



Land of Sky Rural Planning Organization

Title VI and Limited English Proficiency Plan

To Ensure Nondiscrimination in all Programs and Activities

June 30, 2013

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “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 U.S.C. Section 2000d).

Land of Sky Rural Planning Organization (LOSRPO) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

This plan was developed to guide the Land of Sky Rural Planning Organization in its administration and management of Title VI-related activities. The Land-of-Sky Regional Council is the Lead Planning Agency for the Land of Sky Rural Planning Organization.

Title VI Coordinator Contact Information

Land-of-Sky Regional Council
Danna Harrell-Stansbury
Title VI Officer
339 New Leicester Highway, Suite 140
Asheville, NC 28806
Phone: (828) 251-6622 ext. 113

TITLE VI RESPONSIBILITIES

- Ensure that all aspects of the planning process operation comply with Title VI.
- Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic/gender related organizations and participating in roundtable meetings in predominately minority communities.
- Visit public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.
- Ensure that Limited English Proficiency (LEP) individuals who will be affected by planned projects receive meaningful access into the public awareness/involvement process. Meaningful access means that the affected parties will receive the necessary communicative assistance required to allow them to participate in governmental services/activities.

STAFF RESPONSIBILITIES

To ensure the implementation of the Title VI Plan, the following responsibilities have been identified for the Title VI Officer and the Title VI Coordinators.

RESPONSIBILITIES OF THE TITLE VI OFFICER

The LOSRC Title VI Officer is generally responsible for overseeing compliance with applicable nondiscrimination authorities in each Department.

The Title VI Officer, is responsible for:

- Meeting with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the LOSRC Title VI Plan;
- Periodically reviewing the LOSRC Title VI Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance; and
- Working with Title VI Coordinators, determine if any revisions or updates are needed to the Title VI Plan.

RESPONSIBILITIES OF THE TITLE VI COORDINATORS

Each Department or Office within LOSRC that has Title VI responsibilities has a Title VI Coordinator. The Title VI Coordinators are responsible for:

- Familiarizing themselves and staff with Federal and state nondiscrimination regulations and procedures in respective subject areas;
- Supervising staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the LOSRC Title VI Plan. The Title VI Coordinators may designate supervised employees to be additional Title VI Coordinators for his/her Department or Office; and
- Ensuring that their respective Offices/Departments adhere to the LOSRC Title VI Plan.
- Process the disposition of Title VI complaints received by LOSRC
- Collect statistical data (race, color, sex, age, disability or national origin) of participants in and beneficiaries of state highway programs, e.g. relocates, affected citizens, and impacted communities.
- Conduct annual Title VI reviews of special emphasis program areas (FTA grants, planning, design, etc.) to determine the effectiveness of program activities at all levels.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Conduct post-grant approval reviews of LOSRC programs and applicants for compliance with Title VI requirements.
- Identify and eliminate discrimination.

- Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid highway fund contracts administered through LOSRC.
- Review LOSRC program directives in coordination with Title VI liaisons for special emphasis program areas. Where applicable, include Title VI language and related requirements
- Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

Director of Office of Human Resources

- Maintaining a list of Interpretation Service Providers;
- Disseminating the LOSRC Title VI Plan to LOSRC employees;
- Identify and promote opportunities for LOSRC staff to receive Title VI training;
- Maintaining a list of employees who have received Title VI training; and
- Reviewing important issues related to nondiscrimination with the Executive Director, as needed.

Finance Officer

- Ensuring that LOSRC contractors and sub-recipients are aware of LOSRC's Title VI Policy;
- Working with staff involved with consultant contracts and the sub-recipients found to be noncompliant to resolve the deficiency status and write a remedial action if necessary, as described in the Consultant Contracts section of this document;
- Ensuring proper Title VI Language is in all contracts;
- Ensuring the Disadvantaged Business Enterprise (DBE) Policy is followed; and
- Reviewing important issues related to nondiscrimination with the Executive Director, as needed.

Director of Administrative Services

- Ensuring that LOSRC website includes the Nondiscrimination Complaint Procedure;
- Ensuring that key publications have Title VI Notice and accommodations language; and
- Reviewing important issues related to nondiscrimination with the Executive Director, as needed.

Director of the Land of Sky Rural Planning Organization

- Ensuring that all of the activities of the Land of Sky Rural Planning Organization (LOSRPO) adhere to the Title VI Plan;
- Coordinating with appropriate federal and state transportation agencies entities to periodically provide LOSRPO staff with training opportunities regarding nondiscrimination; and
- Reviewing important issues related to nondiscrimination with the Executive Director, as needed.

Director of Local Government Services

- Ensuring that all of the activities of the Local Government Services Department adhere to the Title VI Plan, and
- Reviewing important issues related to nondiscrimination with the Executive Director, as needed.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt.

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed at Land of Sky offices located at 339 New Leicester Highway; Asheville, NC. The name of the Title VI Coordinator and supporting information is available on the following websites:

- French Broad River MPO Web site, at <http://www.fbrmpo.org/>
- Land of Sky RPO Website, at www.landofskyrpo.org
- And on the main Land of Sky Website, at www.landofsky.org

Additional information relating to nondiscrimination obligation can be obtained from the Title VI Coordinator.

Title VI information shall be disseminated to Land of Sky RPO employees via the Policies and Procedures and/or Employee Handbook of the Land of Sky Regional Council (the host agency of the Land of Sky RPO) (see Appendix A) at their annual review. This document will be given at this time as a reminder to employees of the Land of Sky RPO policy statement and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and Land of Sky RPO's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix G)

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Land of Sky RPO, where funding originates from any federal assistance, are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Land of Sky RPO's Title VI Plan(employee file), copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days following:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination; or
- Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

The LOSRPO Complaint Procedures can be found in Appendix H. Complainants will be asked to fill out the Title VI Complaint Form (see Appendix D) to submit the complaint information. In the event that a complaint is made via telephone or email, staff will request that a Title VI Complaint form be submitted. The complaint may be filed in writing with the Land of Sky RPO at the following address:

Land of Sky RPO
Title VI Coordinator
339 New Leicester Highway, Suite 140
Asheville NC 28806

NOTE: Land of Sky RPO encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint form must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Land of Sky RPO will be forwarded to the NCDOT Office of Civil Rights.

The Land of Sky RPO shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in

English. Additionally, Land of Sky RPO shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of complaint will be mailed to the complainant within fifteen days of receipt by Land of Sky RPO (see Appendix K). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within thirty (30) business days from receipt of a complete complaint, the Title VI Coordinator will initiate an investigation and work to resolve the issue. Within ten (10) days of a decision, the Title VI Coordinator will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

- a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
- b. If the complaint is to be investigated, the notification will inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.

The Complainant will be notified that the Title VI Coordinator will attempt to resolve complaints within 180 days after the Land of Sky Rural Planning Organization has accepted the complaint for investigation.

This complaints process is summarized on the complaint form provided in Appendix D. In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

North Carolina Department of Transportation, Office of Civil Rights, Title VI/EO Contract Compliance Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453

US Department of Transportation, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070

Federal Highway Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752

Federal Highway Administration, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010

Federal Transit Administration, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

US Department of Justice, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

VI. Limited English Proficiency (LEP) Plan

Through the Land of Sky Regional Council, the Land of Sky RPO has a training program for new hires and an annual refresher for existing employees. This program makes employees aware that our organization's practices and procedures cannot have the effect of restricting meaningful participation in our program by a LEP person.

In addition the Land of Sky RPO has an LEP Policy and a separate LEP Plan that includes a four factor analysis based on Department of Justice guidance on how to address the requirements of Executive Order 13166. The LOSRPO Title VI plan can be found in Appendix M.

VII. Community Outreach

As an agency receiving federal financial assistance, Land of Sky RPO has made the following community outreach efforts:

Along with other programs, The Land of Sky RPO provides community outreach with regular meetings publicized under the guidance of NCGS §143-318.12. Public notice of official meetings, including posting of meetings and notice can be found on the RPO's website (www.landofskyrpo.org). Meetings are also posted on social media sites such as Facebook and Twitter. Meeting agendas are also shared with television, radio, and print media lists kept current by Land of Sky RPO. The bi-annual adoption of the Transportation Improvement Plan for the region is also publicized with required legal advertising. A brochure will be made available at public meetings to notify the public of their rights under Title VI and the manner in which a complaint can be filed. The LOSRPO Title VI Policy is posted on the RPO website and will be added to significant RPO publications.

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Appendix G Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of Land of Sky RPO's Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

Employee Signature

Employee's Printed name

Date

APPENDIX H

LAND OF SKY RURAL PLANNING ORGANIZATION TITLE VI COMPLAINT PROCEDURES

The complaint procedures outlined herein apply to the Land of Sky Rural Planning Organization (LOSRPO) and other primary recipients and sub-recipients of federal financial assistance. These procedures cover discrimination complaints filed under Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, and other nondiscrimination authorities relating to any program, services, or activities administered by the NCDOT and its sub-recipients, consultants, and contractors. **NOTE:** The Land of Sky Rural Planning Organization will refer transit related complaints to the appropriate transit agency. Transit related complaints are investigated on the nondiscrimination basis of race, color, and national origin.

The Land of Sky Rural Planning Organization will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation meeting(s) between the affected parties and the OCR staff may be utilized for resolution. Upon completion of each investigation, the OCR staff will inform every complainant of all avenues of appeal.

PURPOSE

The purpose of the discrimination complaint procedures is to describe the process used by the Land of Sky Rural Planning Organization for processing complaints under Title VI of the Civil Rights Act of 1964, related statutes and authorities.

FILING OF COMPLAINTS

1. **Applicability** – The complaint procedures apply to the beneficiaries of The Land of Sky Rural Planning Organizations programs, activities, and services, including but not limited to the public, contractors, subcontractors, consultants, and other sub-recipients of federal and state funds.
2. **Eligibility** – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities, based upon race, color, sex, age, national origin, or disability may file a written complaint with the Land of Sky Rural Planning Organization or NCDOT's Civil Rights Office. Additional entities may also be contacted and are listed under section number three (3). The law prohibits intimidation or retaliation of any sort. The complaint may be filed by the affected individual or a representative and must be in writing.
3. **Time Limits and Filing Options** – A complaint must be filed no later than 180 calendar days after the following:
 - The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Title VI complaints may be submitted to the following entities:

- **Land of Sky Rural Planning Organization**, Title VI Coordinator, 339 New Leicester Hwy Suite 130, Asheville, NC 28806

- **North Carolina Department of Transportation**, Office of Civil Rights, Title VI/EO Contract Compliance Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453

- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
 - Federal Highway Administration**, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752

 - Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010

 - Federal Transit Administration**, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

 - Federal Aviation Administration**, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258

- **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

4. **Format for Complaints** – Complaints shall be in **writing** and **signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Those who provide complaints by phone will be asked to fill out a formal complaint form. Complaints will be accepted in other languages including Braille.

5. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term "basis" refers to the complainant's membership in a protected group category. Allegations against **transit** entities must be based on issues involving **only** race, color, or national origin.

Protected Categories	Definition	Examples
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White
Color	Color of skin, including shade of skin within a racial group	Black, White, light brown, dark brown, etc.
National Origin	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered by national origin.	Mexican, Cuban, Japanese, Vietnamese, Chinese
Sex	Gender	Women and Men
Age	Persons of any age	21 year old person
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic

COMPLAINANT NOTIFICATION

LOSRPO Subcontractor Complaint Notification Procedure

1. When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within fifteen (15) business days by registered mail. If the complaint is complete, and not additional information is needed, the Title VI Coordinator will proceed with an investigation.
2. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided thirty (30) business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
3. Within thirty (30) business days from receipt of a complete complaint, the Title VI Coordinator will initiate an investigation and work to resolve the issue. Within ten (10) days of a decision, the Title VI Coordinator will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - c. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - d. If the complaint is to be investigated, the notification will inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
4. The Complainant will be notified that the Title VI Coordinator will attempt to resolve complaints within 180 days after the Land of Sky Rural Planning Organization has accepted the complaint for investigation.
5. All complaints are recorded in the "Land-of-Sky Regional Council - Title VI Complaint Log".

LOSRPO Complaint Procedure

In the event that a complaint is made against the LOSRPO those complaints will be documented in the Council of Government's (COG) complaints log and forwarded to the NCDOT Office of Civil Rights.

Proceso de Quejas por Discriminación

INTRODUCCIÓN

Los procedimientos de quejas presentadas en este documento se aplican al NCDOT y otros destinatarios principales y los sub-receptores que reciben ayuda Federal. Estos procedimientos se aplicarán a las quejas por discriminación presentadas en virtud del Título VI del Acta de Derechos Civiles de 1964, Ley de Restauración de Derechos Civiles de 1987, la Sección 504 del Acta de Rehabilitación de 1973, y autoridades de la no discriminación en relación con cualquier otro actividades, programa, o servicios administrados por el NCDOT y sus sub-receptores, (sistemas de tránsito, Organización de Planeación Metropolitana, universidades y condados) consultores y contratistas. El Departamento de Transporte de Carolina del Norte solo Investigará quejas relacionadas con el tránsito, basado en la no discriminación de raza, color y origen nacional.

NCDOT hará todo lo posible para obtener pronta resolución de las quejas en el nivel más bajo posible de administración. Denuncias de presunta discriminación serán investigadas por las autoridades competentes. La opción de reunión(es) de mediación informal entre las partes afectadas y el personal de OCR puede ser utilizada para su resolución. Al término de cada investigación, el personal de la OCR informará a cada demandante todas las vías de recurso.

PROPÓSITO

El propósito de los procedimientos de denuncia por discriminación es describir el proceso utilizado por la NCDOT para tramitar las quejas en virtud del Título VI del Acta de Derechos Civiles de 1964, relacionados con los estatutos y las autoridades.

PRESENTACIÓN DE QUEJAS

1. **Aplicación** – Los procedimientos de queja aplican a los beneficiarios de los programas de la NCDOT, actividades y servicios, incluyendo pero no limitando a la opinión pública, contratistas, subcontratistas, consultores y otros sub-receptores de fondos federales y estatales.
2. **Eligibilidad** – Cualquier persona o grupo de personas que crea haber sido objeto de discriminación o represalia prohibida por alguna de las autoridades de Derechos Civiles, basada en la raza, color, sexo, edad, origen nacional o discapacidad, puede presentar una queja por escrito a la Oficina de Derechos Civiles de la NCDOT. La ley prohíbe la intimidación o represalias de ningún tipo. La denuncia podrá ser presentada por la persona afectada o un representante y debe ser por escrito.
3. **Plazos y opciones de presentación** – La queja debe ser presentada a más tardar 180 días naturales después de lo siguiente:
 - La fecha del supuesto acto de discriminación; o
 - La fecha en que la persona(s) se dió cuenta de la supuesta discriminación; o
 - Cuando ha sido un curso continuo de conducta, la fecha en que dicho coMetropolitan Planning Organizationrtamiento se interrumpió o en el último ejemplo de dicha conducta.

Título VI las quejas podrán presentarse a las siguientes entidades:

- **North Carolina Department of Transportation**, Office of Civil Rights, Title VI/EO Contract Compliance Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
 - Federal Highway Administration**, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752
 - Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
 - Federal Transit Administration**, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
 - Federal Aviation Administration**, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258
- **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

4. **Formato de Quejas** – Las denuncias deberán ser **por escrito y firmadas** por el denunciante (s) o un representante, e incluir el nombre del autor, dirección y número de teléfono. Las denuncias recibidas por fax o correo electrónico serán confirmadas y procesadas. Las denuncias recibidas por teléfono serán transcritas y proporcionadas al denunciante para la confirmación o su revisión antes de ser procesadas. Quejas seran aceptadas en otros lenguajes, incluyendo Braille.
5. **Fundamento de la Queja**– Las denuncias deberán basarse en cuestiones relacionadas con la raza, color, origen nacional, sexo, edad o discapacidad. El término "fundamento" se refiere a la pertenencia del autor de la queja en una categoría del grupo protegido. Denuncias en contra entidades de tránsito deben basarse solo en cuestiones relacionadas con la raza, color u origen nacional.

Grupo Protegido	Definición	Ejemplos
Raza	Un individuo perteneciente a uno de los grupos raciales aceptados; o la percepción, basada generalmente en las características físicas de que una persona es miembro de un grupo racial.	Afro Americano, Hispano/Latino, Asiático, Indio Americano/Nativo de Alaska, Nativo de Hawaii/Islands del Pacífico, Blanco.
Color	Color de piel, incluyendo tono de piel dentro de un grupo racial.	Negro, blanco, moreno claro, moreno oscuro, etc.

Origen Nacional	Lugar de Nacimiento. La ciudadanía no es un factor. La discriminación basada en el idioma o acento de una persona también está cubierta por el origen nacional.	Mexicanos, cubanos, japoneses, vietnamitas, chinos.
Sexo	Género.	Mujer y hombre.
Edad	Personas de cualquier edad.	Personas de 21 años
Discapacidad	Disabilidad física o mental, permanente o teMetropolitan Planning Organizationral, o percibida.	Ciego, alcohólico, para-amputado, epilépticos, diabéticos, artríticos

Complainant Notification

1. Cuando se recibe una queja, el título VI sección proporcionará confirmación escrita al demandante, dentro de diez (10) días hábiles por correo certificado.
2. Si la denuncia es completa y no se necesita ninguna información adicional, el autor se enviará una carta de aceptación, junto con el formulario de la versión/consentimiento del autor.
3. Si una reclamación se considerará incompleta, se le pedirá información adicional, y el autor se proporcionará 30 días para presentar la información requerida. No hacerlo puede considerarse buena causa para una determinación de ningún mérito de investigación.
4. Dentro de 15 días hábiles desde la recepción de una queja completa, la sección de título VI determinará su competencia en la búsqueda de la materia y si la queja tiene mérito suficiente para justificar la investigación. Dentro de los cinco (5) días de la presente decisión, la sección de título VI le notificará el demandante y el demandado, por correo certificado, informándoles de la disposición.
 - a. Si la decisión no es investigar la queja, la notificación indicará específicamente la razón de la decisión.
 - b. Si la denuncia es ser investigado, la notificación indicará los motivos de la jurisdicción de NCDOT, mientras que informar a las partes a que se necesitarán su plena cooperación en la recopilación de información adicional y ayudar al investigador.
5. Si la denuncia es incompleta, se comunicará con el autor de la queja por escrito o por teléfono para obtener la información adicional. El demandante será determinado calendarios de 15 días para responder a la solicitud de información adicional.
6. Se notificará a la organización querellante que NCDOT intentará resolver quejas dentro de 180 días después de NCDOT ha aceptado la queja para investigación.

APPENDIX I Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville TN 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Land of Sky RPO alleging
_____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 828-251-6622 ext. 120 or write to me at this address.

Land of Sky RPO
Title VI Coordinator
339 New Leicester Highway, Suite 140
Asheville NC 28806

Sincerely,

Danna Harrell-Stansbury
Title VI Coordinator
Director of Marketing and Administration

APPENDIX J Letter Notifying Complainant that the Complaint Is "Substantiated"

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville TN 37040

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against Land of Sky RPO alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Danna Harrell-Stansbury
Title VI Coordinator
Director of Marketing and Administration

APPENDIX K Letter Notifying Complainant that the Complaint Is "Not Substantiated"

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against Land of Sky RPO alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from Land of Sky RPO, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Danna Harrell-Stansbury
Title VI Coordinator
Director of Marketing and Administration

APPENDIX L Samples of Narrative to be included in Posters to be displayed in at FBRMPO events and offices

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "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 U.S.C. Section 2000d).

Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency.

Land of Sky RPO is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. **If you feel you are being denied participation in or being denied benefits of the transit services provided by the Land-of-Sky RPO, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Land of Sky RPO
Title VI Coordinator
339 New Leicester Highway, Suite 140
Asheville NC 28806

For more information, visit our website at www.landofskyrpo.org

Appendix M

**Title VI Complaint Log
Land-of-Sky Regional Council**

Case #	Complainant Name	Complainant Address	Date Filed	Basis	Status	Disposition

**Title VI Complaint Log – Complaints filed against LOSRPO
Land-of-Sky Regional Council**

Case #	Complainant Name	Complainant Address	Date Filed	Basis	Status	Disposition

Appendix N Land of Sky RPOs Limited English Proficiency (LEP) Policy

Executive Order (E.O.)13166 and Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating based on national origin by, among other things, failing to provide meaningful access to individuals who are limited English proficient (LEP).

All recipients and sub-recipients of federal funding are required to take reasonable steps to provide meaningful access to LEP individuals. The Land of Sky RPO (LOSRPO) is a recipient of federal funds. The LOSRPO executes its Title VI and LEP plans and policies.

It is important to ensure that written materials routinely provided by the LOSRPO in English also are provided in regularly encountered languages other than English. It is particularly important to ensure that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity. A document will be considered vital if it contains information that is critical for obtaining the federal services and/or benefits, or is required by law. Vital documents include, for example: applications; consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons of the availability of free language assistance; and written tests that do not assess English language competency, but rather competency for a particular license, job or skill for which English competency is not required; and letters or notices that require a response from the beneficiary or client.

Vital documents must be translated when 1000 people or 5% of the population eligible to be served or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety.

It may sometimes be difficult to draw a distinction between vital and non-vital documents, particularly when considering outreach or other documents designed to raise awareness of rights or services. It is impossible from a practical and cost effective perspective to translate every piece of outreach material into every language, and Title VI and EO 13166 do not require this of their recipients. However, in some circumstances lack of awareness of the existence of a particular program may effectively deny LEP individuals meaningful access. It is important for recipients, sub-recipients and contractors to continually survey/assess the needs of eligible service populations in order to determine whether certain critical outreach materials should be translated into other languages.

The obligation to provide meaningful opportunity to individuals who are LEP is not limited to written translations. Oral communications between recipients and beneficiaries often is a necessary part of the exchange of information. Thus, a recipient

that limits its language assistance to the provisions of written materials may not be allowing LEP persons “effectively to be informed of or to participate in the program.”

There are several steps which can assist recipients in providing such oral assistance. They range from hiring bilingual staff or staff interpreters competent in the skill of interpreting, to contracting qualified outside in-person or telephonic interpreter services, to arranging formally for the services of qualified voluntary community interpreters who are bound by confidentiality agreements. Generally, it is not acceptable for agencies or recipients to rely upon an LEP individual’s family members or friends to provide the interpreter services. The agency or recipient should meet its obligations under EO 13166 and Title VI by supplying competent language service free of cost.

The LOSRPO will comply with this federal requirement by assigning responsibility for LEP assistance as follows:

Requests for Translation of Vital Documents

LEP services will be provided by the local RPO (LOSRPO member agency) in which the LEP individual resides, in accordance with that RPO's LEP policy and plan. The local RPO may request assistance from the RPO that authored the document.

Requests for Translation Assistance at Public Meetings and Workshops

All ads for a public meeting sponsored by the LOSRPO will contain the following language: “Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services (free of charge) should contact (*name of local contact*) at (*telephone number of local contact*) at least 10 working days in advance of the Public Meeting.”

As covered under Title VI requirements for nondiscrimination, at each meeting the LOSRPO will provide the Title VI material and will include this material in an alternate language when applicable.

Maintaining Files

Member RPOs will maintain LEP status for their communities in files to assure consistent communication in the appropriate language. The member RPO/TPO will provide a follow-up report to the LOSRPO as to how individual LEP requests, complaints or issues were resolved and/or what assistance was provided. A summary of LEP reports and complaints will be provided to the LOSRPO concurrent with the annual renewal of the LEP.

Review Process

Member RPOs/TPO will review their respective delivery processes to determine whether any local or LOSRPO program process denies or limits participation by LEP persons within that agency's respective community.

Discrimination-Complaint Procedures

LEP persons should be provided notice of their opportunity to file a discrimination complaint in accordance with Title VI. LEP persons may be advised orally of the opportunity to file a discrimination complaint pursuant to the regulations using an interpreter. LEP persons should be made aware of the free, oral translation of vital information that member MPOs will provide upon request.

Annual Update

Annual assessment of the language needs will be conducted by LOSRPO when this policy is updated by review of census and county labor-market data or review of statistics from school system, community agencies and organizations and comparison to demographic data.

Appendix O Land of Sky RPOs Limited English Proficiency (LEP) Plan

Land of Sky RPOs Limited English Proficiency (LEP) Plan

Introduction

The purpose of this Limited English Proficiency (LEP) policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities and sub-recipients. This includes the Chairs Coordinating Committee.

Glossary

Limited English Proficiency - The LEP program provides assistance for people whom English is not their primary language and who have a limited ability to read, speak, write or understand English.

LPA – The Lead Planning Agency responsible for housing the functions of the LOSRPO.

Vital Document – Forms that include (but are not limited to) applications, consent forms, all compliance plans, public participation plans, letters containing important information regarding participation in a program, appeal forms, other outreach materials.

Substantial Number of LEP – 1000 people or 5% of the population eligible to be served or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively.

Title VI Compliance Officer – The person or persons responsible for compliance of Title VI LEP policies, in the case of the LOSRPO, the Title VI Coordinator.

Plan Summary

This document will describe the LOSRPO's responsibilities to offer language assistance and to support the LEP activities of the local programs.

The LOSRPO developed an LEP program that complies with federal guidelines that includes:

What Documents Apply to the LEP Executive Order

All documents that are vital are included under this provision. A document will be considered vital if it contains information that is critical for obtaining the federal services and/or benefits, or is required by law.

How an LEP Population is Identified

An LEP Person does not speak English as a primary language AND has limited ability to read, speak, write or understand English. The threshold for translation services is 1,000 persons or 5% of the population eligible to be served based on the LOSRPO's LEP Policy. The US Census Bureau's American Community Survey 5-year estimates are the basis for determination. LEP populations that are reasonably close to one of the thresholds can be considered for inclusion for services if the margin of error in the American Community Survey would allow the threshold to be met.

- Hearing or visual impairments - sign language interpretation and Braille texts are accommodations of disabilities provided under the Americans with Disabilities Act and/or Section 504 of the Rehabilitative Acts of 1973.
- Illiteracy - LEP individuals protected by the Executive Order and Title VI are those who not only cannot speak, read, or write English, but primarily speak, read or write an language other than English

What Documents or Materials are Included

Vital documents must be translated when they meet the definition, above. For the purposes of the Land of Sky RPO, the following documents will be translated: the Public Involvement Plan, the Title VI Compliance Plan, this LEP Plan, meeting schedules for all committees and subcommittees of the RPO, the informational brochure about the RPO, and an informational pamphlet about translation services.

Most other documents that require translation and that also relate to transportation are done by the local governments and transit operators directly.

Public Meetings / Workshops / MPO Website and Social Media

All ads for a public meeting will contain the following language: Persons who require special accommodations under the Americans with Disabilities Act or persons who require translation services (free of charge) should contact the LOSRPO at 828.251.6622 at least 10 working days in advance of the Public Meeting. As covered under Title VI requirements for nondiscrimination, at each meeting it is necessary to provide the Title VI material and include this material in an alternate language when applicable. On the website, the RPO provides contact phone numbers, email addresses and links to LEP resources at the RPO.

Monitoring and Updating the LEP Plan This plan is designed to be flexible and is and one that can be easily updated. The LOSRPO will annually update their Title VI and LEP Program. The next required Title VI Program update must be forwarded to the FTA by July 30, 2012.

Dissemination of the LOSRPO Limited English Proficiency Plan The LOSRPO will post the offer for translation services for LEP individuals on its website, www.landofskyrpo.org. The LOSRPO will also maintain its Spanish language resources at [http://www.landofskyrpo.org/información en español](http://www.landofskyrpo.org/información%20en%20español).

Any person or agency, including social service, non-profit and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the LOSRPO's LEP Plan will also be available to the North Carolina Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and to any person or agency requesting a copy.

Any questions or comments regarding this plan should be directed to the

LOSRC Title VI Coordinator:

Danna Stansbury
339 New Leicester Hwy, Suite 140,
Asheville, NC 28806
Phone 828.521.6622, FAX: 828.251.6353
E-mail: danna@landofsky.org

Four Factor Analysis

Introduction

Executive Order No. 13166, “Improving Access to Services for Persons with Limited English Proficiency,” dated August 11, 2000 (65 Fed. Reg. 50121, Aug. 16, 2000) requires federal Agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities, who, due to limited English proficiency, cannot fully and equally participate in or benefit from those programs and activities. The EO and DOJ LEP Guidance advises each federal agency to “take reasonable steps to ensure meaningful access to the information and services they provide.” The DOJ guidance document instructs agencies to consider four factors in developing LEP guidance for their recipients (the number of LEP persons in the eligible service population or likely to be encountered in recipient activities and programs; the frequency with which LEP individuals come into contact with the program; the importance of the service or information provided by the program; and the resources available to the recipient of the federal funds).

Analysis of Factors

Factor 1: Number or Proportion of LEP Individuals in the Eligible Population [1]

The RPO evaluated non-English speakers in the counties that make up the RPO, Buncombe, Haywood, Madison and Transylvania. (See table by language in Appendix A).

Factor 2: Frequency of Contact with the Program [2]

All contacts with the RPO are made through its office in Asheville or at public outreach meetings that support a specific project. These contacts are potentially made through telephone calls, mail, Internet web site, e-mail, and in person. The RPO estimates that fewer than three persons with limited English proficiency have contacted the agency in the past few years.

Factor 3: Nature and Importance of the Program [3]

The Land of Sky RPO is a partnership between local and state government that makes decisions about transportation planning in urbanized areas and meets planning requirements established by federal authorizing legislation for transportation funding. Local governments belonging to the RPO are Buncombe, Haywood Madison and Transylvania Counties, Brevard, Hot Springs, Marshall, Mars Hill and Rosman. While our programs serve a necessary and meaningful public purpose, they do not rise to the level of matters having life or death implications (e.g., the provision of services to children, medical care, food, housing, etc.).

Factor 4: Resources Available [4]

Recognizing the occasional need to handle calls in languages other than English, the RPO staff compiled a list of staff volunteers with fluency in some 5 languages other than English. This is supplemented by contract translation and interpreter services on retainer with Land of Sky Regional Council, the host organization of the RPO. Through these volunteers and contract services, we are able to assist callers who are better served by speaking with staff in languages other than English. Volunteers fluent in the languages of callers or correspondents are asked to deal directly with LEP persons in responding to inquiries. Technical staff is called upon as necessary in order to assist volunteers in providing requested information. We ask for assistance from volunteers to help callers on an infrequent basis—less than once a year. Thus, the RPO’s current policy of using multi-lingual staff volunteers is an efficient and effective use of resources.

The RPO makes available documents pertinent to translation services and other Title VI issues on its website in Spanish and Russian at http://www.losrpo.org/información_en_español_spanish and http://www.losrpo.org/информация_на_русском_russian, respectively. Executive summaries of major planning documents vital to the RPO are also translated, including the Long Range Transportation Plan and the Transportation Improvement Program.

There is significant interest from the RPO boards to create materials that serve native English speakers who have limited language proficiency due to inability to read English or visual impairment. The RPO will be adding these materials over the next fiscal year to present in the spring of 2013 for potential addition to this plan.

LEP Attachment
Regional Assessment of Language Proficiency Populations (2009 5-year American Community Survey)

	Buncombe County, North Carolina	Haywood County, North Carolina	Madison County, North Carolina	Transylvania County, North Carolina	TOTAL
Total	212,328	53,621	19,210	28,541	313,700
	+/-35	+/-84	+/-26	+/-99	
Speak only English	197,695	51,925	18,853	27,592	296,065
	+/-1,030	+/-266	+/-136	+/-183	
Spanish	8,838	1,072	230	572	10,712
	+/-489	+/-240	+/-117	+/-130	
speak English "very well"	4,300	633	51	234	5,218
	+/-457	+/-195	+/-51	+/-104	
speak English less than "very well"	4,538	439	179	338	5,494
	+/-415	+/-166	+/-107	+/-93	
French	730	79	17	40	866
	+/-180	+/-55	+/-29	+/-50	
speak English "very well"	574	69	17	40	700
	+/-165	+/-51	+/-29	+/-50	
speak English less than "very well"	156	10	0	0	166
	+/-82	+/-17	+/-127	+/-127	
Creole	15	0	0	0	15
	24	127	127	127	
speak English "very well"	7	0	0	0	7
	12	127	127	127	
speak English less than "very well"	8	0	0	0	8
	20	127	127	127	
Italian	93	179	0	33	305
	52	106	127	38	
speak English "very well"	72	155	0	20	247
	55	112	127	32	
speak English less than "very well"	21	24	0	13	58
	24	32	127	21	
Portuguese	146	0	0	0	146
	115	127	127	127	

(1,000 persons) inclusion.

speak English "very well"	124	0	0	0	124
	109	127	127	127	
speak English less than "very well"	22	0	0	0	22
	24	127	127	127	
German	797	232	19	128	1,176
	185	120	25	91	
speak English "very well"	667	210	19	104	1,000
	180	116	25	84	
speak English less than "very well"	130	22	0	24	176
	64	23	127	27	
Yiddish	9	0	0	0	9
	15	127	127	127	
speak English "very well"	0	0	0	0	0
	127	127	127	127	
speak English less than "very well"	9	0	0	0	9
	15	127	127	127	
Other West- Germanic	40	0	0	0	40
	34	127	127	127	
speak English "very well"	32	0	0	0	32
	32	127	127	127	
speak English less than "very well"	8	0	0	0	8
	12	127	127	127	
Scandinavian	54	26	0	0	80
	69	28	127	127	
speak English "very well"	54	13	0	0	67
	69	20	127	127	
speak English less than "very well"	0	13	0	0	13
	127	21	127	127	
Greek	303	0	0	0	303
	190	127	127	127	
speak English "very well"	215	0	0	0	215
	174	127	127	127	
speak English less than "very well"	88	0	0	0	88
	74	127	127	127	
Russian	1,009	0	17	0	1,026

	489	127	26	127	
speak English "very well"	299	0	17	0	316
	188	127	26	127	
speak English less than "very well"	710	0	0	0	710†
	405	127	127	127	916†
Polish	68	11	0	0	79
	51	19	127	127	
speak English "very well"	56	11	0	0	67
	47	19	127	127	
speak English less than "very well"	12	0	0	0	12
	18	127	127	127	
Serbo-Croat	0	0	0	0	0
	127	127	127	127	
speak English "very well"	0	0	0	0	0
	127	127	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	
Other Slavic	515	10	0	15	540
	289	17	127	24	
speak English "very well"	139	10	0	15	164
	120	17	127	24	
speak English less than "very well"	376	0	0	0	376
	202	127	127	127	
Farsi	62	0	0	0	62
	55	127	127	127	
speak English "very well"	28	0	0	0	28
	32	127	127	127	
speak English less than "very well"	34	0	0	0	34
	37	127	127	127	
Gujarati	113	0	0	0	113
	98	127	127	127	
speak English "very well"	82	0	0	0	82
	82	127	127	127	
speak English less than "very well"	31	0	0	0	31
	36	127	127	127	

†850 + Margin of Error (+/- 916) basis for LEP (1,000 persons) inclusion.

Hindi	31	0	0	0	31
	30	127	127	127	
speak English "very well"	22	0	0	0	22
	25	127	127	127	
speak English less than "very well"	9	0	0	0	9
	18	127	127	127	
Other Indic	145	0	0	22	167
	140	127	127	41	
speak English "very well"	114	0	0	22	136
	126	127	127	41	
speak English less than "very well"	31	0	0	0	31
	32	127	127	127	
Other Indo- European	266	0	0	0	266
	195	127	127	127	
speak English "very well"	45	0	0	0	45
	52	127	127	127	
speak English less than "very well"	221	0	0	0	221
	172	127	127	127	
Chinese	104	0	14	74	192
	86	127	23	90	
speak English "very well"	61	0	14	46	121
	56	127	23	56	
speak English less than "very well"	43	0	0	28	71
	41	127	127	36	
Japanese	138	33	11	0	182
	93	38	19	127	
speak English "very well"	68	33	11	0	112
	53	38	19	127	
speak English less than "very well"	70	0	0	0	70
	56	127	127	127	
Korean	140	0	0	0	140
	97	127	127	127	
speak English "very well"	89	0	0	0	89
	62	127	127	127	
speak English	51	0	0	0	51

less than "very well"	53	127	127	127	
Mon-Khmer	27	28	0	0	55
	32	31	127	127	
speak English "very well"	27	28	0	0	55
	32	31	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	
Hmong	47	0	0	14	61
	57	127	127	25	
speak English "very well"	32	0	0	14	46
	54	127	127	25	
speak English less than "very well"	15	0	0	0	15
	24	127	127	127	
Thai	37	0	0	0	37
	36	127	127	127	
speak English "very well"	37	0	0	0	37
	36	127	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	
Laotian	19	0	0	0	19
	18	127	127	127	
speak English "very well"	15	0	0	0	15
	17	127	127	127	
speak English less than "very well"	4	0	0	0	4
	7	127	127	127	
Vietnamese	174	0	0	0	174
	141	127	127	127	
speak English "very well"	63	0	0	0	63
	68	127	127	127	
speak English less than "very well"	111	0	0	0	111
	91	127	127	127	
Other Asian	31	0	17	0	48
	35	127	28	127	
speak English "very well"	13	0	17	0	30
	20	127	28	127	

speak English less than "very well"	18	0	0	0	18
	23	127	127	127	
Tagalog	271	16	20	10	317
	121	25	32	22	
speak English "very well"	208	0	11	10	229
	118	127	23	22	
speak English less than "very well"	63	16	9	0	88
	46	25	18	127	
Other Pacific Island	117	0	0	41	158
	112	127	127	58	
speak English "very well"	69	0	0	0	69
	75	127	127	127	
speak English less than "very well"	48	0	0	41	89
	48	127	127	58	
Navajo	0	0	0	0	0
	127	127	127	127	
speak English "very well"	0	0	0	0	0
	127	127	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	
Other Native American	39	10	0	0	49
	72	18	127	127	
speak English "very well"	39	10	0	0	49
	72	18	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	
Hungarian	68	0	0	0	68
	52	127	127	127	
speak English "very well"	54	0	0	0	54
	49	127	127	127	
speak English less than "very well"	14	0	0	0	14
	22	127	127	127	
Arabic	75	0	0	0	75
	58	127	127	127	
speak English	75	0	0	0	75

"very well"	58	127	127	127	
speak English less than "very well"	0	0	0	0	0
	127	127	127	127	

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value.

1. An '*' entry in the margin of error column indicates that too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '**' entry in the margin of error column indicates that no sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
3. An '-' entry in the estimate column indicates that no sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
4. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
5. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
6. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
7. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
8. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
9. An '(X)' means that the estimate is not applicable or not available.

[NOTE. For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.](#)