# ADOT FHWA
# Title VI Liaison Quarterly Meeting

Presentation by ADOT Civil Rights Office
May 30, 2024

# Quarterly Meeting Agenda

- Title VI Liaison program overview
- Spotlight: Environmental Planning and the ADOT Grand-35 Study
- Four Factor Analysis
- LEP Four Factor worksheet
- LEP Four Factor worksheet activity

# Ice Breaker

If I handed you a plane ticket right now to anywhere in the world, where would you go?

# Title VI of the Civil Rights Act of 1964

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance."

**42 USC 2000d**

# What do you think your role is as a Title VI Liaison?

# Title VI Liaison Program

The purpose of the program is to ensure that all ADOT policies, procedures, and practices are compliant with federal Title VI Nondiscrimination statutes and regulations.

**The Title VI Liaison Program liaisons:**

- Assist with integrating Civil Rights requirements of Title VI and the Executive Orders into the daily operations of ADOT.
- Act as the cornerstone of ADOT's Title VI compliance oversight.

# Title VI Liaison Responsibilities…

- Submit the Title VI Post Meeting summaries after public meetings
- Ensuring a Four Factor Analysis is completed when interacting with the public
- Ensures demographic data is collected
- The Title VI Liaison Program representatives provide the CRO quarterly updates on their program area for Title VI activities
- Ensuring Title VI Nondiscrimination language and Appendices A & E are included in contracts

# Liaison Spotlight

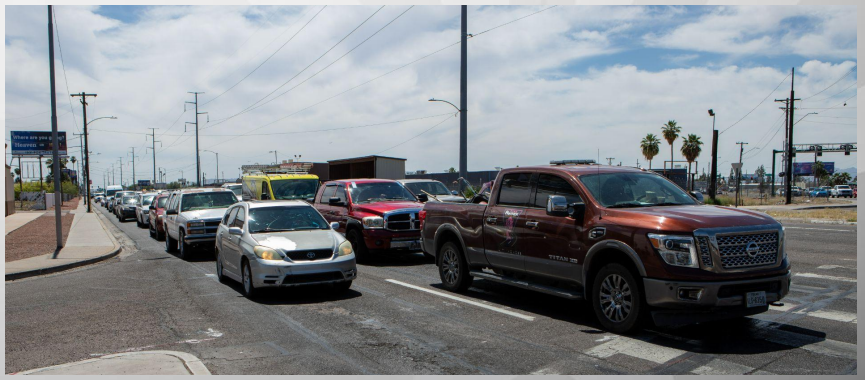
CRO would like to spotlight the ADOT Environmental Planning program area for all they have done regarding the Grand- 35 project.

# ADOT Grand-35 Study – Title VI Liaison Meeting

May 30, 2024

# Grand-35 Study

- Evaluates improvements to the intersection of Grand Ave, 35th Ave, Indian School Rd & BNSF railroad to:
  - Improve traffic flow and safety
  - Reduce vehicle-train conflicts
- Accommodates future high capacity transit



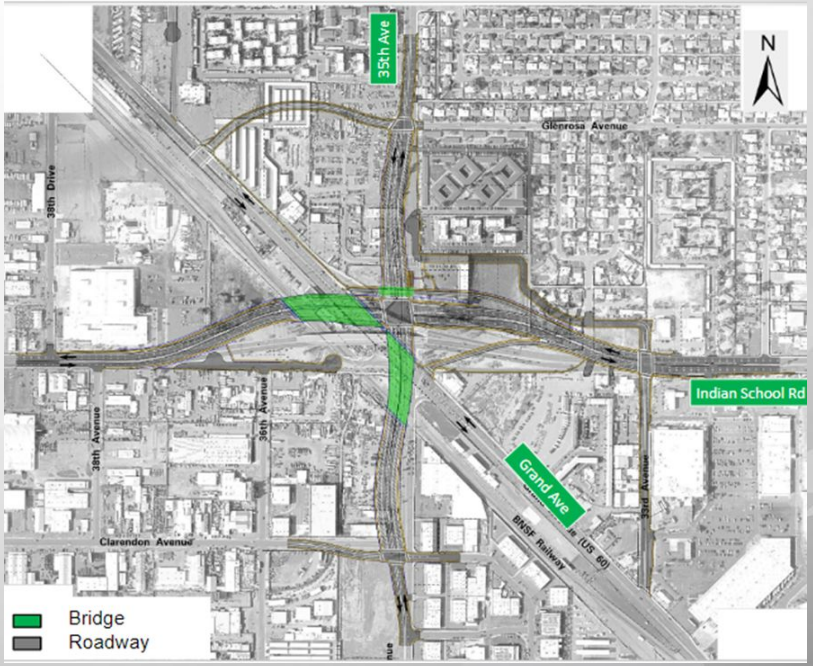
# Preferred Alternative for Intersection Design

- Refined to a Preferred Alternative based on analysis, public & agency input.
- Raise 35th Ave and Indian School Road over Grand Ave to create a new elevated intersection.
- Prepared Environmental Assessment (EA) and Design Concept Report (DCR).

# Preferred Alternative Community Impacts

## Social and Economic Impact

- Acquisition of approximately 60 businesses and 5 residences.
- Changes to property access.
- Temporary construction impacts to businesses and drivers.




*Additional information can be found in Sections 4.3, 4.4, and Appendix C of the Draft EA.

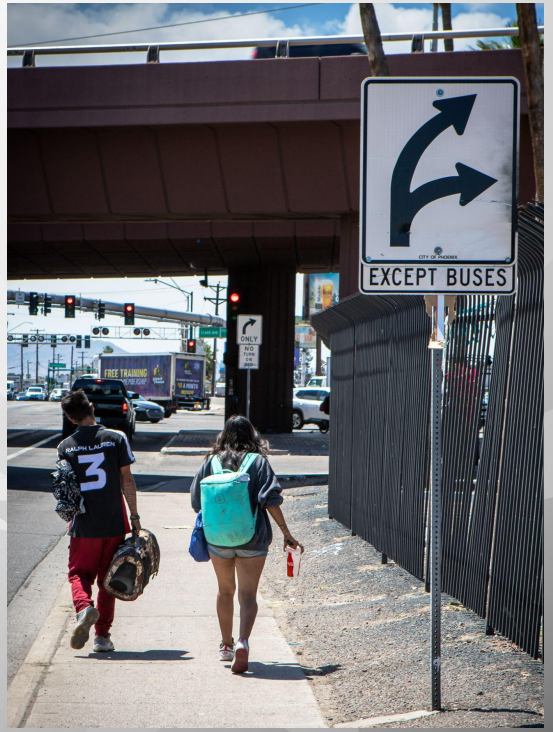
# Community Demographics

- High minority population
  - 81% Hispanic; 4% Black; 2% Asian; 2% Native American; 4% 2 or more races
- High % Spanish speakers
  - Spanish: (60%)
  - Vietnamese-speaking business owners
- Low income population
  - 35.3% households below poverty level
  - Unhoused population

# Environmental Justice (EJ) Requirements

"The fair treatment and meaningful involvement of all people, particularly **minority and low-income populations**, in the environmental decision-making process." REQUIRES:

- M*eaningful opportunities for public involvement* for minority and low-income populations.
- Soliciting input from affected minority and low-income populations in the development of alternatives and decisions.
- A review of whether actions are disproportionately high and adverse to EJ communities.



# Mitigation Strategies

- Mitigation strategies identified in Environmental Assessment
- Work with City of Phoenix and other community partners
- Assist businesses impacted by construction
- Help displaced employees find jobs
- Assist unhoused persons find shelter, resources

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PHX
COMMUNITY ACTION RESPONSE ENGAGEMENT SERVICES

# Phases of Study Public Input

We are here

## Phase 1: Public/Agency Scoping

Identify range of feasible alternatives, constraints, issues, community priorities

Public scoping meeting

## Phase 2: Alternatives Analysis

Evaluate various alternatives, narrow to two potential alternatives

Public alternatives meeting

## Phase 3: Draft EA/DCR

Identify Preferred Alternative

Release draft EA/DCR for public review/comment

Public hearing

## Phase 4: Final EA/DCR

Identify Selected Alternative and Mitigation

Represents ADOT decision on the project

Allows ADOT to acquire right of way and move forward into final design

# Public Involvement Strategy

- Focus on grassroots outreach directly to community members where they live and work
- Make information accessible for all language needs
- Provide multiple ways to get information and engage

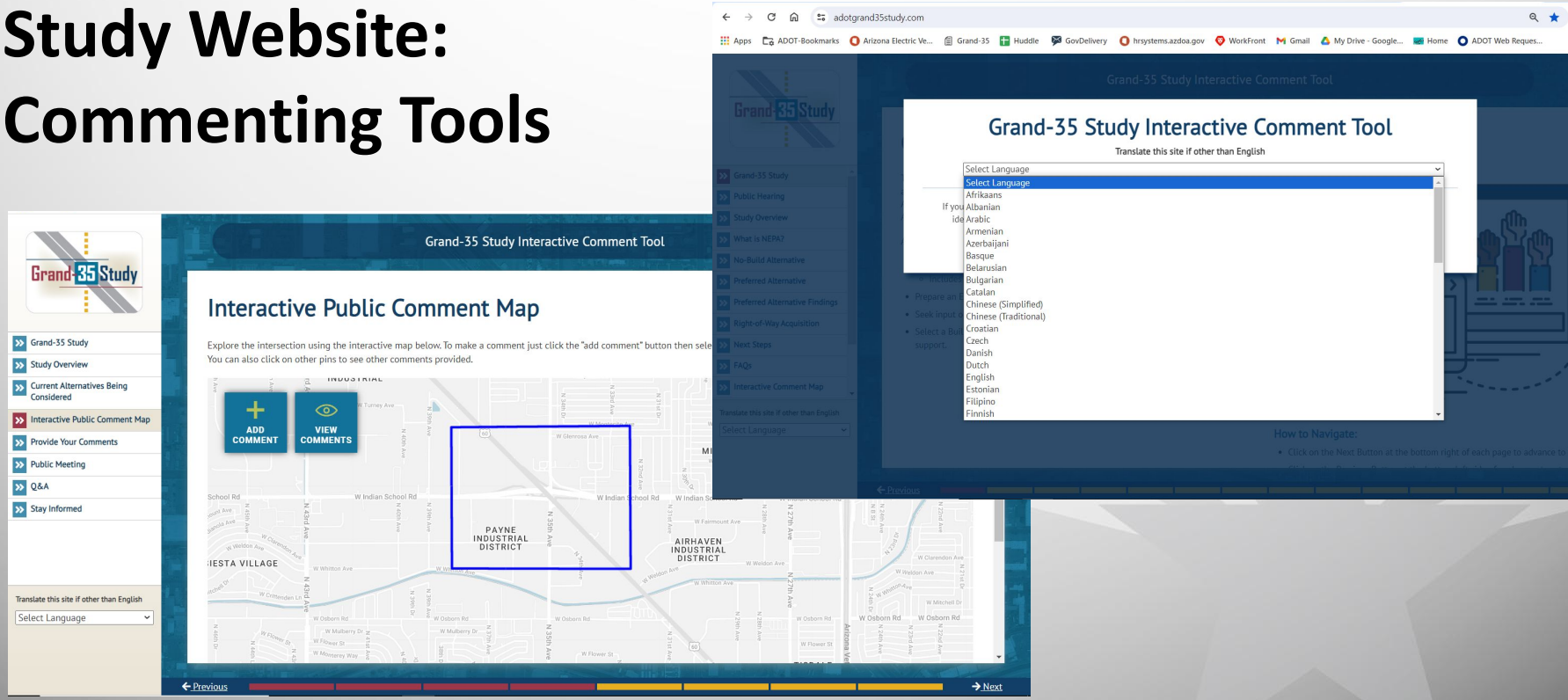
# Phase 1: Public and Agency Scoping

# Vietnamese Outreach

- Initial canvassing outreach identified Vietnamese speaking business owners in one shopping center.
- Secured Vietnamese translator for verbal/written translation.
- Provided email notice for written translation and verbal script for translator to use when calling business owners.
    - Provided information about the study, ways to provide input, asked for questions/concerns

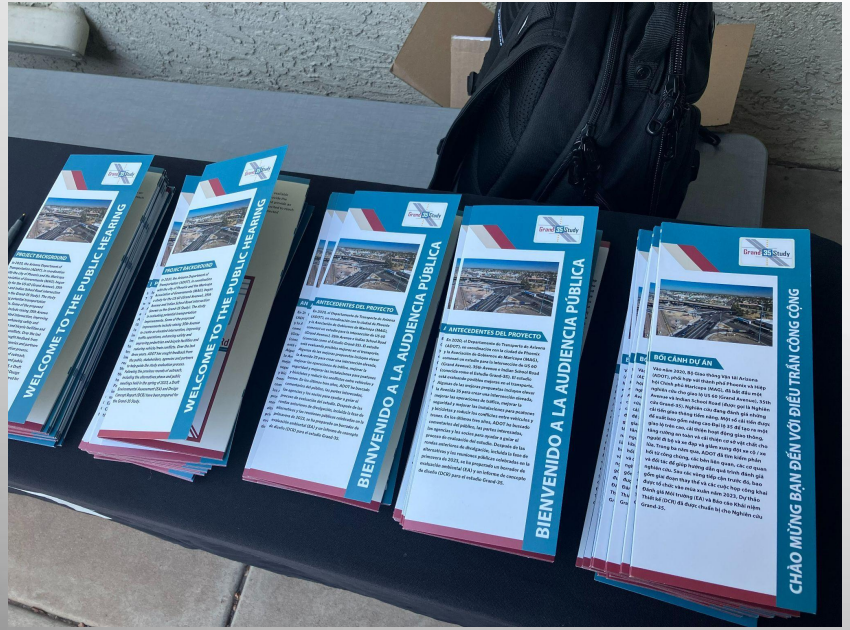
# Phase 2: Alternatives Analysis

# Study Website: Commenting Tools



# Website: Flyover Video & Simulations

# Phase 3: Release of Draft EA/DCR for Public Comment



# Questions?

For more information visit: azdot.gov/Grand-35

# Wifi Access for group activity

Network: GuestAccess

Password: GreatSt@te48!

# What is the Limited English Proficiency (LEP) requirement?

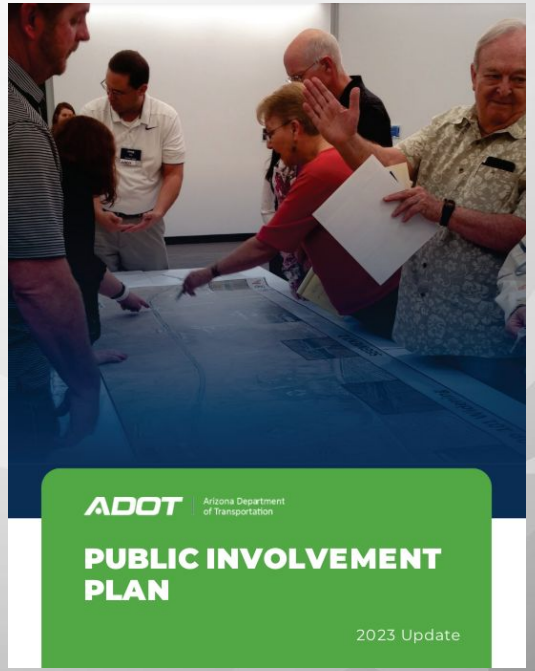
- 23 CFR 200.9(b)(12)
  - Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Executive Order #13166
  - Implement a system to provide services, so LEP persons can have meaningful access to them, and be afforded the opportunity to participate in the transportation decision making process

# When is an LEP analysis needed?

- Conduct a Four Factor Analysis for every project or study
- Conduct a Four Factor Analysis when interaction with the public may occur
  - Surveys, flyers, mailers
- A Four Factor Analysis may be completed multiple times during the project life cycle
  - Over 2 years since the Four Factor Analysis was last conducted
  - Multiple public meetings in different locations of a large project area

# ADOT 2023 Public Involvement Plan

- ADOT Public Involvement Plan
- An LEP Four-Factor Analysis shall be conducted for each project/study and should be conducted as part of the development of the project-specific public involvement plan (PIP)
- Complete an LEP Four-Factor Analysis worksheet



# Four Factor Analysis

- A tool to determine what are the prevalent languages in the project area.
- ADOT is required to take reasonable steps to ensure meaningful access to programs and activities by LEP persons.

<u>Four Factors involved in the analysis:</u>

1. Demography
2. Frequency
3. Importance
4. Resources

# Four Factor Analysis

1. Demography – Is the number and/or proportion of LEP persons served and languages spoken in service area.

   <u>Example of resources for Demographics</u>

   - Prior Experiences with LEP Individuals
   - Census, Table C16001
   - School Systems
   - State and Local Governments
   - Community Organizations
   - Religious Organizations
   - Legal Aid Entities

# Safe Harbor Threshold

Safe Harbor Threshold – written translation must be provided for vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, by the program/activity (a "safe harbor" for translation of written materials).

- Failure to provide written translations under these cited circumstances does not mean that the recipient is in noncompliance
- The "safe harbor" provides a starting point for recipients to consider

Example:

| Flagstaff, AZ | Miami, AZ |
|---|---|
| Population: 64,361 | Population: 1,920 |
| Population: 5% is 3,218 | Population: 5% is 96 |
| **1,000** or 3,218 | 1,000 or **96** |

# LEP Four-Factor analysis worksheet

ADOT
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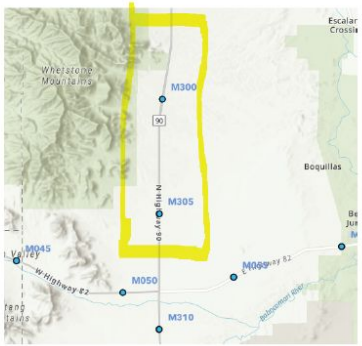
**LEP Four Factor Analysis**

Project Name: SR 90 Kartchner to Whetstone, I-10 Benson to Dragoon
Project TRACS Number: F0629/F0628
Date: 4/16/2024

Boundaries of the project/study area used for the LEP analysis (attach map).

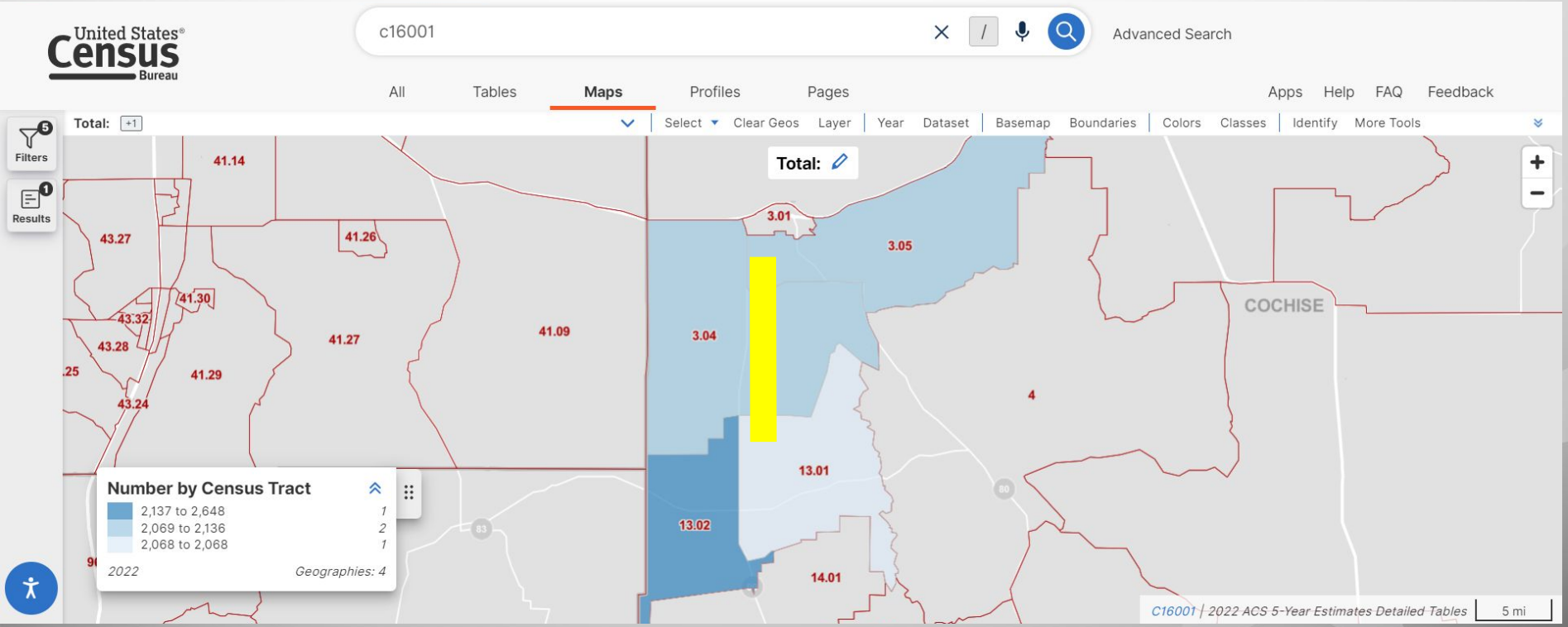
**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be impacted by the project, activity or service.**



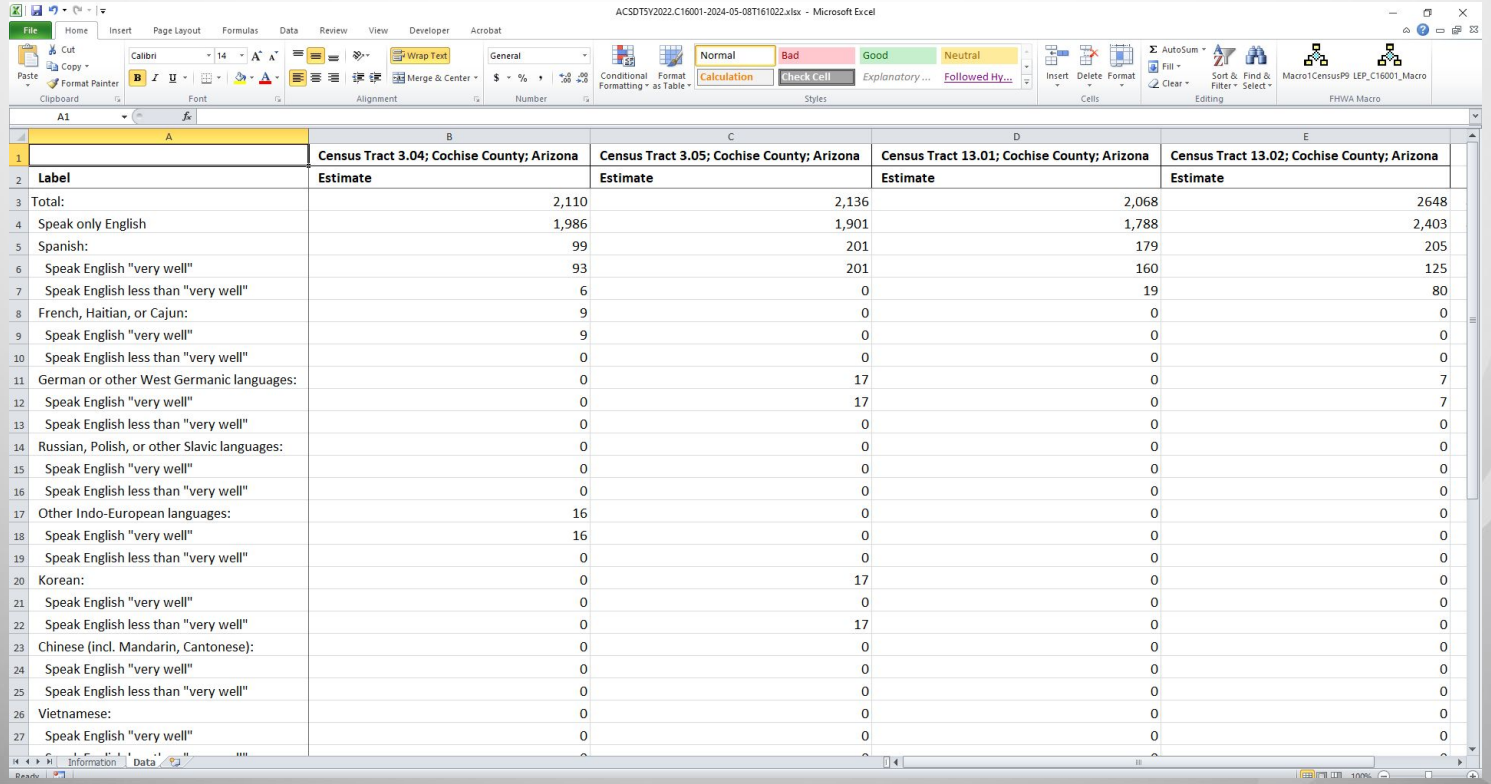

***1A - Prior Experiences:*** *Have other languages been previously identified in the area that have met the threshold?*

- ☐ Yes
- ☑ ~~No~~

# Census Data: C16001



# Census Data: C16001



ACSDT5Y2022.C16001-2024-05-08T161022.xlsx - Microsoft Excel

| | A | B | C | D | E |
|---|---|---|---|---|---|
| 1 | | Census Tract 3.04; Cochise County; Arizona | Census Tract 3.05; Cochise County; Arizona | Census Tract 13.01; Cochise County; Arizona | Census Tract 13.02; Cochise County; Arizona |
| 2 | Label | Estimate | Estimate | Estimate | Estimate |
| 3 | Total: | 2,110 | 2,136 | 2,068 | 2648 |
| 4 | Speak only English | 1,986 | 1,901 | 1,788 | 2,403 |
| 5 | Spanish: | 99 | 201 | 179 | 205 |
| 6 | Speak English "very well" | 93 | 201 | 160 | 125 |
| 7 | Speak English less than "very well" | 6 | 0 | 19 | 80 |
| 8 | French, Haitian, or Cajun: | 9 | 0 | 0 | 0 |
| 9 | Speak English "very well" | 9 | 0 | 0 | 0 |
| 10 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 11 | German or other West Germanic languages: | 0 | 17 | 0 | 7 |
| 12 | Speak English "very well" | 0 | 17 | 0 | 7 |
| 13 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 14 | Russian, Polish, or other Slavic languages: | 0 | 0 | 0 | 0 |
| 15 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 16 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 17 | Other Indo-European languages: | 16 | 0 | 0 | 0 |
| 18 | Speak English "very well" | 16 | 0 | 0 | 0 |
| 19 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 20 | Korean: | 0 | 17 | 0 | 0 |
| 21 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 22 | Speak English less than "very well" | 0 | 17 | 0 | 0 |
| 23 | Chinese (incl. Mandarin, Cantonese): | 0 | 0 | 0 | 0 |
| 24 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 25 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 26 | Vietnamese: | 0 | 0 | 0 | 0 |
| 27 | Speak English "very well" | 0 | 0 | 0 | 0 |

| LEP Language(s) in project/study area that meet the threshold | Number of LEP persons that speak this language (threshold: 1,000 people) | Percent of LEP persons that speak this language (threshold: 5%) |
|---|---|---|
| Spanish | 105/8962 | 1.17% |
| | | |
| | | |

***1C - Interviews:*** *Interviews and review of local materials are not a requirement. They should be conducted to determine if other languages that don't meet the threshold should be translated. Review the standard work document for examples of when to consider conducting interviews. Consult with organizations that serve and work with LEP populations to get an accurate assessment of the existing and emerging LEP communities in the area. Collect and review available data from federal, state and local government agencies, and community and faith-based organizations.*

| Date | Name | Organization | Language Needs Identified | Notes |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |

***1D - Local Material Reviewed:***

| Materials | Language Identified |
|---|---|
| Benson Unified School District website | None, but the bottom of website provided contact info for Title VI compliance manager, and information was presented in english only. |
| City of Benson website | No other language provided or Title VI statement |
| Cochise College website | No other language provided or Title VI statement |

# Four Factor Analysis

2. Frequency – Rate of contact with service or program

- Recipients should survey key program areas and assess major points of contact with the public, such as:
  - Participation in public meetings
  - Customer service interactions
  - Operation surveys
  - Frequency with which Agency has or should have contact with LEP individuals from different language groups

# Four Factor Analysis

3. Importance – determine the nature and importance of program/service to LEP persons

- Identify the programs, services, or activities that would have a serious consequence if language barriers prevented LEP person's access to them
- A determination should be made as to the impact on actual and potential services to LEP beneficiaries

# LEP Four-Factor Analysis worksheet

| *List the types interactions and activities LEP persons have in the project area:* |
|---|
| *The project site is between the city of Benson and the town of Whetstone. There are no churches or schools in Whetstone, and Benson only has English language churches. Benson Hospital has a language translation widget, but otherwise I do not see anything that would lead me to believe there are significant LEP needs in the community.* |

**Factor 3: The nature/importance of the study/project provided by ADOT to LEP person's lives.**
TIP: The more important the study/project is, or the greater the possible impacts are to LEP individuals, the more likely language services are needed. For example, an LEP person's inability to use public transportation may adversely affect their ability to obtain health care and/or education services, or access to employment.

| *Impacts: Check box if impacts of any level are expected.* | *Please elaborate on the checked impact(s):* |
|---|---|
| ☐ *Mode of transportation* | |
| ☐ *Community property (i.e. Places of Worship, Parks, Recreation Centers, or Cemeteries)* | |
| ☑ ~~*Hospitals or Access to Medical Services (i.e. Hospitals, pharmacies)*~~ | *There is a hospital in Benson, but travel in the area will be minimally impacted. I have not yet been provided a traffic control plan, however, there may be flagging operations at times.* |
| ☐ *Bus Routes or airports* | |
| ☐ *Private residential residential or commercial properties* | |

# Four Factor Analysis

4. Resources – Determine the available resources and costs available for the project

# LEP Four-Factor Analysis worksheet

**Factor 4: Resources available to ADOT and associated costs**

- ADOT's standard practice is to provide written translation of materials and oral interpretation when an LEP language meets the Safe Harbor Threshold (1,000 persons or 5% of the affected project population, whichever is less), when specific needs have been identified for other LEP languages that don't meet the threshold through other factors above, or upon request.
- Project teams should carefully explore the most cost-effective means of delivering accurate language services before limiting services due to project budget financial constraints. Be advised the total amount of federal financial aid to ADOT as an agency is considered and not only the federal financial aid of a specific project.
- ***No individual will be denied participation in ADOT-sponsored activities due to their Limited English Proficiency.***
- Contact the Civil Rights Office at 602.712.8946 or civilrightsoffice@azdot.gov for LEP guidance.

***RECOMMENDATIONS***

Based on the data contained on this LEP Four Factor Analysis Worksheet and the ADOT LEP Plan, the following language services will be provided for this project (check all that apply):

**LEP languages to be served:**

Note: If services vary by language please note languages for each service provided.

- ☐ Written Translation
  - ☐ Contracted
  - ☐ ADOT Bilingual Staff*
  - ☐ Community Volunteers*
- ☐ Oral Translation
  - ☐ Contracted
  - ☐ **ADOT Bilingual Staff*** (as needed/requested)
  - ☐ Community Volunteers*
- ☐ Web Tools (e.g. Google Translate widget)
- ☑ ~~Title VI LEP language on materials only- Language(s):~~

# LEP Four Factor Worksheet Activity

- Groups of 2-4 people
- Assigned a project area
- Complete the LEP Four Factor Worksheet as a team
  - Use the Census data provided to you
  - Use sources available to you
  - Be creative
- Share takeaways

# Shout Outs

- MPD Research Program – CRO completed an onsite program area review on May 22, 2024.
- Shout Out to all the Title VI Liaisons for continuing to submit Quarterly Reports, Meeting Summaries, other documents, and reaching out for Title VI Materials.

# CONTACT US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Civil Rights Specialist

Anthony Enoch Jr
Civil Rights Specialist

**602-712-8946**
**TITLEVI@azdot.gov**

# Bisbee, AZ Census

| Label (Grouping) | | Bisbee city, Arizona!!Estimate |
|---|---|---|
| Total: | Total %: | 4,911 |
| Speak only English | 80.35 | 3,946 |
| Spanish: | 17.19 | 844 |
| Speak English less than "very well" | 4.15 | 204 |

# Jerome, AZ Census

| Label (Grouping) | | Jerome, Arizona Estimate |
|---|---|---|
| Total: | Total %: | 357 |
| Speak only English | 96.36 | 344 |
| Spanish: | 2.24 | 8 |
| Speak English "very well" | 2.24 | 8 |
| Speak English less than "very well" | | 0 |
| German or other West Germanic languages: | 1.40 | 5 |
| Speak English "very well" | | 5 |

# Williams, AZ Census

| Label (Grouping) | | Williams, Arizona Estimate |
|---|---|---|
| Total: | Total %: | 2,909 |
| Speak only English | 80.30 | 2,336 |
| Spanish: | 17.53 | 510 |
| Speak English "very well" | 12.31 | 358 |
| Speak English less than "very well" | 5.23 | 152 |

# Payson, AZ Census

| Label (Grouping) | | Payson, Arizona Estimate |
|---|---|---|
| Total: | Total %: | 15,804 |
| Speak only English | 89.55 | 14,153 |
| Spanish: | 7.21 | 1,139 |
| Speak English "very well" | 5.38 | 851 |
| Speak English less than "very well" | 1.82 | 288 |

# Sierra Vista, AZ Census

| Label (Grouping) | | Sierra Vista, Arizona Estimate |
|---|---|---|
| Total: | Total %: | 42,516 |
| Speak only English | 81.08 | 34,472 |
| Spanish: | 13.06 | 5,551 |
| Speak English "very well" | 9.89 | 4,206 |
| Speak English less than "very well" | 3.16 | 1,345 |

# Lake Havasu City, AZ Census

| Label (Grouping) | | Lake Havasu City, AZ Estimate |
|---|---|---|
| Total: | Total %: | 55,133 |
| Speak only English | 90.54 | 49,915 |
| Spanish: | 7.52 | 4,145 |
| Speak English "very well" | 5.57 | 3,069 |
| Speak English less than "very well" | 1.95 | 1,076 |

# Yuma City, AZ Census

# Four Factor Analysis

2. Frequency – Rate of contact with service or program

- Recipients should survey key program areas and assess major points of contact with the public, such as:
  - Participation in public meetings
  - Customer service interactions
  - Operation surveys
  - Frequency with which Agency has or should have contact with LEP individuals from different language groups

# Language Access Plan, or LEP Plan

At minimum your Title VI Implementation Plan should include:

1. Four Factor Analysis conducted on the entire service area
2. A process of self-assessment to determine which personnel interact with members of the public.
   - Where will your Agency potentially encounter persons with LEP?
3. Process to identify LEP Populations citywide and on a project-by project bases

# Four Factor Analysis

Is a tool to determine the prevalent languages in the project area.

- Agencies are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

  <u>Below are the Four Factors involved in the analysis:</u>

  1. Demography
  2. Frequency
  3. Importance
  4. Resources

| *List the types interactions and activities LEP persons have in the project area:* |
|---|
| *The project site is between the city of Benson and the town of Whetstone. There are no churches or schools in Whetstone, and Benson only has English language churches. Benson Hospital has a language translation widget, but otherwise I do not see anything that would lead me to believe there are significant LEP needs in the community.* |

**Factor 3: The nature/importance of the study/project provided by ADOT to LEP person's lives.**
TIP: The more important the study/project is, or the greater the possible impacts are to LEP individuals, the more likely language services are needed. For example, an LEP person's inability to use public transportation may adversely affect their ability to obtain health care and/or education services, or access to employment.

| *Impacts: Check box if impacts of any level are expected.* | *Please elaborate on the checked impact(s):* |
|---|---|
| ☐ *Mode of transportation* | |
| ☐ *Community property (i.e. Places of Worship, Parks, Recreation Centers, or Cemeteries)* | |
| ☑ *~~Hospitals or Access to Medical Services (i.e. Hospitals, pharmacies)~~* | *There is a hospital in Benson, but travel in the area will be minimally impacted. I have not yet been provided a traffic control plan, however, there may be flagging operations at times.* |
| ☐ *Bus Routes or airports* | |
| ☐ *Private residential residential or commercial properties* | |

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*RECOMMENDATIONS*

Based on the data contained on this LEP Four Factor Analysis Worksheet and the ADOT LEP Plan, the following language services will be provided for this project (check all that apply):

**LEP languages to be served:**

Note: If services vary by language please note languages for each service provided.

- ☐ Written Translation
  - ☐ Contracted
  - ☐ ADOT Bilingual Staff*
  - ☐ Community Volunteers*
- ☐ Oral Translation
  - ☐ Contracted
  - ☐ ADOT Bilingual Staff*
  - ☐ Community Volunteers*
- ☐ Web Tools (e.g. Google Translate widget)
  - ☐ Written translation
  - ☐ Oral interpretation
- ☐ Title VI LEP language on materials only Language(s):

*Verified able and available

**Civil Rights Office Review**

Date submitted to Civil Rights Office:

- ☐ This document has been reviewed by the Civil Rights Office.
  Date of review Staff who reviewed
- ☐ LEP recommendations approved by the Civil Rights Office. If approved with modifications list below:

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*1C - **Interviews:** Interviews and review of local materials are not a requirement. They should be conducted to determine if other languages that don't meet the threshold should be translated. Review the standard work document for examples of when to consider conducting interviews. Consult with organizations that serve and work with LEP populations to get an accurate assessment of the existing and emerging LEP communities in the area. Collect and review available data from federal, state and local government agencies, and community and faith-based organizations.*

| Date | Name | Organization | Language Needs Identified | Notes |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |

*1D - Local Material Reviewed:*

| Materials | Language Identified |
|---|---|
| | |
| | |
| | |

**Factor 2: The frequency with which LEP Individuals come into contact with the project.**

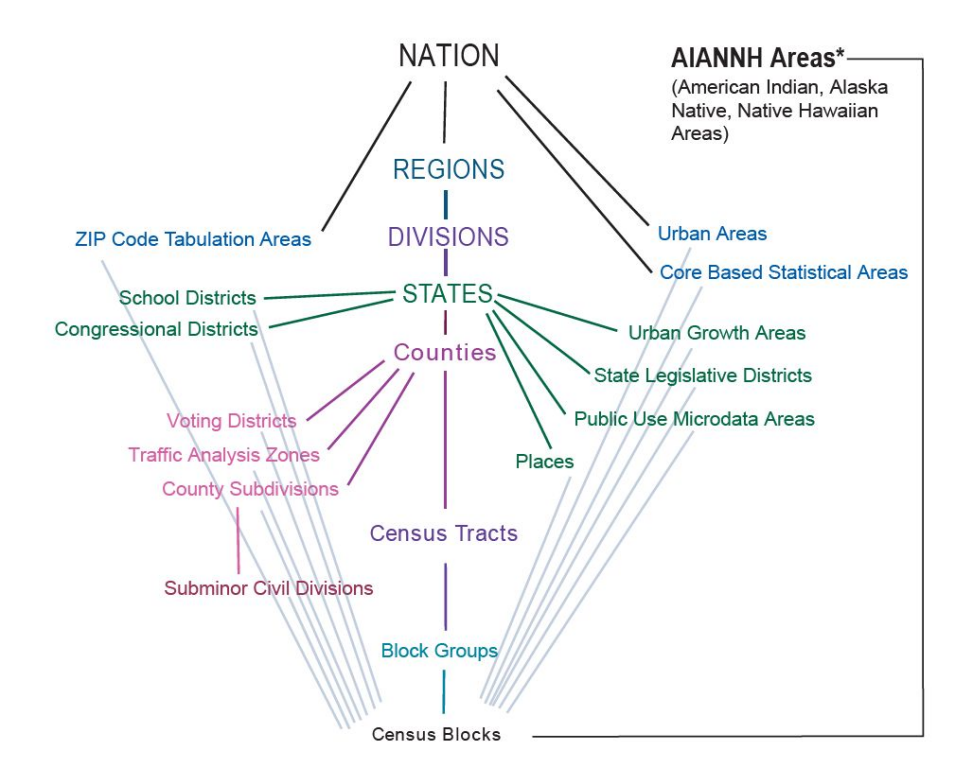
*TIP: The more frequent contact you will have with a particular LEP group, the more likely that language services in that particular language will be needed. The proximity of a project to where affected LEP populations live, work/own businesses, shop, attend school, visit medical facilities, etc. the more frequently they are likely to come into contact with the project.*

*Likelihood of contact: Select likelihood of contact with LEP individuals for this project:*

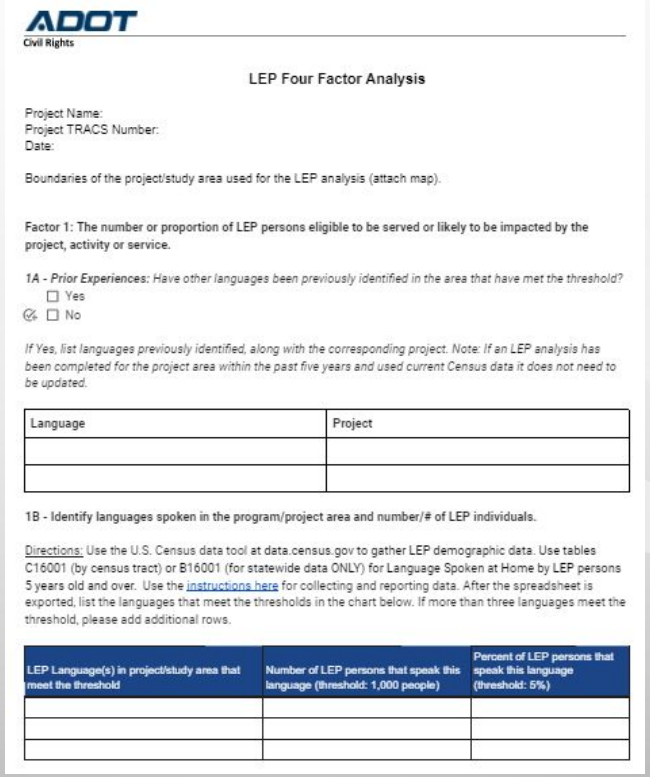
- ☐ Very unlikely
- ☐ Unlikely
- ☐ Likely
- ☐ Highly Likely

| *List the types interactions and activities LEP persons have in the project area:* |
|---|
| |

# Standard Hierarchy of Census Geographic Entities



# LEP Four Factor Analysis Worksheet



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Civil Rights

**LEP Four Factor Analysis**

Project Name:
Project TRACS Number:
Date:

Boundaries of the project/study area used for the LEP analysis (attach map).

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be impacted by the project, activity or service.**

*1A - Prior Experiences: Have other languages been previously identified in the area that have met the threshold?*
☐ Yes
☐ No

*If Yes, list languages previously identified, along with the corresponding project. Note: If an LEP analysis has been completed for the project area within the past five years and used current Census data it does not need to be updated.*

| Language | Project |
|---|---|
| | |
| | |

**1B - Identify languages spoken in the program/project area and number/# of LEP individuals.**

Directions: Use the U.S. Census data tool at data.census.gov to gather LEP demographic data. Use tables C16001 (by census tract) or B16001 (for statewide data ONLY) for Language Spoken at Home by LEP persons 5 years old and over. Use the instructions here for collecting and reporting data. After the spreadsheet is exported, list the languages that meet the thresholds in the chart below. If more than three languages meet the threshold, please add additional rows.

| LEP Language(s) in project/study area that meet the threshold | Number of LEP persons that speak this language (threshold: 1,000 people) | Percent of LEP persons that speak this language (threshold: 5%) |
|---|---|---|
| | | |
| | | |
| | | |

# Four Factor Analysis Project

# LEP Four-Factor Analysis worksheet

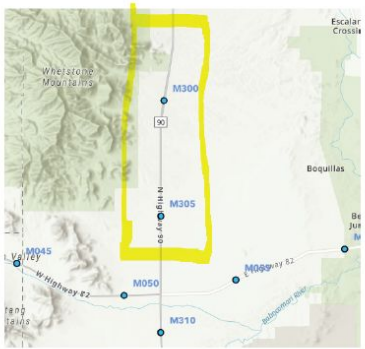
ADOT
Civil Rights

**LEP Four Factor Analysis**

Project Name: SR 90 Kartchner to Whetstone, I-10 Benson to Dragoon
Project TRACS Number: F0629/F0628
Date: 4/16/2024

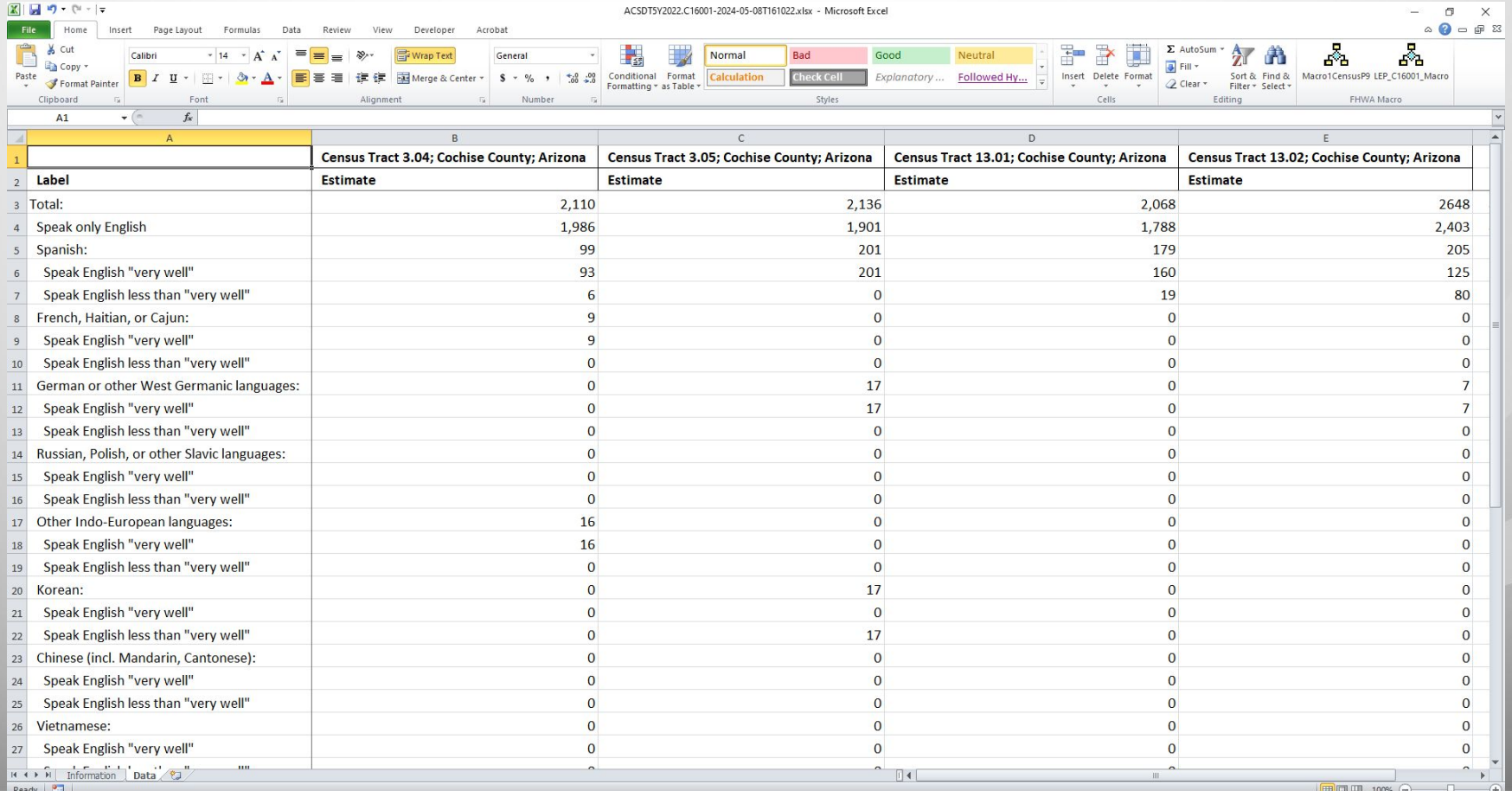
Boundaries of the project/study area used for the LEP analysis (attach map).

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be impacted by the project, activity or service.**




***1A - Prior Experiences:*** *Have other languages been previously identified in the area that have met the threshold?*

- ☐ Yes
- ☑ ~~No~~



ACSDT5Y2022.C16001-2024-05-08T161022.xlsx - Microsoft Excel

| | A | B | C | D | E |
|---|---|---|---|---|---|
| 1 | | Census Tract 3.04; Cochise County; Arizona | Census Tract 3.05; Cochise County; Arizona | Census Tract 13.01; Cochise County; Arizona | Census Tract 13.02; Cochise County; Arizona |
| 2 | Label | Estimate | Estimate | Estimate | Estimate |
| 3 | Total: | 2,110 | 2,136 | 2,068 | 2648 |
| 4 | Speak only English | 1,986 | 1,901 | 1,788 | 2,403 |
| 5 | Spanish: | 99 | 201 | 179 | 205 |
| 6 | Speak English "very well" | 93 | 201 | 160 | 125 |
| 7 | Speak English less than "very well" | 6 | 0 | 19 | 80 |
| 8 | French, Haitian, or Cajun: | 9 | 0 | 0 | 0 |
| 9 | Speak English "very well" | 9 | 0 | 0 | 0 |
| 10 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 11 | German or other West Germanic languages: | 0 | 17 | 0 | 7 |
| 12 | Speak English "very well" | 0 | 17 | 0 | 7 |
| 13 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 14 | Russian, Polish, or other Slavic languages: | 0 | 0 | 0 | 0 |
| 15 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 16 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 17 | Other Indo-European languages: | 16 | 0 | 0 | 0 |
| 18 | Speak English "very well" | 16 | 0 | 0 | 0 |
| 19 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 20 | Korean: | 0 | 17 | 0 | 0 |
| 21 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 22 | Speak English less than "very well" | 0 | 17 | 0 | 0 |
| 23 | Chinese (incl. Mandarin, Cantonese): | 0 | 0 | 0 | 0 |
| 24 | Speak English "very well" | 0 | 0 | 0 | 0 |
| 25 | Speak English less than "very well" | 0 | 0 | 0 | 0 |
| 26 | Vietnamese: | 0 | 0 | 0 | 0 |
| 27 | Speak English "very well" | 0 | 0 | 0 | 0 |

| LEP Language(s) in project/study area that meet the threshold | Number of LEP persons that speak this language (threshold: 1,000 people) | Percent of LEP persons that speak this language (threshold: 5%) |
|---|---|---|
| Spanish | 105/8962 | 1.17% |
| | | |
| | | |

***1C - Interviews:*** *Interviews and review of local materials are not a requirement. They should be conducted to determine if other languages that don't meet the threshold should be translated. Review the standard work document for examples of when to consider conducting interviews. Consult with organizations that serve and work with LEP populations to get an accurate assessment of the existing and emerging LEP communities in the area. Collect and review available data from federal, state and local government agencies, and community and faith-based organizations.*

| Date | Name | Organization | Language Needs Identified | Notes |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |

***1D - Local Material Reviewed:***

| Materials | Language Identified |
|---|---|
| Benson Unified School District website | None, but the bottom of website provided contact info for Title VI compliance manager, and information was presented in english only. |
| City of Benson website | No other language provided or Title VI statement |
| Cochise College website | No other language provided or Title VI statement |

**Factor 4: Resources available to ADOT and associated costs**

- ADOT's standard practice is to provide written translation of materials and oral interpretation when an LEP language meets the Safe Harbor Threshold (1,000 persons or 5% of the affected project population, whichever is less), when specific needs have been identified for other LEP languages that don't meet the threshold through other factors above, or upon request.
- Project teams should carefully explore the most cost-effective means of delivering accurate language services before limiting services due to project budget financial constraints. Be advised the total amount of federal financial aid to ADOT as an agency is considered and not only the federal financial aid of a specific project.
- ***No individual will be denied participation in ADOT-sponsored activities due to their Limited English Proficiency.***
- Contact the Civil Rights Office at 602.712.8946 or civilrightsoffice@azdot.gov for LEP guidance.

***RECOMMENDATIONS***

Based on the data contained on this LEP Four Factor Analysis Worksheet and the ADOT LEP Plan, the following language services will be provided for this project (check all that apply):

**LEP languages to be served:**

Note: If services vary by language please note languages for each service provided.

- ☐ Written Translation
  - ☐ Contracted
  - ☐ ADOT Bilingual Staff*
  - ☐ Community Volunteers*
- ☐ Oral Translation
  - ☐ Contracted
  - ☐ **ADOT Bilingual Staff*** (as needed/requested)
  - ☐ Community Volunteers*
- ☐ Web Tools (e.g. Google Translate widget)
  - ☐ Written translation
  - ☐ Oral interpretation