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# LIMITED ENGLISH PROFICIENCY PLAN (LEP)

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*\*2-6-24 Updated contact information*

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## **LIMITED ENGLISH PROFICIENCY**

### Introduction

The purpose of this Limited English Proficiency (LEP) policy guidance is to clarify the responsibilities of the MPO as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT) and to assist the MPO in fulfilling its responsibility to provide meaningful access to essential MPO programs and activities for those not able to read or speak English. . It was prepared in furtherance of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and other federal and state authorities to ensure that no person shall be subjected to discrimination on the basis of race, color, or national origin under any MPO program or activity that receives federal financial assistance.

## **ENVIRONMENTAL JUSTICE**

### Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000, DOJ's General LEP Guidance). 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 applies to all federal agencies and subsequent DOT and modal administration orders included all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities, and subrecipients.

## **PLAN SUMMARY**

The Hernando/Citrus MPO has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide meaningful language assistance for LEP persons seeking access to MPO programs. 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.

This plan details the procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the MPO's extent of obligation to provide LEP services, the

MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the County to be served or likely to encounter an MPO program, activity, or service; 2) the frequency with which LEP individuals come in contact with an MPO program; 3) the nature and importance of the program, activity or service provided by the MPO to the LEP population; and 4) the resources available to the MPO and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## **LEP FOUR FACTOR ANALYSIS**

### **1. The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity or service**

The MPO examined the US Census Bureau's 2016-2020 American Community Survey (ACS) data and was able to determine that of the 316,286 residents within the Hernando/Citrus MPO Planning area over the age of 5 years old, 2.6% describe themselves as speaking English less than "very well", the majority of whom are Spanish speakers.

### **2. Frequency with which LEP individuals come in contact with the program**

The MPO 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. Since the adoption of the LEP plan on September 18, 2018, the MPO recorded no requests for an interpreter in any language and no requests for translated MPO documents.

### **3. The nature and importance of the program, activity or services provided by the MPO to LEP community.**

The MPO evaluates the need for any formal outreach efforts to identify those MPO programs would be of importance to a Spanish-speaking LEP person. One identified program is the paratransit and fixed-route transit systems to help accommodate the Spanish speaking LEP population. The transit operators in both counties have translated their system route maps and brochures. As there are relatively small concentrations of Spanish-speaking LEP persons in each county, MPO is able to assess program impacts and translate any of its documents and brochures into Spanish, as needed.

Many Spanish-speaking Outreach Operation clients are economically disadvantaged and receive medical services through Medicaid. The MPO's coordinates its Transportation Disadvantaged Program (TD) thru Mid Florida Community Services, Inc., in Hernando County and the Citrus Connection in Citrus County. The TD Program was also identified as a potential provider of important services for the Spanish-speaking LEP person.

### **4. The resources available to the MPO and overall costs**

The MPO assessed its available resources that could be used for providing LEP assistance. This included identifying staff and volunteer language interpreters are readily available, how much a professional interpreter and translation service would cost, which documents should be translated, available organizations the MPO could partner with for outreach/translation efforts, examining which financial and in-kind sources could be used for assistance, and what level of staff training is needed.

After analyzing the four factors, the MPO developed the LEP plan which provides a reasonable degree of services for LEP populations in the service area.

## **HOW TO IDENTIFY AN LEP PERSON WHO NEEDS LANGUAGE ASSISTANCE**

### Tools to help identify persons who may need language assistance

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When MPO sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gage the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in table. While staff may not be able to provide translation assistance at a particular meeting, the cards can be an excellent tool to identify language needs for future meetings. Also, have the cards available at the MPO office reception area and Transportation Disadvantaged Program office's walk-in counter; and;
- Post a notice of available language assistance at MPO reception area.

## **LANGUAGE ASSISTANCE MEASURES**

Staff may be able to assist with written communications and small MPO document translation requests from LEP persons. Hernando County web pages may be translated by right clicking the page and selecting "Translate with Bing". Citrus County web pages may be translated by scrolling to the bottom of the page and clicking "TRANSLATE" with Bing.

The following MPO documents are currently available in Spanish: Transportation Disadvantaged Program brochure and application, THE Bus and Citrus Connection (fixed-route transit) routes and information, as well as the Title VI discrimination complaint form.

## **MPO STAFF TRAINING**

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires.

### Training Topics

- Understanding the Title VI LEP responsibilities;
- What language assistance services the MPO offers;
- Use of LEP "I Speak Cards;"
- How to access a staff interpreter;

- Documentation of language assistance requests;
- How to handle a complaint;
- The importance of educating subrecipients on the MPO's LEP program responsibilities and their obligation to provide language assistance.

## PROVIDING NOTICE OF AVAILABLE LANGUAGE SERVICE TO LEP PERSONS

When an interpreter is needed, in person or on the telephone, first determine what language is required. If the required language is not available or if a formal interpretation is required, staff shall use the telephone interpreter service. Language Line Interpreter Services are available 24 hours a day, 7 days a week at 1-800-752-6096.

Information will be provided on the MPO website, in legal advertisements regarding language services available.

## OUTREACH TECHNIQUES

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish.
- When running a general public meeting notice, staff should insert the clause “**Un traductor del idioma español estará disponible.**” This means, “A Spanish translator will be available.” Or if not sure of the need, staff should insert this clause, “**Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la** (insert staff name) **al teléfono (###-###-###), cuando menos 48 horas antes de la junta,**” which asks persons who need Spanish language assistance to make arrangements with the MPO within two days of the publication notice.

## MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO will follow the Title VI Program update schedule for the LEP Plan.

### Plan components to monitor

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Hernando and Citrus Counties?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified MPO programs? Are there other programs that should be included?

- Have the MPO's available resources, such as technology, staff, and financial costs changed?
- Has the MPO fulfilled the goals of the LEP Plan?
- Were any complaints received?

## **DISSEMINATION OF THE MPO LIMITED ENGLISH PROFICIENCY PLAN**

The LEP plan is available on our website at: [www.hernandocitrusmpo.us](http://www.hernandocitrusmpo.us).

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal Internet service, all Hernando County libraries offer free Internet access. Copies of the LEP Plan will be provided to the Hernando and Citrus County Office of Health and Human Resources, the Florida Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy. Each MPO subrecipient and program participants will be provided a copy and will be educated on the importance of providing language assistance. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the MPO Title VI Specialist:

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## HERNANDO/CITRUS MPO DEMOGRAPHIC INFORMATION

### Sociocultural Data Report – Citrus County

Source: US Census Bureau, 2010 American Community Survey (ACS) and 2016-2020 ACS, FDOT EDTM

Citrus County - General Population	2010	2016-2020
Total Population	140686	147938
Total Households	59974	64621
Average persons/acre	0.351	0.37
Average persons/household	2	2.25
Average persons/family	2.861	2.89
Males	68183	71999
Females	72503	75939

Citrus Language Trends for non native speakers, greater than 5 years of age	2010	2010 %	2016-2020	2016-2020 %
Speaks English Well	1475	1.09	1636	1.15
Speaks English Not Well	718	.53	718	.5
Speaks English Not at All	235	.17	274	.19
Speaks English Not Well or Not at All	953	.7	992	.7

Citrus Race and Ethnicity Trends	2010	2010 %	2016-2020	2016-2020 %
White alone	131271	93.31	135714	91.74
Black or African American Alone	3942	2.8	4043	2.73
Native Hawaiian and Other Pacific Islander Alone	33	.02	26	.02
Asian Alone	1851	1.32	2616	1.77
American Indian or Alaska Native Alone	606	.43	412	.28
Some other race alone	1026	.73	1224	.83
Claimed 2 or more races	1957	1.39	3903	2.64
Hispanic or Latino of Any Race	6171	4.39	8677	5.87
Not Hispanic or Latino	134515	95.61	139261	94.13
Minority	14687	10.44	18398	12.44

## Sociocultural Data Report – Hernando County

Source: US Census Bureau, 2010 American Community Survey (ACS) and 2016-2020 ACS, FDOT EDTM

Hernando County - General Population	2010	2016-2020
Total Population	170337	190700
Total Households	70254	76708
Average persons/acre	.543	.61
Average persons/household	2	2.46
Average persons/family	2.899	3.04
Males	81546	91920
Females	88791	98780

Hernando Language Trends for non native speakers over 5 years of age	2010	2010 %	2016-2020	2016-2020 %
Speaks English Well	2724	1.68	3841	2.11
Speaks English Not Well	1864	1.15	1473	.81
Speaks English Not at All	463	.29	515	.28
Speaks English Not Well or Not at All	2327	1.44	1988	1.09

Hernando Race and Ethnicity Trends	2010	2010 %	2016-2020	2016-2020 %
White alone	153968	90.39	165207	86.63
Black or African American Alone	8366	4.91	9964	5.2
Native Hawaiian and Other Pacific Islander Alone	166	.1	111	.06
Asian Alone	1716	1.01	2291	1.2
American Indian or Alaska Native Alone	264	.15	547	.29
Some other race alone	3434	2.02	4136	2.17
Claimed 2 or more races	2423	1.42	8444	4.43
Hispanic or Latino of Any Race	16500	9.69	26964	14.14
Not Hispanic or Latino	153837	90.31	163736	85.86
Minority	30931	18.16	44412	23.29