

Limited English Proficiency (LEP) Plan

GREENVILLE-PICKENS AREA TRANSPORTATION STUDY (GPATS)

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Introduction

This plan will serve as a guide for GPATS, who is a recipient of federal funding, to address any current needs as well as anticipate any future needs of individuals with limited English language skills. This plan is an expanded section of the Title VI document and was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. This regulation holds that no person shall be subjected to discrimination on the basis of race, color, or national origin under any DOT-assisted program or activity because they face challenges communicating in English.

This plan uses data from the U.S. Census in order to adequately assess the prospective LEP needs within the GPATS defined area. The Four Factor Analysis was used as a guide for staff to ensure all responsibilities to the LEP public were considered.

The plan will be updated as need be in the following years. However, a major update will need to occur after Census 2020 and will reassess all statistical data as well as any LEP persons encountered and the way in which GPATS assisted getting those persons the information they requested. The GPATS programs will also be reassessed for the need of language assistance to be continued and/or offered.

Senior management will be made aware of this plan as well as any other planning personnel involved in GPATS programs. The LEP plan will be included on the GPATS website (www.gpats.org) as well as the Title VI document complete with policy, procedure, and the complaint form. Translated copies can be obtained upon request for LEP persons. Questions or comments about the LEP plan and/or Title VI document should be directed to the GPATS Title VI Coordinator who is part of the Transportation Planning Staff.


















Four Factor Analysis

Factor 1. The number or proportion of LEP persons in the SCDOT service area who may be served or likely to encounter a GPATS program, activity, or service.

The GPATS boundary encompasses portions of five different counties: Greenville, Pickens, Anderson, Spartanburg, and Laurens. From ESRI Business Analyst, the US Census 2017 ACS 5-Year Estimates populations with GPATS' boundary include:

Table 1: Population Age 5-Years and Over by Language Spoken at Home and Ability to Speak English

Range	Population Age 5+ Years by Language Spoken at Home and Ability to Speak English	2015 - 2019 ACS Estimates					Speak English Not Well or at All
		7	Percent	MOE(±)	Coefficient of Variation (CV)	Reliability	
	Total Population	631,781	100.0%	6,818	0.7%		
5 to 17 years	Speak only English	97,828	15.50%	2,735	1.7%		
	Speak Spanish	10,898	1.70%	1,124	6.3%		
	Speak English "very well" or "well"	10,192	1.60%	1,052	6.3%		
	Speak English "not well"	643	0.10%	244	23.1%		643
	Speak English "not at all"	64	0.00%	78	74.1%		64
	Speak other Indo-European languages	1,459	0.20%	294	12.2%		
	Speak English "very well" or "well"	1,332	0.20%	276	12.6%		
	Speak English "not well"	111	0.00%	85	46.6%		111
	Speak English "not at all"	16	0.00%	25	95.0%		16
	Speak Asian and Pacific Island languages	1,794	0.30%	378	12.8%		
	Speak English "very well" or "well"	1,611	0.30%	361	13.6%		
	Speak English "not well"	133	0.00%	78	35.7%		133
	Speak English "not at all"	50	0.00%	77	93.6%		50
	Speak other languages	198	0.00%	119	36.5%		
	Speak English "very well" or "well"	198	0.00%	119	36.5%		
	Speak English "not well"	0	0.00%	0			-
	Speak English "not at all"	0	0.00%	0			-
18 to 64 years	Speak only English	370,062	58.60%	4,848	0.8%		
	Speak Spanish	30,961	4.90%	1,981	3.9%		
	Speak English "very well" or "well"	20,188	3.20%	1,317	4.0%		
	Speak English "not well"	7,159	1.10%	823	7.0%		7,159
	Speak English "not at all"	3,614	0.60%	755	12.7%		3,614
	Speak other Indo-European languages	8,441	1.30%	828	6.0%		
	Speak English "very well" or "well"	8,029	1.30%	749	5.7%		
	Speak English "not well"	390	0.10%	172	26.8%		390
	Speak English "not at all"	23	0.00%	25	66.1%		23
	Speak Asian and Pacific Island languages	7,085	1.10%	903	7.7%		
	Speak English "very well" or "well"	5,614	0.90%	666	7.2%		
	Speak English "not well"	1,066	0.20%	276	15.7%		1,066
	Speak English "not at all"	405	0.10%	217	32.6%		405
	Speak other languages	1,313	0.20%	324	15.0%		
Speak English "very well" or "well"	1,244	0.20%	279	13.6%			
Speak English "not well"	53	0.00%	44	50.5%		53	

65 years and over	Speak English "not at all"	16	0.00%	25	95.0%		16
	Speak only English	96,934	15.30%	1,961	1.2%		
	Speak Spanish	2,027	0.30%	343	10.3%		
	Speak English "very well" or "well"	1,256	0.20%	259	12.5%		
	Speak English "not well"	464	0.10%	160	21.0%		464
	Speak English "not at all"	307	0.00%	140	27.7%		307
	Speak other Indo-European languages	1,692	0.30%	296	10.6%		
	Speak English "very well" or "well"	1,523	0.20%	269	10.7%		
	Speak English "not well"	75	0.00%	52	42.1%		75
	Speak English "not at all"	94	0.00%	72	46.6%		94
	Speak Asian and Pacific Island languages	945	0.10%	247	15.9%		
	Speak English "very well" or "well"	464	0.10%	148	19.4%		
	Speak English "not well"	377	0.10%	178	28.7%		377
	Speak English "not at all"	104	0.00%	81	47.3%		104
	Speak other languages	143	0.00%	68	28.9%		
	Speak English "very well" or "well"	102	0.00%	57	34.0%		
	Speak English "not well"	41	0.00%	35	51.9%		41
	Speak English "not at all"	0	0.00%	0			-
Total Speak English Not Well or at All							15,205

[Table 1](#) above shows LEP populations, along with the Margin of Error (MOR) used to calculate the Coefficient of Variation (CV)¹, as a whole within GPATS’ boundaries based on different ethnicities that speaks English “very well,” “well,” “less than very well,” or “not at all.”

The Hispanic/Latino/Spanish-speaking group makes up the largest percent of ethnicities within GPATS’ boundaries.

Also, it is reasonable to assume the population that doesn’t speak English “very well” are immigrants to the US.

The map on the next page shows the geographical distribution of LEP populations which speak English “less than very well”.

¹ Decisions about the quality of an estimate based on the MOE are difficult to make. ESRI has simplified this process by adding symbols to flag reliability of data based on sample size. Symbols are based on thresholds of reliability ESRI established using an estimate's Coefficient of Variation (CV).



High Reliability: Small CVs, less than or equal to 12 percent, are flagged green to indicate that the sampling error is small relative to the estimate and the estimate is reasonably reliable.



Medium Reliability: Estimates with CVs between 12 and 40 are flagged yellow—use with caution.

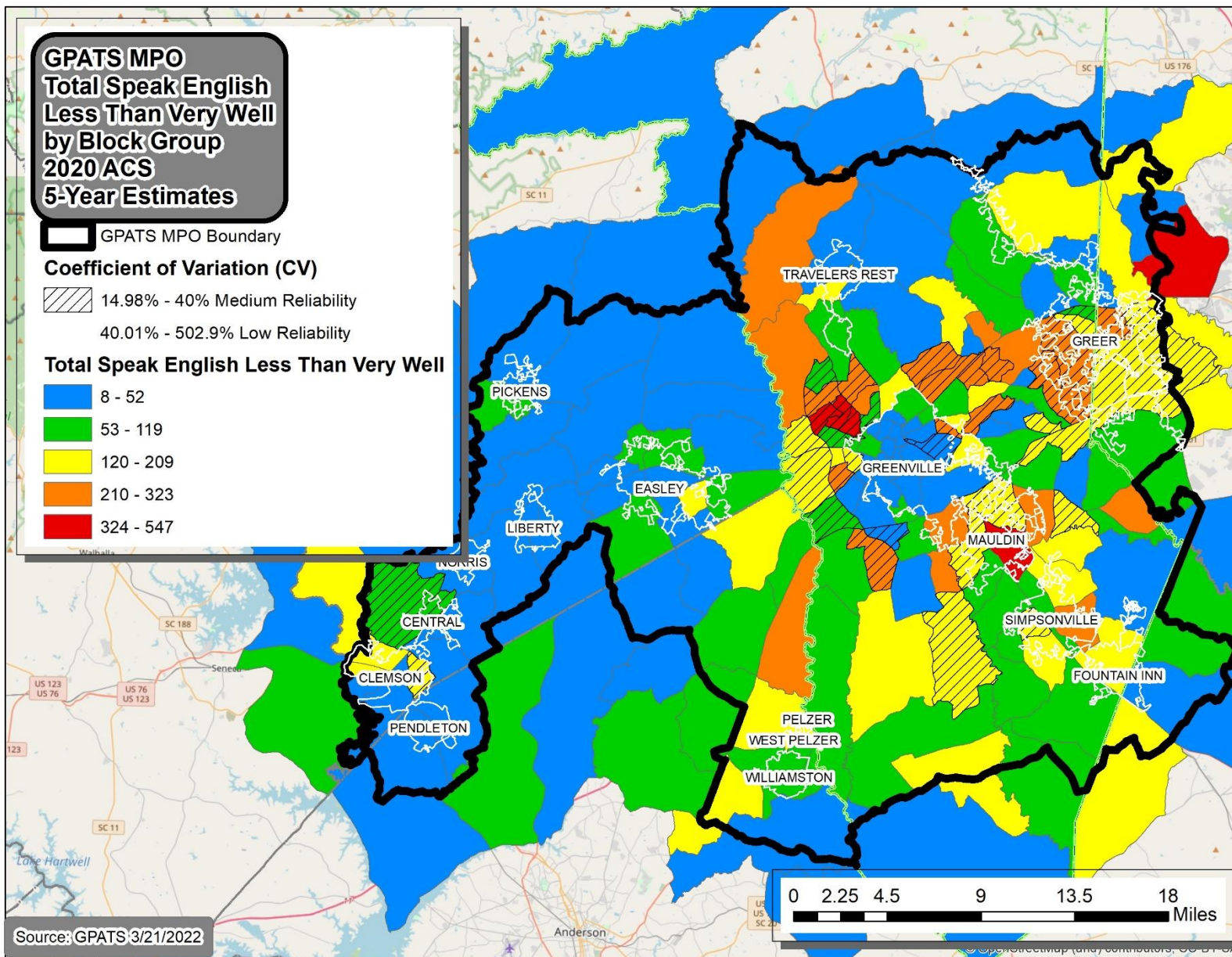


Low Reliability: Large CVs, over 40 percent, are flagged red to indicate that the sampling error is large relative to the estimate. The estimate is considered very unreliable.

The CV is a measure of relative error in the estimate, calculated as the ratio of the standard error to the estimate itself.

Read an [in-depth explanation of Margin of Error](#) from ESRI's Data Team.

Figure 1: Total Population that Speaks English Less Than Well



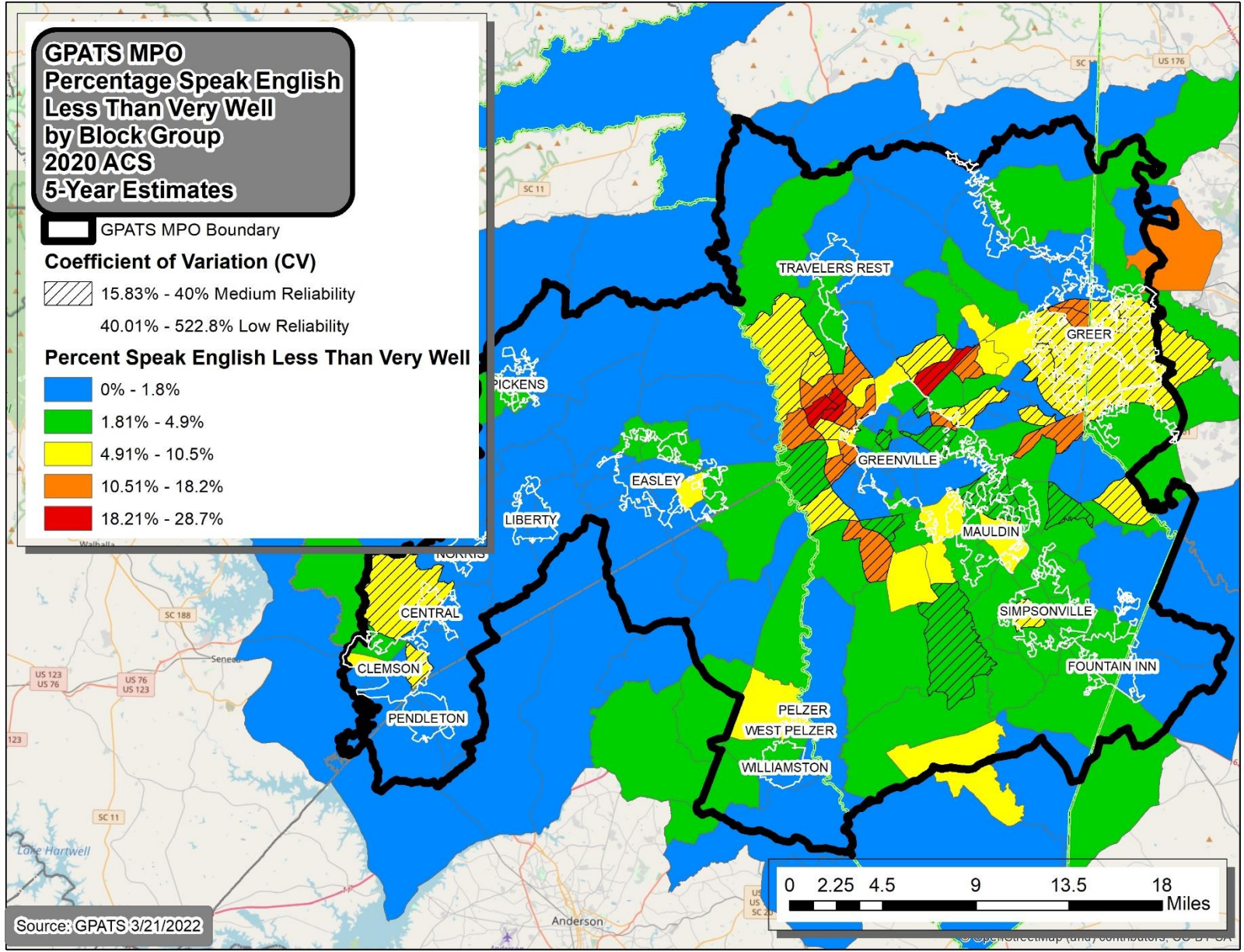


Figure 2: Percentage Population that Speaks English Less Than Well

Factor 2. The frequency with which LEP individuals come in contact with GPATS for public information.

GPATS has had limited contact with LEP groups. Nevertheless, when GPATS has public meeting, there is a member on staff that can be requested for public meetings when dealing with LEP populations that speak Spanish. For all other LEP populations that speak other languages, that might be needed, GPATS will hire a translator as needed. This also includes translating GPATs documents into respective languages.

GPATS has not received any requests for information in another language.

Factor 3. The nature and importance of the program, activity, or service provided by GPATS to LEP community.

GPATS's most critical activity that is provided to the LEP community revolves around public involvement (public information or planning meetings). GPATS includes areas from five different counties and manages projects such as roadway, transit, pedestrian, and bicycling projects.

It is crucial that all geographic areas and demographic groups are made aware of these projects as well as any other public information concerning transportation.

GPATS also monitors any Title VI reports that may occur as well as any requests for public information to be translated into another language.

GPATS will continue to assess any LEP needs by communicating with community organizations that serve LEP persons, as well as with LEP persons.

Factor 4. The resources available to GPATS and overall costs.

An employee of Greenville County (where GPATS staff is housed) who speaks Spanish fluently has offered any assistance if ever needed. GPATS staff will make this assistance known as needs arise. GPATS will also make an effort to ensure that the public is aware that this assistance is readily available. Several techniques can be employed to ensure outreach to LEP persons during public involvement session. One technique would be to make sure any printed materials are written in an alternative language if being presented in a known area of LEP population. Also, public meeting notices, based on the LEP population and when relevant, will include a translated clause for "A (insert alternative Language) translator will be available."

In situations where Greenville County/GPATS employees cannot or should not provide services, i.e., an unfamiliar language or dialect, a legal matter or need for expert testimony, Greenville County/GPATS will acquire professional translators and/or interpreters.

Implementation Plan

With the identification of potential locations for LEP population, GPATS will work to make sure information is as accessible as possible. GPATS will annually review its LEP data and procedures and identify potential people and organizations that can help to facilitate communication between GPATS and LEP populations.

GPATS doesn't have reoccurring monthly and annual meetings. Such occurrences are scheduled as needed, like when new plans are to be created. To help facilitate this;

- Schedules, documents at meetings, drafts, and final documents, will be printed in English and in Spanish.
 - When GPATS substantiates the need to translate into other languages, GPATS will translate Schedules, documents at meetings, drafts, and final documents, accordingly.

GPATS will work to identify people and organizations that can connect and facilitate communication with LEP populations. As of now, GPATS is aware of these organizations:

Organization	Organization Type	Contact	Email	Phone No.
The Chinese Culture and Education Center	LEP		info@ccecbridge.org	(864) 503-7404
Greenville Literacy	LEP	Lisa Hall	Hall@greenvilleliteracy.org	(864) 467-3461
Hispanic Alliance	LEP	Dina Estrada	Dina@HispanicAllianceSC.com	(864) 250-8968
Refuge Sports	LEP		refugesports@gmail.com	
Upstate International	LEP		info@upstateinternational.org	(864) 631-2188

Staff Training

The Title VI Coordinator will make staff aware of the Title VI Plan and will be educated and train on LEP procedures. This will include;

- Make staff aware of the services available to LEP populations, and
- How to handle request for information.

Notice to LEP People

To make LEP population more aware of LEP services, GPATS will;

- Provide also provide notices in Spanish of upcoming meetings and events,
 - When GPATS substantiates the need to translate into other languages, GPATS will translate its notices into that respective language,
- Interpreters will be provide at meetings and events held by GPATS, and

- GPATS will inform persons and organization associated with LEP groups of upcoming events and meetings.

Monitoring Evaluating & Updating the LEP Plan

The Title VI Coordinator will annually review and update the LEP Plan. This shall include;

- Updating the LEP data with the most recent census data available,
- Tracking the number of Encounters of LEP populations,
- Soliciting feedback from LEP populations, and
- Informing GPATS staff of changes in LEP population and procedures.

Dissemination of Plan

The [LEP Plan](#) is available on the GPATS website. It will also be made available to through LEP persons and Organizations.