



# **LIMITED ENGLISH PROFICIENCY PLAN**

Northern Oklahoma  
Regional Transportation Planning Organization  
(NORTPO)

**2022**

Northern Oklahoma Development Authority



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The Northern Oklahoma Regional Transportation Planning Organization (NORTPO) complies with all civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance. Therefore, the NORTPO does not discriminate on the basis of race, sex, color, or nation origin, religion or disability, in the admission, access to and treatment in transportation planning programs and activities.



**Northern Oklahoma Regional  
Transportation Planning Organization**



**RESOLUTION OF THE  
NORTHERN OKLAHOMA REGIONAL TRANSPORTATION  
PLANNING ORGANIZATION  
APPROVING FFY 2022 LIMITED ENGLISH PROFICIENCY PLAN**

**WHEREAS**, the Northern Oklahoma Regional Transportation Organization (NORTPO) was established to serve as the planning organization and to provide guidance to local governments in conducting the regional transportation planning process for the Northern Oklahoma Development Authority (NODA) and Oklahoma Economic Development Authority (OEDA) and the counties of Alfalfa, Beaver, Blaine, Cimarron, Dewey, Ellis, Garfield, Grant, Harper, Kay, Kingfisher, Major, Noble, Texas, Woods, and Woodward, pursuant to the requirements and provisions of Moving Ahead for Progress in the 21st Century Act (MAP-21 Section 134 (d)(2) of Title 23);

**WHEREAS**, Executive Order 13166 signed on August 11, 2000 guides the Limited English Proficiency Plan, and

**WHEREAS**, NORTPO has prepared the Limited English Proficiency Plan to provide all its stakeholders the opportunity to participate in the transportation planning process, regardless of their proficiency in speaking the English language, and

**NOW THEREFORE, BE IT RESOLVED** that NORTPO does adopt and endorse the FFY2022 Limited English Proficiency Plan, as the guide for reaching those not proficient in speaking the English language.

PASSED, APPROVED AND ADOPTED by the NORTPO Policy Board on the 21<sup>st</sup> day of April, 2022.

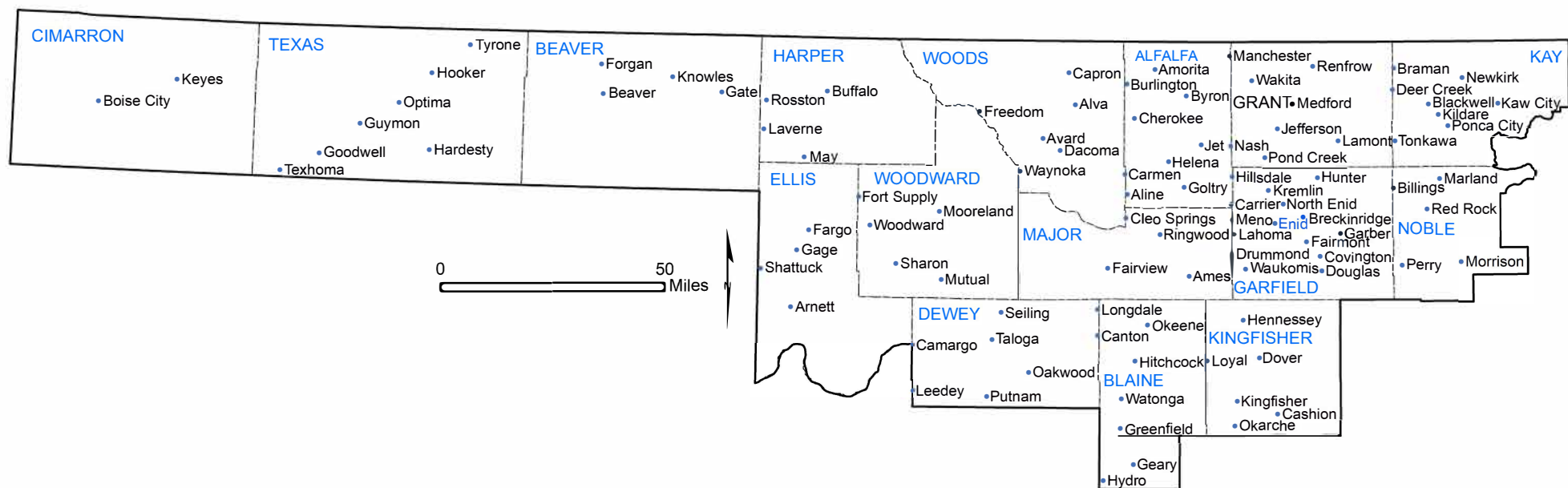
\_\_\_\_\_  
Chair, NORTPO Policy Board

Attest:

\_\_\_\_\_  
Secretary

# Northern Oklahoma Regional Transportation Planning Organization (NORTPO)

## Incorporated Cities and Towns



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## Introduction

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### RTPO History

Northern Oklahoma Regional Transportation Planning Organization (NORTPO) is a Regional Transportation Planning Organization (RTPO), as designated by the Oklahoma Department of Transportation (ODOT). Our region consists of 16 counties in north central and northwest Oklahoma. NORTPO is a division of the Northern Oklahoma Development Authority (NODA).

An RTPO is an organization that identifies local transportation needs, conducts planning, assists local governments, and supports the statewide transportation planning process in non-metropolitan regions of a state. States can designate RTPOs as a method for formalizing the engagement of officials from areas with a population size less than 50,000 as they incorporate rural transportation needs in the statewide transportation planning process. RTPOs oversee development of the regional transportation planning process, and the regional public participation process in the non-metropolitan areas of the state. The plan-writing format follows a hierarchy that includes goals, objectives, and policies to assist NORTPO in planning and prioritization of transportation system projects and studies.

The Long Range Transportation Plan (LRTP) is the centerpiece of the transportation planning process. Since 2015, NORTPO has developed LRTPs for nine counties: Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, Major, Noble, and Woodward. These plans serve as a part of the region wide effort of NORTPO to identify and examine both short and long range goals for development. A regional approach to long range transportation planning is necessary because of the rural nature and diverse characteristics of the population in Oklahoma.

In 2012, ODOT contracted with Oklahoma Association of Regional Councils (OARC) to implement a transportation planning process in three selected Council of Governments (COGs). Subsequently those COGs developed RTPOs: Northern Oklahoma Regional Transportation Planning Organization (NORTPO), Southwestern Oklahoma Regional Transportation Planning Organization (SORTPO), and Central Oklahoma Regional Transportation Planning Organization (CORTPO). Since 2012, two additional RTPOs came on board - Northeastern Oklahoma Regional Transportation Planning Organization (NEORTPO) and South Central Oklahoma Regional Transportation Planning Organization (SCORTPO). These RTPOs are working together as part of a statewide pilot for regional transportation planning.

Per their agreement with ODOT, NORTPO has developed, or in is the process of developing, the following three plans to aid in the regional planning process. Below are descriptions of the purpose each plan.

### **Planning Work Program (PWP)**

The PWP is one element of the transportation planning process that the RTPO will follow in support of development of transportation planning products. The PWP will document the transportation planning activities and projects to be accomplished with SPR funds in the NORTPO region on an annual basis.

### **Long Range Transportation Plan (LRTP)**

The LRTP is the centerpiece of the transportation planning process. Since 2015, NORTPO has developed LRTPs for nine counties: Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, Major, Noble, and Woodward. FFY2022 will continue the regional planning process. It is anticipated the regional plan development will take until FFY2023 to complete. Phase 1 (FFY2020) development focused on the introduction; federal planning regulations; goals and strategies for implementation; regional characteristics and profile; beginning discussions of transportation needs; public involvement (which occur throughout all phases of development), and appendices items tied to Phase 1. Phase 2 (FFY2022) will include public surveys; demographic trends; future population and employment projections; commercial development; development patterns and land use by county/TAZ; regional destinations; economic activity; opportunity zones; environmental and cultural resources; trends and challenges; transportation inventory; freight needs; public transit, bicycle and pedestrian facilities; and continue with transportation needs, public participation, and appendices updates. In Phase 3 (FFY2022) staff will continue to cultivate public participation and involvement, as well as updating appendices. Focus will center on rural vs. urban vs. town vs. main street concerns; additional demographic trends, future populations, and employment; system management review and technology; transportation, homeland security, and emergency preparedness; functional classifications; alternative fuel corridors; freight development; and transit, bicycle, and pedestrian needs. Financial aspects, as well as project selection and phasing, will be thoroughly discussed and planned in Phase 3.

### **Public Participation Plan (PPP)**

The intent of the Public Participation Plan is to encourage and support proactive public participation throughout the planning and decision-making process related to the development of proposed transportation plans, programs, and projects so that a safe, efficient transportation system reflecting the needs and interests of all stakeholders can be provided. Public participation provides citizens, affected public agencies, private providers of transportation and other interested parties' reasonable opportunity to comment, participate in goal-setting, problem solving, and expand the focus of transportation decision making. In addition, Fixing America's Surface Transportation (FAST) Act requires transportation agencies to develop and implement a proactive approach to ensure that transportation services are extended to those traditionally underserved.



## **Purpose of Limited English Proficiency Plan**

Individuals who do not speak English as their primary language and are limited in their ability to read, write, or understand it are classified as Limited English Proficient (LEP). According to the U.S. Census Bureau's American Community Survey, individuals who experience LEP are defined as individuals 5 years or older who self-identify as speaking English less than "very well". Total LEP population equals the sum of all individuals who speak a language other than English and of that population speak English less than "very well." See Appendix b.

As a recipient of funding from the US Department of Transportation (USDOT) via SPR funds administered by the Oklahoma Department of Transportation (ODOT), NODA must assure that individuals experiencing LEP have meaningful language assistance by reasonable means when using NODA or NORTPO services. Funding assistance from the U.S. DOT agencies, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) requires a plan for providing this meaningful access in accordance with Title VI of the Civil Rights Act of 1964 and implementing the regulations.

The NORTPO LEP Plan presents the sources of authority for LEP plan requirements and instructions for determining if the threshold to provide language assistance is present. The plan will provide guidelines for the RTPO to meet these language needs as well as define the role of the Title VI program in that process. Specifically, this plan will discuss information gathered and analyzed through a USDOT Four Factor Analysis and how those findings will affect NORTPOs interaction with individuals who experience LEP. Individuals who experience LEP are any individual, of any language, over the age of 5 who reports they speak a language other than English and speak English less than "very well" through the U.S. Census Bureau's American Community Survey.

## **Federal Requirements**

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities.

In 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

Recipients who fail to provide services to LEP applicants and beneficiaries in their federally assisted programs and activities may be discriminating on the basis of national origin in violation of Title VI and its implementing regulations. Title VI and its regulations require recipients to take reasonable steps to ensure "meaningful" access to the information and services they provide. What constitutes reasonable steps to ensure meaningful access will be contingent on a number of factors. Among the factors to be considered are: 1. The number or proportion of individuals who experience LEP eligible to be served or likely to be encountered by a program, activity, or service, 2. The frequency with which individuals who experience LEP come into contact with programs, activities, and services, 3. Nature and importance of the program or service to the individuals who experience LEP, and 4. Resources available to the recipient and costs for the organization.

## Title VI Complaint Process

The Northern Oklahoma Development Authority (NODA) uses the following detailed internal procedures for prompt processing and resolution of all the Title VI complaints received directly by any of its divisions having responsibilities under the Title VI and the related Nondiscrimination statutes. These procedures include but are not limited to:

1. Any person who believes that he or she, individually, as a member of any specific class, has been subjected to discrimination by NODA or any of their recipients prohibited by Title VI of the Civil Rights Act of 1964 as amended, may file a written complaint with the Title VI Coordinator. A complaint may also be filed by a representative on behalf of such a person.
2. In order to have the complaint considered under this procedure, the complaint must be filed no later than 180 calendar days after:
  - The date of the alleged act of discrimination: or
  - Where there has been a continuing course of conduct, the date on which that conduct was discontinued
3. Complaints shall be filed using NODA'S Title VI Complaint Form (available at [www.noda-ok.org/civilrights](http://www.noda-ok.org/civilrights), [www.nortpo.org/civilrights](http://www.nortpo.org/civilrights), or by contacting the Title VI Coordinator). Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

Complaints should be directed to:

Northern Oklahoma Development Authority  
Title VI Complaints Attention: Executive Director  
2901 N. Van Buren  
Enid, Oklahoma 73703

4. Upon receipt of the signed complaint form, the Title VI Coordinator will log-in the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
5. The Title VI Coordinator reviews and determines the appropriate action regarding every Title VI complaint. The department will not proceed with or continue a complaint investigation if:
  - a. The complaint is, on its face, without merit
  - b. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions.
  - c. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identify) has made it impossible to investigate further.
6. Within ten (10) business days, the Title VI Coordinator will acknowledge receipt of

the allegation, inform the complainant of action taken or proposed action to be taken to process the allegation(s) and the complainant is advised of other avenues of redress available, such as the FHWA/FTA, U.S. Department of Justice, U.S. Department of Transportation and the State Department of Transportation. The notification letter contains:

- a. The basis of the complaint.
- b. A brief statement of the allegation(s) over which NODA has jurisdiction.
- c. A brief statement of NODA's jurisdiction over the recipient to investigate the complaint; and
- d. An indication of when the parties will be contacted.

7. The Title VI Coordinator also notifies the Oklahoma Department of Transportation's Contract Compliance Division within ten (10) Calendar days of receipt of the allegations who will notify the appropriate Federal Agency. Generally, the following information will be included in every notification to the ODOT Contract Compliance Division:

- a. Name, address, and phone number of the complainant.
- b. Email address if available.
- c. Basis of complaint (i.e., race, color, national origin, sex age, disability/handicap).
- d. Date of the alleged discriminatory act(s).
- e. Date of complaint received by the recipient.
- f. A statement of the complaint.
- g. Other agencies (state, local or Federal) where the complaint has been filed.
- h. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.

8. Within sixty (60) calendar days from the date the original complaint was received, the Title VI Coordinator will conduct and complete an investigation of the allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to the Oklahoma Department of Transportation.

9. The Title VI Coordinator will conduct an in-depth, personal interview with the complainant(s) information gathered in this interview includes: identification of each complainant by race, color, sex, age, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information the investigation team feels is relevant to the complaint. The interviews are recorded either in audio format or by taking notes. The Title VI Coordinator arranges for the complainant to read, make necessary changes to, and sign the interview transcripts or interview notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.

10. The Title VI Coordinator forwards the investigative report to the Oklahoma Department of Transportation's Contract Compliance Division. The Oklahoma Department of Transportation will review the report and forwards the investigative report to the appropriate Federal Agency. Included with the reports is a copy of the complaint, copies of all documentation pertaining to the complaint, the date the complaint was filed, the date the investigation was completed, the disposition and the date of

the disposition, and any other pertinent information. If for some reason, the investigation cannot be completed within this timeframe, a status report be submitted to ODOT at this stage and the report shall follow upon completion. The appropriate Federal Agency reviews and issues the official Letter of Findings to the complainant.

11. If the complaint cannot be resolved by NODA to the satisfaction of all parties concerned, the party not satisfied is advised of his or her right to appeal pursuant to the Title 49, Code of Federal Regulations, Part 21. The appeal must be filed, in writing no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary to:

U.S. Department of Transportation  
400 Seventh Street Southwest  
Washington, D.C. 20590

## **Providing Notice**

From the four-factor analysis findings, NORPTO will publicize the availability of Spanish interpreter service, free of charge, on a per request basis prior to committee meetings, workshops, forums or events. Notice is provided by:

Posting a sign in Spanish and English at the front-desk reception area to notify LEP individuals of any available services; and

This notice in English provided for all public and committee meeting notices:

*“Any person requiring special accommodation for participation in the meeting should contact the NODA/NORTPO office at least seventy-two hours in advance of the meeting time with their request.”*

## Limited English Proficiency Analysis

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### Four Factor Analysis

Federal agencies and recipients of federal funds are required to take reasonable steps to ensure meaningful access to individuals who experience LEP. NORTPO will make reasonable efforts to provide language assistance to ensure meaningful access for individuals who experience LEP by conducting a Four-Factor Analysis to assess the need.

The assessment constitutes:

1. The number or proportion of individuals who experience LEP eligible to be served or likely to be encountered by a program, activity, or service
2. The frequency with which individuals who experience LEP come into contact with programs, activities, and services
3. Nature and importance of the program or service to the individuals who experience LEP
4. Resources available to the recipient and costs for the organization

The specific steps taken in creating an LEP plan will depend on the information gathered from the Four-Factor Analysis, including Census data, fieldwork with LEP individuals and the organizations that serve them, analyses of agency resources, and the costs of providing language assistance.

### Factor 1: Number and Proportion of Individuals Who Experience LEP

To understand the language makeup of the population ages 5 years and over in the NORTPO region, staff analyzed data from the 2015 - 2019 ACS Selected Social Characteristics table using county-level geography. This dataset was used for analysis because the 2016 – 2020 ACS data was not available at the time of this plans writing. For planning purposes, an individual who experiences LEP is any person, of any language, over the age of 5, who reports speaking a language other than English and speaks English less than “very well”.

The following tables are found in Appendix A. Table A1 identifies the primary languages spoken at home in the NORTPO region and what percentage of those persons identify as experiencing LEP. According to the 2015-2019 ACS five-year averages, 187,784 persons, or 87.03%, of the NORTPO region reports speaking English only at home while 27,995 persons, or 12.97%, report speaking a language other than English. Of those who reported speaking a language other than English 12,777 persons, or 45.64%, reported they speak English less than “very well”. Based on our analysis of the available ACS data, 5.92% of the NORTPO population age 5 years and older qualify as LEP. Spanish was the second most spoken language at 10.86% of the total.

Table A2 details the spoken language distribution of each county within the region. English is the most spoken language at home in each county, totaling 187,784 individuals, with Spanish being the second most spoken language at home for all 16 counties, totaling 23,439 individuals. Spanish is the only non-English language that comprises more than 5.00% of any county's population, and the region overall.

ACS data shows, 40.07% of Texas County self-reported speaking Spanish at home (the highest share within the region) while 50.03% reported speaking English less than “very well”; meaning 20.05% of Texas County's population is Spanish speaking and speaks English less than “very well”.

The two most common non-English languages spoken in the NORTPO region are Spanish (23,439 individuals) and Asian and Pacific Islander (2,414 individuals).

**Factor 2: The frequency with which individuals who experience LEP come into contact with programs, activities, and services**

To date, NORTPO staff has not been contacted by any individual(s) who experience LEP or anyone seeking a language service to participate in program activities. Going forward, NORTPO staff will document the frequency of contact or service requests for information/assistance from individuals who experience LEP.

A database cataloging all contact with individuals experiencing LEP will be maintained following the adoption of this plan via the LEP Reporting Form, found in Appendix B. Inquiries by individuals experiencing LEP will be reported and logged at the date of contact. Due to the relatively small size of the current LEP population, the nature of programs, services, and activities of NORTPO, interaction with individuals who experience LEP is infrequent and unpredictable. To the best of the programs abilities, arrangements will be made to provide translation or interpretation services upon request.

**Factor 3: Nature and importance of the programs or services to the individuals who experience LEP**

NORTPO's role as a regional transportation planning organization entails coordinating the cohesion of federal and locally funded transportation planning activities. This role does not include any services or programs providing vital, immediate, or emergency assistance, such as medical treatment or services for basic needs. NORTPO must ensure that all segments of the population including individuals who experience LEP, have an opportunity to be involved in the transportation planning process, in order to be consistent with the Federal Environmental Justice programs and policies.

Three federally funded transportation programs that have impacts are:

- Long Range Transportation Plans (LRTP),
- Planning Work Program (PWP), and
- Public Participation Plan (PPP)

**Factor 4: Resources available to the recipient and costs for the organization**

NORTPO staff has made the NORTPO website translatable to 32 different languages available by a dropdown box on the nortpo.org home page. Accommodations to language assistance requests will be made upon request, when reasonable.

## SAFE HARBOR

According to USDOT LEP Guidance, the Four-Factor Analysis is used to determine oral language assistance needs while the Safe Harbor provisions address written translations. As described in the USDOT Needs Guidance, a “safe harbor” provision ensures the recipients of Federal funding comply with their obligation under Title VI to provide written translations in languages other than English with greater certainty. Failure to provide written translations under the circumstances outlined in Table 1 does not mean there is noncompliance, but rather provides evidence of attempted compliance with written translation obligations under Title VI.

Evidence of compliance with the recipient’s written translation obligations under Safe Harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, or whichever is less, of persons served or likely to be affected. Further requirements are:

Table 1

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population	Translated vital documents
More than 5% of the eligible population and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population and less than 1,000 in number	No written translation is required

## **Language Assistance**

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### **Staff Training**

NODA/NORTPO's process for assisting an individual who experiences limited English proficiency is located in Appendix C.

NORTPO staff is informed of our process for interacting with any individual who experiences LEP. "I Speak" cards are located within the NORTPO office and will be available at all NORTPO community engagement events. Any interaction where cards are used will be documented. See Appendix D for sample cards.

### **Translation of Written Materials**

After analyzing data from the Census Bureau (Appendices A), the following language has reached the thresholds for language assistance:

- Spanish

Language assistance will be provided for individuals experiencing LEP through the translation of key materials, as well as through oral interpretation upon requested.

The Google Translate program allows users to view HTML content in other languages. This feature has been added to the [nortpo.org](http://nortpo.org) website, allowing page information to be viewed in 32 languages. It is accessible from a box on the [nortpo.org](http://nortpo.org) home page.

NORTPO has access to trifold brochures, developed by ODOT, in Spanish, informing the public of their rights under Title VI. These brochures are available at the NORTPO office, at public meetings held by NORTPO, and on the NORTPO website.

NORTPO has adopted the USDOT Safe Harbor Provisions and determined the following documents are considered vital for the public from this agency and will be translated, in full or in summary, for individuals experiencing LEP, into Spanish, upon request. They include:

- Planning Work Program,
- Public Participation Plan, and
- the Long Range Transportation Plans

Through the four-factor analysis, NORPTO will publicize the availability language accommodations on agendas and notices. Information is also available via:

Front Desk Sign – Posting a sign in Spanish and English at the front-desk reception area to notify individuals experiencing LEP of available services; and

Meeting Notices – Advertising the availability of translation services when advertising for NORPTO related activities, at the bottom of the agenda.



## Conclusion

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### **Monitoring and Updating the LEP Plan**

NORTPO will continue monitoring the changes in population and language needs of individuals who experience LEP in the region.

A review of the LEP Plan will coincide with the review of the Public Participation Plan. For each review, NORTPO staff will consider the following:

1. How many individuals who experience LEP were encountered and were their needs met?
2. What is the current population of individuals who experience LEP, and how has it changed?
3. Has there been a change in the types of languages where translation services are needed?
4. Have available resources, such as technology, staff, and financial costs changed?
5. Were any complaints received?
6. Has NORTPO fulfilled the goals and intent of the LEP Plan?

## Appendix A

Table A1

### Languages Spoken by NORTPO Population

	NORTPO Population	Percent of Total	Total LEP*	Percent of Total**
Population 5 years and over	215,779			
<b>English only</b>	187,784	87.03%		
Speaks Language other than English	27,995	12.97%		
Speaks English less than "very well"			12,777	5.92%
<b>Spanish</b>	23,439	10.86%		
Speaks English less than "very well"			10,884	5.04%
<b>Other Indo-European languages</b>	1,113	0.52%		
Speaks English less than "very well"			162	0.08%
<b>Asian and Pacific Islander languages</b>	2,414	1.12%		
Speaks English less than "very well"			1,420	0.66%
<b>Other languages</b>	1,029	0.48%		
Speaks English less than "very well"			311	0.14%
<b>Total LEP</b>			<b>12,777</b>	<b>5.92%</b>

\*LEP = Speaks English less than "very well"

\*\* A percentage of "population 5 years and over"

# Appendix A

Table A2

Languages Spoken by NORTPO Population by County

	Alfalfa		Blaine		Garfield		Grant		Kay		Kingfisher		Major		Noble	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Population 5 years and over	5,535		9,038		57,466		4,153		41,441		14,615		7,179		10,624	
English only	5,232	94.5%	8,040	89.0%	50,098	87.2%	4,038	97.2%	38,846	93.7%	12,403	84.9%	6,701	93.3%	10,418	98.1%
Speaks Language other than English	303	5.5%	998	11.0%	7,368	12.8%	115	2.8%	2,595	6.3%	2,212	15.1%	478	6.7%	206	1.9%
Speaks English less than "very well"	121	2.2%	538	6.0%	3,774	6.6%	27	0.7%	754	1.8%	820	5.6%	272	3.8%	89	0.8%
Spanish	236	4.3%	911	10.1%	5,064	8.8%	91	2.2%	1,936	4.7%	2,127	14.6%	454	6.3%	108	1.0%
Speaks English less than "very well"	106	1.9%	533	5.9%	2,569	4.5%	18	0.4%	616	1.5%	801	5.5%	272	3.8%	65	0.6%
Other Indo-European languages	45	0.8%	34	0.4%	290	0.5%	12	0.3%	277	0.7%	40	0.3%	9	0.1%	34	0.3%
Speaks English less than "very well"	13	0.2%	5	0.1%	20	0.0%	0	0.0%	54	0.1%	6	0.0%	0	0.0%	7	0.1%
Asian and Pacific Islander languages	14	0.3%	0	0.0%	1,710	3.0%	12	0.3%	102	0.2%	41	0.3%	0	0.0%	8	0.1%
Speaks English less than "very well"	0	0.0%	0	0.0%	1,129	2.0%	9	0.2%	28	0.1%	9	0.1%	0	0.0%	6	0.1%
Other languages	8	0.1%	53	0.6%	304	0.5%	0	0.0%	280	0.7%	4	0.0%	15	0.2%	56	0.5%
Speaks English less than "very well"	2	0.0%	0	0.0%	56	0.1%	0	0.0%	56	0.1%	4	0.0%	0	0.0%	11	0.1%

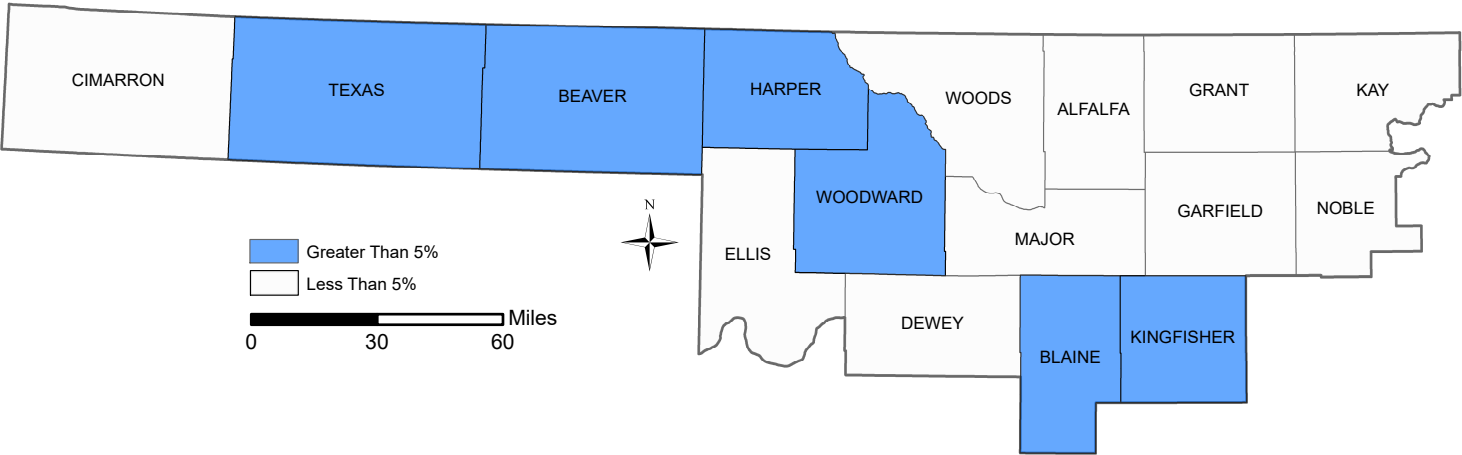
	Beaver		Cimarron		Dewey		Ellis		Harper		Texas		Woods		Woodward	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Population 5 years and over	5,063		2,028		4,599		3,773		3,508		19,041		8,485		19,231	
English only	4,056	80.1%	1,635	80.6%	4,327	94.1%	3,576	94.8%	2,826	80.6%	10,694	56.2%	8,016	94.5%	16,878	87.8%
Speaks Language other than English	1,007	19.9%	393	19.4%	272	5.9%	197	5.2%	682	19.4%	8,347	43.8%	469	5.5%	2,353	12.2%
Speaks English less than "very well"	476	9.4%	81	4.0%	116	2.5%	51	1.4%	317	9.0%	4,219	22.2%	74	0.9%	1,048	5.4%
Spanish	993	19.6%	357	17.6%	202	4.4%	148	3.9%	678	19.3%	7,630	40.1%	291	3.4%	2,213	11.5%
Speaks English less than "very well"	464	9.2%	80	3.9%	79	1.7%	34	0.9%	317	9.0%	3,817	20.0%	65	0.8%	1,048	5.4%
Other Indo-European languages	10	0.2%	35	1.7%	7	0.2%	49	1.3%	2	0.1%	153	0.8%	50	0.6%	66	0.3%
Speaks English less than "very well"	8	0.2%	0	0.0%	0	0.0%	17	0.5%	0	0.0%	26	0.1%	6	0.1%	0	0.0%
Asian and Pacific Islander languages	0	0.0%	0	0.0%	6	0.1%	0	0.0%	0	0.0%	404	2.1%	86	1.0%	31	0.2%
Speaks English less than "very well"	0	0.0%	0	0.0%	3	0.1%	0	0.0%	0	0.0%	233	1.2%	3	0.0%	0	0.0%
Other languages	4	0.1%	1	0.0%	57	1.2%	0	0.0%	2	0.1%	160	0.8%	42	0.5%	43	0.2%
Speaks English less than "very well"	4	0.1%	1	0.0%	34	0.7%	0	0.0%	0	0.0%	143	0.8%	0	0.0%	0	0.0%

Appendix A

Map A1

Limited English Proficiency (LEP) Map

Counties Identified as LEP for Spanish Speakers





## LEP REPORTING FORM

The Limited English Proficiency (LEP) Reporting Form is to be filled out by staff when an LEP individual contacts the department for services or resources. This reporting information is vital for the Title VI program's reporting requirements to the Oklahoma Department of Transportation and the Federal Highway Administration.

Staff Name:		Date:	
-------------	--	-------	--

How did the LEP individual contact you?

☐

Telephone

☐

In Person

☐

In Writing

If other, please explain:

Individuals reason for contacting NORTPO:

Service(s) provided:

☐

Interpreter

☐

Translator

Service(s) provided by:

☐

NORTPO Employee

☐

NODA Employee

☐

OEDA Employee

☐

Volunteer

☐

Vendor/Contractor

☐

Committee Member

Name(s):	
----------	--

Language spoken:	
------------------	--

Length of time to provide service:	
------------------------------------	--



## **Process of Assisting an Individual Who Experiences Limited English Proficiency**

This document provides guidelines on assisting any individual who experiences LEP that contacts NORTPO for services or requests.

An individual who experiences LEP is someone who does not speak English as their primary language and has a limited ability to read, speak, write, or understand English. These individuals may be entitled to language assistance with respect to a service, or request.

### **In-Person**

1. Use “I Speak” cards located within this packet and ask the individual(s) to point to the language they speak.
2. Check the LEP-Interpreter-Translator File/Database and contact the individual that speaks the requested language:  
Check file/database in this order
  1. NORTPO employee
  2. NODA or OEDA Employee
  3. Volunteer
  4. Vendor/Contractor
  5. Committee member
3. Following the phone conversation, complete the LEP Reporting Form to document the occurrence and how it was resolved then submit to the NORTPO Transportation Planner to be filed.

### **Translation via phone**

1. Ask the caller what language they are speaking
2. Place caller on hold
3. Check the LEP-Interpreter-Translator Database and contact the individual that speaks the requested language:  
Conference Calling Instructions
  - Ask the caller to hold
  - Press the conference/transfer button
  - Dial the number for the employee, Committee member or vendor
  - Press the conference/transfer button again and all callers should be on the phone
4. Following the conversation, complete the LEP Reporting Form to document the occurrence and how it was resolved then submit to the NORTPO Transportation Planner to be filed.

### **Translation for written documents**

Any in-coming correspondence (such as emails, fax, or letters) that requires translation should be forwarded to the NORTPO Transportation Planner. Identified vital documents will be transferred as required by the Title VI Program.

# I speak ...

## A

### Amharic

እኔ አማርኛ ነው ምናገረው.

### Arabic

أنا أتحدث اللغة العربية

### Armenian

Ես խոսում եմ հայերեն

## B

### Bengali

আমি বাংলা কথা বলতে পারি

### Bosnian

Ja govorim bosanski

### Bulgarian

Аз говоря български

### Burmese

ကျွန်တော်/ကျွန်မ မြန်မာ လို ပြောတတ် ပါတယ်။

3

## G

### German

Ich spreche Deutsch

### Greek

Μιλώ τα ελληνικά

### Gujarati

હુ ગુજરાતી બોલુ છુ

## C

### Cambodian

ខ្ញុំនិយាយភាសាខ្មែរ

### Cantonese

我講廣東話 (Traditional)

我讲广东话 (Simplified)

### Catalan

Parlo català

### Croatian

Govorim hrvatski

### Czech

Mluvím česky

4

## H

### Haitian Creole

M pale kreyòl ayisyen

### Hebrew

אני מדבר עברית

### Hindi

मैं हिंदी बोलता हूँ ।

### Hmong

Kuv has lug Moob

### Hungarian

Beszélek magyarul

7

## D

### Danish

Jeg taler dansk

### Dari

من دری حرف می زنم

### Dutch

Ik spreek het Nederlands

## E

### Estonian

Ma räägin eesti keelt

## F

### Finnish

Puhun suomea

### French

Je parle français

5

## I

### Icelandic

Ég tala íslensku

### Ilocano

Agsaonak ti Ilokano

### Indonesian

syay bisa berbahsa Indonesia

### Italian

Parlo italiano

## J

### Japanese

私は日本語を話す

8

## K

### Kackchiquel

Quin chagüic'ká chábal' ruin' rí  
tzújon cakchiquel

### Korean

한국어 합니다

### Kurdish

man Kurdii zaanim

### Kurmanci

man Kurmaanji zaanim

## L

### Laotian

ຂ້ອຍປາກົດສາລາວ

### Latvian

Es runāju latviski

### Lithuanian

Að kal bu lietuviš kai

9

## R

### Romanian

Vorbesc românește

### Russian

Я говорю по-русски

## S

### Serbian

Ja говорим српски

### Sign Language (American)



12

## M

### Mandarin

我講國語 (Traditional)

我讲国语/普通话 (Simplified)

### Mam

Bán chiyola tuj kíyol mam

### Mon

အဲဒီအကောင်အရာ

## N

### Norwegian

Jeg snakker norsk

10

### Slovak

Hovorím po slovensky

### Slovenian

Govorim slovensko

### Somali

Waxaan ku hadlaa af-Soomaali

### Spanish

Yo hablo español

### Swahili

Ninaongea Kiswahili

### Swedish

Jag talar svenska

## T

### Tagalog

Marunong akong mag-Tagalog

### Tamil

நான் தமிழ் பேசுவேன்

13

## P

### Persian

من فارسی صحبت می کنم.

### Polish

Mówię po polsku

### Portuguese

Eu falo português do Brasil  
(for Brazil)

Eu falo português de Portugal  
(for Portugal)

### Punjabi

ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

## Q

### Qanjobal

Ayin tí chí walq' anjob' al

### Quiche

In kinch'aw k'u'in ch'e quiche

11

### Thai

พูดภาษาไทย

### Turkish

Türkçe konuşurum

## U

### Ukrainian

Я розмовляю українською мовою

### Urdu

میں اردو بولتا ہوں

## V

### Vietnamese

Tôi nói tiếng Việt

## W

### Welsh

Dwi'n siarad

14



## X

**Xhosa**  
Ndithetha isiXhosa

## Y

**Yiddish**  
איך רעד יידיש

**Yoruba**  
Mo nso Yooba

## Z

**Zulu**  
Ngiyasikhuluma isiZulu

15

### Selected Indigenous Languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frase en español	Frase en lengua
chichineo jonaz	chichineco jonaz	yo hablo chichimeca	ikáuj úzá' é'-i
mazateco	mazateco del norte	yo hablo mazateco	Chá'ña enná
	Santa María Chilchotla	Hablo la lengua de Santa María Chilchotla	Chá'ña énn nda xo
maya	maya	Yo hablo maya	teen k-in 't'aan maya
mixe	mixe bajo	Yo hablo mixe	Madyakpiéeh ayauk
	mixe alto, de TlahuiloIpēc	Yo hablo mixe	Xaamk'èxpēt ayauk' èis nkajpyxypy
mixteco	mixteco del oeste de la costa	yo hablo mixteco	Yuu kain se' en savi ñu ñundua

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### Selected Indigenous Languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frase en español	Frase en lengua
náhuatl	náhuatl de la huasteca veracruzana (se entiende junto con Veracruz y San Luis Potosí)	yo hablo náhuatl	Na ntlajowa náhuatl
tojolabal	tojolabal	yo hablo tojolabal	Ja'ke'ni wala kúmaniyon tojol-abál
triqui	triqui de la baja	yo hablo triqui	'unj a'mii xna' ánj nu' a
tzeltal	tzeltal (variante unificada)	Yo hablo tzeltal	Te'jo'one ja k'op te bats'il k'op tselal
tsotsil	tzeltal (variante unificada)	Yo hablo tsotsil	Vu'ume jna'xi k' opo'j ta bats'i k'op
zapoteco	zapoteco de la planicie costera	yo hablo zapoteco	Naa riné' diidxazá
chinanteco	chinanteco del sureste medio	yo hablo chinanteco	Jnea lo' n jujnti ktee' dsa mo' kúto

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## Limited English Proficiency Resources [www.lep.gov](http://www.lep.gov)

"I Speak" is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL). 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 as the initial source.

Office for Civil Rights and Civil Liberties  
[www.dhs.gov/crcl](http://www.dhs.gov/crcl)

Toll Free: 1-866-644-8360  
Toll Free TTY: 1-866-644-8361  
Email: [crcl@dhs.gov](mailto:crcl@dhs.gov)



See page 16,17  
for selected  
indigenous  
languages  
of Mexico.

<b>A - pg. 3</b> Amharic Arabic Armenian	<b>G - pg. 6</b> German Greek Gujarati	<b>M - pg. 10</b> Mandarin Mam Mon	<b>T - pg. 13, 14</b> Tagalog Tamil Thai Turkish
<b>B - pg. 3</b> Bengali Bosnian Bulgarian Burmese	<b>H - pg. 7</b> Haitian Creole Hebrew Hindi Hmong Hungarian	<b>N - pg. 10</b> Norwegian	<b>U - pg. 14</b> Ukrainian Urdu
<b>C - pg. 4</b> Cambodian Cantonese Catalan Croatian Czech	<b>I - pg. 8</b> Icelandic Ilocano Indonesian Italian	<b>P - pg. 11</b> Persian Polish Portuguese Punjabi	<b>V - pg. 14</b> Vietnamese
<b>D - pg. 5</b> Danish Dari Dutch	<b>J - pg. 8</b> Japanese	<b>R - pg. 12</b> Romanian Russian	<b>W - pg. 14</b> Welsh
<b>E - pg. 5</b> Estonian	<b>K - pg. 9</b> Kackchiquel Korean Kurdish Kurmanci	<b>S - pg. 12, 13</b> Serbian Sign Language Slovak Slovenian Somali Spanish Swahili Swedish	<b>X - pg. 15</b> Xhosa
<b>F - pg. 5</b> Finnish French	<b>L - pg. 9</b> Laotian Latvian Lithuanian		<b>Y - pg. 15</b> Yiddish Yoruba
			<b>Z - pg. 15</b> Zulu

## Appendix E

### TITLE VI COMPLAINT FORM

The Northern Oklahoma Development Authority is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

**Northern Oklahoma Development Authority**

**2901 N. Van Buren**

**Enid, OK 73703**

**Phone: 580-237-4810**

<http://www.noda-ok.org>

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

- ☐ Race      ☐ Color      ☐ National Origin      ☐ Religion  
☐ Sex      ☐ Age      ☐ Disability

Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if known):	
Work Phone:	
Date of alleged incident:	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

☐ Yes

☐ No

If so, please provide the following information:

Agency:	
Address:	
Name of Investigator (if known):	
Phone Number:	
E-mail Address:	
Date Filed:	
Status of case:	

I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or typed name of complainant:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Completed forms must be submitted to the Northern Oklahoma Development Authority.  
If you require any assistance in filling out this form please contact the Title VI Coordinator at 580-237-4810.

Print Form

## Appendix F

### Acronyms

<b>ACS</b>	American Community Survey
<b>FHWA</b>	Federal Highway Administration
<b>FTA</b>	Federal Transit Administration
<b>LEP</b>	Limited English Proficiency
<b>L RTP</b>	Long Range Transportation Plan
<b>NORTPO</b>	Northern Oklahoma Regional Transportation Planning Organization
<b>NODA</b>	Northern Oklahoma Development Authority
<b>PPP</b>	Public Participation Plan
<b>PWP</b>	Planning Work Program
<b>USDOT</b>	United States Oklahoma Department of Transportation
<b>ODOT</b>	Oklahoma Department of Transportation

### Definitions

**Executive Order 13166** – Requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

**Limited English Proficient Individual** - Persons who do not speak English as their primary language, who have a limited ability to read, write, speak, or understand English. These individuals may be entitled to language assistance under Title VI of the Civil Rights Act of 1964, with respect to a particular type of service, benefit, or encounter. The U.S. Census Bureau classifies individuals who experience LEP as individuals 5 years or older who self-identify as speaking English less than "very well".

**Interpretation** - Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text. As a result, interpretation requires skills different from those needed for translation.

**Limited English Proficiency Plan** - Each agency and each recipient of federal financial assistance must take reasonable steps to provide meaningful access to LEP individuals. Among the factors to be considered in determining what constitutes reasonable steps to ensure meaningful access are: 1. The number or proportion of individuals who experience LEP eligible to be served or likely to be encountered by a program, activity, or service, 2. The frequency with which individuals who experience LEP come into contact with programs, activities, and services, 3. Nature and importance of the program or service to the individuals who experience LEP, and 4. Resources available to the recipient and costs for the organization.

**Title VI - Section 601 of the Civil Rights Act of 1964** - No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

**Safe Harbor Stipulation** - A "Safe Harbor" means that if a recipient provides written translations pursuant with USDOT LEP Guidance such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.