	3.13	4,196	0.47
Dallas County	2,390,700	432,921	18.11	17,189	0.72	41,316	1.73	12,969	0.54
Denton County	754,621	37,474	4.97	5,554	0.74	13,879	1.84	1,324	0.18
Ellis County	157,446	11,667	7.41	145	0.09	242	0.15	87	0.06
Erath County	39,033	1,987	5.09	34	0.09	48	0.12		0
Hood County	53,792	2,101	3.91	162	0.3	23	0.04	2	0
Hunt County	86,348	2,984	3.46	61	0.07	209	0.24	11	0.01
Johnson County	152,703	8,157	5.34	253	0.17	536	0.35		0
Kaufman County	110,365	6,299	5.71	204	0.18	361	0.33	100	0.09
Navarro County	45,091	4,638	10.29	67	0.15	214	0.47	21	0.05
Palo Pinto County	26,591	1,646	6.19	115	0.43	4	0.02		0
Parker County	121,809	3,710	3.05	167	0.14	96	0.08	60	0.05
Rockwall County	87,816	3,301	3.76	590	0.67	465	0.53	152	0.17
Somervell County	8,239	236	2.86		0		0		0
Tarrant County	1,875,483	170,073	9.07	15,324	0.82	32,751	1.75	10,269	0.55
Wise County	60,337	3,844	6.37	30	0.05	59	0.1	39	0.06
Total NCTCOG Region	6,854,866	728,315	10.62	55,005	0.8	117,919	1.72	29,230	0.43

Source: 2014-2018 American Community Survey; www.census.gov

*Limited English Proficiency (LEP) is classified as any person whose primary language is other than English and answered that their ability to speak English was "well," "not

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

NCTCOG is the agency responsible for the distribution of federal, state, and local funds; in this capacity, NCTCOG must ensure that all segments of the population are involved or have the opportunity to be involved in the decision making process. Individual departments and program areas administer federal, state, and local funds from approximately 25-40 funding agencies, depending on fiscal year.

Public meetings, committee meetings, and Executive Board meetings are several ways that North Texans can become informed of and involved in NCTCOG activities. Public meeting, committee meetings, and Executive Board meeting notices include the telephone number and email address to request special accommodations for language translation or disability. On each notice, this information is provided in English. As required by individual funding requirements and the need established by the individual programs and activities, public meetings are advertised in newspapers, and translated ads are placed in the major Spanish newspapers.

Due to the multitude of funding agencies that NCTCOG receives funding from on an annual basis, each agency Department determines the most appropriate outreach and public involvement activities that will meet the individual federal, state, and/or regional funding requirements. Each Department determines the best approach to providing the services or activities to the greatest number of recipients for which they are funded.

NCTCOG staff encounters most LEP individuals through programs provided through the Area Agency on Aging and the Workforce Solutions for North Central Texas. Additionally, the NCTCOG web content and other materials for public awareness campaigns are available in English and Spanish.

Factor 4: The resources available to the recipient and costs.

NCTCOG currently has available, if needed, bilingual staff who can assist with translation needs and/or translation review in several languages. NCTCOG also has agreements with translation services that cover many languages, as well as American Sign Language.

NCTCOG has resources to procure translation and interpretation services as needed. At no cost, the Google Translate tool was added to the NCTCOG website, making information more readily accessible in more than 100 languages. Visualization tools such as animations, maps, renderings, photos and others are also used, when possible, to increase understanding among all audiences. These tools can also be especially beneficial for LEP persons. All language assistance is provided at no charge to LEP individuals.

Guidelines for Making Language Assistance Available

The four-factor analysis will be used as a tool for analyzing to what extent and how the needs of LEP communities are addressed during NCTCOG program activities and program implementation.

For example, the four-factor analysis will be used to determine initial translation or alternative format needs for documents, meetings materials, and the website. Translators and interpreters

used by the NCTCOG will be evaluated to ensure accurate, high-quality language services are available to LEP persons.

Increased use of visualization tools will be used to make information more understandable and, in some cases, reduce the need for English proficiency.

Plans, projects and programs for areas with a high number of LEP persons will have materials that address the needs of the population in those area. Environmental Justice communities, including non-English speakers, are mapped whenever possible to provide, as much as possible, plan- or project-specific data.

The NCTCOG will make every effort to accommodate language translation needs, if provided sufficient notice. A minimum of three business days advance notice is required for these arrangements to be provided at Executive Board meetings, committee meetings, and public meetings.

NCTCOG staff will consistently seek input and involvement from organizations and agencies which serve LEP populations to complement other language assistance and outreach efforts.

Staff Training for Interacting with and Considering the Needs of LEP Persons

All NCTCOG staff members have access to training materials related to Title VI and Limited English Proficiency. Periodic training is offered to existing and new employees that includes the requirements and techniques for providing meaningful access to services for LEP persons.

Notice of Assistance Available for LEP Persons

Public meeting notices include the telephone number and email address to request special accommodations for language translation or disability. On each notice, this information is included in English and Spanish.

Monitoring and Updating Plans and Strategies That Address How LEP Individuals Have Access to Information and Opportunities for Program Participation

This Language Assistance Plan will be reviewed and updated periodically, as appropriate.

Environmental justice and Title VI activities will be periodically summarized to provide information about how the NCTCOG:

- Addresses the needs of LEP persons and those traditionally underserved by existing services.
- Facilitates opportunities for full and fair participation from all individuals.
- Makes information accessible and understandable.
- Ensures no person shall, on the basis of race, color, national origin, age, sex, disability, or religion, be excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance.

This Language Assistance Plan is supplemented by individual NCTCOG department Title VI or Language Assistance Plans developed for conformance or compliance with specific programmatic requirements.