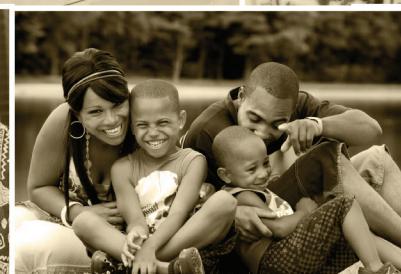


HAMPTON ROADS TRANSPORTATION PLANNING ORGANIZATION

TITLE VI & LEP PLAN

Title VI, Environmental Justice
and Limited English Proficiency



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Report Documentation

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Title VI Plan

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Abstract

Title VI of the Civil Rights Act of 1964 states, “*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.*” Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. The Hampton Roads Transportation Planning Organization (HRTPO) Title VI and LEP Plan was developed to ensure the HRTPO is in compliance with nondiscrimination requirements as outlined in Title 23 CFR and 49 CFR and related laws and provides specific information on how to file a nondiscrimination complaint.

A Limited English Proficient person is one who does not speak English as their primary language and/or has a limited ability to read, speak, write, or understand English very well. The Hampton Roads Transportation Planning Organization (HRTPO) Limited English Proficiency (LEP) Plan is part of a comprehensive effort to provide language assistance for LEP persons seeking meaningful access to HRTPO plans, programs, and activities as required by Executive Order 13166.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, and guidelines to notify LEP persons that assistance is available. In developing this LEP Plan, the HRTPO staff conducted a U.S. Department of Transportation (USDOT) Four-Factor LEP analysis, which considers the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HRTPO programs, activities, or services;
2. The frequency with which LEP individuals come in contact with HRTPO programs, activities, or services;
3. The nature and importance of the program, activity or service provided by the HRTPO to the LEP population; and
4. The resources available to the HRTPO and overall cost to provide LEP assistance.

This Plan provides an overview of Environmental Justice and Limited English Proficiency (LEP) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, Environmental Justice and LEP are incorporated into the metropolitan transportation planning process. Environmental Justice guidelines and outreach strategies for minority, low-income, and LEP populations are included within the HRTPO Public Participation Plan, completed in the Fall of 2012.

For more information about this plan, please contact the HRTPO Public Involvement and Title VI Administrator at (757) 420-8300 or kmiller@hrtpo.org

Acknowledgements

This report was prepared by the HRTPO in cooperation with the U.S. Department of Transportation (USDOT), the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Virginia Department of Transportation (VDOT), the Transportation District Commission of Hampton Roads (TDCHR) – known as the Hampton Roads Transit (HRT), and the Williamsburg Area Transit Authority (WATA). The contents of this report reflect the views of the HRTPO. The contents do not necessarily reflect the official views or policies of the FHWA, FTA, HRT, WATA, VDOT, TDCHR, Department of Rail and Public Transportation (DRPT), or Hampton Roads Planning District Commission. FHWA, FTA or VDOT acceptance of this plan is not evidence of fulfillment of the requirements of this agency, nor does not constitute endorsement/approval of the need for any recommended policies or a commitment to fund any such policies. Additional assessments may be necessary.

This report was included as a work element in the FY 2012 Unified Planning Work Program (UPWP), which was approved by the HRTPO at its April 2012 meeting. FHWA approved the original Title VI Plan in August of 2010. The last administrative update was made to the Title VI Plan in February of 2011. The LEP Plan was included as a work element in the FY 2012 Unified Planning Work Program (UPWP), which was approved by the HRTPO on June 16, 2011. It was updated to reflect changes in internal staff and partner agencies, in May of 2012.

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Purpose

The Hampton Roads Transportation Planning Organization (HRTPO), as a sub-recipient of federal financial assistance, is required to comply with Title VI and subsequent nondiscrimination laws, as well as provide an overview of how the HRTPO addresses Executive Order 12898 on Environmental Justice and Executive Order 13166 on Limited English Proficiency (LEP). The purpose of this Title VI/LEP Plan is to describe the measures taken by the HRTPO to assure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws, Environmental Justice, and LEP.

Hampton Roads Transportation Planning Organization

The HRTPO, for which this Title VI/LEP Plan is applicable, is the metropolitan planning organization (MPO) for the Hampton Roads area. As such, it is a federally mandated transportation policy board comprised of representatives from local, state, and federal governments, transit agencies, and other stakeholders and is responsible for transportation planning and programming for the Hampton Roads Metropolitan Planning Area (MPA). Any highway or transit project or program to be constructed or conducted within the MPA and to be paid for with Federal funds, must receive approval by the HRTPO before any Federal funds can be expended. In addition, any highway or transit project deemed to be regionally-significant, regardless of the source(s) of funding, must receive HRTPO approval to proceed. The Hampton Roads MPA includes the cities of Chesapeake, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach, and Williamsburg; the counties of Isle of Wight, James City, and York; and a portion of Gloucester County.

Policy Statement and Authorities

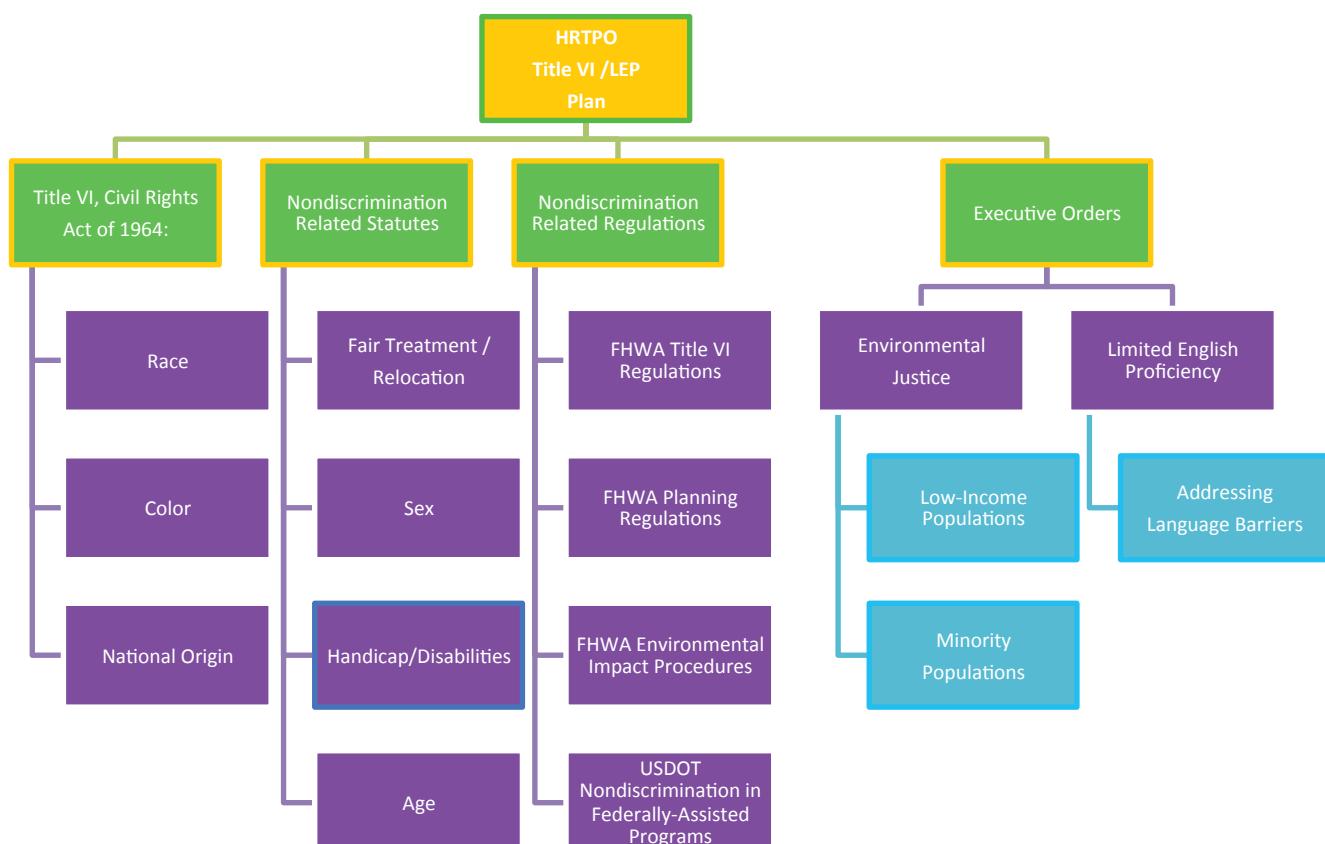
The HRTPO assures that no person shall, on the grounds of race, color, national origin, handicap, sex, age or income status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (Public Law 100-259) and subsequent nondiscrimination laws and related authorities, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The HRTPO further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. In the event the HRTPO distributes federal-aid funds to another governmental entity, the HRTPO will include Title VI language in all written agreements and will monitor for compliance. The HRTPO Executive Director is responsible for ensuring implementation of the organization's Title VI Plan. The Title VI Administrator, under supervision of the Executive Director, is responsible for coordinating the overall administration of the Title VI/LEP Plan and assurances. The authorities that provide guidance on Title VI and related nondiscrimination laws, regulations, and executive orders can be found in the "Title VI and Other Nondiscrimination Laws" section of this document.

Introduction

Title VI of the Civil Rights Act of 1964 prohibits federal agencies and sub-recipients of federal funds from discriminating, on the basis of race, color or national origin, against participants or clients of programs that receive Federal funding. Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. This document addresses prohibition of discrimination as mandated by Title VI as well as by the authorities listed in the following section.

In addition to nondiscrimination, this document provides information regarding two Presidential Executive Orders pertaining to fairness and inclusiveness. Executive Order 12898 mandates that federal agencies address equity and fairness, or Environmental Justice, toward low-income and minority persons and populations. Executive Order 13166 mandates that federal agencies ensure that people who have Limited English Proficiency (LEP) have meaningful access to federally-conducted and/or funded programs and activities. Detailed Environmental Justice guidelines and outreach strategies for minority, low-income, and LEP populations to comply with Executive Order 12898 and Executive Order 13166 are included each as a separate chapter within the HRTPO Public Participation Plan, completed in the Fall of 2009.

The chart below depicts the nondiscrimination authorities addressed in the HRTPO Title VI/LEP Plan.



Title VI and Other Nondiscrimination authorities

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all of the Civil Rights Act titles:

I. Voting Rights	VII. Equal Employment Opportunity
II. Public Accommodation	VIII. Registration and Voting Statistics
III. Desegregation of Public Facilities	IX. Intervention and Procedure after Removal in Civil Rights Cases
IV. Desegregation of Public Education	X. Establishment of Community Relations Service
V. Commission on Civil Rights	XI. Miscellaneous

VI. Nondiscrimination in Federally Assisted Programs and Activities

Title VI “declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy.” Any organization that receives Federal funds is bound to comply with Title VI.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

- **The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal and federal-aid programs and projects.
- **The Federal Aid Highway Act of 1973** states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.
- **Section 504 of the Rehabilitation Act of 1973** states that no qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.
- **The Age Discrimination Act of 1975** states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
- **The Civil Rights Restoration Act of 1987, P.L.100-209** amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.
- **The American Disabilities Act (ADA) of 1990** prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.

- **23 CFR Part 200** – Federal Highway Administration regulations: Title VI Program and Related Statutes – Implementation and Review Procedures.
- **49 CFR Part 21** – Nondiscrimination in Federally-Assisted Programs.
- **23 CFR Part 450** – Federal Highway Administration planning regulations.
- **23 CFR Part 771** – Federal Highway Administration regulations, Environmental Impact Procedures.

In addition to the laws listed above, two executive orders must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

- **Executive Order 12898** – Environmental Justice (February 11, 1994), a presidential mandate to address equity and fairness toward low-income and minority persons/population. Executive Order 12898 organized and explained the federal government's commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission. U.S. DOT Order 5610.2 (April 15, 1997) expanded upon Executive Order 12898 requirements and describes process for incorporating Environmental Justice principles into DOT programs, policies, and activities. FHWA Order 6640.23 (December 2, 1998) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.
- **DOT Order 5610.2** on Environmental Justice summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration(FTA), or other U.S. DOT components.
- **Executive Order 13166** – Limited English Proficiency (August 11, 2000), a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with Limited English Proficiency to federally-conducted and federally assisted programs and activities.
- **The National Environmental Policy Act (NEPA) of 1969** addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for “all Americans, safe, healthful, productive and aesthetically pleasing surroundings,” and provides a requirement for taking a “systematic interdisciplinary approach” to aid in considering environmental and community factors in decision-making.
- **FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning** - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

Environmental Justice

On February 11, 1994, President William J. Clinton signed **Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**, which directs federal agencies to develop strategies to help them identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. The Executive Order was also intended to provide minority and low-income communities with access to public information and opportunities for public participation in matters relating to human health or the environment.

Adverse effects as described in Executive Order 12898 is the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to:

- Bodily impairment, infirmity, illness or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of:
 - man-made or natural resources
 - aesthetic values
 - community cohesion or a community's economic vitality
 - the availability of public and private facilities and services
- Adverse employment effects.
- Displacement of persons, businesses, farms, or non-profit organizations.
- Increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community.
- Denial of, reduction in, or significant delay in the receipt of benefits of the HRTPO programs, policies, or activities.

Environmental Justice joins social and environmental movements by addressing the unequal environmental burden often borne by minority and low-income populations. The right to a safe, healthy, productive, and sustainable environment for all, where “environment” is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments.

Environmental Justice helps to ensure that programs, policies, and activities that have adverse effects on communities do not affect minority and low-income populations disproportionately. To prevent discrimination as described in Executive Order 12898, the *Federal Highway Administration Order 6640.23 Order To Address Environmental Justice in Minority Populations and Low-Income Populations* dated December 2, 1998 defines minority and low-income individuals and populations as follows:

Minority – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:

- **Black** – a person having origins in any of the black racial groups of Africa.
- **Hispanic** – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **American Indian and Alaskan Native** – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.

- **Asian American** – a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific islands.

Minority Population – any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.

Low-Income – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.

Low-Income Population – any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed program, policy or activity.

Environmental Justice is incorporated through all phases of the transportation planning and programming process. Environmental Justice Guidelines for the HRTPO have been developed and are included as a chapter within the updated HRTPO Public Participation Plan, completed in the Fall of 2012 and within the 2034 Hampton Roads Long-Range Transportation Plan. The HRTPO Environmental Justice Guidelines include maps identifying underserved communities, outreach strategies, benefits/burdens methodologies, and an evaluation component.

Limited English Proficiency

On August 11, 2000, President William J. Clinton 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. The Executive Order also requires that federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. These individuals may be entitled to language assistance at no cost to them with respect to a particular type of service, benefit, or encounter.

The United States Department of Transportation guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. Demography: number and/or proportion of LEP persons served and languages spoken in service area.
2. Frequency: rate of contact with service or program.
3. Importance: nature and importance of program/service to people’s lives.
4. Resources: available resources, including language assistance services.

The four-factor analysis should be used to determine which language assistance services are appropriate to address

the identified needs of the LEP population. More information regarding the identification of LEP individuals within the community as well as outreach strategies are included within the HRTPO Public Participation Plan.

HRTPO Title VI Administrator

The HRTPO Title VI Administrator is generally responsible for overseeing compliance with applicable nondiscrimination authorities in each of the metropolitan transportation planning and programming areas. Other staff members are expected to provide information and support to assist the Administrator member perform his or her tasks.

Responsibilities of the Title VI Administrator

The Title VI Administrator is responsible for supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the HRTPO Title VI/LEP Plan. In support of this, the Title VI Administrator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the HRTPO. Any individual may exercise his or her right to file a complaint with the HRTPO, if that person believes that he or she or any other program beneficiaries have been subjected to discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, sex, handicap, age, or income status. The HRTPO will make a concerted effort to resolve complaints in accordance with Discrimination Complaint Procedures.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the HRTPO Title VI/LEP Plan.
- Periodically review the HRTPO Title VI/LEP Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with staff involved with Consultant Contracts and the sub-recipient found to not be noncompliant, to resolve the deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this document.
- Review important issues related to nondiscrimination with the Executive Director, as needed.
- Maintain a list of Interpretation Service Providers.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the nondiscrimination authorities. The HRTPO Title VI/LEP Plan is to be disseminated to HRTPO employees, contractors, the general public, and any of the HRTPO services.
- Coordinate with appropriate federal, state, and regional entities to periodically provide HRTPO employees with training opportunities regarding nondiscrimination.

Questions

For questions on the HRTPO Title VI/LEP Plan and procedures, please contact Kendall Miller, Title VI Administrator at (757) 420-8300 or by email at TitleVIAdministrator@hrtpo.org. For information on the HRTPO's work programs or publications, please see the HRTPO website at www.hrtpo.org.

HRTPO Responsibilities

The HRTPO ensures compliance with all applicable nondiscrimination authorities and with regard to the following:

- Communications and Public Participation
- Planning and Programming
- Environmental Justice
- Consultant Contracts
- Education and Training

In addition to the responsibilities listed in this section, responsibilities may include reviewing Title VI guidelines and procedures for the HRTPO Title VI Plan, and incorporating Title VI-related language and provisions into HRTPO documents, as appropriate.

Communications and Public Participation

As described in the HRTPO's Public Participation Plan, since transportation has a direct and personal impact on the population of a region and is of critical importance to economic vitality and quality of life, the HRTPO continually endeavors to provide citizens, affected public agencies, and other interested parties with reasonable opportunities to be involved in the transportation planning process.

Note: The Communications and Public Participation area applies to and affects the HRTPO work program as a whole, particularly HRTPO efforts and responsibilities related to the Planning and Programming and Environmental Justice areas. The updated HRTPO Public Participation Plan includes specific information regarding outreach and communication strategies and detailed Environmental Justice guidelines. Special emphasis is placed on outreach strategies for minority, low-income, and LEP populations.

HRTPO Responsibilities

Under the guidance of the Title VI Administrator, the HRTPO is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the HRTPO public participation process. The HRTPO will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Develop and distribute information on nondiscrimination and HRTPO programs to the general public.
- Provide services for individuals with special needs – Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings. Notifications of opportunities for public participation will include contact information for people needing these or other special accommodations.
- Include contact information for people needing these or other special accommodations.
- Include the following statement in all of the HRTPO public notices:

“The HRTPO will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Contact the Public Involvement and Community Outreach Administrator at (757) 420-8300 for more information.

- Include the Title VI Statement to the public (see Appendix 2) in relevant press releases and on the HRTPO website.

Planning and Programming

- The HRTPO is responsible for developing long- and short-range transportation plans and programs to provide efficient transportation services for the Hampton Roads Metropolitan Area. A comprehensive transportation process is used which entails the monitoring and collection of various data pertaining to transportation issues. The HRTPO coordinates with VDOT, DRPT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed. An outreach plan for long-range transportation plan updates is included within the Public Participation Plan.

HRTPO Responsibilities

The HRTPO is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the HRTPO planning and programming processes. The HRTPO Title VI Administrator will:

- Ensure that all aspects of the planning and programming process operation comply with nondiscrimination authorities.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Make the document available to the public and member agencies on the HRTPO website or in hard copy format, if requested.
- Continue to ensure that staff makes concerted efforts to involve members of all social, economic, and ethnic groups in the planning process.

Environmental Justice

The concept of Environmental Justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of regional transportation planning, Environmental Justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

HRTPO Responsibilities

The Title VI Administrator is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the HRTPO efforts to address Environmental Justice. HRTPO staff will:

- Ensure that all aspects of efforts to address Environmental Justice comply with nondiscrimination authorities.
- Create an Environmental Justice/Title VI Methodology that will be used as the basis upon which to conduct Environmental Justice analysis during the development of the Long-Range Transportation Plan.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Ensure the updated HRTPO Public Participation Plan includes Environmental Justice guidelines, which outlines outreach strategies for minority, low-income, and LEP populations during the development and implementation of HRTPO plans and programs.
- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all HRTPO public participation procedures.

Consultant Contracts

The HRTPO is responsible for selection, negotiation, and administration of its consultant contracts. The HRTPO operates under its internal contract procedures and all relevant federal and state laws.

HRTPO Responsibilities

Under the guidance of the Title VI Administrator, who is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities, HRTPO staff will:

- Ensure inclusion of nondiscrimination language in contracts and Requests for Proposals (RFPs).
- Review consultants for compliance as described below:
 - Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.
 - If a recipient or sub-recipients is found to be not in compliance with nondiscrimination authorities, the Title VI Administrator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.

Education and Training

In an effort to continuously improve the HRTPO's overall compliance posture, nondiscrimination training will be coordinated with FHWA, VDOT, DRPT, HRT, and WATA, and made available to HRTPO staff on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes.

HRTPO Responsibilities

Under the category of education and training, nondiscrimination responsibilities include:

- Distribution of information to HRTPO staff on training programs regarding Title VI and related statutes.
- Tracking staff participation in nondiscrimination training.
- Maintain and update nondiscrimination training as necessary.
- Maintain and update the HRTPO Title VI Plan as necessary.

Discrimination Complaint Procedures

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws and Presidential Executive Orders added handicap, sex, age, income status and limited English proficiency to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a sub-recipient of federal assistance, the HRTPO has adopted a Discrimination Complaint Procedure as part of its Title VI Plan to comply with Title VI and associated statutes.

- I. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the HRTPO. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the HRTPO Title VI Administrator for review and action.

2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a. The date of the alleged act of discrimination; or
 - b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In case, the recipient or his/her designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should 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 to an officer or employee of the recipient, the person shall be interviewed by the Title VI Administrator. If necessary, the Title VI Administrator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Within 10 days, the HRTPO Title VI Administrator will acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA).
5. Within 10 days, a letter will be sent to the VDOT Central Office, Civil Rights Division, and a copy to the FHWA Virginia Division Office. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
6. In the case of a complaint against the HRTPO, a VDOT investigator will prepare a final investigative report and send it to the complainant, respondent (HRTPO person listed), the HRTPO Title VI Administrator, and FHWA Virginia Division.
7. Generally, the following information will be included in every notification to the VDOT Office of Civil Rights:
 - a. Name, address, and phone number of the complainant.
 - b. Name(s) and address(es) of alleged discriminating official(s).
 - c. Basis of complaint (i.e., race, color, national origin, sex, age, handicap/disability, income status, limited English proficiency).
 - d. Date of 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 raised in the complaint.

8. Within 60 days, the HRTPO Title VI Administrator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director of the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
9. Within 90 days of receipt of the complaint, the HRTPO Title VI Administrator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the Virginia Department of Transportation or the Federal Highway Administration, if they are dissatisfied with the final decision rendered by the HRTPO. The HRTPO's Title VI Administrator will also provide the VDOT Civil Rights Central Office with a copy of the determination and report findings.
10. In the case a nondiscrimination complaint that was originated at the HRTPO is turned over to and investigated by VDOT, FHWA or another agency, the HRTPO Title VI Administrator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and VDOT policies and procedures.
11. In accordance with federal law, the HRTPO will require that applicants of federal assistance notify the HRTPO of any law suits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
12. The HRTPO will submit Title VI accomplishment reports to the VDOT Central Office, Civil Rights Division, in compliance with VDOT's established processes.
13. The HRTPO will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR and VDOT's established procedures and guidelines.
14. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the HRTPO will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the HRTPO.
15. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act.

Appendix A: Discrimination Complaint Form

Please provide the following information in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Hampton Roads Transportation Planning Organization, Title VI Administrator, 723 Woodlake Drive, Chesapeake, VA 23320.

You can reach our office Monday-Friday from 8:00am to 4:30pm at (757) 420-8300, or you can email the HRTPO Title VI Administrator at TitleVIAdministrator@hrtpo.org.

Complainant's Name:

Street Address:

City:

State:

Zip Code:

Telephone No. (Home):

(Business):

Email Address:

Person discriminated against (if other than complainant):

Name:

Street Address:

City:

State:

Zip Code:

Telephone No.:

The name and address of the agency, institution, or department you believe discriminated against you.

Name:

Street Address:

City:

State:

Zip Code:

Date of incident resulting in discrimination:

Describe how you were discriminated against. What happened and who was responsible? If additional space is required, please either use back of form or attach extra sheets to form.

Does this complaint involve a specific individual(s) associated with the HRTPO? If yes, please provide the name(s) of the individual(s), if known.

Where did the incident take place?

Are there any witnesses? If so, please provide their contact information:

Name:

Street Address: _____

City: _____ State: _____ Zip Code: _____

Telephone No.: _____

Name: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Telephone No.: _____

Did you file this complaint with another federal, state or local agency; or with a federal or state court?

Yes

No

If answer is Yes, check each agency complaint was filed with:

Federal Agency

Federal Court

State Agency

State Court

Local Agency

Other

Please provide contact person information for the agency you also filed the complaint with:

Name: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Date Filed: _____

Sign the complaint in the space below. Attach any documents you believe support your complaint.

Complainant's Signature _____

Signature Date _____

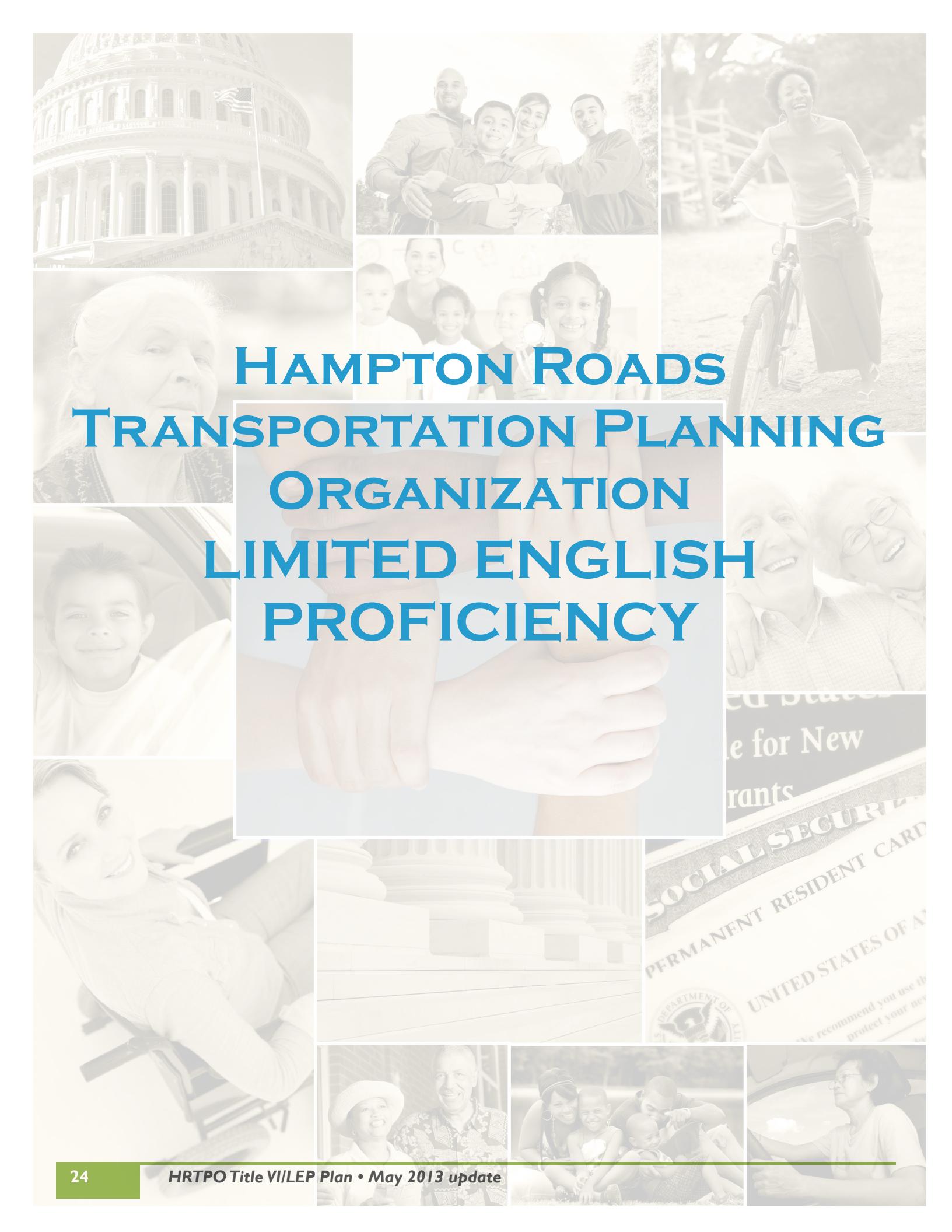
For Internal Use Only:

Log #: _____

Appendix B: Notice to the Public

In order to comply with 49 CFR Section 21.9(d), the HRTPO shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The paragraph below will be inserted into all significant publications that are distributed to the public, such as future versions and updates of the Long-Range Transportation Plan, Transportation Improvement Program, and Unified Planning Work Program. The text will be placed permanently on the HRTPO's website (<http://www.hrtpo.org>).

"The Hampton Roads Transportation Planning Organization (HRTPO) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Discrimination Complaint Form, see www.hrtpo.org or call (757) 420-8300.



HAMPTON ROADS TRANSPORTATION PLANNING ORGANIZATION LIMITED ENGLISH PROFICIENCY

As a recipient of federal funds, the HRTPO follows the United States Department of Transportation Policy Guidance (U.S. DOT 2005) concerning recipients' responsibilities to limited English proficient (LEP) persons. Individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English are limited English proficient, or "LEP." HRTPO's Title VI and LEP Guide is intended to guide the agency in the provision of meaningful access to its services, programs and activities by LEP persons.

In 2007, the FTA's Office of Civil Rights released a handbook – implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons – to provide recipients with technical assistance to implement federal guidelines. The U.S. DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The Federal Transit Administration updated the Title VI Circular to 4702.1B – Title VI and Title VI-Dependent Guidelines for FTA Recipients – in October 2012. This revised circular provides guidance to grantees on how to comply with Title VI regulations and specifies recommended steps to ensure grantees provide meaningful language access to persons who are limited English proficient.

Introduction

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English very well. The purpose of this Limited English Proficiency Plan is to outline the responsibilities of the Hampton Roads Transportation Planning Organization (HRTPO) in regards to Limited English Proficient (LEP) persons and establish a process for providing assistance to LEP persons for HRTPO programs, activities, and services pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

Title VI 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."

Executive Order 13166

Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of *national origin* discrimination. Executive Order 13166 "*Improving Access to Services for Persons With Limited English Proficiency*," directs each Federal agency that is subject to the requirements of Title VI of the Civil Rights Act of 1964 to publish guidance for its respective recipients and sub-recipients clarifying that obligation. The U.S. Department of Transportation (USDOT) published policy guidance on December 14, 2005 to clarify the responsibilities of recipients of Federal financial assistance from the USDOT.

HRTPO staff has developed the Title VI/Limited English Proficiency(LEP) strategy to provide language assistance for LEP persons seeking meaningful access to HRTPO programs as required by Executive Order 13166 and USDOT's policy guidance. This strategy details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, and guidelines to notify LEP persons that assistance is available. In developing the HRTPO LEP strategy, the HRTPO staff undertook a USDOT Four-Factor LEP analysis, which considers the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HRTPO programs, activities, or services.
2. The frequency with which LEP individuals come in contact with HRTPO programs, activities, or services;
3. The nature and importance of the program, activity or service provided by the HRTPO to the LEP population; and
4. The resources available to the HRTPO and overall cost to provide LEP assistance.

Four Factor Analysis

FACTOR I: Number or proportion of LEP persons eligible to be served or likely to encounter HRTPO programs, activities, or services.

Using 2006-2010 American Community Survey (ACS) 5-Year Estimates from the US Census Bureau, it was determined that 8.57% of the Hampton Roads population 5 years and older speak a language other than English. Of those, 2.83% or 42,928 are considered LEP persons, defined as individuals who speak English less than “very well”. The largest language subpopulation within the LEP population was that of Spanish or Spanish Creole, which has 18,974 LEP persons 5 years and older. This is followed by Asian and Pacific Island speaking LEP persons (14,363), Indo-European speaking LEP persons (7,525), and LEP persons speaking a language not in one of the aforementioned categories (2,067). See Appendix B for further details.

To create a visual display of language speakers throughout Hampton Roads, the information above was mapped by US Census Tract, defined as small, relatively permanent statistical subdivisions of a county. The lingual diversity map identifies the location of speakers of languages other than English, including those areas deemed “critical” (one standard deviation above the average number of linguistically diverse persons per census tract). Individual language categories (Spanish and Spanish Creole, Indo-European, Asian and Pacific Island, and Other Languages) are also mapped, likewise identifying the location of respective language speakers and those areas considered critical. The lingual diversity map is then related against mapped LEP population data to relate LEP concentrations to lingual-diverse census tracts in the region. The relationship finds LEP populations are largely contained in linguistically diverse areas of the region, indicating clustering of lingual neighborhoods to enclaves. See Appendix D and E for the maps pertaining to lingual diversity and the relationship to LEP populations.

To help identify potential languages within these general LEP language categorizations, the HRTPO staff consulted 2006-2010 American Community Survey 5-Year Estimates: *Language Spoken at Home by Ability to Speak English for the Population 5 years and Over*. These estimates provide a detailed language population count for unique languages spoken in counties across the United States. Analyzing the data from 2006-2010 ACS 5-Year Estimates, the top three LEP languages spoken at home throughout Hampton Roads include Spanish or Spanish Creole (18,974 or 1.25%), Tagalog (5,680 or 0.37%), and Korean (2,380 or 0.16%) (Appendix C). Other predominant LEP languages spoken at home throughout the region include

Table I: LEP Languages spoken at Home

Indo-European	Asian and Pacific Islander	Other
Spanish or Spanish Creole	Tagalog	African languages
French or French Creole	Korean	Arabic
Russian	Vietnamese	
German	Chinese	

#- Exceeds 1% Regional Population. See Appendix C for detailed information.

FACTOR 2: Frequency with which LEP individuals come in contact with HRTPO programs, activities, or services.

The HRTPO assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying public meeting attendees. No previous LEP requests have been received thus far. Documentation of LEP requests will be done annually upon implementation of the 2013 Title VI/LEP Plan.

FACTOR 3: Nature and importance of the program, activity or service provided by the HRTPO to the LEP population.

To assess the nature and importance of the programs, activities, and services provided by the HRTPO to LEP persons and the general community, the HRTPO conducted an internal and external review:

Internal Review

Internally, HRTPO staff evaluated programs and services based on the HRTPO's function as the regional entity responsible for transportation planning in the Hampton Roads region, the potential public interest, and the impact upon the quality of life of the public by HRTPO functions. Per evaluation of HRTPO programs, documents, and services, it was determined the following documents could be seen as vital documents:

- Long Range Transportation Plan
- Transportation Improvement Plan
- Unified Planning Work Program
- Public Participation Plan

Based on this evaluation and the language assessment in Factor I of the Four Factor analysis, the staff will seek partner organizations proficient in Spanish to provide information about HRTPO plans and programs. Translation and/or interpretation services, for Spanish and other languages, will be considered upon request and in coordination with partner agencies in the region. Furthermore, public meeting notices would be classified as vital documents requiring translation services. To facilitate the translation process for public meeting notices, the staff will prepare a template for the selected primary LEP language.

If any notice or document bears a direct impact toward a localized population that meets or exceeds the LEP Safe Harbor clause, then the notice or document will be considered for translation as described previously, to include translating notices and key information contained within vital documents. Federal law provides a "safe harbor" which means that if an MPO provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for MPOs 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. 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. 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.

External Review

Externally, a public outreach effort within the identified language communities will be conducted. Community groups that work with the Spanish or Spanish Creole, Tagalog, and Korean populations will be outreached for their input. In this outreach, the HRTPO staff will provide community groups a synopsis of what the primary purpose and functions of the Hampton Roads Transportation Planning Organization are and ask what key issues, programs, services, and activities they perceive as critical. These will be noted in the transportation planning process and sent forward to the appropriate agency and/or locality as applicable.

FACTOR 4: Resources available to the HRTPO and overall costs to provide LEP assistance.

The HRTPO assessment for available resources is an ongoing activity. HRTPO staff will conduct outreach to identify volunteer interpreters, civic groups, and community organizations to further coordinate language assistance services. A database of cost-based translations services has also been prepared.

Table 2: HRTPO/HRPDC Language List

Farsi	Portuguese
French	Spanish
German	Tagalong

The following sections provide more details about how HRTPO staff will provide assistance for persons of Limited English Proficiency, train staff, distribute LEP information to the public, and monitor the LEP plan. Finally, [Appendix G](#) provides HRTPO Nondiscrimination Complaint Procedures and a Discrimination Complaint Form.

How to Identify an LEP Person who Needs Language Assistance

- Examine records of requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- Set up a sign-in sheet table at HRTPO-sponsored events, have a staff member greet and briefly speak to attendees to informally gauge the attendee's ability to speak and understand English;
- Have the Census Bureau's "I Speak Cards" at workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings;
- Post a notice of available language assistance in the HRTPO reception area; and
- Post a notice of available language assistance on the HRTPO website.

Language Assistance Measures

When an interpreter is needed, in person or on the telephone, HRTPO staff will first determine what language is required. HRTPO staff will utilize the services provided by Google translate, or if by phone, seek to address the request with the on-call language service provider.

HRTPO Staff Training

All HRTPO staff will be provided access to the LEP Plan and will be offered training on procedures and services available. Training topics will include:

- Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.
- LEP program responsibilities and obligations.
- Language assistance services offered.
- Use of LEP Language Assistance Cards (“I Speak Cards”).
- Documentation of language assistance requests.

Providing Notice of Available Language Service to LEP Persons

Signs should be posted that language assistance is available in public areas such as at HRTPO reception, conference room waiting areas, and the HRTPO website.

Outreach Techniques

If HRTPO staff knows that they will be presenting a topic in a geographic location with a known concentration of LEP persons, HRTPO staff will make a concerted effort to have meeting notices, fliers, advertisements, or agendas printed in the alternative language. As well, HRTPO staff will coordinate with local community groups to have someone available who can help interpret information at the meeting.

When running a general public meeting notice in a geographic location that could be of potential importance to LEP persons or if staff will be hosting a meeting or a workshop, HRTPO staff will, to the extent possible, insert the following clause: “An interpreter will be available” in the predominant language. HRTPO staff will seek to coordinate with local community groups to have someone available who can help interpret information at the meeting.

HRTPO will include this statement when running general public meeting notices: “The HRTPO will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Contact Ms. Kendall Miller, Public Involvement and Title VI Administrator, at (757) 420-8300 for more information. *Para información en español, llame al (757) 366-4375.*

Coordination with local community groups is a key outreach component as HRTPO staff identifies and seeks to engage LEP person in HRTPO programs and activities.

Plan Monitoring and Updating

The HRTPO will monitor and update its Plan for Special Language Services, as needed, to ensure meaningful access to its programs and services by LEP persons. The HRTPO will use a combination of qualitative and quantitative approaches to monitor whether the Plan for Special Language Services effectively meets the needs of LEP persons across the Hampton Roads region. On a triennial basis, the HRTPO will review demographic data of Hampton Roads LEP populations and solicit feedback from HRTPO staff, LEP persons and community-based organizations serving LEP individuals to evaluate the effectiveness of its Title VI and LEP Plan.

By establishing an evaluative review of the Plan for Special Language Services, the HRTPO can assess whether its language assistance services are effective and have impacted relations with LEP communities. The HRTPO will monitor its implementation plan by soliciting regular feedback from HRTPO staff and third-party contractors, community-based organizations and LEP persons.

In compliance with U.S. DOT guidelines, the HRTPO will monitor and evaluate its Title VI and LEP Plan by reviewing the following information:

- Changes in the number and proportion of LEP persons in the HRTPO planning area
- New demographic data from the U.S. Census and American Community Survey
- Changes in the frequency of contact with LEP language groups (e.g., language line usage and translated website pageviews)
- Nature and importance of programs, services and activities to LEP persons
- Expansion of services and programs
- Changes in the availability of resources, including technological advances and/or identification of additional financial resources
- The effectiveness of current language assistance measures in meeting the needs of LEP persons
- Feedback from LEP persons on the effectiveness of current language assistance services
- The effectiveness of staff LEP trainings and agency-wide language assistance protocol (e.g., “Vital Documents Guidelines”)

Dissemination of the HRTPO Limited English Proficiency Plan

HRTPO staff will post the LEP Plan on its website at www.hrtpo.org. Any person with Internet access will be able to view the plan. Copies of the LEP Plan will also be provided to the HRTPO member jurisdictions and interested parties upon request. For complete information about the HRTPO LEP Program or related program activities, contact the HRTPO’s Public Involvement and Title VI Administrator, at (757) 420-8300 or at kmiller@hrtpo.org

Appendix A: Hampton Roads Demographics

Table 3: Population by Gender

Geography	Total Population	Total Population: Male	Total Population: Female
Chesapeake City	222,209	108,051	114,158
Gloucester County	36,858	18,239	18,619
Hampton City	137,436	65,750	71,686
Isle of Wight County	35,270	17,177	18,093
James City County	67,009	32,346	34,663
Newport News City	180,719	87,263	93,456
Norfolk City	242,803	125,797	117,006
Poquoson City	12,150	5,997	6,153
Portsmouth City	95,535	45,933	49,602
Suffolk City	84,585	40,588	43,997
Virginia Beach City	437,994	214,441	223,553
Williamsburg City	14,068	6,625	7,443
York County	65,464	32,001	33,463

Source: U.S. Census, 2010.

Table 4: Population by Age

Geography	Total Population	Total Population: Population Under 18 Years	Total Population: Population 18 Years And Older	Total Population: Population 65 Years And Older
Chesapeake City	222,209	57,521	164,688	23,146
Gloucester County	36,858	8,140	28,718	5,410
Hampton City	137,436	31,274	106,162	16,856
Isle of Wight County	35,270	8,031	27,239	5,165
James City County	67,009	14,385	52,624	13,870
Newport News City	180,719	43,913	136,806	19,219
Norfolk City	242,803	50,612	192,191	22,796
Poquoson City	12,150	2,969	9,181	1,891
Portsmouth City	95,535	22,666	72,869	12,619
Suffolk City	84,585	22,137	62,448	9,727
Virginia Beach City	437,994	105,249	332,745	46,435
Williamsburg City	14,068	1,404	12,664	1,879
York County	65,464	16,276	48,188	7,934

Source: US Census, 2010.

Table 5: Population by Race

Geography	Total Population	White	Black Or African American	American Indian And Alaska Native	Asian	Native Hawaiian And Other Pacific Islander	Some Other Race	Population Of Two Or More Races
Chesapeake City	222,209	139,012	66,237	871	6,383	169	2,760	6,777
Gloucester County	36,858	32,149	3,197	139	286	15	208	864
Hampton City	137,436	58,642	68,104	594	2,992	154	1,826	5,124
Isle of Wight County	35,270	25,318	8,712	126	281	15	191	627
James City County	67,009	53,792	8,805	197	1,506	55	924	1,730
Newport News City	180,719	88,518	73,514	851	4,956	315	4,850	7,715
Norfolk City	242,803	114,304	104,672	1,200	7,999	396	5,407	8,825
Poquoson City	12,150	11,557	78	38	260	3	39	175
Portsmouth City	95,535	39,701	50,878	421	1,019	112	916	2,488
Suffolk City	84,585	44,197	36,120	268	1,350	54	648	1,948
Virginia Beach City	437,994	296,670	85,935	1,685	26,769	657	8,622	17,656
Williamsburg City	14,068	10,407	1,968	38	808	5	353	489
York County	65,464	50,031	8,751	251	3,205	99	884	2,243

Source: US Census, 2010.

Table 6: Population by Economic Characteristics

Geography	Total Population	*Total Disabled Population	*Workers In Labor Force: 16 Years And Over	Mean Travel Time To Work: 16 Years And Over	Median Household Income	Median Income	Total Population: Per Capital Income	Families Below Poverty Line In 1999	Individuals Below Poverty Line
							\$29,306	3,100	14,623
Chesapeake City	222,209	21,126	118,605	24.1	\$67,855	\$36,133	\$29,306	3,100	14,623
Gloucester County	36,858	4,166	19,019	32.4	\$59,331	\$34,249	\$27,395	789	3,385
Hampton City	137,436	14,800	73,527	22.1	\$49,815	\$32,903	\$24,051	3,031	17,040
Isle of Wight County	35,270	4,947	18,658	28.3	\$62,242	\$27,279	\$29,547	513	2,843
James City County	67,009	5,976	32,091	25.3	\$73,903	\$31,305	\$38,162	743	4,446
Newport News City	180,719	16,960	100,378	21.6	\$49,562	\$33,002	\$24,249	4,709	23,417
Norfolk City	242,803	26,678	134,534	21.5	\$42,667	\$31,731	\$23,773	6,778	36,847
Poquoson City	12,150	-	6,339	22.5	\$84,315	\$34,315	\$36,840	137	592
Portsmouth City	95,535	14,417	49,638	23.5	\$45,488	\$33,132	\$22,302	2,925	14,091
Suffolk City	84,585	9,546	42,360	27.7	\$65,104	\$31,305	\$27,334	2,014	9,109
Virginia Beach City	437,994	39,050	247,933	22.7	\$64,618	\$43,456	\$30,873	5,404	29,122
Williamsburg City	14,068	-	6,179	19.5	\$50,794	\$31,305	\$22,851	90	1,404
York County	65,464	4,973	34,815	22.0	\$81,055	\$43,543	\$35,823	603	2,466

Source: 2006-2010 American Community Survey 5-Year Estimates; 2008-2010 American Community Survey 3-Year Estimates.

* Note: Because the 2010 U.S. Census did not include a long-form questionnaire, there is no SF-3 data for 2010.

Appendix B: Languages Spoken at Home

Table 7: Languages Spoken at Home

Geography	Population 5 Years And Over	Speak Only English	Speak Other Languages	Speak English Less Than "Very Well" Or At All; Spanish Or Spanish Creole	Does Not Speak English Well Or At All; Indo-European Languages	Does Not Speak English Well Or At All; Asian And Pacific Island Languages	Does Not Speak English Well Or At All; Other Languages
				Speak English Less Than "Very Well" Or At All; Spanish Or Spanish Creole	Does Not Speak English Well Or At All; Indo-European Languages	Does Not Speak English Well Or At All; Asian And Pacific Island Languages	Does Not Speak English Well Or At All; Other Languages
Chesapeake City	204,951	191,209	13,742	4,442	2,053	825	1,489
Gloucester County	34,642	33,770	872	321	176	45	100
Hampton City	129,941	120,664	9,277	2,866	907	610	1,024
Isle of Wight County	32,867	31,640	1,227	465	214	203	48
James City County	61,082	55,628	5,454	1,593	1,067	209	237
Newport News City	168,217	152,403	15,814	6,059	3,266	962	1,572
Norfolk City	225,119	203,677	21,442	7,531	3,895	1,313	1,802
Poquoson City	11,590	10,698	892	252	62	18	160
Portsmouth City	89,623	85,724	3,899	1,194	589	294	303
Suffolk City	76,531	73,015	3,516	1,014	652	173	183
Virginia Beach City	406,725	358,990	47,735	15,455	5,280	2,711	6,756
Williamsburg City	13,130	12,099	1,031	356	291	26	30
York County	61,184	56,185	4,999	1,380	522	135	659
							64

Source: 2006-2010 American Community Survey 5-Year Estimates

* Note: Because the 2010 U.S. Census did not include a long-form questionnaire, there is no SF-3 data for 2010.

Appendix C: 2010 Detailed LEP Languages Spoken at Home

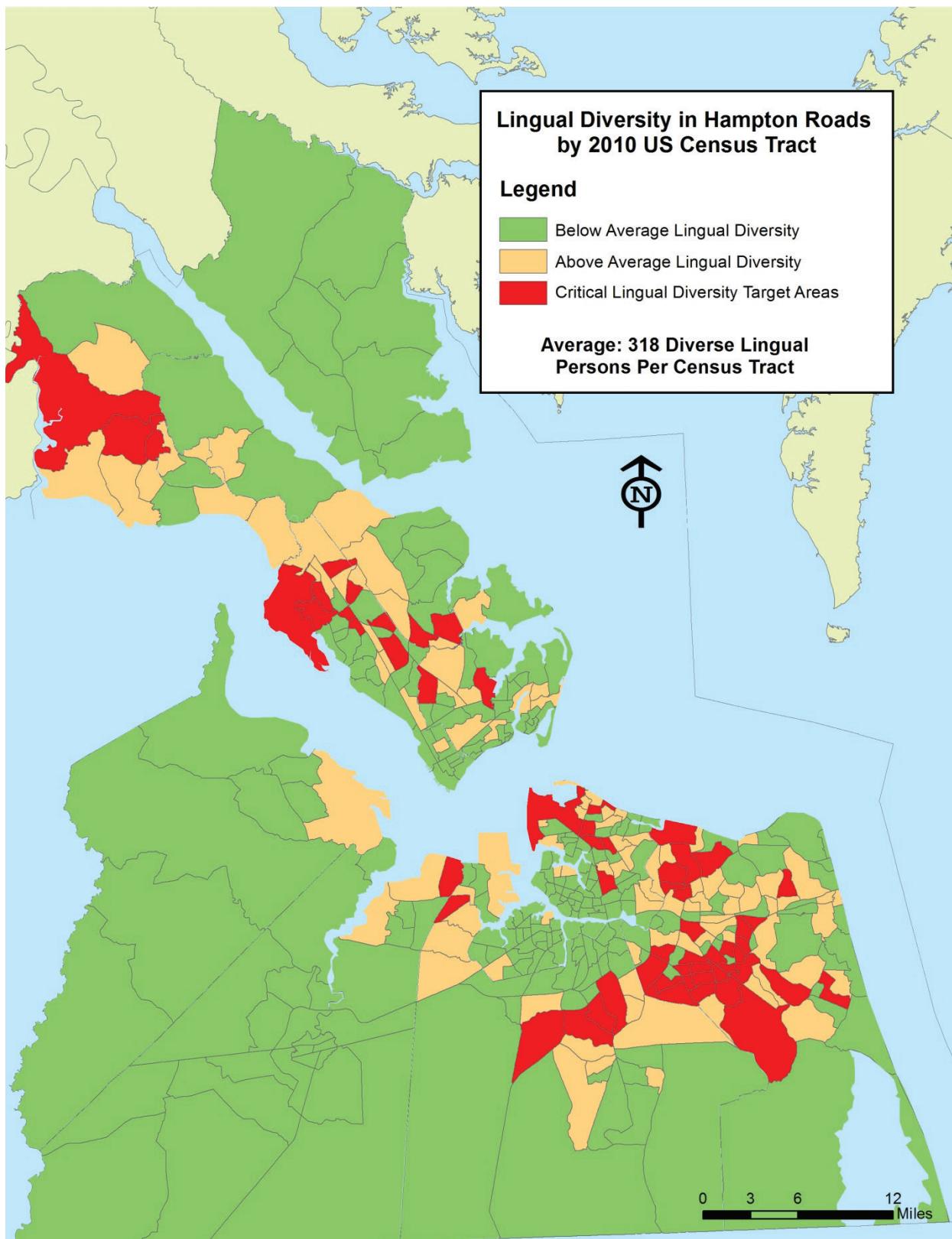
Table 8: 2010 Detailed LEP Languages Spoken at Home (Regionally)

Language	Number of speakers Regionally	Percentage of Regional Population	Language	Number of speakers Regionally	Percentage of Regional Population
English only	1,385,702	91.43%	Other West Germanic languages	159	0.01%
Spanish or Spanish Creole	18,974	1.25%	Portuguese or Portuguese Creole	154	0.01%
Tagalog	5,680	0.37%	Other Pacific Island languages	150	0.01%
Korean	2,380	0.16%	Scandinavian languages	149	0.01%
Vietnamese	2,225	0.15%	Hindi	138	0.01%
Chinese	2,193	0.14%	Hungarian	130	0.01%
French or French Creole	1,668	0.11%	Serbo-Croatian	116	0.01%
Russian	1,126	0.07%	Urdu	115	0.01%
German	1,023	0.07%	Other Indo-European languages	113	0.01%
African languages	959	0.06%	Polish	107	0.01%
Arabic	876	0.06%	Other Slavic languages	104	0.01%
Japanese	809	0.05%	Yiddish	67	0.00%
Other Indic languages	586	0.04%	Armenian	42	0.00%
Persian (Farsi)	502	0.03%	Navajo	36	0.00%
Italian	473	0.03%	Laotian	35	0.00%
Gujarati	471	0.03%	Hebrew	34	0.00%
Greek	411	0.03%	Other and unspecified languages	32	0.00%
Other Asian languages	405	0.03%	Other Native North American languages	0	0.00%
Thai	288	0.02%	Hmong	0	0.00%
Mon-Khmer, Cambodian	198	0.01%			

Source: 2006-2010 American Community Survey 5-Year Estimates

Appendix D: Lingual Diversity of Hampton Roads

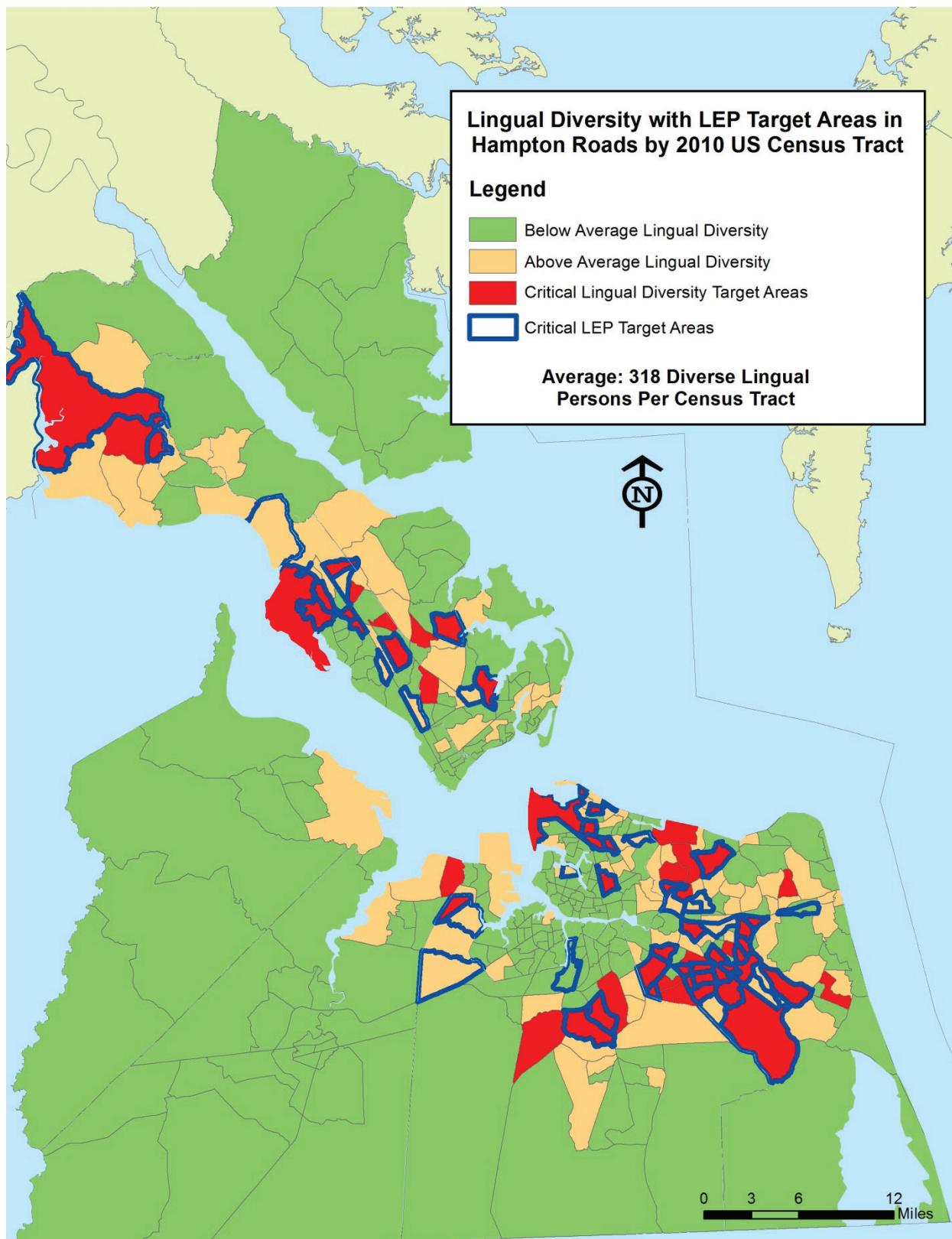
Lingual Diversity of Hampton Roads



Lingual Diversity Map: A tabulation and visual display of the location of speakers of other languages throughout the Hampton Roads region.

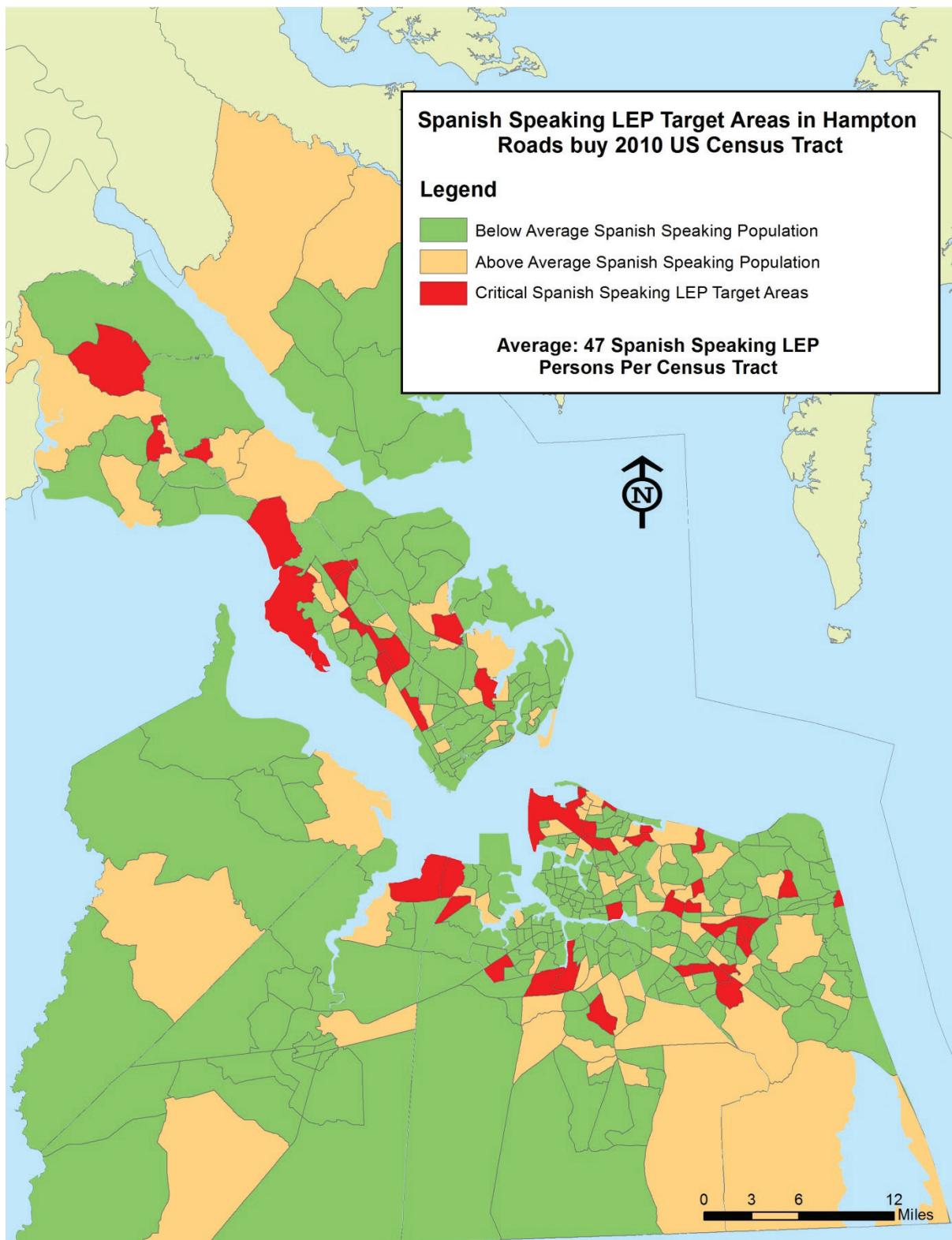
Appendix D (continued)

Lingual Diversity of Hampton Roads With LEP Target Areas



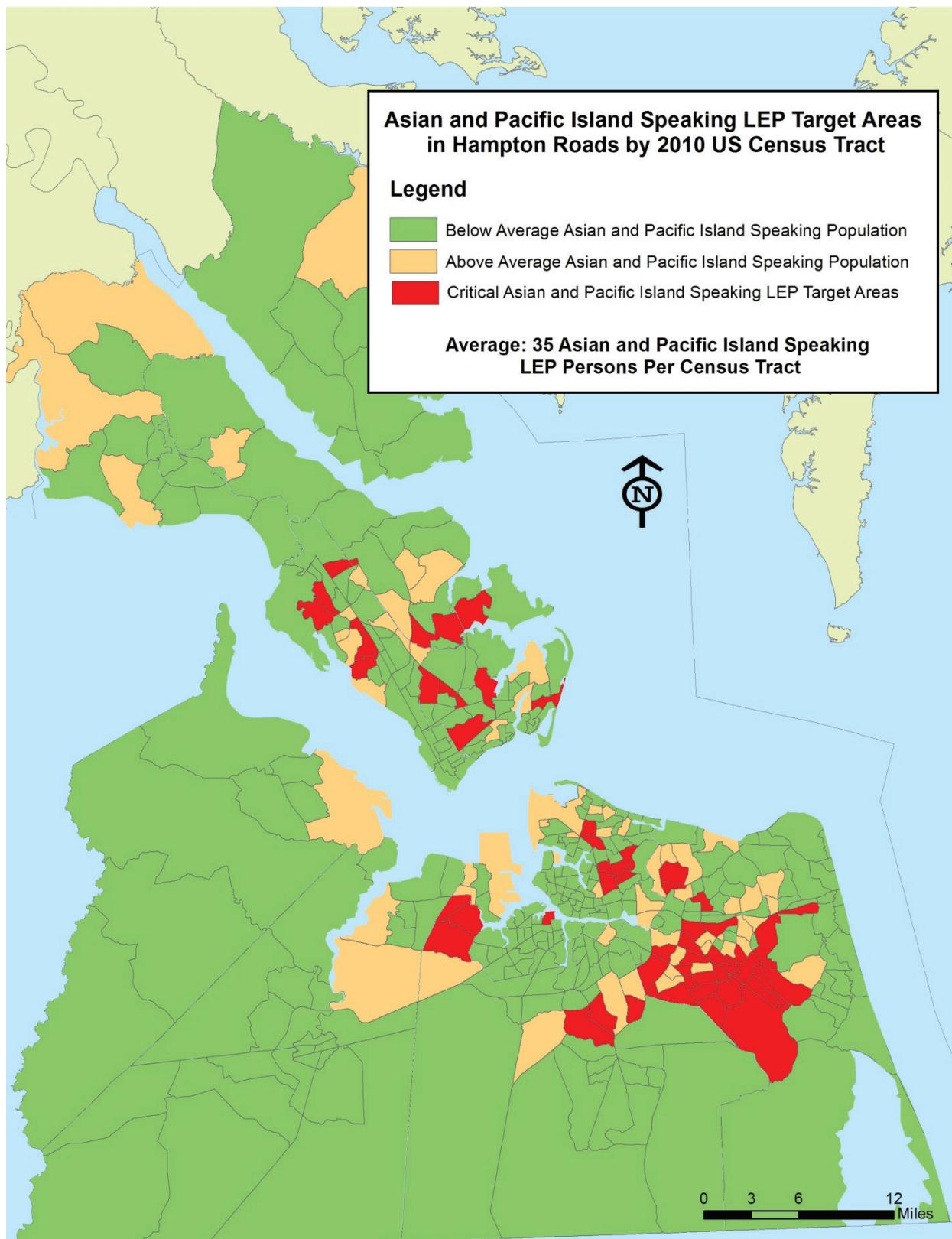
Appendix E: Distinct Population Distributions

Spanish Speaking Population with LEP Target Areas



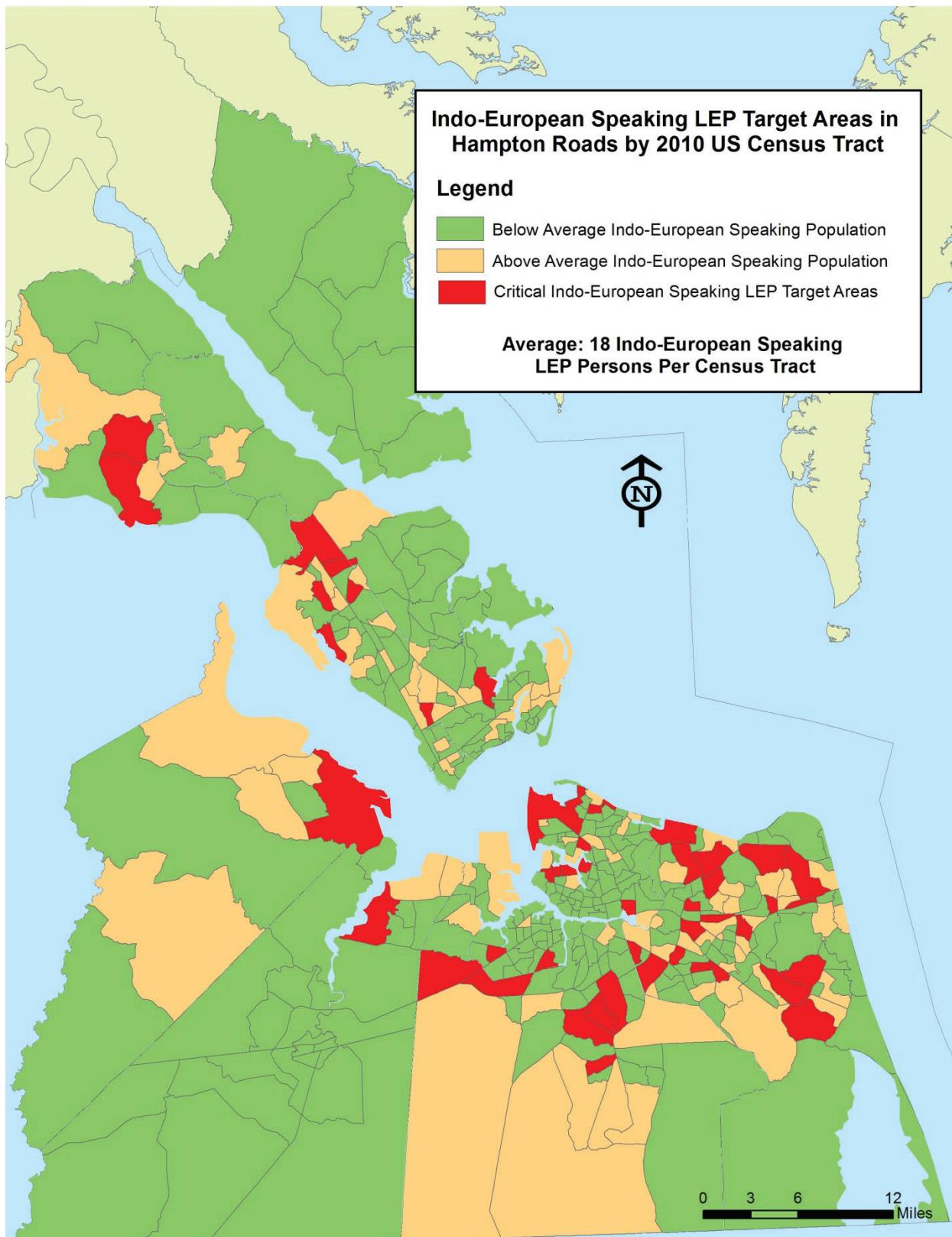
Appendix E (continued)

Asian and Pacific Island Speaking Population with LEP Target Areas



Appendix E (continued)

Indo-European Speaking Population of Hampton Roads with LEP Target Areas



Appendix E (continued)

Speakers of Other Languages Population with Lep Target Areas

