



Limited English Proficiency Plan

January 2025



TABLE OF CONTENTS

Table of Contents	1
Introduction	2
Understanding the Scope of the Limited English Proficiency Plan	2
Who is a Limited English Proficient Person?	3
Determining the Needs of Limited English Proficiency.....	3
Limited English Proficiency Self-Assessment for the North Florida TPO	4
Table 1. Population Limited English Proficiency	4
Table 2. North Florida Population Speaking a Language other than English.....	5
Map 1. Persons Speaking English Less than Very Well (age 5+)	6
Table 3. Top 3 Languages Spoken at Home in North Florida by LEP Persons.....	7
Complaint Procedure	8
LEP Updates	10
Appendix A - TITLE VI COMPLAINT FORM.....	11

INTRODUCTION

The North Florida Transportation Planning Organization (North Florida TPO or TPO) is a transportation policy making body responsible for planning and prioritizing transportation projects, and allocating funds in Clay, Duval, Nassau and St. Johns counties, Florida. The North Florida TPO works with the public, counties, five independent transportation authorities, local elected officials, community groups and the Florida Department of Transportation to develop transportation plans and programs through a *continuing, cooperative and comprehensive (3-C)* planning process.

The **Limited English Proficiency (LEP) Plan** is a tool that helps guide the actions of the North Florida TPO in this effort and shows meaningful compliance with **Title VI of the Civil Rights Act of 1964**, which prohibits discrimination based on race, color or national origin. In 1974, the U.S. Supreme Court affirmed that failure to provide those with limited English proficiency meaningful opportunities to participate in federally-funded programs is a form of national origin discrimination in violation of Title VI. Additionally, requirements are outlined in **Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency** signed August 11, 2000. Its purpose is to ensure meaningful access to programs and services to eligible persons who have limited proficiency in the English language.

In the December 14, 2005 Federal Register, (Volume 70, Number 230) the U.S. Department of Transportation (U.S. DOT) published **Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient Persons**. This guidance explicitly identifies metropolitan planning organizations (MPOs), such as the North Florida TPO, as organizations that must follow this guidance. It specifies that the Limited English Proficiency Plan must include reasonable steps to ensure meaningful access consistent with the fundamental mission of the organization, though not unduly burdening the organization.

In keeping with this guidance, the North Florida TPO has developed this plan to identify the local population with Limited English Proficiency and to provide them with meaningful access to the programs and services the TPO provides, including involvement in the TPO decision making process, while not incurring undue burdens on the organization's resources.

Understanding the Scope of the Limited English Proficiency Plan

As noted in the previous section, the Limited English Proficiency Plan applies to individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English. It does not extend to those who are proficiently multilingual or to the following:

- Individuals with hearing or visual impairments – Sign language interpretation and Braille text are accommodations provided under the Americans with Disabilities Act.
- Illiteracy – The inability to speak, read or write English and conditions that may trigger language assistance under Title VI but is distinguished Limited English Proficient (LEP)

because a person who is LEP cannot speak, read or write English, but primarily speaks, reads or writes in a language other than English.

Who is a Limited English Proficient Person?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English are considered limited English proficient or “LEP.” The U.S. Census Bureau reports data on households that are LEP and individuals who speak English “less than very well”.

Determining the Needs of Limited English Proficiency

As a recipient of federal funds, the North Florida TPO must take reasonable steps to ensure meaningful access to the information and services it provides. As noted in LEP guidance and directives, four factors should be considered when determining “reasonable steps.” The “four-factor analysis” is outlined below:

- Factor 1** **The number or proportion of LEP persons eligible to be served or likely to be encountered by the North Florida TPO’s programs, services or activities**

- Factor 2** **The frequency with which LEP individuals come in contact with these programs, services or activities**

- Factor 3** **The nature and importance of the program, service or activity in people’s lives**

- Factor 4** **The resources available and the overall cost to the TPO**

The U. S. Department of Transportation (DOT) policy guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on local assessment of the four factors listed above. What follows is a self-assessment of need in Clay, Duval, Nassau and St. Johns counties.

LIMITED ENGLISH PROFICIENCY SELF-ASSESSMENT FOR THE NORTH FLORIDA TPO

The North Florida TPO has assessed its programs and services using the following four (4) factors analysis.

Factor 1 The number or proportion of LEP persons eligible to be served or likely to be encountered by the North Florida TPO’s programs, services or activities

The broadest source of demographic data for the four counties in the TPO planning area is the American Community Survey compiled by the U.S. Census Bureau. This data is collected annually and aggregated over five years. Data reported by the U.S. Census in the American Community Survey for 2023 for persons speaking English “less than well” is a key indicator of the linguistic landscape of the region.

Demographic data for the number of LEP persons in Clay, Duval, Nassau and St. Johns counties who are eligible to be served, likely to be served, or likely to be encountered by the TPO through participation in the transportation planning process has been collected and analyzed.

As illustrated on Table 1, 72,973 persons in the region, do not speak English well or at all. This is 4.8 percent of total population age five and over.

Table 1. Population Limited English Proficiency

	Clay	Duval	Nassau	St Johns	North Florida TPO
Total Population 5+	211,752	942,590	90,169	278,738	1,523,249
Speaks English Very Well	205,101	885,768	88,739	270,668	1,450,276
Speaks English Less than Very Well	6,651	56,822	1,430	8,070	72,973
% of Total Populaton Speaks English Less than Very Well	3.1	6.0	1.6	2.9	4.8

American Community Survey 2023, 5-year estimates (Table DP02)

As illustrated on **Table 2** on the following page, 13.6 percent of the population for the four-county region age five and over speaks a language other than English.

Table 2. North Florida Population Speaking a Language other than English

	Population (5 years and over)	Speak a Language other than English	Population Speaking Spanish	Population Speaking other Indo-European	Population Speaking Asian and Pacific Island Languages	Population Speaking other Languages
Clay	211,752	22,120	13,591	4,005	3,705	819
Duval	942,590	149,269	74,863	35,829	26,845	11,732
Nassau	90,169	4,751	2,762	1,026	690	273
St. Johns	278,738	30,425	13,788	11,427	4,493	717
North Florida TPO	1,523,249	206,565	105,004	52,287	35,733	13,541
Percent		13.6%	6.9%	3.4%	2.3%	0.9%

American Community Survey 2023, 5-year estimates (Table DP02)

Map 1 on page 7 illustrates the geographic distribution of this population. The percentages shown are of persons speaking English less than very well.

Table 3 depicts the percentage of LEP persons age five and older by language in Clay, Duval, Nassau and St. Johns counties. As illustrated, the percentage of LEP population in the North Florida region is well below the same for both the state and nation. Five percent of the total population age five and older that speaks Spanish speaks English “less than very well.” The percentage of LEP persons who speak Indo European and Asian and Pacific Island languages is even lower.

Table 3. Top 3 Languages Spoken at Home in North Florida by LEP Persons

County	Population Estimate (5 years and older)	Number of LEP Persons	%	LEP Persons Who Speak Spanish		LEP Persons Who Speak Indo-European Languages		LEP Persons Who Speak Asian and Pacific Island Languages	
				Estimate	%	Estimate	%	Estimate	%
Clay	211,752	6,651	3.1%	6,651	3.1%	724	0.3%	1,437	0.7%
Duval	942,590	56,822	6.0%	56,822	6.0%	12,195	1.3%	11,440	1.2%
Nassau	90,169	1,430	1.6%	1,116	1.2%	1,026	1.1%	240	0.3%
St. Johns	278,738	8,070	2.9%	3,492	1.3%	3,368	1.2%	1,120	0.4%
North Florida TPO	1,523,249	72,973	4.8%	68,081	4.5%	17,313	1.1%	14,237	0.9%
Florida	20,814,553	2,517,985	12.1%	1,962,878	9.4%	377,252	1.8%	139,225	0.7%
United States	313,447,641	26,299,012	8.4%	16,642,933	5.3%	3,637,966	1.2%	4,890,240	1.6%

Factor 2 The frequency with which LEP individuals come in contact with these programs, services or activities.

The four-factor analysis did not identify a predominant language spoken by the LEP population in the area covered by the North Florida TPO. Five percent of the English speaking population in the region also speaks Spanish. For this reason, the TPO does and will continue to provide the Title VI complaint form and instructions in Spanish. The form is provided in Appendix A. It should be noted that the LEP frequency of five percent is considerably less than the statewide average of twelve percent.

The North Florida TPO conducts regular board meetings, advisory committee meetings and public meetings throughout the year. The frequency of contact with LEP persons is difficult to anticipate. The North Florida TPO has received no translation requests since publicizing the LEP Plan in 2012. A TPO staff member who speaks Spanish is also available for translation and interpretation.

This service is available for other meetings as needed.

The TPO website has translation software available at the bottom of the page (SELECT LANGUAGE). The user can select a language that will translate text on the North Florida TPO webpage (www.northfloridatpo.com). It will not translate documents. Documents can be translated upon request.

Complaint Procedure

Title VI Complaint Forms are available in Spanish. A copy is included in **Appendix A**. A complaint may be given orally. An interpreter will be provided if needed.

Complaints should be directed to **Marci Larson**, Public Affairs Manager/Title VI Officer

904-306-7513

mlarson@northfloridatpo.com

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

The North Florida TPO's programs use federal funds to plan for future transportation projects and improvements and therefore do not include any direct service or program that requires vital, immediate or emergency assistance such as medical treatment or services for basic needs (food and shelter). The North Florida TPO does not conduct interviews, receive applications or other activities required to participate in federal or state programs or events. Citizen involvement in TPO committees and TPO public involvement activities are voluntary.

The North Florida TPO, however, is committed to ensuring that all citizens regardless of race, ethnicity, income, including LEP persons, have the opportunity to participate in the transportation planning process consistent with the Federal Environmental Justice program and policy.

The impact of proposed transportation investments on under-served and under-represented population groups is part of the evaluation process using federal funds for three major areas:

- ◆ The biennial **Unified Planning Work Program (UPWP)** is the TPO's two-year task-based budget
- ◆ The five-year **Transportation Improvement Program (TIP)** is updated annually
- ◆ The **Long Range Transportation Plan (LRTP)** has a 20-year planning horizon and is updated every five years.

Participation of the underserved is encouraged in outreach related to these and other North Florida TPO activities. The North Florida TPO is committed to ensuring opportunities for participation by all stakeholders and every effort is made to have an inclusive planning process.

Given the size of the LEP population (approximately one half the national LEP population and one third the statewide LEP population,) it is not considered necessary to translate the TPOs major planning documents at this time. The TPO is committed to providing the Title VI Complaint Procedure and Complaint Form in both English and Spanish and will revisit this data regularly to be cognizant of changing demographics.

Factor 4 The resources available and the overall cost to the TPO.

The approximate cost of full translation of the major reports produced by the North Florida TPO into any language other than English is shown in Table 4.

As noted in Factor 3, current demographics do not warrant publication of TPO documents in a language other than English at this time and given the cost of doing so, it would not be fiscally prudent to do so.

The LEP Plan will be revisited regularly to consider changing demographics.

LEP Updates

The North Florida TPO is committed to providing access to all and does not intend that this LEP Plan exclude access to anyone requiring language assistance. We will continue to accommodate all reasonable requests. As noted in all advertisements, with 72-hour notice, we will meet all special requests. Anyone who requires special language services should contact the North Florida TPO's Public Affairs Manager/Title VI Coordinator.

Name: Marci Larson

Telephone: 904-306-7513

Toll Free: 1-888-488-4898, ask for Marci Larson

Email: mlarson@northfloridatpo.com

Hearing & Speech Impaired call 711 FL Relay System

APPENDIX A - TITLE VI COMPLAINT FORM



Queja de Discriminación

a. Nombre: _____

b. Direccion: _____

c. Telefono: _____

d. Fecha en que ocurrio el alegado acto discriminatorio: _____

e. Declaracion: _____

Use papel adicional si es necesario.