



## FTA Title VI Program



## Central Iowa Regional Transportation Planning Alliance

Iowa Department of Transportation  
800 Lincoln Way  
Ames, IA 50010

Revised 1.12.15

\*This program to be submitted every three years to the Iowa Department of Transportation,  
Office of Employee Services, Civil Rights Team.\*

Date: October 18, 2018

## **Recipient Profile**

Recipient: [Central Iowa Regional Transportation Planning Alliance \(CIRTPA\)](#)

Administrative Head: [R. Todd Ashby, Executive Director](#)

Recipient Title VI Coordinator: [Tracey Deckard, Office Manager](#)

Address: [420 Watson Powell Jr. Parkway, Suite 200](#)

City/State: [Des Moines, IA](#)

Zip Code/County: [50309/Polk County](#)

Phone: [515-334-0075](#)

Fax: [515-334-0098](#)

Email: [info@dmampo.org](mailto:info@dmampo.org)

Website: [www.cirtpa.org](http://www.cirtpa.org)

Has the recipient signed and submitted its Title VI Assurances?    Yes [X](#)    No \_\_\_\_\_

Has the recipient submitted its Title VI Program Plan?                    Yes [X](#)    No \_\_\_\_\_

What strategies has your planning process developed for ensuring, demonstrating, and sustaining compliance with Title VI?

[CIRTPA reviews Title VI requirements periodically to ensure staff is kept apprised of new procedures. Staff also undertakes a self-certification process annually, which includes review of compliance with Title VI. Staff works to ensure Title VI notification is included on the CIRTPA's website, agendas, and other pertinent documents.](#)

## **General Requirements**

### **1.**

- ☒ Attach a copy of recipient's Title VI notice to the Public.

Required elements:

☒ A statement that the agency operates programs without regard to race, color, or national origin

☒ A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations

☒ A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient

List locations where the notice is posted:

The full notice that includes a statement that the CIRTPA operates without regard to race, color, or national origin, the instructions for filing a complaint, and how to contact the CIRTPA for any questions or more information is included on the home page of the CIRTPA's website as well as in the Des Moines Area MPO office where CIRTPA is housed. Additionally, a statement is included on all CIRTPA agendas that includes the non-discrimination statement and provides a phone number and website to find more information or file a complaint. Similar notices are included on public meeting sign in sheets and in documents summarizing public input provided on plans.

### **2.**

- ☒ Please attach a copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

- ☒ Are complaint procedures and the complaint form posted on the recipient's website?  
Please provide the URL: <http://cirtpa.org/title-vi/>

### 3.

- ☒ Please list and describe any transit-related Title VI investigations, complaints, or lawsuits filed with, concerning, or naming the recipient in the last three years.

No complaints or lawsuits have been filed.

	Date Filed (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

#### 4.

- ☒ Please attach a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made in the last three years.

Please describe the methods used to inform low-income and minority populations of planning efforts for transportation-related services and/or improvements:

The CIRTPA includes media outlets that serve minority and limited English proficient populations on all press releases and public notices when announcing public meetings on planning projects.

List minority and/or community media utilized to ensure notification of public meetings or public review of recipient documents for residents in minority and low-income areas:

Notifications are sent to all television and radio media in the central Iowa area, as well as The Des Moines Register, and the Des Moines Business Record. Additional media specifically targeted to minority and low-income areas include the Bystandard (African American publication in Des Moines area), Greater Des Moines News (African American publication for central Iowa) and Spanish radio stations La Reina and La Ley.

When was the public participation plan last reviewed? Please describe how.

CIRTPA staff reviews the Public Participation Plan is reviewed annually during the CIRTPA's self-certification process to ensure that it adequately reflects the CIRTPA engagement process as well as state and federal requirements. If necessary, CIRTPA staff asks the board to formally update the plan. The last plan review took place in October 2015, which resulted in minor clarifications, formatting adjustments, and staff updates. This plan was reviewed in 2018 as part of this review, and it was determined that it remained up-to-date.

#### 5.

- ☒ Please attach a copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance, *Federal Register*, Volume 70, Number 239, <http://www.gpo.gov/fdsys/pkg/FR-2005-12-14/html/05-23972.htm>.

What steps has the recipient taken to ensure meaningful access to the benefits, services, information, and other important components of its programs and services to persons with limited English proficiency?

As outlined in the Language Assistance Plan, the CIRTPA has analyzed LEP populations throughout the planning area using ACS data. The ACS classified persons speaking a language other than English in their homes and if they spoke English "very well" or "less than very well." Those

individuals that speak English “less than very well” are classified as Limited English Proficient persons according to FTA C 4702.1B. The CIRTPA has identified languages that meet the Department of Justice defines the Safe Harbor threshold as 1,000 persons OR 5% of the total population in the CIRTPA planning area, whichever is less as these groups are likely candidates for translation services. CIRTPA has taken the following steps to provide access to these LEP groups:

- CIRTPA’s website, [www.cirtpa.org](http://www.cirtpa.org), includes a link at the bottom written in the LEP languages for more information on translation. This takes the user to a page with information in the LEP language informing the user on how to request additional information from CIRTPA.
- CIRTPA’s website notifies the user that it offers translation services to those who wish to participate. Upon request, CIRTPA has translation services available to translate documents, provide real-time translation via phone, or provide real-time translation at public meetings.
- CIRTPA has a staff person capable of speaking Spanish should a Spanish-speaking person call or visit the office who can help get the person the translation services they need.
- CIRTPA has flashcards available in multiple languages that allow a non-English speaker to point to the language they speak, thereby enabling CIRTPA staff to obtain the translation services they require.

## **6.**

List all non-elected committees and councils, the membership of which is selected by the recipient:

CIRTPA’s formal decision making bodies (a Technical Committee and a Policy Committee) are appointed by the city councils and county supervisors of CIRTPA’s member governments and are not selected by CIRTPA. These decision making bodies have subcommittees which are made up of members from the larger committees and are appointed by the board chair.

Describe the process the recipient uses to encourage the participation of minorities on such committees.

As noted above, CIRTPA does not have any committees in which the membership is selected by CIRTPA. However, the CIRTPA does include a note on our membership form that encourages our member governments to consider diversity when making representative selections.

Racial/Ethnic Breakdown of the Non-Elected Committees and Councils: N/A

## **7.**

If applicable, describe the efforts the recipient uses to ensure subrecipients are complying with Title VI:

Not applicable to CIRTPA

Include a schedule of subrecipient Title VI program submissions:

(insert table or list)

## **8.**

Has the recipient constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., with Federal Transit Administration funds? \_\_\_\_ Yes      ☒ No

If yes, please attach the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

## **9.**

☒ Please attach a copy(ies) of board meeting minutes, resolution(s), or other appropriate documentation showing the board(s) of directors or appropriate governing entity(ies) or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

## **Requirements of Planning Agencies**

### **1.**

☒ Has the planning agency developed a demographic profile of the planning area that includes identification of the locations of socioeconomic groups, including low-income and minority populations? Provide a summary of the planning area demographics.

Yes; the information is attached.

### **2.**

Please describe the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

CIRTPA's Horizon Year 2035 Long-Range Transportation Plan includes an analysis of persons with limited English proficiency (LEP), persons over 65, and persons with disabilities. CIRTPA staff recently updated its Environmental Justice analysis similar to that conducted by the Des Moines Area MPO that identifies concentrations of minority populations, persons in poverty, those over 65, single heads of household, carless households, persons with disabilities, and those with limited

English proficiency. Census tracts that have at least five of the seven groups are classified as EJ areas.

### **3.**

☒ Please attach demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects.

Not applicable – CIRTPA suballocates funding to its member cities and counties to use on eligible projects of their choosing. CIRTPA has not awarded funds to public transportation projects.

### **4.**

☒ Please attach analysis of the planning agency's transportation system investments that identifies and addresses any disparate impacts.

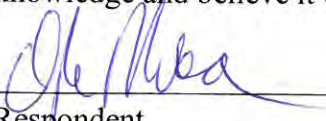
List adverse social, environmental, economic or demographic impact identified in the planning process:

Attached is analysis conducted by CIRTPA staff that maps projects included in the CIRTPA Transportation Improvement Program with the Environmental Justice areas as described in question 2. Transportation investments have been made in both high concentrated areas as well as non-concentrated areas.



### **Declaration of the Respondent**

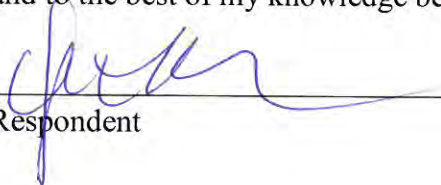
I declare that I have provided information as a part of the Title VI Program to the best of my knowledge and believe it to be true, correct, and complete.

  
Respondent

10/31/18  
Date

### **Declaration of the Administrative Head**

I declare that I have reviewed and approved the information provided in the Title VI Program and to the best of my knowledge believe it to be true, correct, and complete.

  
Respondent

10/31/18  
Date

THE

# CIRTPA

CENTRAL IOWA REGIONAL TRANSPORTATION PLANNING ALLIANCE

420 Watson Powell, Suite 200 – Des Moines, Iowa 50309

Phone: (515) 334-0075 - Fax: (515) 334-0098

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## CIRTPA TITLE VI PUBLIC NOTICE

The Central Iowa Regional Transportation Planning Alliance (CIRTPA), by virtue of accepting federal funding, pledges to not discriminate against anyone on the basis of race, color, national origin, sex, minority status, or income level.

### Background

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. In addition, other statutes, laws, regulations, executive orders and the U.S. Constitution provide guidance for the effective execution of the objectives of Title VI. These include:

- Section 324 of the Federal Aid Highway Act, the enabling legislation of the Federal Highway Administration (FHWA), which prohibits discrimination based on sex;
- The 1994 Presidential Executive Order which directed every federal agency to make Environmental Justice (EJ) a part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority populations and low-income populations.

CIRTPA commits to upholding the principles of Title VI of the Civil Rights Act of 1964 and related guidance. CIRTPA's policies and programs should not discriminate against people based on race, color, national origin or sex. CIRTPA's policies and programs should avoid disproportionately negative effects on minority and low-income populations. CIRTPA seeks to involve as broad a cross-section of region's population, in addition to the population segments and certain organizations with special interests in transportation.

### Public Participation Plan

CIRTPA aims to provide citizens, stakeholder groups, and other interested parties with reasonable opportunities to be involved in planning processes. These efforts are outlined in the Public Participation Plan. For more information, please call or email staff at 515-334-0075 or [info@dmampo.org](mailto:info@dmampo.org). The Public Participation Plan is also available online at [www.cirtpa.org/public-participation](http://www.cirtpa.org/public-participation).

### Complaint Process

Members of the public can file complaints with CIRTPA if it does not meet the expectations of Title VI of the Civil Rights Act of 1964, Section 324 of the Federal Aid Highway Act, or the 1994 Presidential Executive Order regarding Environmental Justice. The process of filing a complaint is as follows:

- Persons wishing to file a formal discrimination complaint may do so by completing the Title VI Complaint Form and submitting it within 180 days of the alleged discrimination. The complaint should first be filed with the CIRTPA. The complainant can also file the complaint directly with the Iowa DOT or the FTA.
  - To get a Title VI Complaint Form, please call or email CIRTPA staff at 515-334-0075 or [info@dmampo.org](mailto:info@dmampo.org).
  - The Title VI Complaint is also available in printable PDF and online form formats at [www.cirtpa.org/title-vi-complaint-form](http://www.cirtpa.org/title-vi-complaint-form).
- Within 10 calendar days, CIRTPA will forward this form and any additional information to the Iowa Department of Transportation (Iowa DOT) Title VI Coordinator.
- The Iowa DOT will conduct an investigation into the complaint and make a recommendation to the Federal Highway Administration (FHWA), which will make the final determination.
- The Iowa DOT and CIRTPA will inform the person filing the complaint of the final determination. More information from the Iowa DOT is available online at <http://www.iowadot.gov/civilrights/subrecipient.html>.

### Staff Contact

For more information about Title VI or the Title VI complaint process, please contact CIRTPA Title VI Coordinator at 515-334-0075 or [tdeckard@dmampo.org](mailto:tdeckard@dmampo.org).



## TITLE VI DISCRIMINATION COMPLAINT FORM

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Basis of Complaint (e.g., race, disability, sex): \_\_\_\_\_

Date(s) of alleged discrimination: \_\_\_\_\_

Name and position (if known) of person(s) that discriminated against you:

\_\_\_\_\_  
\_\_\_\_\_

Address: \_\_\_\_\_

Please provide a detailed description of the circumstances of the incident(s) and how you were discriminated against. Please provide, if applicable, names and contact information of individuals who may have knowledge of the incident or are perceived as parties in the complained of incident Include any additional information supporting your complaint (please use additional pages as necessary):

\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

The Title VI Complaint form may be submitted directly to the following agencies. The complainant should first file the complaint with CIRTPA. The complainant can also file directly with the Iowa DOT and the FTA:

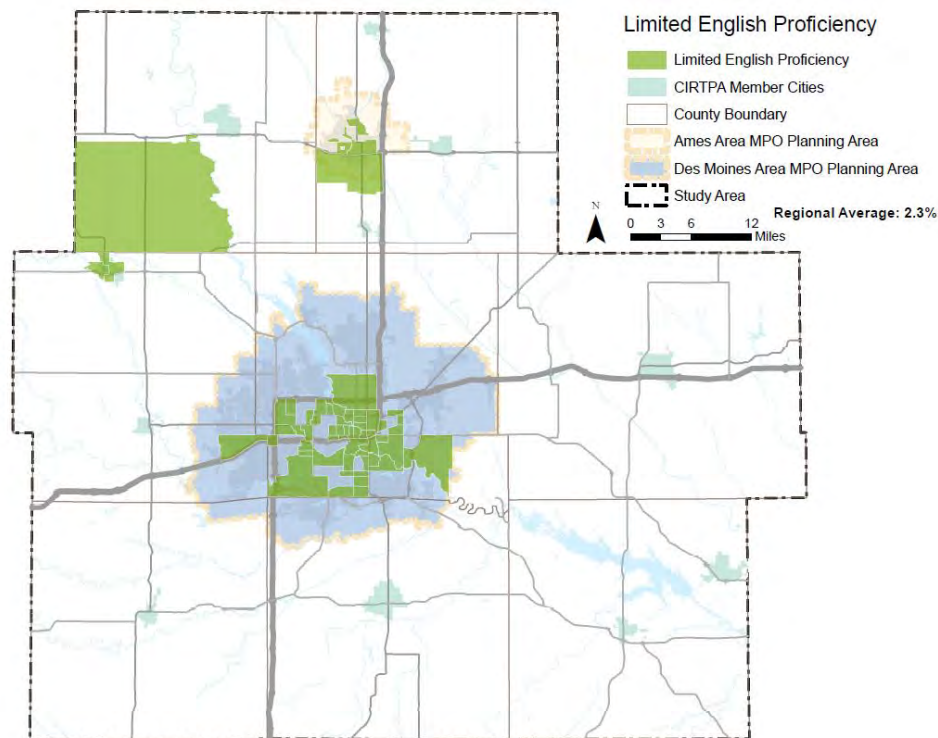
Iowa Department of Transportation  
Office of Employee Services – Civil Rights  
800 Lincoln Way  
Ames, Iowa 50010  
515-239-1422  
515-817-6502 (fax)  
[dot.civilrights@dot.iowa.gov](mailto:dot.civilrights@dot.iowa.gov)

Title VI Compliance Manager  
Central Iowa Regional Transportation Planning Alliance  
420 Watson Powell, Suite 200  
Des Moines, IA 50309  
(515)-334-0075

## Area Profile

The CIRTPA planning area is located in Central Iowa, occupying the following eight counties: Boone, Dallas, Jasper, Polk, Madison, Marion, Story, and Warren. Within the CIRTPA region lays the Des Moines Area MPO, located in portions of Dallas, Polk, Madison, and Warren Counties, as well as the Ames MPO within Story and Boone Counties. According to the 2012-2016 American Community Survey 5-year estimates, the eight-county region is home to more 760,000 people, with roughly 500,000 residing inside the Des Moines Area MPO planning boundary. The region's unemployment rate averages at 3.5 percent, falling below the current national rate of 6.7 percent (US Bureau of Labor Statistics). The average poverty rate also falls below the national rate of 14.3 percent, at 9.6 percent of all people. While unemployment and poverty rates sit below the national averages, there is still a need to focus on passenger transportation in the region. On average, only about 1.2 percent of people currently use public transportation as a means of commuting to work. With an aging population in the rural areas of the region and a growing demographic of urbanites choosing public transportation over driving, demand for other means of transportation is rapidly growing.

To address the needs of the region's limited English proficient (LEP) population, an analysis was performed to locate concentrated areas where LEP populations live. Using 2011-2015 American Community Survey 5-year data, the percent of the population considered to be LEP for each census tract was calculated and compared to all census tracts in the eight-county region. Any tract that had a percentage above the regional average of 2.3 percent was determined to be a concentrated area of LEP populations. The map below displays these areas.



Map 1: Central Iowa Limited English Proficiency Analysis (ACS, 2011-2015 5-year Average)

A majority of the LEP census tracts are located within or near the two MPO boundaries in the region (Des Moines Area MPO and Ames Area MPO). Additional concentrated areas of LEP populations

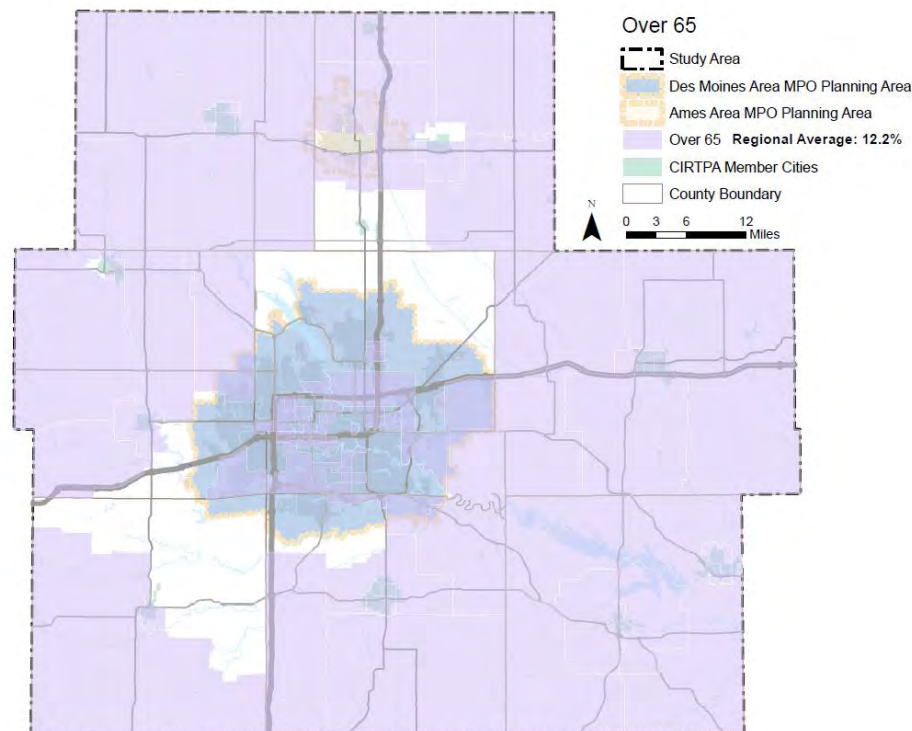
exist in the City of Perry, which is located near the northern border of Dallas County. The following table breaks down the amount of LEP households by county.

County	Total Households	LEP Households	LEP Percent	Over 500 LEP Households?
Boone	10,759	25	0.2%	No
Dallas	27,593	452	1.6%	No
Jasper	14,437	22	0.2%	No
Madison	6,225	40	0.6%	No
Marion	12,978	91	0.7%	No
Polk	177,049	5,283	3.0%	Yes
Story	35,901	1,120	3.1%	Yes
Warren	18,009	9	0.0%	No
Total	302,951	7,042	2.3%	-

Table 1: Regional Analysis of Households with Limited English Proficiency (ACS, 2015)

The LEP population's need for access to passenger transportation programs and activities includes providing schedules and brochures in languages other than English. Within the Des Moines Area MPO, services such as the Des Moines Area Regional Transit Authority (DART) offer a number of foreign language translations of their website through Google, and have a translation service that users can call into for many different languages. For areas outside the Des Moines Area MPO, services like HIRTA provide translation for various brochures and schedules.

Along with LEP populations, concentrations of persons over the age of 65 are also important for transit agencies to locate, as these populations rely more heavily on passenger transportation. The following map displays concentrated areas of persons over the age of 65. These areas were determined using the same methodology used for locating LEP areas. The map shows that a majority of the census tracts outside of the two MPO planning areas have high concentrations of persons over 65.



Map 2: Regional Analysis of Populations over 65 (ACS, 2011-2015 5-year Average)

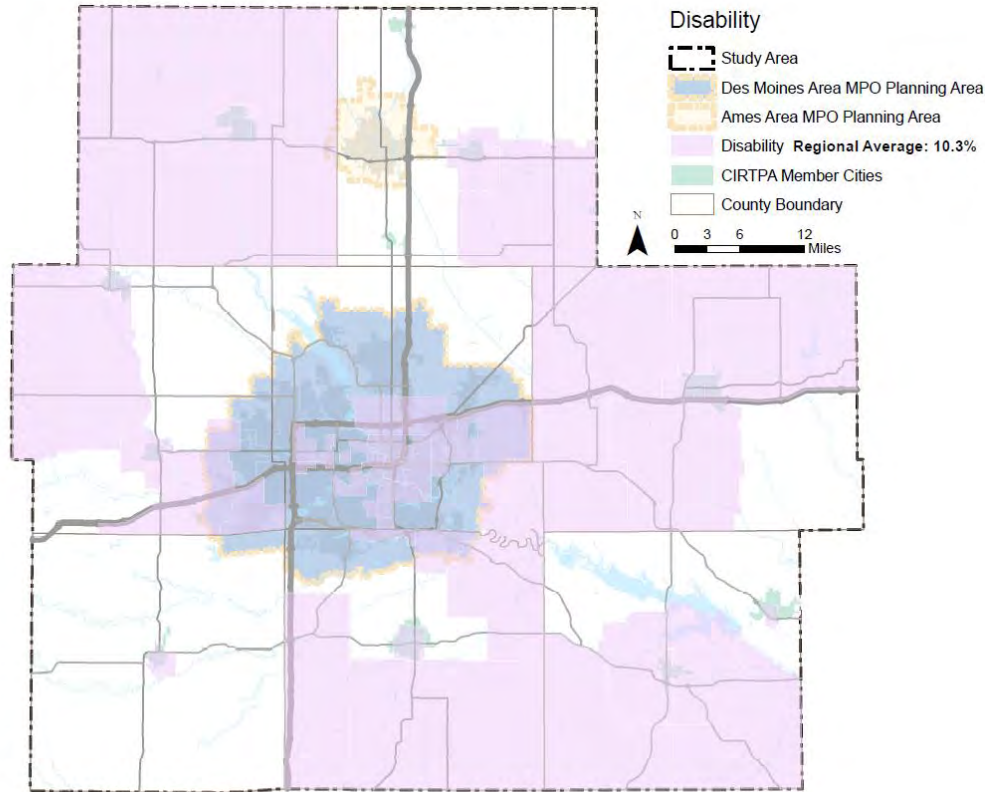
Looking regionally, the total estimated number of people over 65 make up 12.2 percent of the entire population. Of all the counties, Jasper County has the highest percent, sitting at 17.7, and Story County has the lowest at 10.4 percent. All of these numbers are growing regionally. The following table breaks this information down by county estimates.

County	Total Population	Population over 65	Percent over 65
Boone	26,401	4,431	16.8%
Dallas	74,892	8,111	10.8%
Jasper	36,726	6,489	17.7%
Madison	15,644	2,444	15.6%
Marion	33,248	5,378	16.2%
Polk	452,369	51,709	11.4%
Story	93,586	9,698	10.4%
Warren	47,542	6,828	14.4%
Total	780,408	95,088	12.2%

Table 2: Regional Analysis of Populations over 65 (ACS, 2011-2015 5-year Average)

Similar to populations over 65, people with disabilities are also more dependent on passenger transportation. Concentrated areas of people with disabilities were determined using the same methodology as the previously mentioned population groups. The following map shows that there is a scattering of disabled population groups across the CIRTPA region.





Map 3: Regional Analysis of Persons with Disability (ACS, 2011-2015 5-year Average)

Overall, 10.3 percent of the total population in the region has a disability. The county with the highest percentage is Jasper County, at 14.8 percent. Story County is the lowest, with 7 percent of its population having a disability. The table below displays information for all counties in the CIRTPA region.

County	Total civilian noninstitutionalized population	Population with Disability	Percent with Disability
Boone	25,769	3,643	14.1%
Dallas	74,382	5,656	7.6%
Jasper	35,023	5,189	14.8%
Madison	15,457	1,858	12.0%
Marion	32,999	4,084	12.4%
Polk	447,444	46,791	10.5%
Story	92,861	6,510	7.0%
Warren	46,957	5,311	11.3%
Total	770,892	79,042	10.3%

Table 3: Regional Analysis of Persons with Disability (ACS, 2011-2015 5-year Average)

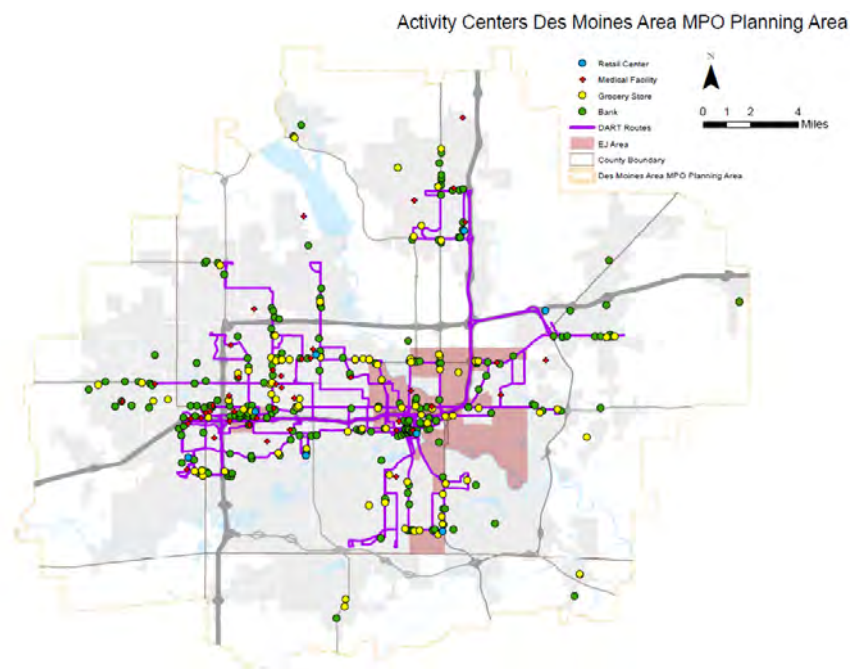
Major activity centers in the region exist within the two MPO planning areas. Inside of the Des Moines Area MPO, large employers are located in various locations across Greater Des Moines. The primary



employment center is located in downtown Des Moines, where several large employers are based, including Principal Financial Group.

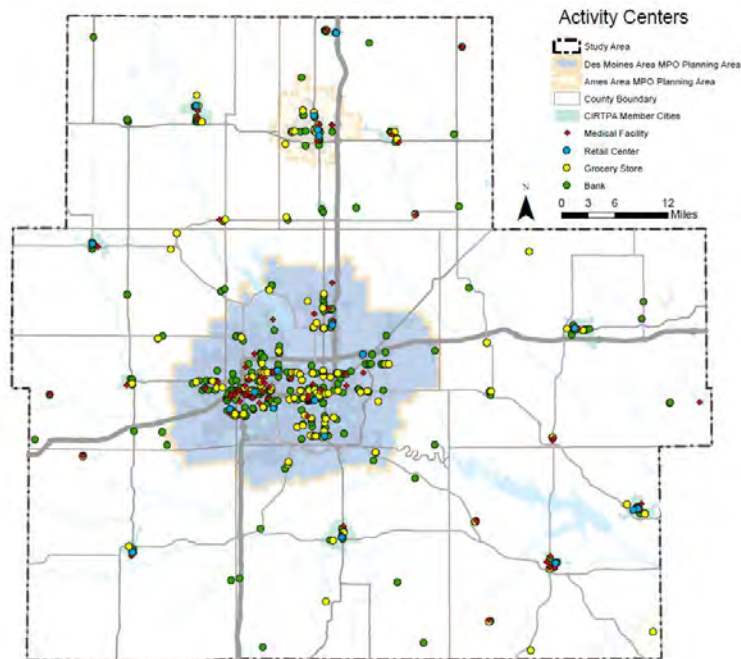
West Des Moines offers another employment center, surrounding the Jordan Creek Town Center. The existing mall in the area provides a large number of retail jobs and is a popular destination point for people across the entire CIRTPA/DMAMPO region. Large corporate offices such as Wells Fargo and Athene USA also add many jobs to the area.

The Greater Des Moines region offers a large amount of health care facilities near downtown Des Moines, as well as in West Des Moines, near 60th Street and University Avenue. Access to the various activity centers via public transit is displayed on the map on the following page.



Map 4: MPO Region Activities Center

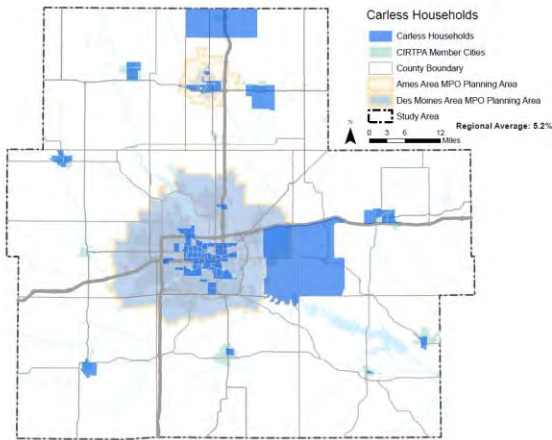
Looking beyond the Des Moines Area MPO boundary and into the more rural areas of the region, activity centers can typically be found in the larger communities that are current members of CIRTPA. These communities typically have stronger downtowns and larger health care facilities that serve a greater portion of the region. Along with health care facilities, grocery stores and retail centers in the region also tend to be located in these communities, while banks have a higher frequency and can also be found in the smaller communities throughout each of the eight counties. The following map displays these activity centers.



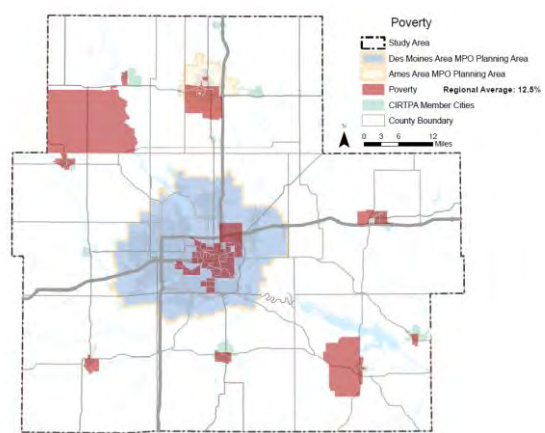
Map 5: CIRTPA Region Activity Centers (InfoGroup, 2014)

An understanding of where activity centers are in the region is a key component to successful passenger transportation planning. These areas provide both amenities and necessities to residents throughout the region. Access to these centers, then, becomes a need for those that rely on public transit as a means of transportation. By mapping the locations of banks, grocery stores, medical facilities, and retail centers, transit agencies can determine areas that currently do not have access via public transportation. Currently, the Heart of Iowa Regional Transit Agency (HIRTA) provides door to door transit services to all of the counties in the CIRTPA region, with the exception of Polk County. The Des Moines Area Regional Transit Authority (DART) serves a majority of the Des Moines Area MPO planning area, and is the largest public transit agency in Iowa.

Nearly 6 percent of the region is carless and more than 13 percent falls below the poverty level. These affect the Greater Des Moines population more than the region as a whole, and should be taken into consideration by organizations working within those boundaries. Maps of each of these population concentrations can be found on the next page.

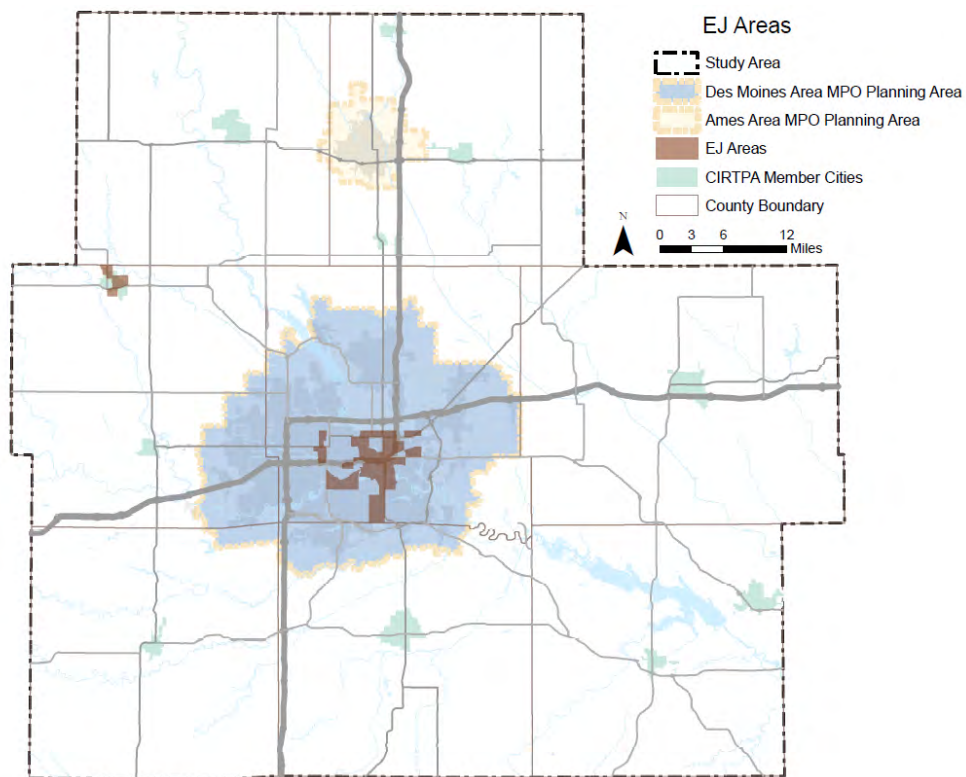


Map 6: Regional Analysis of Carless Households  
(ACS, 2011-2015 5-year Average)



Map 7: Regional Analysis of Poverty  
(ACS, 2011-2015 5-year Average)

Finally, the combination of these statistics, considered degrees of disadvantage, provides a glimpse at environmental injustice within the region. As shown in the map below, these areas are concentrated to central areas of the MPO region, specifically within Des Moines and West Des Moines, as well as, within the City of Perry.



Map 8: Regional Analysis of Environmental Injustice (ACS, 2011-2015 5-year Average)



# CIRTPA Public Participation Plan

2015 Update

October 2015

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*The Central Iowa Reginal Transportation Planning Alliance (CIRTPA) prepared this report with partial funding from the U.S. Department of Transportation’s Federal Highway Administration and Federal Transit Administration, and in part with local matching funds provided by the CIRTPA member governments. The contents of this report are the responsibility of the CIRTPA. The United States government and its agencies assume no liability for the contents of this report or for the use of its contents.*

## INTRODUCTION

The Central Iowa Regional Transportation Planning Alliance (CIRTPA) provides a continuous, cooperative, and comprehensive (3-C) transportation planning process for the central Iowa region, excluding the planning areas of the Des Moines Area Metropolitan Planning Organization (DMAMPO) and the Ames Area Metropolitan Planning Organization (AAMPO). As part of a successful 3-C transportation planning process, the CIRTPA solicits public review and comment on the work, projects, and products proposed and created by the CIRTPA.

The CIRTPA's Public Participation Plan (PPP) intends to promote this effort by defining a process that provides citizens, stakeholder groups, and other interested parties with reasonable opportunities to be involved in the transportation planning process.

The CIRTPA developed this PPP in consultation with the public and other interested parties. Included in this PPP are the CIRTPA's policies and procedures for conducting public outreach, scheduling public meetings, and incorporating public input into the transportation planning process.

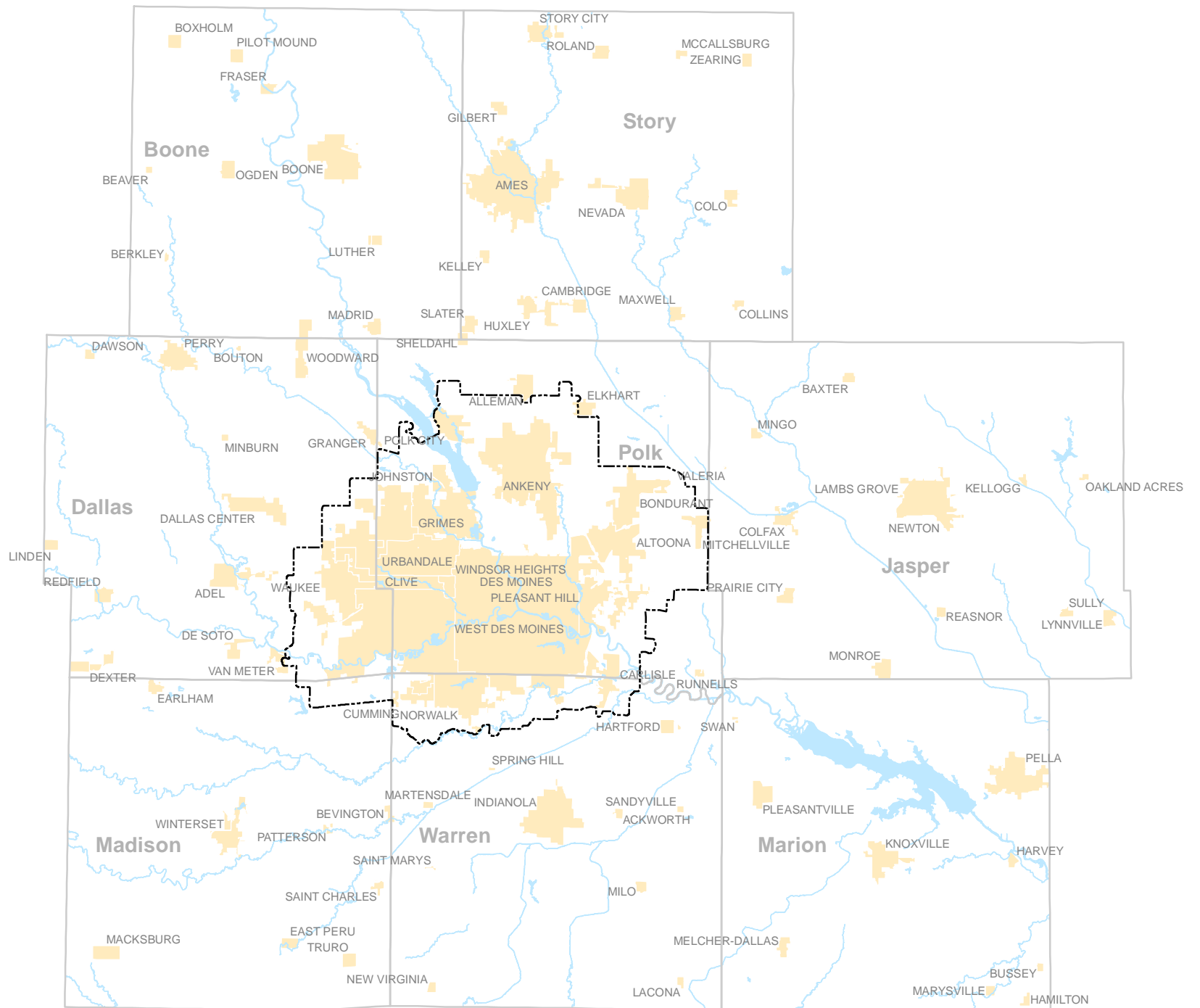
## ABOUT CIRTPA

The Central Iowa Regional Transportation Planning Alliance (CIRTPA) was created in 1994 to carry out transportation planning for the central Iowa region, excluding the planning areas of the Des Moines Area Metropolitan Planning Organization (DMAMPO) and the Ames Area Metropolitan Planning Organization (AAMPO). The CIRTPA serves as the designated regional transportation planning agency for the Iowa Department of Transportation's (DOT) Region 11. The CIRTPA coordinates planning and programming efforts in the region and fosters new partnerships with state and local officials.

The CIRTPA's Regional Transportation Planning Area includes Boone, Jasper, and Marion Counties and portions of Dallas, Madison, Polk, Story, and Warren Counties not included as part of the DMAMPO or the AAMPO. Members of the CIRTPA include the eight counties noted above as well as ten cities: Adel, Boone, Indianola, Knoxville, Nevada, Newton, Pella, Perry, Story City, and Winterset. The location of the CIRTPA region within Iowa is shown on a map on the following page. The CIRTPA has an agreement with the DMAMPO for support services in carrying out its transportation planning responsibilities.

The CIRTPA cooperates with a number of agencies, including the Iowa DOT, the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the DMAMPO, the AAMPO, Des Moines Area Regional Transit Authority (DART), the Heart of Iowa Regional Transit Authority (HIRTA), and the CIRTPA's ten member communities and eight member counties in fulfilling its transportation planning responsibilities.

The CIRTPA Transportation Policy Committee (TPC) receives input and recommendations from its Technical Committee. In addition to the Technical Committee, the CIRTPA will establish and support other committees, as needed, on various transportation-related issues relevant to the CIRTPA's responsibilities. The CIRTPA also can request citizens to serve on these committees, as appropriate.



0 5 10 20 Miles





## REGULATIONS and REQUIREMENTS

### *Title VI of the Civil Rights Act of 1964*

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and natural origin in programs and activities that receive federal financial assistance. As President John F. Kennedy said in 1963, “Simple justice requires that public funds, to which all taxpayers of all races [colors, and national origins] contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in racial [color or national origin] discrimination.” Per the US Department of Justice:

*If a recipient of federal assistance is found to have discriminated and voluntary compliance cannot be achieved, the federal agency providing the assistance should either initiate fund termination proceedings or refer the matter to the Department of Justice for appropriate legal action. Aggrieved individuals may file administrative complaints with the federal agency that provides funds to a recipient, or the individuals may file suit for appropriate relief in federal court. Title VI itself prohibits intentional discrimination. However, most funding agencies have regulations implementing Title VI that prohibit recipient practices that have the effect of discrimination on the basis of race, color, or national origin.*

*To assist federal agencies that provide financial assistance, the wide variety of recipients that receive such assistance, and the actual and potential beneficiaries of programs receiving federal assistance, the US Department of Justice has published a Title VI Legal Manual. The Title VI Legal Manual sets out Title VI legal principles and standards. Additionally, the Department has published an Investigation Procedures Manual to give practical advice on how to investigate Title VI complaints. Also available on the Federal Coordination and Compliance Website are a host of other materials that may be helpful to those interested in ensuring effective enforcement of Title VI.*

### *Executive Order #12898*

The US Environmental Protection Agency (EPA) defines environmental justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EPA has this goal for all communities and persons across this Nation. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”

In February 1994, President Bill Clinton signed Executive Order #12898 – Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The order is intended to focus federal attention on the “environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. That order is intended to promote nondiscrimination in federal programs substantially affecting human health and the environment, and to provide minority

communities and low-income communities with access to public information on, and an opportunity for public participation in, matters relating to human health or the environment.”

### *Open Meetings Law*

The State of Iowa established the Open Meetings Law in 1999. It states that meetings should be open to the public; however, the Open Meetings Law does permit some closed meetings. The Open Meetings Law applies to the CIRTPA Policy Committee, the CIRTPA Transportation Technical Committee and such other subgroups as may be directed by the CIRTPA Policy Committee.

Where Open Meetings Law applies, the CIRTPA keeps minutes as public records that show the date, time, members present, and the actions taken during the meeting. Staff may keep additional records from the meetings that also are public records.

### *Public Records Law*

The State of Iowa also established the Public Records Law in 1999. This legislation, with certain statutory exceptions, ensures that every person has a right to examine public records and to copy them.

### *Nondiscrimination Obligations*

The CIRTPA is obligated to manage its programs and provide planning services to Central Iowa without regard to race, color, and national origin. The CIRTPA is further obligated to avoid discrimination based on handicap or disability.

### *Accommodations*

The CIRTPA schedules public input meetings at convenient and accessible locations, and at times and facilities compliant with the Americans with Disabilities Act.

As part of its environmental justice analysis, the CIRTPA has identified two degrees of disadvantage, or types of traditionally disadvantaged populations, as the analytic basis for ensuring compliance with Title VI. The two degrees of disadvantage include:

- Non-white population
- Persons in poverty

The CIRTPA created maps highlighting areas identified as disadvantaged through this process. The maps help the CIRTPA determine public input meeting locations. This process will also help the CIRTPA develop a methodology for assessing the positive and negative effects that transportation projects may have on areas sensitive to environmental justice.

With these concerns in mind, the CIRTPA is committed to providing its materials to all citizens within the CIRTPA planning area. The CIRTPA developed a Language Assistance Plan to ensure individuals with limited English proficiency have meaningful access to the transportation

planning process. For example, the CIRTPA encourages persons with limited English proficiency (LEP) to contact the CIRTPA for translation services of CIRTPA documents. Upon request, the CIRTPA works with local organizations to obtain translations of the desired documents within a reasonable period. The CIRTPA also ensures that a notice of the availability of translation services is included in relevant CIRTPA documents and written in the language of large LEP populations. More details on LEP accommodations can be found in the CIRTPA's Language Assistance Plan, available online at [www.cirtpa.org/public-participation/](http://www.cirtpa.org/public-participation/).

### *Complaint Procedures*

Persons wishing to file a formal discrimination complaint may do so by completing the Title VI Complaint Form available by contacting the CIRTPA. Complaint forms are also available on the CIRTPA website at [www.cirtpa.org/title-vi-complaint-form/](http://www.cirtpa.org/title-vi-complaint-form/) in printable PDF and online form formats. Persons should send the form to the CIRTPA's designated Title VI Coordinator. Within 10 calendar days, the CIRTPA will forward this form and any additional information to the Iowa DOT Title VI Coordinator. The Iowa DOT will conduct an investigation into the complaint and make a recommendation to the FHWA, who will make the final determination. The Iowa DOT and the CIRTPA will inform the person filing the complaint of the final determination. For more information, please visit <http://www.iowadot.gov/civilrights/subrecipient.html>.

### *Record Keeping*

The CIRTPA's civil rights specialist maintains a log of all complaints and the disposition of those complaints. The CIRTPA maintains files of each complaint for a period of no less than seven years. Annually, the CIRTPA staff provides a summary of discrimination complaints to the CIRTPA Policy Committee. At the time of this publication, the CIRTPA has yet to receive any discrimination complaints.

## OUTREACH STRATEGIES

The CIRTPA implements a variety of techniques to reach the populations outlined at the beginning of this section. As work on documents such as the long-range transportation plan (LRTP) or the Transportation Improvement Program (TIP) commences, staff has a general outline of public engagement strategies to be implemented. It is important to note, however, that these strategies are designed to be responsive to public feedback and may be modified to enhance the engagement.

### *Public Events*

The CIRTPA Policy Committee and Transportation Technical Committee meet every other month. All of these meetings are open to the public, per the State of Iowa's Open Meetings Law.

The CIRTPA also hosts a number of roundtables and subcommittees that hold regular meetings. These roundtables and subcommittees are outlined on the previous page. All of the roundtable and subcommittee meetings are open to the public as well.

The CIRTPA schedules single purpose public input meetings for the LRTP, the TIP, and the PPP with the sole intent of disseminating information to the public and soliciting public comment on these important documents. Additionally, the CIRTPA holds public input meetings to solicit public review and comment on amendments to the LRTP, the TIP, and the PPP, and to gather feedback on the development of other planning products. When practical and feasible, the CIRTPA supplements public input meetings with other outreach techniques, such as publicly circulated surveys regarding current issues and concerns. The CIRTPA provides the results of any such surveys to the public.

Finally, the CIRTPA hosts special events on an as-needed basis. These include public open houses with learning opportunities and chances to interact with the CIRTPA's community partners; facilitated small group discussions; and focus groups with subject matter experts; speaker series events.

### *Publications*

Press releases are issued as needed on the planning efforts, studies and other activities of the CIRTPA. Topics include reports on progress the region is making in meeting the performance measures of the long-range transportation plan, events related to planning activities, and public input opportunities. Media releases go to media outlets throughout the region, including those with LEP and minority audiences.

On occasion, the CIRTPA publishes other documents and informational brochures that provide summary information regarding important planning issues and activities.

To subscribe to the CIRTPA distribution list, contact CIRTPA staff at 515.334.0075.

### *Online Presence*

Over the past few years, the CIRTPA has significantly bolstered its online presence. The CIRTPA website – accessible at [www.cirtpa.org](http://www.cirtpa.org) – provides an overview of upcoming meetings along with agendas, committee representatives, staff information, news, maps, plans, and publications produced by the CIRTPA. Relevant links are included on the website, too.

The CIRTPA makes every effort to provide adequate notice for public review and comment, particularly as these activities relate to proposed drafts of the LRTP, the TIP, and the PPP. The CIRTPA makes notifications and announcements of upcoming public input meetings for the LRTP, the TIP, and the PPP approximately four weeks in advance of the scheduled meeting through publications and online. Approximately one week in advance, the CIRTPA publishes legal notice of public meetings and public review and comment periods in the Des Moines Register. The CIRTPA also posts meeting agendas and minutes in accordance with the State of Iowa's Open Meetings Law. The CIRTPA issues press releases of upcoming public input meetings to local media outlets and encourages them to advertise the dates, times, and locations of public meetings and public review and comment periods. These release go to a broad range of media outlets, including several with LEP and minority audiences.

From time to time, member governments request amendments to the LRTP and to the TIP. In conducting revisions to the approved TIP, the CIRTPA notifies the public of the CIRTPA's intent to discuss and potentially vote on revisions at least one week prior to the meeting, when possible.

### *Availability of Information*

In order to provide reasonable access to information about transportation issues and processes, the CIRTPA posts all of its publications, meeting notices, and other related information online at [www.cirtpa.org](http://www.cirtpa.org). The CIRTPA posts most publications in PDF format, which uses the free, downloadable Adobe Reader software. The CIRTPA will provide hard copies of any document upon request. Additionally, the CIRTPA staff is available to make presentations on relevant topics to local citizens, organizations, and other interested parties. The CIRTPA also employs the use of videos to relay information related to regionally significant planning initiatives. The CIRTPA also posts copies of all presentations to its CIRTPA Policy Committee on the website, as well as copies of presentations from guest speakers. To request a hard copy of a document or to schedule a presentation call 515.334.0075 or fax 515.334.0098.

### *Public Review and Comment*

The CIRTPA provides a public review and comment period of 45 calendar days prior to the adoption of the LRTP, the TIP, and the PPP. The CIRTPA hosts public meetings across Central Iowa region to discuss these documents with the public. In an effort to provide information to the public and to solicit public input, public input meetings take place during the development

of the LRTP, and during the review periods of the draft LRTP, draft TIP, and draft PPP. Additional public input meetings take place as needed.

The CIRTPA provides the public an opportunity to comment on proposed revisions to the approved TIP. The CIRTPA considers two types of revisions in the TIP development process. An amendment to the TIP involves major changes to an approved project or the addition of a new project. Amendments to the approved TIP require formal CIRTPA approval. Amendments are required under the following conditions:

- **Project cost:** Projects in which the recalculated project costs increase federal-aid by more than 30 percent or increase total federal-aid by more than \$2 million from the original amount.
- **Schedule changes:** Projects added or deleted from the TIP.
- **Funding sources:** Projects receiving additional federal funding sources to a project.
- **Fiscal constraint:** Changes that result in the TIP no longer being fiscally constrained (makes any of the four federal fiscal years not fiscally constrained).
- **Scope changes:** Changing the project termini, the amount of through traffic lanes, type of work from an overlay to reconstruction, or a change to include widening of the roadway.

Administrative modifications involve minor changes to existing projects in the approved TIP. Administrative modifications do not require formal CIRTPA approval and often are conducted administratively by the CIRTPA staff. Administrative modifications that involve moving Surface Transportation Program (STP) or Transportation Alternative Program (TAP) funds forward require CIRTPA approval to ensure that the CIRTPA's TIP remains fiscally constrained. Administrative modifications involve:

- **Project cost:** Projects in which the recalculated project costs do not increase federal-aid by more than 30 percent and do not increase total federal-aid by more than \$2 million from the original amount.
- **Schedule changes:** Changes in schedules to projects included in the first four years of the TIP.
- **Funding sources:** Changes to funding from one source to another.
- **Scope changes:** All changes to a project's scope require an amendment.

In conducting revisions to the approved TIP, the CIRTPA considers all amendments and modifications as optional votes. The public is invited to CIRTPA Policy Committee meetings to provide comments on these revisions prior to the CIRTPA vote. A person may speak at the CIRTPA Policy Committee meeting if he or she:

- Lives in or represents someone living in the CIRTPA planning area; and,
- Registers with complete contact information and the subject the comments will address prior to the start of the CIRTPA Policy Committee meeting.

Speakers are generally limited to three minutes; however, the chair may reduce speaking time to two minutes based on the number of individuals wishing to speak at a meeting. The chair also may amend this time limit if an individual is speaking on behalf of an organization or group of individuals. Speakers generally offer comments at the beginning of the meeting and must state the subject he or she will be addressing. The public comment portion of the meeting is the only time when comments by the public are permitted. It is not the intent of the board to engage in debate during this time. Any audio/visual or similar equipment to be used to support the comments must be approved by the CIRTPA chair at least 24 hours prior to the meeting. While the CIRTPA generally follows the procedure outlined above, the chair has the discretion to amend the comment portion of the meeting as appropriate.

Public notifications are made on the CIRTPA website regarding the CIRTPA's intent to discuss and vote on revisions at least one week prior to the meeting, when possible.

### *Visualization Techniques*

The CIRTPA makes every reasonable effort to incorporate visualization techniques into its public outreach activities. The CIRTPA creates large legible maps for public meetings regarding the development of the LRTP and the TIP to help demonstrate the location and impact of possible transportation improvements and various network alternatives. Other useful visual aids used by the CIRTPA may include graphs representing various types of data and flow charts to depict the transportation planning process. The CIRTPA also works to provide an online interactive map demonstrating the location of various planning activities and transportation projects in Central Iowa.

### *Accommodations for Special Populations*

The CIRTPA works to reach out to special populations traditionally underserved by existing transportation systems that may face challenges accessing employment and other services. These populations may include low-income and minority households, persons with disabilities, and persons with limited English proficiency. The CIRTPA schedules public input meetings at Americans with Disabilities Act compliant facilities, and at convenient and accessible locations and times.

The CIRTPA works with the Iowa DOT to provide translation services, which are publicized on the CIRTPA's website at [www.cirtpa.org/translation-services/](http://www.cirtpa.org/translation-services/). To request translation services, people can call or email CIRTPA staff at 515-334-0075. The public is asked to provide the CIRTPA staff with as much notice as possible, so they can best provide for any special accommodations that may be necessary in order for them to participate in any public events. Additional information on the CIRTPA's nondiscrimination obligations and procedures for investigating and

tracking Title VI complaints can be found elsewhere in this document, or is available upon request by calling 515.334.0075 or by visiting [www.cirtpa.org/title-vi/](http://www.cirtpa.org/title-vi/).



PLANNING DOCUMENT OR ACTIVITY	PUBLIC PARTICIPATION PROCEDURES
Long-Range Transportation Plan (LRTP)	<ul style="list-style-type: none"> <li>• Public input meetings held during the development of the LRTP</li> <li>• Draft + final LRTP available on CIRTPA website</li> <li>• Legal notice published one week prior to public meeting</li> <li>• Forty-five calendar day public comment and review period</li> <li>• At least one public input meeting held for completed draft LRTP</li> </ul>
Transportation Improvement Program (TIP)	<ul style="list-style-type: none"> <li>• Draft + final TIP available on CIRTPA website</li> <li>• Legal notice published one week prior to public meeting</li> <li>• Forty-five calendar day public comment and review period</li> <li>• At least one public meeting held for draft TIP</li> </ul>
TIP Revisions	<ul style="list-style-type: none"> <li>• Proposed TIP revisions available on CIRTPA website</li> <li>• Information regarding proposed TIP revision(s) made available through CIRTPA website at least one week prior to formal action, when possible</li> <li>• Legal notice published one week prior to the public meeting</li> <li>• Public comment for proposed TIP revisions can be made at the CIRTPA Policy Committee meeting prior to the CIRTPA's formal action on the request</li> </ul>
LRTP Amendments	<ul style="list-style-type: none"> <li>• Proposed LRTP amendments made available on CIRTPA website</li> <li>• Legal notice published one week prior to the public meeting</li> <li>• Forty-five calendar day public comment and review period</li> <li>• At least one public input meeting held</li> <li>• Public comment for proposed LRTP revisions can be made at the CIRTPA Policy Committee meeting prior to the CIRTPA's formal action on the request</li> </ul>
Public Participation Plan (PPP)	<ul style="list-style-type: none"> <li>• Draft and final PPP available on CIRTPA website</li> <li>• Legal notice published one week prior to public meeting</li> <li>• Forty-five calendar day public comment and review period</li> <li>• At least one public input meeting held</li> </ul>
Additional Public Comment Period, as necessary	<ul style="list-style-type: none"> <li>• Relevant documents and plans available on CIRTPA website</li> <li>• Legal notice published one week prior to public meeting</li> <li>• At least a fifteen calendar day public comment and review period</li> </ul>

## MEETING SCHEDULE

Regularly scheduled meetings of the CIRTPA committees are as follows:

- The Policy Committee and the Technical Committee meet jointly on the third Thursday of every other month starting January at 9:30 am at the CIRTPA office – Burnham Conference Room;

The CIRTPA posts meeting times, agendas and minutes on its website at [www.cirtpa.org](http://www.cirtpa.org).

All meetings of the Technical Committee, Policy Committee, and other subgroups of the CIRTPA are open to the public. Members of the public may request time on the agenda at the Technical Committee or the CIRTPA Policy Committee to comment on specific subjects of interest to the representatives. Additionally, the CIRTPA Chair may appoint new subcommittees and working groups to address specific transportation-related topics or areas of interest.

The CIRTPA hosts an annual public meeting for comment on the proposed TIP. The TIP is an annual document identifying transportation projects that CIRTPA member governments and agencies intend to implement using federal funds over the next four years. The CIRTPA holds other public input opportunities throughout the year, as necessary, allowing for comment on proposed revisions to the approved TIP.

Several public input meetings occur in conjunction with the update of the LRTP. The LRTP addresses transportation planning issues over at least a twenty-year period and undergoes updates every five years. Amendments to the approved LRTP also require a public input meeting. Because these meetings are infrequent, the CIRTPA schedules them on an as-needed basis.

## PUBLIC INPUT

The CIRTPA accepts input and comments from the public through a variety of means. Members of the public may make comments by calling the CIRTPA at 515.334.0075. Written comments may be:

- Presented at public meetings

- Faxed to the CIRTPA at 515.334.0098

- Submitted online at [www.cirtpa.org/public-comment-form/](http://www.cirtpa.org/public-comment-form/)

- Mailed to the CIRTPA, 420 Watson Powell Jr., Way, Suite 200, Des Moines, Iowa 50309

The public may submit comments to their respective Technical Committee or Policy Committee representatives for transmittal to the respective full committees. Citizens can make comments on CIRTPA plans, reports, and programs at public input meetings. Additionally, members of the public or a representative of a group with expressed comments on a particular topic may request of the CIRTPA Chair an appointment to serve as a citizen representative on the appropriate subcommittee of the Technical Committee or the Policy Committee. Citizens or representatives of special interest groups may request time on a CIRTPA Technical Committee or Policy Committee agenda to offer input to the full committees as well. The CIRTPA staff shares all public comments and input with the Technical Committee and the Executive Committee in verbal and/or written form.

The CIRTPA accepts and considers public input and comments received during the public participation process. When the CIRTPA receives significant written or oral comments regarding the draft LRTP, the draft TIP, or the draft PPP through the public participation process, the CIRTPA includes a summary, analysis, and report on those comments in the final document. In those instances where a final LRTP, TIP, or PPP differs significantly from the version that was made available for public comment, the CIRTPA provides an additional opportunity for further public comment on the final version. Additional public comment periods are at least fifteen calendar days.

## **COORDINATION AND CONSULTATION**

The CIRTPA coordinates its public participation efforts with the statewide transportation planning public involvement and consultation process, as necessary. The LRTP, the TIP, and PPP are developed with due consideration of other related planning activities in Central Iowa, and the CIRTPA consults and/or coordinates with other agencies and officials responsible for other planning activities that may be impacted or affected by transportation. Additionally, the CIRTPA involves the appropriate federal land management agencies in the development of the LRTP and TIP, as necessary.

## EVALUATION

The CIRTPA periodically reviews the PPP in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the PPP, the CIRTPA may revise these procedures to incorporate new and innovative ways to involve the public and ensure a full and open participation process. In particular, the CIRTPA documents information regarding public attendance at public input meetings, records the number of requests or complaints associated with special populations, and solicits feedback on the use of visual aids at public meetings. The CIRTPA reviews this information every year and evaluates the need to revise these procedures.

## CONTACT INFORMATION

The CIRTPA understands that, without the public, the planning process is not nearly as strong as it could be. As such, the CIRTPA encourages residents to submit comments to the CIRTPA. This can be accomplished by contacting the CIRTPA by:

Mail: CIRTPA  
420 Watson Powell, Jr., Way, Suite 200  
Des Moines, Iowa 50309

Phone: 515.334.0075

Fax: 515.334.0098

Web: [www.cirtpa.org](http://www.cirtpa.org)



# Language Assistance Plan

Central Iowa Regional Transportation Planning Alliance

October 2015

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The Central Iowa Regional Transportation Planning Alliance (CIRTPA) has prepared this document with partial funding from the United States Department of Transportation’s Federal Highway Administration and Federal Transit Administration, and in part through local matching funds provided by CIRTPA’s member governments. These contents are the responsibility of CIRTPA. The United States Government and its agencies assume no liability for the contents of this report or for the use of its contents.



## Introduction

The Central Iowa Regional Transportation Planning Alliance (CIRTPA) is a transportation policy-making board responsible for planning and prioritizing transportation projects and funding allocation in the eight-county area of Boone, Dallas, Jasper, Madison, Marion, Polk, Story, and Warren counties, though not including the planning areas of the Des Moines Area Metropolitan Planning Organization or Ames Area Metropolitan Planning Organization. The CIRTPA works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans and programs through a continuing, cooperative, and comprehensive planning process. This planning process guides the use of federal and state dollars spent on existing and future transportation projects and programs. The **Language Assistance Plan (LAP)** plays an important part in that process. It ensures individuals with limited English proficiency have meaningful access to the transportation planning process.

## Background

The U.S. Department of Transportation (DOT) requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). 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 to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The LAP outlined below is based on the federal guidance provided by U.S. DOT.

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 does not define limited

English proficiency or non-limited English proficient populations. It reports data based on the four categories of English-speaking ability: very well, well, not well, and not at all.

## Language Assistance Needs Assessment – Four Factor Analysis

This plan outlines how to identify a person who may require language assistance, the ways in which the CIRTPA provides such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service. In order to prepare the Language Assistance Plan (LAP), a needs assessment was conducted utilizing the four factor analysis, as recommended by USDOT. The four factors are:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by CIRTPA services and programs.
- Factor 2: The frequency with which LEP persons come into contact with CIRTPA services and programs.
- Factor 3: The nature and importance of the CIRTPA's services and programs in people's lives.
- Factor 4: The resources available to the CIRTPA for LEP outreach, as well as, the costs associated with the outreach.

### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by CIRTPA services and programs**

The planning and programming decisions made by the CIRTPA will affect the future economic health of the region and the transportation options available to residents. An effective LAP program is the only way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be addressed through the planning and project development process.

As indicated in the table below, the latest Census data shows a steady growth of the increasingly diverse population in the planning area. The eight county region has experienced a substantial increase in non-English speaking population or people who speak a language "other than English" (see Table 1).

Table 1: English Proficiency

CIRTPA	2000	2013	Percent Change
Language Spoken At Home	8-County Total		
Population 5 years and Over	600,230	704,478	17%
Language Other Than English	44,699	67,834	52%
Speak English Less than "very well"	20,788	29,549	42%
Spanish	19,471	31,627	62%
Speak Spanish Less than "very well"	9,234	14,832	61%
Other Indo-European Languages	12,823	14,508	13%
Speak English Less than "very well"	4,693	4,585	-2%
Other languages	12,405	21,699	75%
Speak English Less than "very well"	6,788	9,880	46%

Source: U.S. Census Bureau

When the LEP is further broken down, it indicates that is the Spanish, Serbo-Croatian, Chinese, Vietnamese, other Asian languages, and African languages groups pass the threshold for speaking English less than very well (see Table 2). The CIRTPA will continue to monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached in any additional language groups.

Table 2: Detailed Breakdown of English Proficiency

	Total	Percent
Total:	704,478	100%
Speak only English	636,644	90%
<b>Spanish or Spanish Creole:</b>	<b>31,627</b>	<b>4%</b>
<b>Speak English "very well"</b>	<b>16,795</b>	<b>2%</b>
<b>Speak English less than "very well"</b>	<b>14,832</b>	<b>2%</b>
French (incl. Patois, Cajun):	1,552	0%
Speak English "very well"	1,272	0%
Speak English less than "very well"	280	0%
Italian:	427	0%
Speak English "very well"	333	0%
Speak English less than "very well"	94	0%
Portuguese or Portuguese Creole:	208	0%
Speak English "very well"	175	0%
Speak English less than "very well"	33	0%
German:	1,915	0%
Speak English "very well"	1,469	0%
Speak English less than "very well"	446	0%
Yiddish:	66	0%
Speak English "very well"	62	0%
Speak English less than "very well"	4	0%
Other West Germanic languages:	311	0%
Speak English "very well"	219	0%
Speak English less than "very well"	92	0%
Scandinavian languages:	320	0%
Speak English "very well"	276	0%
Speak English less than "very well"	44	0%
Greek:	96	0%
Speak English "very well"	82	0%
Speak English less than "very well"	14	0%
Russian:	761	0%
Speak English "very well"	463	0%
Speak English less than "very well"	298	0%
Polish:	229	0%
Speak English "very well"	136	0%
Speak English less than "very well"	93	0%
<b>Serbo-Croatian:</b>	<b>4,856</b>	<b>1%</b>
<b>Speak English "very well"</b>	<b>2,665</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>2,191</b>	<b>0%</b>

Other Slavic languages:	145	0%
Speak English "very well"	67	0%
Speak English less than "very well"	78	0%
Armenian:	28	0%
Speak English "very well"	9	0%
Speak English less than "very well"	19	0%
Persian:	106	0%
Speak English "very well"	68	0%
Speak English less than "very well"	38	0%
Gujarati:	144	0%
Speak English "very well"	81	0%
Speak English less than "very well"	63	0%
Hindi:	982	0%
Speak English "very well"	759	0%
Speak English less than "very well"	223	0%
Urdu:	403	0%
Speak English "very well"	297	0%
Speak English less than "very well"	106	0%
Other Indic languages:	1,466	0%
Speak English "very well"	938	0%
Speak English less than "very well"	528	0%
Other Indo-European languages:	493	0%
Speak English "very well"	300	0%
Speak English less than "very well"	193	0%
<b>Chinese:</b>	<b>4,513</b>	<b>1%</b>
<b>Speak English "very well"</b>	<b>2,324</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>2,189</b>	<b>0%</b>
Japanese:	275	0%
Speak English "very well"	202	0%
Speak English less than "very well"	73	0%
Korean:	1,129	0%
Speak English "very well"	496	0%
Speak English less than "very well"	633	0%
Mon-Khmer, Cambodian:	258	0%
Speak English "very well"	107	0%
Speak English less than "very well"	151	0%
Hmong:	225	0%
Speak English "very well"	145	0%
Speak English less than "very well"	80	0%
Thai:	1,124	0%
Speak English "very well"	699	0%
Speak English less than "very well"	425	0%

Laotian:	2,156	0%
Speak English "very well"	1,353	0%
Speak English less than "very well"	803	0%
<b>Vietnamese:</b>	<b>3,180</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,307</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,873</b>	<b>0%</b>
<b>Other Asian languages:</b>	<b>2,427</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,376</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,051</b>	<b>0%</b>
Tagalog:	653	0%
Speak English "very well"	413	0%
Speak English less than "very well"	240	0%
Other Pacific Island languages:	468	0%
Speak English "very well"	260	0%
Speak English less than "very well"	208	0%
Navajo:	-	0%
Speak English "very well"	-	0%
Speak English less than "very well"	-	0%
Other Native North American languages:	143	0%
Speak English "very well"	115	0%
Speak English less than "very well"	28	0%
Hungarian:	3	0%
Speak English "very well"	3	0%
Speak English less than "very well"	-	0%
Arabic:	1,676	0%
Speak English "very well"	905	0%
Speak English less than "very well"	771	0%
Hebrew:	91	0%
Speak English "very well"	91	0%
Speak English less than "very well"	-	0%
<b>African languages:</b>	<b>3,269</b>	<b>0%</b>
<b>Speak English "very well"</b>	<b>1,923</b>	<b>0%</b>
<b>Speak English less than "very well"</b>	<b>1,346</b>	<b>0%</b>
Other and unspecified languages:	109	0%
Speak English "very well"	100	0%
Speak English less than "very well"	9	0%

Source: U.S. Census Bureau

\*Bold Text indicates languages that meet threshold

**Factor 2: The frequency with which LEP persons come into contact with the CIRTPA services and programs.**

The first factor identified Spanish as the most significant language spoken by the LEP population in the CIRTPA. The size of the LEP population in this region will likely continue to increase and, as a result, so will the probability of future contact with the CIRTPA. However, to date, no requests for language assistance services have been made by LEP individuals or groups. As the LEP program is expanded in the planning area, any requests for language assistance will be monitored and used to gauge the effectiveness of the CIRTPA's outreach to these populations.

The CIRTPA conducts regular board meetings and public hearings throughout the year. Community outreach and the CIRTPA's website is the main source of potential contact between the CIRTPA and LEP persons. As a result, the frequency of contact is difficult to anticipate.

The CIRTPA's Public Participation Plan highlights the need for outreach opportunities that engage populations that have traditionally been underserved and lacked involvement in the transportation planning process.

**Factor 3: The nature and importance of CIRTPA services and programs in people's lives.**

The CIRTPA programs use federal funds to plan for future transportation improvements and projects, and therefore do not include any direct services or programs that require vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter). Further, the CIRTPA does not conduct activities such as applications or interviews prior to participation in its programs or events. The participation of any citizen with the CIRTPA or its committees is voluntary.

However, the CIRTPA must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and the policy of the CIRTPA.

The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process in use of federal funds in three major areas for the CIRTPA. These three areas are deemed to have the most widespread impact on the lives of people in the planning area:

- The **Public Participation Plan (PPP)**, public engagement plan for planning activities;
- The **Transportation Improvement Program (TIP)**, a 4-year staged program of federally funded projects for all modes of travel; and,
- The **Long Range Transportation Plan (LRTP)**, a 35-year forecast of multi-modal transportation needs.

Inclusive public participation is a priority consideration in other CIRTPA plans, studies and programs as well. The impacts of transportation improvements resulting from these planning activities have an effect on all residents. The CIRTPA will place greatest emphasis on language assistance for educational materials and public input related to the three major programs and plans identified above. Related materials are often helpful with outreach for other CIRTPA projects and studies.

**Factor 4: The resources available to the CIRTPA for LEP outreach, as well as the costs associated with the outreach.**

The CIRTPA seeks input from all stakeholders, and every effort is made to ensure that the planning process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process.

Given the size of the LEP population in the CIRTPA area and current financial constraints, full language translations of complete transportation plan documents and maps is not considered warranted or cost feasible at this time. However, the CIRTPA plans to continue its practice of sending press releases to Spanish newspapers for important meetings and activities, and will evaluate the cost feasibility of additional translations of summary fact sheets and key website information into Spanish.

The CIRTPA will seek to identify any existing Spanish outreach materials from organizations such as federal, state, and local transportation agencies that can be effectively used as outreach tools to these communities. The CIRTPA will also expand efforts to collaborate with state and local agencies and educational facilities to provide language translation and interpretation services when practical, in consideration of funding limitations.

## Implementation of the Language Assistance Plan (LAP)

One of the main tasks for the CIRTPA is to monitor the prioritization of transportation projects in its Long Range Transportation Plan (LRTP). In particular, the CIRTPA must analyze any major decision made to the overall transportation system, particularly if it negatively affects areas of high concentration of LEP population. Some of the ongoing LAP implementation strategies include:

- Identifying the LEP Individuals who need Language Assistance;
- Language Assistance Measures;
- Public Involvement; and
- Monitoring and Updating the LAP.



**Identifying the LEP Individuals who need Language Assistance:**

The CIRTPA will continue to monitor the language needs of the LEP individuals within its services area and will continue to do the following:

- Continue to monitor the languages and the customers' needs encountered by the front-line staff;
- Use the Census Bureau's Language Identification Flashcards to help identify LEP individuals at public meetings and the front desk;
- Continue to monitor the American Community Survey 1-Year Estimate published each year by the US Census Bureau for changes in the LEP population; and,
- Closely monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached for LEP populations.

**Language Assistance Measures:**

The CIRTPA will continue to implement the current measures to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:

- Continue to provide for interpreters as needed in Spanish, Serbo-Croatian, Chinese, Vietnamese, and any other language requested through the Iowa International Center's Interpretation and Translation Services;
- When possible have a dedicated staff person willing to provide assistance to a Spanish speaking person;
- Provide links on the CIRTPA website in Spanish, Serbo-Croatian, Chinese, and Vietnamese with information on how to receive translation assistance;
- Continue to translate important notices regarding major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population; and,
- Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

**Public Involvement:**

The CIRTPA will continue to implement an inclusive public outreach process as detailed in the Public Participation Plan:

- Continue to monitor the effectiveness of the current process via feedback received from the public as well as certain targeted surveys;
- Update the Public Participation Plan as needed; and,
- Explore new and innovative techniques and strategies to engage the public in transportation planning.

### **Monitoring and Updating the LAP:**

The CIRTPA will continue to update the LAP as required by the USDOT and as the characteristics of the population changes. Updates will be made as necessary and may include, but not limited to:

- Changes in LEP population by number or area as new information are made available;
- Updated analysis of the current LEP service area;
- Requirements for addition language translation services; and,
- Updates to policies and procedures, if such guidance is directed by the CIRTPA Board.

### **Contact Information**

The CIRTPA does not intend that its LAP Plan exclude anyone requiring language assistance and will make every reasonable effort to accommodate requests. Anyone who requires special language services should contact the CIRTPA's Title VI Coordinator or the Communications Manager:

Tracey Deckard  
Office Manager/Title VI Coordinator  
420 Watson Powel, Suite 200  
Des Moines, IA 50309  
515.334.0075  
[tdeckard@dmampo.org](mailto:tdeckard@dmampo.org)

Gunnar Olson  
Communications Manager  
420 Watson Powel, Suite 200  
Des Moines, IA 50309  
515.334.0075  
[golson@dmampo.org](mailto:golson@dmampo.org)

# FFY 2019-2022 TIP Projects and EJ Areas

