LANGUAGE ASSISTANCE PLAN

OF

THE COASTAL REGION METROPOLITAN PLANNING ORGANIZATION

The Language Assistance Plan (LAP) is established pursuant to and in accordance with Title VI of the Civil Rights Act and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency".

Prepared by
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MPC and CORE MPO are committed to enforcing the provisions of the Civil Rights Act, Title VI, and all the related requirements mentioned above. CORE MPO is also committed to taking positive and realistic affirmative steps to ensure the protection of rights and opportunities for all persons affected by its plans and programs.

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Chapter One: An Introduction to the Coastal Region Metropolitan Planning Organization

The Coastal Region Metropolitan Planning Organization (CORE MPO) is the Metropolitan Planning Organization (MPO) responsible for transportation planning in the Savannah area. The CORE MPO's Metropolitan Planning Area (MPA) boundary includes all of Chatham County, the portion of the 2010 Savannah Urbanized Area located in Effingham County, the City of Richmond Hill, and the portion of the 2010 Savannah Urbanized Area located in unincorporated Bryan County (see CORE MPO MPA boundary map below).
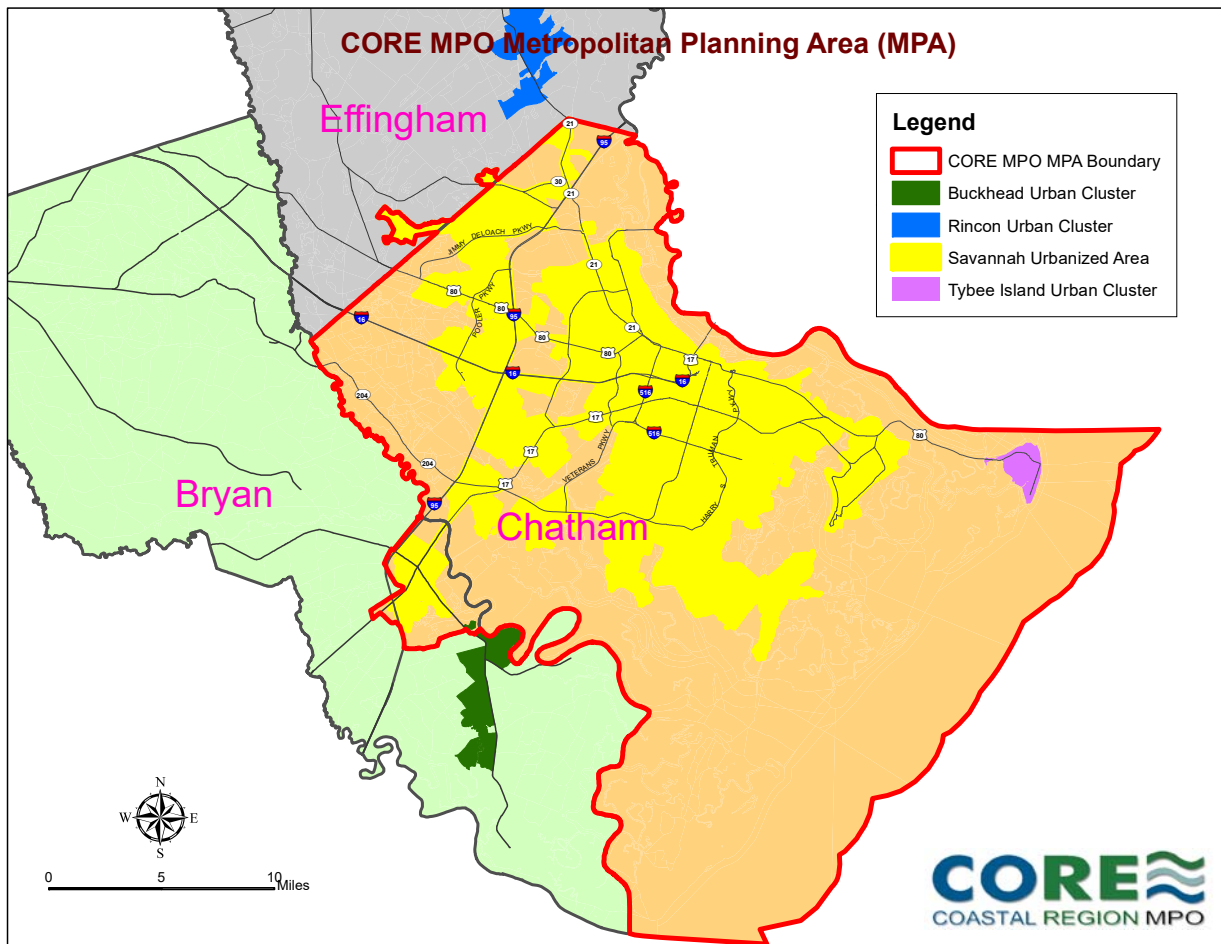
CORE MPO is a comprehensive, cooperative and continuing process and is the forum for decision-making on transportation issues in the Savannah area. CORE MPO receives federal, state and local funds to administer programs and develop transportation plans. The MPO is also working closely with the Chatham Area Transit Authority (CAT), the transit operating agency of the Savannah area. The Chatham County – Savannah Metropolitan Planning Commission (MPC) provides staff support to CORE MPO. The MPO maintains a database that includes U.S. Census information for the Savannah area including current population estimates as well as demographic and economic forecasts for purposes of comprehensive planning and travel demand modeling.

CORE MPO is dedicated to creating a sustainable living environment for all citizens in the Savannah area.

This mission is accomplished through professional planning initiatives and the provision of objective information. In addition, it is made possible through the involvement of the community in collaborative partnerships that encourage healthy economic growth compatible with the environment, improve the area's quality of life and provide opportunities for leadership.

As the federally designated Metropolitan Planning Organization, CORE MPO is responsible for the development and maintenance of a Unified Planning Work Program (UPWP). The UPWP is developed annually through a cooperative process with the transportation planning partners in the Savannah area, including the Georgia Department of Transportation (GDOT) and the Chatham Area Transit Authority (CAT).

CORE MPO is also responsible for developing a 20 plus year Metropolitan Transportation Plan (MTP) and a short-range Transportation Improvement Program (TIP). The MTP evaluates transportation system performance and is a source of policies, projects and actions that implement community vision of transportation improvements needed to reach the community goals. The TIP is a detailed capital program or a list of federally funded highway, transit and other multi-modal projects for the CORE MPO planning area over the next four years. As the designated Transportation Management Area (TMA – an MPO with a population more than 200,000), CORE MPO is responsible for developing and maintaining a Congestion Management Process (CMP) as well.

The CORE MPO's Participation Plan is a federally mandated document, adopted by the CORE MPO Board and serves as a guide for the MPO's public participation activities for the development of MTP/TIP and their amendments as well as other MPO special transportation studies and plans. Formal participation policies and procedures are identified in this plan.

Pursuant to 23 U.S.C. 134(1) (5) and 49 US C.5306 (e), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) jointly review and evaluate the CORE MPO's transportation planning process at least every four years.

Chapter Two: Background of Language Assistance Plan (LAP)

On August 11, 2000, President William J. Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had the purpose to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are 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. These individuals are referred to as being Limited English Proficient, or "LEP".

> *Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.* – Executive Order 13166.

Not only do all federal agencies have to develop Language Assistance Plans (LAP) as a condition of receiving federal financial assistance, but recipients of federal funds must comply with Title VI and LEP guidelines of the federal agency from which funds are provided. Federal financial assistance include grants, training, use of equipment, donations of surplus property, and other forms of financial contributions from federal sources. Recipients of federal funds range from state and local agencies, to nonprofits, and other organizations.

Title VI covers a recipient's entire program or activity, which means all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow Executive Order 13166. The US Department of Transportation published *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons* in the Federal Register dated December 14, 2005. This guidance was issued to ensure that persons in the United States are not excluded from participation in DOT-assisted programs and activities simply because they face challenges communicating in English. The US DOT policy recommendations explicitly identify MPOs as organizations required to follow the guidance.

> *The guidance applies to all DOT funding recipients, which includes state departments of transportation, state motor vehicle administrations, airport operators, **metropolitan planning organizations**, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.* – US DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons.

Elements of an Effective LAP Policy

The US Department of Justice, Civil Rights Division has developed a set of planning elements that were incorporated into the design of this Language Assistance Plan. These elements include:

1. Identifying LEP persons;
2. Identifying ways in which language assistance will be provided;

3. Training staff; and

4. Providing notice to LEP persons.

The Four-Factor Analysis

The USDOT guidance outlines Four Factors that recipients should apply to the various kinds of contact they have with the public in order to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons. These factors are:

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 or grantee;

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

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

4. The resources available and overall cost.

The greater the number or proportion of eligible LEP persons, the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of US DOT guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments. Smaller recipients with limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "Safe Harbor" means that if a recipient provides written translations (as under circumstances outlined in paragraphs A and B of the publication *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*) such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

Strong 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, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.** Translation of other documents, if needed, can be provided orally. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a Safe Harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. **This Safe Harbor provision applies to the translation of written documents only.** It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Chapter Three: CORE MPO's Language Assistance Plan Development

It is the goal of the Coastal Region Metropolitan Planning Organization to enhance meaningful access for all, including those with Limited English Proficiency, through the MPO's public involvement process for all the plans and programs.

As a recipient of federal planning funds that operates on a relatively small and constrained budget, CORE MPO takes reasonable steps to ensure meaningful access by all to the planning process, information and services it provides. The Language Assistance Plan (LAP) includes elements to ensure that where substantial numbers of residents of the Savannah area live who do not speak or read English proficiently, these LEP individuals have access to the planning process and published information and that the production of multilingual publications and documents and/or interpretation at meetings/events will be provided to the degree that funding permits. This plan will demonstrate the efforts that CORE MPO undertakes to make its plans and programs accessible to all persons without regard to their ability to communicate in English.

Determining Needs

CORE MPO is incorporating into this LAP the set of elements developed by the US Department of Justice, Civil Rights Division through general guidelines and procedures including the following.

- Identification: Identifying LEP populations in service areas
- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying staff resources to assist LEP customers
- Training: Providing training on LAP to responsible employees

CORE MPO has utilized the four-factor analysis identified by the USDOT in determining what constitutes reasonable steps to ensure meaningful access. The US DOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed below.

Factor One - the number and/or proportion of LEP persons in the eligible service area

- 2000 Census Data

CORE MPO serves the Savannah area that includes all of Chatham County, a part of Bryan County and a part of Effingham County (see the CORE MPO MPA boundary map in Chapter One). There is no LEP data readily available for the MPO's planning area. However, LEP related census data is available at the county level.

The 2000 Census Summary File 3 (SF 3) has a range of 4 classifications of how well people speak English. The classifications are 1) very well, 2) well, 3) not well, and 4) not at all. For planning purposes, we are considering people that speak English "not well" or "not at all" as Limited English Proficient (LEP) persons.

Table 1 displays the primary language and number of individuals that speak English not well or less than well for the Savannah area based on the 2000 Census data. There are 2,908 individuals in the Savannah area that are defined as Limited English Proficient according to Table 1, comprising 1.07% of Savannah area's residents five years and older. A relative majority of these LEP persons (1,711 or 0.63% of the total population five years and older) speak Spanish, meeting the Safe Harbor rule. The other LEP language

groups have not reached the Safe Harbor threshold. Chatham County is the population center of the Savannah region and most of the Spanish-speaking LEP persons reside in Chatham County (1,543 out of the regional total of 1,711).

Table 1 – Savannah Region's Population 5 Years and Older by Language Spoken at Home and Ability to Speak English
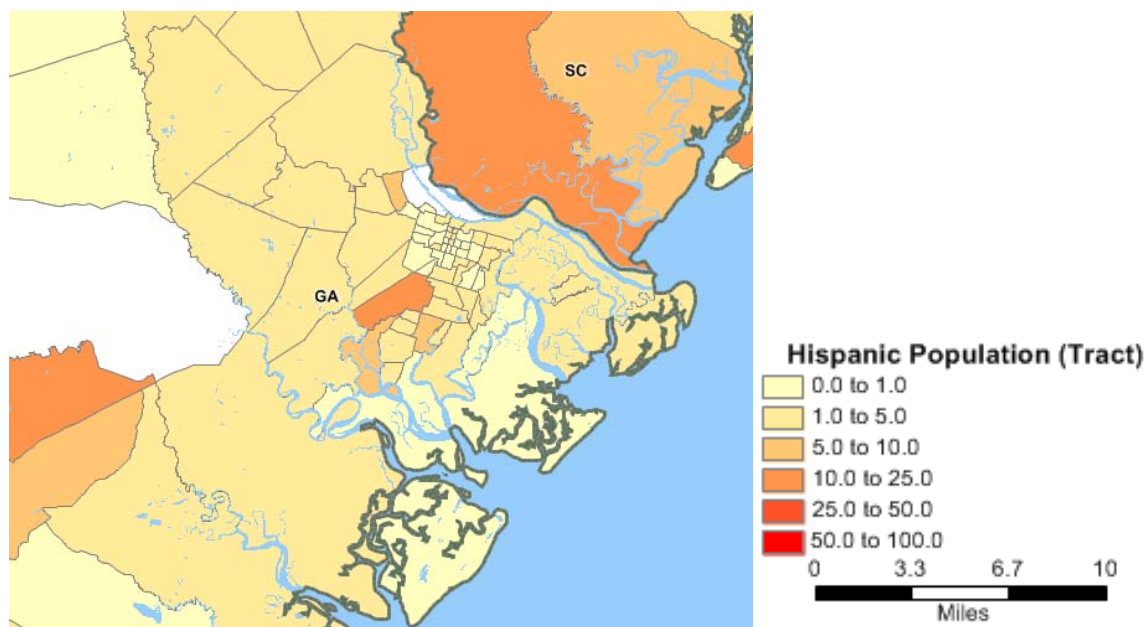
POPULATION 5 YEARS AND OVER BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH	Chatham County	Bryan County	Effingham County	Total for the Savannah Area	Pct of Total Population
Population 5 years and over	**216,600**	**21,631**	**34,701**	**272,932**	**100.00%**
Speak only English	202,148	20,716	33,722	256,586	94.01%
Speak a language other than English	14,452	915	979	16,346	5.99%
Spanish	**6,533**	**409**	**460**	**7,402**	**2.71%**
Speak English "very well"	3,922	279	261	4,462	1.63%
Speak English "well"	1,068	39	122	1,229	0.45%
Speak English "not well"	1,243	88	64	1,395	0.51%
Speak English "not at all"	300	3	13	316	0.12%
LEP Persons Speaking Spanish	1,543	91	77	1,711	0.63%
Other Indo-European Languages	**4,207**	**238**	**308**	**4,753**	**1.74%**
Speak English "very well"	3,049	194	171	3,414	1.25%
Speak English "well"	746	44	104	894	0.33%
Speak English "not well"	370	0	33	403	0.15%
Speak English "not at all"	42	0	0	42	0.02%
LEP Persons Speaking Other Indo-European languages	412	0	33	445	0.16%
Asian and Pacific Island Languages	**2,923**	**234**	**211**	**3,368**	**1.23%**
Speak English "very well"	1,156	115	111	1,382	0.51%
Speak English "well"	1,121	64	77	1,262	0.46%
Speak English "not well"	517	55	23	595	0.22%
Speak English "not at all"	129	0	0	129	0.05%
LEP Persons Speaking Other Asian and Pacific Island Languages	646	55	23	724	0.27%
All other Languages	**789**	**34**	**0**	**823**	**0.30%**
Speak English "very well"	652	23	0	675	0.25%
Speak English "well"	109	11	0	120	0.04%
Speak English "not well"	28	0	0	28	0.01%
Speak English "not at all"	0	0	0	0	0.00%
LEP Persons Speaking All Other Languages	28	0	0	28	0.01%
ABILITY TO SPEAK ENGLISH					
Population 5 years and over	**216,600**	**21,631**	**34,701**	**272,932**	**100.00%**
Speak a language other than English	14,452	915	979	16,346	5.99%
Total LEP Persons	2,629	146	133	2,908	1.07%

Data Source: Census 2000 Summary File 3 (SF 3) – Sample Data – P19. AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATIONS 5 YEARS AND OVER [67] – Universe: Population 5 years and over

- 2010 Census Data

The 2010 census does not include any LEP related data. However, from the comparisons of maps using 2000 and 2010 census data (shown below), it is apparent that the Savannah area had witnessed a growth of Hispanic population during the 10-year period. The Hispanic population is concentrated in and around the Hunter Army Airfield and in West Chatham County, particularly along US 17. A dot density map based on the 2010 census data also demonstrates the concentrations of the Hispanic populations in the Savannah area.

Hispanic Population 2000 - FHWA HEPGIS Maps

Hispanic Population 2010 - FHWA HEPGIS Maps
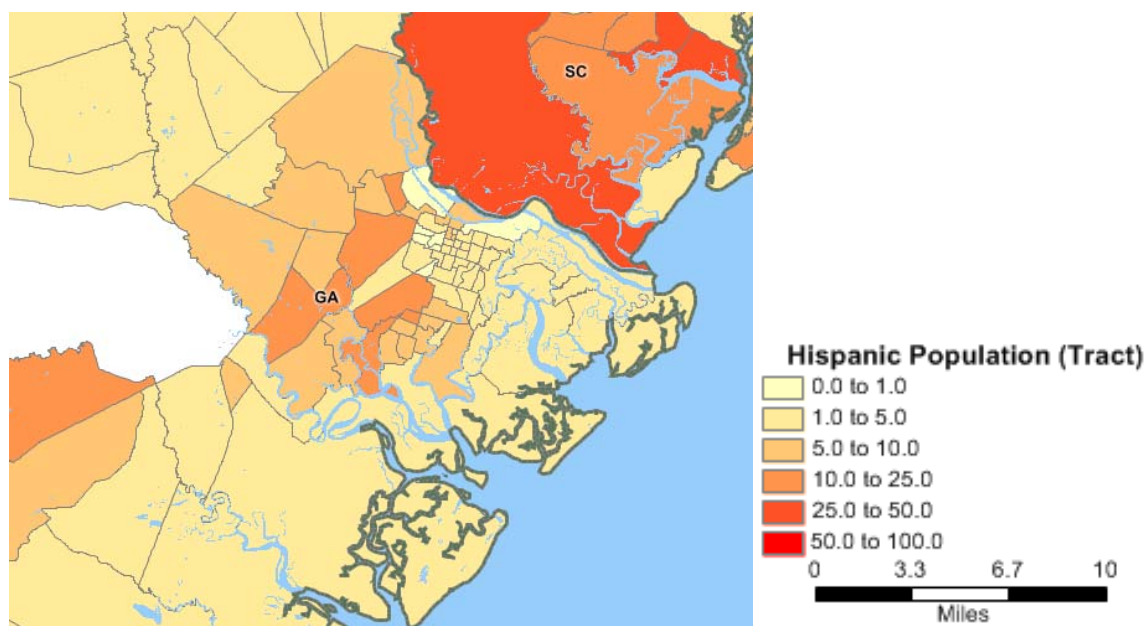
Concentration of Hispanic Population

Legend

CORE MPO Metropolitan Planning Area

Latino Concentration
- Less than 100
- 101 - 250
- 251 - 500
- 501 - 1000
- > 1000

Effingham

South Carolina

Bryan

Chatham

Atlantic Ocean

N

Miles
0   1.75   3.5   7

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- ACS Census Data

Between the decennial censuses, the Census Bureau has been collecting data using a sampling method and compiled it through the American Community Survey (ACS). The ACS data has huge margins of error (MOE) and is not comparable to the decennial census data. Because of the sampling method used, the ACS data is not very accurate or reliable - the smaller the geography, the less accurate. Even so, the ACS data can provide some information indicative of a trend.

The LEP related data is available at the county level for ACS. The ACS defines how people speak English into two categories – 1) very well and 2) not very well. For planning purposes, we are considering people that speak English "not very well" as Limited English Proficient (LEP) persons.

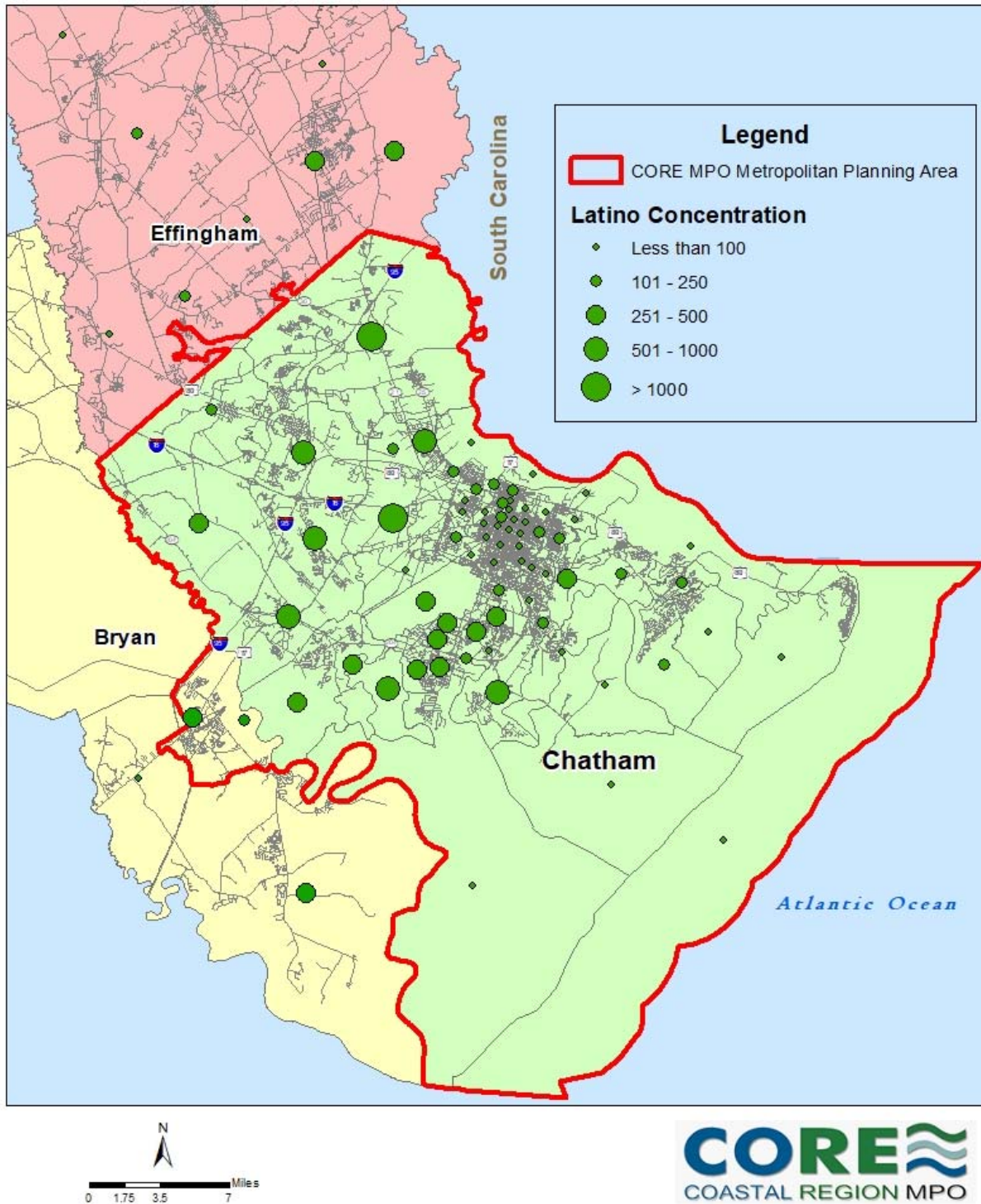**Table 2** shows people's ability to speak English based on the 2009-2013 American Community Survey (ACS) for the Savannah area. The ACS data shows that around 9,136 individuals in the Savannah area may be defined as Limited English Proficient, about 2.76% of the Savannah area's residents five years and older, of which Spanish-speaking LEP persons comprise a majority. Though the exact numbers are different between the decennial census data and the ACS data, the trend is clear – the Spanish-speaking persons are the majority LEP persons for the Savannah area and most of them reside in Chatham County. Other LEP persons reaching the Safe Harbor threshold either speak other Indo-European languages or Asian and Pacific Island languages, but the data does not provide details on which specific language they are speaking. Most of these non-Spanish-speaking LEP persons live in Chatham County as well.

Table 2 – Savannah Region's Population 5 Years and Older by Ability to Speak English

LANGUAGE SPOKEN AT HOME	Chatham County Estimates	Bryan County Estimates	Effingham County Estimates	Total Estimates for the Savannah	Pct of Total Population
Population 5 years and over	**252,267**	**29,162**	**49,457**	**330,886**	**100.00%**
English only	232,085	27,875	47,245	307,205	92.84%
Language other than English	20,182	1,287	2,212	23,681	7.16%
Speak English less than "very well"	8,254	417	465	9,136	2.76%
Spanish	11,157	769	1,323	13,249	4.00%
Speak English less than "very well"	5,188	250	234	5,672	1.71%
Other Indo-European languages	3,812	300	679	4,791	1.45%
Speak English less than "very well"	1,003	50	158	1,211	0.37%
Asian and Pacific Islander languages	4,494	207	210	4,911	1.48%
Speak English less than "very well"	1,968	117	73	2,158	0.65%
Other languages	719	11	0	730	0.22%
Speak English less than "very well"	98	0	0	98	0.03%

Data Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The latest available LEP data from 2011 – 2015 ACS has detailed breakdowns for languages (see **Table 3**). The data further confirms that the only population that has reached the LEP threshold for the Savannah region are people who speak Spanish. The groups to watch for in the future are LEP persons who speak Chinese or Vietnamese – the LEP persons are above 600 for both groups.

Table 3 – Latest LEP Information for the Savanah Area

	Bryan County, Georgia		Chatham County, Georgia		Effingham County, Georgia		Savannah MSA, Georgia	
	Estimate	% County Pop	Estimate	% County Pop	Estimate	% County Pop	Estimate	% MSA Pop
Total:	**30,794**	**100.00%**	**260,239**	**100.00%**	**51,166**	**100.00%**	**342,199**	**100.00%**
Speak only English	**28,849**	**93.68%**	**236,415**	**90.85%**	**48,958**	**95.68%**	**314,222**	**91.82%**
Spanish or Spanish Creole:	**1,128**	**3.66%**	**13,221**	**5.08%**	**1,318**	**2.58%**	**15,667**	**4.58%**
Speak English "very well"	726	2.36%	7,343	2.82%	1,081	2.11%	9,150	2.67%
Speak English less than "very well"	**402**	**1.31%**	**5,878**	**2.26%**	**237**	**0.46%**	**6,517**	**1.90%**
French (incl. Patois, Cajun):	**47**	**0.15%**	**1,126**	**0.43%**	**157**	**0.31%**	**1,330**	**0.39%**
Speak English "very well"	47	0.15%	921	0.35%	69	0.13%	1,037	0.30%
Speak English less than "very well"	0	0.00%	205	0.08%	88	0.17%	293	0.09%
French Creole:	**0**	**0.00%**	**116**	**0.04%**	**0**	**0.00%**	**116**	**0.03%**
Speak English "very well"	0	0.00%	99	0.04%	0	0.00%	99	0.03%
Speak English less than "very well"	0	0.00%	17	0.01%	0	0.00%	17	0.00%
Italian:	**32**	**0.10%**	**212**	**0.08%**	**0**	**0.00%**	**244**	**0.07%**
Speak English "very well"	32	0.10%	199	0.08%	0	0.00%	231	0.07%
Speak English less than "very well"	0	0.00%	13	0.00%	0	0.00%	13	0.00%
Portuguese or Portuguese Creole:	**7**	**0.02%**	**218**	**0.08%**	**49**	**0.10%**	**274**	**0.08%**
Speak English "very well"	3	0.01%	180	0.07%	22	0.04%	205	0.06%
Speak English less than "very well"	4	0.01%	38	0.01%	27	0.05%	69	0.02%
German:	**102**	**0.33%**	**846**	**0.33%**	**88**	**0.17%**	**1,036**	**0.30%**
Speak English "very well"	83	0.27%	620	0.24%	65	0.13%	768	0.22%
Speak English less than "very well"	19	0.06%	226	0.09%	23	0.04%	268	0.08%
Yiddish:	**0**	**0.00%**	**8**	**0.00%**	**0**	**0.00%**	**8**	**0.00%**
Speak English "very well"	0	0.00%	8	0.00%	0	0.00%	8	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other West Germanic languages:	**0**	**0.00%**	**96**	**0.04%**	**0**	**0.00%**	**96**	**0.03%**
Speak English "very well"	0	0.00%	85	0.03%	0	0.00%	85	0.02%
Speak English less than "very well"	0	0.00%	11	0.00%	0	0.00%	11	0.00%
Scandinavian languages:	**28**	**0.09%**	**101**	**0.04%**	**3**	**0.01%**	**132**	**0.04%**
Speak English "very well"	28	0.09%	52	0.02%	3	0.01%	83	0.02%
Speak English less than "very well"	0	0.00%	49	0.02%	0	0.00%	49	0.01%
Greek:	**0**	**0.00%**	**110**	**0.04%**	**0**	**0.00%**	**110**	**0.03%**
Speak English "very well"	0	0.00%	105	0.04%	0	0.00%	105	0.03%
Speak English less than "very well"	0	0.00%	5	0.00%	0	0.00%	5	0.00%
Russian:	**73**	**0.24%**	**208**	**0.08%**	**30**	**0.06%**	**311**	**0.09%**
Speak English "very well"	73	0.24%	202	0.08%	30	0.06%	305	0.09%
Speak English less than "very well"	0	0.00%	6	0.00%	0	0.00%	6	0.00%

Polish:	**0**	**0.00%**	**107**	**0.04%**	**0**	**0.00%**	**107**	**0.03%**
Speak English "very well"	0	0.00%	97	0.04%	0	0.00%	97	0.03%
Speak English less than "very well"	0	0.00%	10	0.00%	0	0.00%	10	0.00%
Serbo-Croatian:	**0**	**0.00%**	**4**	**0.00%**	**0**	**0.00%**	**4**	**0.00%**
Speak English "very well"	0	0.00%	4	0.00%	0	0.00%	4	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other Slavic languages:	**17**	**0.06%**	**87**	**0.03%**	**0**	**0.00%**	**104**	**0.03%**
Speak English "very well"	17	0.06%	38	0.01%	0	0.00%	55	0.02%
Speak English less than "very well"	0	0.00%	49	0.02%	0	0.00%	49	0.01%
Armenian:	**0**	**0.00%**	**4**	**0.00%**	**0**	**0.00%**	**4**	**0.00%**
Speak English "very well"	0	0.00%	4	0.00%	0	0.00%	4	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Persian:	**0**	**0.00%**	**110**	**0.04%**	**0**	**0.00%**	**110**	**0.03%**
Speak English "very well"	0	0.00%	47	0.02%	0	0.00%	47	0.01%
Speak English less than "very well"	0	0.00%	63	0.02%	0	0.00%	63	0.02%
Gujarati:	**27**	**0.09%**	**773**	**0.30%**	**186**	**0.36%**	**986**	**0.29%**
Speak English "very well"	27	0.09%	433	0.17%	186	0.36%	646	0.19%
Speak English less than "very well"	0	0.00%	340	0.13%	0	0.00%	340	0.10%
Hindi:	**49**	**0.16%**	**651**	**0.25%**	**163**	**0.32%**	**863**	**0.25%**
Speak English "very well"	21	0.07%	282	0.11%	163	0.32%	466	0.14%
Speak English less than "very well"	28	0.09%	369	0.14%	0	0.00%	397	0.12%
Urdu:	**50**	**0.16%**	**51**	**0.02%**	**4**	**0.01%**	**105**	**0.03%**
Speak English "very well"	50	0.16%	41	0.02%	4	0.01%	95	0.03%
Speak English less than "very well"	0	0.00%	10	0.00%	0	0.00%	10	0.00%
Other Indic languages:	**55**	**0.18%**	**282**	**0.11%**	**24**	**0.05%**	**361**	**0.11%**
Speak English "very well"	55	0.18%	207	0.08%	24	0.05%	286	0.08%
Speak English less than "very well"	0	0.00%	75	0.03%	0	0.00%	75	0.02%
Other Indo-European languages:	**0**	**0.00%**	**213**	**0.08%**	**6**	**0.01%**	**219**	**0.06%**
Speak English "very well"	0	0.00%	162	0.06%	6	0.01%	168	0.05%
Speak English less than "very well"	0	0.00%	51	0.02%	0	0.00%	51	0.01%
Chinese:	**94**	**0.31%**	**1,051**	**0.40%**	**72**	**0.14%**	**1,217**	**0.36%**
Speak English "very well"	18	0.06%	515	0.20%	40	0.08%	573	0.17%
Speak English less than "very well"	76	0.25%	536	0.21%	32	0.06%	644	0.19%
Japanese:	**0**	**0.00%**	**212**	**0.08%**	**5**	**0.01%**	**217**	**0.06%**
Speak English "very well"	0	0.00%	166	0.06%	0	0.00%	166	0.05%
Speak English less than "very well"	0	0.00%	46	0.02%	5	0.01%	51	0.01%
Korean:	**30**	**0.10%**	**810**	**0.31%**	**0**	**0.00%**	**840**	**0.25%**
Speak English "very well"	14	0.05%	477	0.18%	0	0.00%	491	0.14%
Speak English less than "very well"	16	0.05%	333	0.13%	0	0.00%	349	0.10%
Mon-Khmer, Cambodian:	**0**	**0.00%**	**29**	**0.01%**	**0**	**0.00%**	**29**	**0.01%**
Speak English "very well"	0	0.00%	29	0.01%	0	0.00%	29	0.01%

Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hmong:	**0**	**0.00%**	**8**	**0.00%**	**0**	**0.00%**	**8**	**0.00%**
Speak English "very well"	0	0.00%	8	0.00%	0	0.00%	8	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Thai:	**0**	**0.00%**	**98**	**0.04%**	**4**	**0.01%**	**102**	**0.03%**
Speak English "very well"	0	0.00%	27	0.01%	4	0.01%	31	0.01%
Speak English less than "very well"	0	0.00%	71	0.03%	0	0.00%	71	0.02%
Laotian:	**0**	**0.00%**	**48**	**0.02%**	**0**	**0.00%**	**48**	**0.01%**
Speak English "very well"	0	0.00%	2	0.00%	0	0.00%	2	0.00%
Speak English less than "very well"	0	0.00%	46	0.02%	0	0.00%	46	0.01%
Vietnamese:	**124**	**0.40%**	**1,066**	**0.41%**	**18**	**0.04%**	**1,208**	**0.35%**
Speak English "very well"	28	0.09%	511	0.20%	18	0.04%	557	0.16%
Speak English less than "very well"	96	0.31%	555	0.21%	0	0.00%	651	0.19%
Other Asian languages:	**0**	**0.00%**	**375**	**0.14%**	**0**	**0.00%**	**375**	**0.11%**
Speak English "very well"	0	0.00%	237	0.09%	0	0.00%	237	0.07%
Speak English less than "very well"	0	0.00%	138	0.05%	0	0.00%	138	0.04%
Tagalog:	**49**	**0.16%**	**411**	**0.16%**	**54**	**0.11%**	**514**	**0.15%**
Speak English "very well"	18	0.06%	319	0.12%	40	0.08%	377	0.11%
Speak English less than "very well"	31	0.10%	92	0.04%	14	0.03%	137	0.04%
Other Pacific Island languages:	**4**	**0.01%**	**298**	**0.11%**	**27**	**0.05%**	**329**	**0.10%**
Speak English "very well"	4	0.01%	233	0.09%	27	0.05%	264	0.08%
Speak English less than "very well"	0	0.00%	65	0.02%	0	0.00%	65	0.02%
Navajo:	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**
Speak English "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other Native North American languages:	**0**	**0.00%**	**35**	**0.01%**	**0**	**0.00%**	**35**	**0.01%**
Speak English "very well"	0	0.00%	35	0.01%	0	0.00%	35	0.01%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hungarian:	**0**	**0.00%**	**6**	**0.00%**	**0**	**0.00%**	**6**	**0.00%**
Speak English "very well"	0	0.00%	6	0.00%	0	0.00%	6	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Arabic:	**0**	**0.00%**	**365**	**0.14%**	**0**	**0.00%**	**365**	**0.11%**
Speak English "very well"	0	0.00%	177	0.07%	0	0.00%	177	0.05%
Speak English less than "very well"	0	0.00%	188	0.07%	0	0.00%	188	0.05%
Hebrew:	**0**	**0.00%**	**88**	**0.03%**	**0**	**0.00%**	**88**	**0.03%**
Speak English "very well"	0	0.00%	88	0.03%	0	0.00%	88	0.03%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
African languages:	**0**	**0.00%**	**349**	**0.13%**	**0**	**0.00%**	**349**	**0.10%**
Speak English "very well"	0	0.00%	264	0.10%	0	0.00%	264	0.08%
Speak English less than "very well"	0	0.00%	85	0.03%	0	0.00%	85	0.02%

Other and unspecified languages:	**29**	**0.09%**	**31**	**0.01%**	**0**	**0.00%**	**60**	**0.02%**
Speak English "very well"	29	0.09%	31	0.01%	0	0.00%	60	0.02%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%

Data Source: U.S. Census Bureau, 2011-2015 5-Year American Community Survey

- 2020 Census Data

The Census Bureau will start the 2020 census data collection soon. CORE MPO will monitor the LEP data and make further analysis after the 2020 Census data become available. If additional LEP populations are identified, staff will revise this Language Assistance Plan accordingly.

Factor Two - the frequency with which LEP persons come in contact with the program

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

CORE MPO Plans and Programs

The CORE MPO's key planning documents are the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP) and the Unified Planning Work Program (UPWP). The LEP population does not comprise a big percentage of the total population and the frequency with which LEP individuals come into contact with the MPO's plans and programs is very low even where they are represented in relatively high numbers. However, given the growth of the LEP populations (particularly people of Hispanic origin) in the Savannah area after 2000, there is a probability of increased contact between the LEP persons with the CORE MPO plans and programs. Thus strategies need to be developed accordingly.

CAT Transit Service

The LEP persons have a much larger probability of using public transportation. The June 2010 LEP survey conducted by the Chatham Area Transit Authority (CAT) included sixty-six (66) CAT employees who interacted with consumers on a regular basis. The results of the survey indicated a growing number of LEP riders who utilized CAT services. The results of the June 2010 survey are summarized below.

- On average, contact with LEP persons utilizing CAT is significant. In June 2010 approximately 60% of the surveyed employees reported contact with LEP persons.
- About 60.6% of those surveyed reported at least one LEP person using CAT to commute daily.
- On an average day, CAT employees encounter approximately 258 LEP persons utilizing CAT services. This accounts for approximately 2% of the total ridership on a daily basis based on 10,979 passengers per day.
- Spanish is the dominant LEP language group, representing 71% of the LEP persons encountered.
- Twenty of the sixty-six surveyed employees reported a request for translation assistance.

CAT conducted another on-board survey in 2012/2013 for the update of the 2013 Transit Development Plan (TDP). CORE MPO staff coordinated with CAT staff for LEP related survey questions to get a better picture of the LEP needs in the Savannah area. The results are similar to the 2010 survey results – Hispanic populations in the Savannah area are the major LEP groups who are using public transportation.

CAT is going to conduct another survey in 2019/2020 for the Transit System Re-design (currently ongoing)

and the updates to the Transit Development Plan. LEP data collection will be a part of the survey. CORE MPO staff will coordinate with CAT staff closely on the survey design so that the collected information can be used not only to improve the transit services, but also to help the MPO plan for a more efficient transportation system for the Savannah area.

Factor Three - the nature and importance of the service provided by the program

Public transportation and regional transportation planning are vital to many people's lives. According to the Department of Transportation's Policy Guidance Concerning Recipient's Responsibilities to LEP Persons, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively may adversely affect his or her ability to access health care, education, or employment.

CORE MPO has assessed the frequency with which LEP individuals come in contact with the MPO's plans and programs as well as with the CAT's transit system. The methods utilized for this assessment include analysis of Census data mentioned in Factor One, examining phone inquiries, requests for translated documents, and staff survey.

CORE MPO

The biggest population gains for the Savannah area since 2000 come from the Hispanic and Asian communities. Transportation planning affects LEP populations throughout the planning process and in particular during the regular updates of the MTP and TIP as well as during development of special transportation studies. The transportation planning and the investment decisions carried out by the MPO might impact the mobility and access of LEP populations. For the CORE MPO's transportation planning process, participation opportunities will be provided to the LEP persons in the form of public comment on the use of federal funds in the following areas: update of UPWP, development and amendment of MTP, development and update of TIP, update of the Participation Plan and the Title VI Plan, update of the MPO's Non-Motorized Transportation Plan and Transit Mobility Vision Plan, and development of MPO's special studies.

The transportation improvement plans and programs of the MPO listed above do have an impact on all residents. Efforts will be made to encourage an understanding of the MPO planning process, and opportunities for all to comment will be provided. CORE MPO is committed to obtaining and incorporating input from all stakeholders and every effort will be made to make the planning process as inclusive as possible.

The CORE MPO's participation goal is to have all the residents of the Savannah area involved in the development of the MPO's plans and programs. Limited English Proficient speakers are among those we want to reach out and invite to participate in the MPO's planning process. The MPO staff will be striving to utilize various methods to ensure participation by all should resource allows. Some of the possible tools include the following:

- Meet people where they are for public meetings (community churches, etc.);
- Use materials in the format that people can understand (graphics, charts, maps, etc.);
- Utilize a wide array of options to communicate with the public and to communicate planning activities and policies;
- Utilize the MPC website with language translation functions to reach out to populations in the Savannah area who are not proficient in English;
- Evaluate the participation process conducted at the conclusion of each MTP and TIP update to assess

the effectiveness of public outreach activities;

- Translate vital documents into Spanish (Title VI/Non-discrimination notice to the public, Title VI Complaint Form, MTP executive summary, etc.) as resources allow; and
- Strives to maintain a friendly and accessible open-door policy for all constituents.

CAT

As an agency providing public transportation for Savannah and Chatham County, CAT strives to meet the needs of its client base to make sure that all segments of the population, including LEP persons, have the opportunity to be provided public transit.

For many LEP individuals, public transit is the principal transportation mode available. It is therefore important for CAT to be able to communicate effectively with all of its riders. When CAT is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. CAT is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

CORE MPO understands the importance of public transportation to LEP persons and will work with CAT to provide more efficient transit services.

Factor Four - resources available and overall cost

The US DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons states: "*Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources may chose not to develop a written LEP plan*".

While the Savannah area has a relatively small proportion of LEP populations and CORE MPO has very limited resources in terms of funding and staff level, the decision has been made to develop a written Language Assistance Plan because demographic trends indicate the number of LEP persons is increasing within the CORE MPO's metropolitan planning area.

Funding for developing/updating the LAP and carrying out the LEP requirements will come from the limited resources of the Metropolitan Planning (PL) and Section 5303 programs.

CORE MPO also decided to work with CAT, other departments of the MPC, GDOT and other partners to pool all available staff resources together to better serve the LEP persons in the Savannah area. The existing resources include:

- Bi-lingual staff members in Spanish and Chinese from MPC, CAT, GDOT, and local governments and agencies can help translate the functional planning areas from English to the appropriate languages as needed to facilitate understanding of the organization and the transportation planning process.
- Some software such as Google Translation is widely available for use. However, the software-translated documents will go through verification process by the people who can speak the specific language.
- CORE MPO staff members have identified and initiated dialogue with some community organizations (Hispanic church, Chinese church, etc.) where LEP persons congregate in order to conduct future public meetings.
- CORE MPO staff members have acquired some contact information from the area's universities that might provide language translation assistance.
- CORE MPO staff members have maintained good relationship with some community members who

are bi-lingual and able to help with urgent translation services.

- The Board of Education (BOE) has some programs related to LEP students. CORE MPO staff members have initiated coordination with the Chatham County BOE to get LEP data and to possibly enlist assistance in distributing planning information to LEP families.
- MPC's SAGIS Department and the Graphics Department can help provide GIS analysis related to LEP and make easy-to-understand graphics, maps and charts.
- The existing Latino magazine for the Savannah area can help the MPO publicize meeting notices, flyers and other distributed materials.
- Planning information can be provided in written and electronic formats. Where appropriate, audiotape or large font formats will be available at request.
- The CORE MPO's Advisory Committee on Accessible Transportation (ACAT) can provide input on transportation planning and transit services.
- CAT has an organized advisory council that offers suggestions and/or observations about transit service. It is comprised of a former member of the CAT board, two frequent users of public transportation, a member of Living Independence for Everyone, LIFE, (representing the disabled community), and a representative of the Latin American Services Organization, LASO (representing the Latino community).
- Transit-related information is available in Spanish and posted on all buses. This information includes fares, half-fare policies and where to apply for a CAT half-fare identification card, and courtesy rules for riding the bus.
- CAT has published advertisements promoting transit in the leading Spanish-speaking newspaper, La Voz. Spanish-speaking customers can call CAT's phone number to get transit information in Spanish.
- CAT has a recording in Spanish available 24 hours each day that gives basic information on the transit system. Callers are prompted in Spanish to access this translated information.
- Two transit agents responsible for providing schedule and route information received training in Business Spanish to assist in responding to customer queries in Spanish.

Language Assistance Plan

The LEP guidance recommends consideration of the following measures for LEP language assistance:

- Types of language services available;
- How staff can obtain those services;
- How to respond to LEP callers;
- How to respond to written communications from LEP persons;
- How to respond to LEP individuals who have in-person contact with staff; and
- How to ensure competency of interpreters and translation services.

CORE MPO makes efforts to engage in partnerships with or enlist help from federal, state, and local agencies as well as multi-lingual community volunteers/organizers to provide language translation and interpretation services within the scope of available funding. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language; and/or translation, which means the written transfer or a message from one language into another language.

Translation of all CORE MPO plans and materials is not possible at this time primarily due to cost

restrictions, the barriers to meaningful translation or interpretation of technical planning documents, the existence of multiple dialects within a single language group, and other relevant factors. However, CORE MPO will assess the provision of limited oral language services to LEP individuals such as the following:

- Identifying points of contact where a LEP person interacts with an organization,
- Identifying staff language capabilities, and
- Identifying outside resources, both paid and unpaid and the cost of these services.

Currently only Spanish speaking LEP persons are indentified in the Savannah area as reaching the Safe Harbor threshold (more than 1,000 persons) for which written translations of vital documents are required. At the same time, the Asian community is growing. Given the CORE MPO's and CAT's budget and the number of staff, it is deemed that written translations of all documents would be so burdensome as to defeat the legitimate objectives of our programs. The following lists what has been achieved and what is in process.

- CORE MPO has translated the Title VI/Nondiscrimination Notice to the Public and the Title VI/Nondiscrimination Complaint Form into Spanish and posted them to the MPO website and the MPC offices.
- The GDOT bi-lingual staff member has helped the CORE MPO staff to translate the survey for the 2045 MTP Update into Spanish. The MPO did receive some responses from the Hispanic version of the Survey.
- The bi-lingual MPO staff has translated the introduction on the MPO's planning process into Chinese.
- The newly updated MPC website at https://www.thempc.org/ has a Language Translation function that is based on Google Translation. The web contents can be translated into any selected language.
- CORE MPO will translate the executive summary of the 2045 MTP into Spanish since the plan has been adopted by the CORE MPO Board on August 7, 2019.
- CAT has translated the bus schedules into Spanish and distributed them on the CAT buses and on the CAT website.

Staff Training

An effective plan would include training to ensure that 1) staff knows about LEP policies and procedures; and 2) staff that have contact with the public are trained to work effectively with in-person and telephone interpreters.

CORE MPO staff members have received training in Title VI and Environmental Justice requirements that have been held by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Georgia Department of Transportation (GDOT), and other training institutions such as National Highway Institute (NHI) and National Transit Institute (NTI). Staff have also participated in various webinars on proposed federal circulars on these programs and provided comments. CAT staff members have received similar trainings as well as Business Spanish. Staff will attend future trainings as opportunities arise to keep up with the changes, and will maintain the records for these trainings as a part of the annual accomplishments.

The CORE MPO's Language Assistance Plan will be distributed to all MPC employees. The plan has been posted on the MPO website at https://www.thempc.org/Core/TitleVi. The plan will also be explained in orientation and training sessions for new employees and other staff members who are most likely to communicate with LEP individuals.

LEP Notifications

The USDOT LEP guidance offers several examples of notification to LEP individuals of language assistance:

- Posting signs in appropriate languages in intake areas and other entry points;
- Stating in outreach documents such as brochures, booklets, and other outreach and recruitment information that language services are available;
- Working with community based organizations and other stakeholders to inform LEP individuals of the programs and activities;
- Using a telephone voice mail menu in the most common languages encountered;
- Including notices in local newspapers in languages other than English;
- Airing notices on non-English language radio and television stations; and
- Giving presentations at schools and religious organizations.

CORE MPO will strive to utilize the variable tools listed above for public notification of the MPO's plans and programs as funding allows.

Monitoring and Updating the LAP

The monitoring and updating of the LAP will be coordinated with the update of the MPO's Participation Plan and Title VI Plan. The CORE MPO Board and its advisory committees will be asked to assist in the evaluation and plan update. The LAP evaluation can also be a part of the participation evaluation process for the MTP or TIP development/update. Development of an evaluation tool to assess LEP service provision and establishing a tracking system to collect primary language data are among future options for consideration.

Chapter Four: LEP Complaint Processing

The LEP complaint process will follow the Title VI / nondiscrimination complaint process of the CORE MPO. This process is posted to the MPO website at https://www.thempc.org/Core/TitleVi.