

# Limited English Proficiency Plan

I Speak...



Ensuring Meaningful Access for  
Limited English Proficient Individuals

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# TABLE OF CONTENTS

I.	Introduction .....	3
II.	Purpose of the Plan, Effective Strategy and Policy.....	4
III.	Four- Factor Analysis .....	5
IV.	INDOT’S Five-Point LEP Plan .....	17
V.	LEP Monitoring and Updating .....	21
VI.	LEP Complaint Procedure.....	22
VII.	Appendices .....	23
	i) LEP Report Form .....	24
	ii) Language Questionnaire .....	25
	iii) Multi-lingual Employee Volunteer List .....	26
	iv) Language Identification Cards .....	27
	v) Title VI Public Involvement Survey .....	28

# I. INTRODUCTION

INDOT is committed to ensuring that all persons having language barriers are made equal participants early in the development stages and throughout the life of INDOT's programs, projects, services, or activities, and that the public and communities the department serve are allowed to provide input for those projects or plans that may have an impact on their wellbeing. It is INDOT's intent to ensure fairness, equal opportunity, inclusion, and access by actively seeking input from persons who do not speak English, or have difficulty communicating in English, regarding quality-of-life issues that directly affect them.

This Limited English Proficiency (LEP) Plan, in keeping with Executive Order (EO) 13166, has been designed to provide guidance to INDOT employees for meeting the needs of individuals with limited English proficiency and all beneficiaries of transportation programs.

## **What does it mean to be Limited English Proficient (LEP)?**

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

## **Background**

### **Title VI & Executive Order 13166**

Title VI of the federal Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. National origin discrimination includes discrimination based on a person's inability to speak, read, write, or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

### **Executive Order 13166**

On August 11, 2000, President Bill Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP) and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will

provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries

## **II. PURPOSE of the PLAN, EFFECTIVE STRATEGY and POLICY**

INDOT has developed its' LEP Plan to eliminate or reduce barriers while providing guidance on how to access and fulfill INDOT's commitment to ensure Indiana citizens have safe, timely, and meaningful access to its programs and services. For the purposes of this plan, only those individuals who were identified in the 2021 U.S. Census American Community Survey, C16001 Language Spoken at Home for the Population 5 Years and Over as having the ability to speak English less than "very well" are being considered. INDOT's LEP Plan addresses these elements to aid in identifying LEP persons so that they are provided meaningful access to INDOT services and activities that may affect their quality of life. These elements include the following.

### **1. Identifying LEP persons who need language assistance.**

The State Transportation Improvement Plan (STIP) will provide the program and project-level basis for determining the need for public involvement and public engagement. Impacts to communities should be recognized early and monitored continually throughout the transportation decision-making process. One method for this is through enhanced public outreach and participation methods at all points of the statewide transportation planning process ensuring meaningful participation by citizens, including traditionally underserved communities. The integration of environmental justice principles into the transportation planning process is consistent across all areas of INDOT. INDOT has contracted with a consulting firm, to develop an analysis used to target underserved communities and vulnerable populations. INDOT intends to have its' Project Equity Scoring Tool in place by year 2024. .

The analysis provides demographic and socioeconomic profiles of each INDOT district, subdistrict, and metropolitan planning area that will be used to ensure targeted outreach opportunities to these identified community areas. The analysis includes information on LEP areas, population demographics, education, income, transportation access, and related information critical for targeted outreach.

### **2. Identify ways in which language assistance will be provided.**

INDOT will provide oral and written translation, written interpretation, and translation, and

sign language, if requested or as a result of an LEP analysis on any given project or projected program, requiring translation or interpretation. In addition, video visualization techniques will be used to illustrate INDOT projects as called for in INDOT's Public Involvement Plan.

INDOT will evaluate its programs, services, and activities where LEP persons are likely to be encountered or when projects may impact an LEP population. An annual survey of its employees will be conducted to determine the frequency of contact with LEP persons.

### **3. Training staff and others.**

All INDOT staff will receive training, especially those involved in public outreach and public involvement, on identifying LEP populations and providing LEP translation and interpretation.

Sub-recipients and MPOs must provide LEP services to be in compliance with Title VI and EO 13166. Sub-recipient reviews will be conducted to ensure compliance with EO 13166. Contractor compliance reviews will include a provision to comply with the order.

### **4. Provide notice to LEP persons.**

After LEP populations have been identified, strategies will be developed to provide notice of a program, service, or activity, using appropriate media, including brochures (also in languages other than English). Community groups serving LEP populations will be contacted, as well as schools, church groups, chambers of commerce, and other relevant entities.

## **III. FOUR-FACTOR ANALYSIS**

**The Four Factor Analysis is a local assessment that considers:**

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

**Factor #1 – The number or portion of LEP Persons served or encountered in the eligible service population.**

Based on data from the U.S. Census Bureau C16001 Language Spoken at Home for The Population 5 Years and Over, Indiana’s total estimated population is 6,335,798 of which 5,768,984 speak only English. Other languages reported spoken in Indiana are as follows.

Language Spoken at Home	Total Citizens Speak Language other than English	# Citizens Speak English Very Well	# Citizens Speak English Less than Very Well
Spanish	295,350	185,627	109,723
French, Haitian, or Cajun	16,009	10,282	5,727
German or other West Germanic languages	63,094	47,353	15,741
Russian, Polish, or other Slavic languages:	17,277	12,212	5,065
Other Indo-European languages:	44,111	33,015	11,096
Korean:	7,364	4,387	2,977
Chinese (incl. Mandarin, Cantonese):	25,529	14,039	11,490
Vietnamese:	7,289	3,043	4,246
Tagalog (incl. Filipino):	9,420	6,810	2,610
Other Asian and Pacific Island languages:	46,724	24,886	21,838
Arabic:	12,931	7,980	4,951
Other and unspecified languages:	21,716	16,304	5,412

The U.S. Census data shows Indiana citizens that speak Spanish very well are 187,627, and less than very well are 109,723 which totals 295,350. Spanish speakers comprise the largest non-English speaking language group, which is 4.66% of Indiana’s total population. Spanish speakers less than very well represented 1.73% of Indiana’s total population. The tables listed in the “Data by the Districts” section herein shows a breakdown of Indiana’s population by language speaking ability and demonstrates the need to ensure that LEP persons are included in the transportation public involvement process. INDOT focused its analysis on Spanish Speaking group as Spanish Speakers represents the largest number of non-English speaking language group. Please note however, INDOT makes language assistance available to all LEP speaking individuals where the need is presented.

**The Safe Harbor Provision**

The U.S. Department of Transportation (U.S.DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S.DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect INDOT's requirement to provide meaningful access to LEP individuals through oral language services. A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. See FHWA guidance below:

*Table 1*

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

[https://www.fhwa.dot.gov/civilrights/programs/title\\_vi/lep\\_fourfactor.cfm](https://www.fhwa.dot.gov/civilrights/programs/title_vi/lep_fourfactor.cfm)

### **Data by the Districts**

INDOT has six districts for the purpose of organizing and managing highway construction, maintenance, traffic, development, and testing. The six districts are Crawfordsville, Fort Wayne, Greenfield, LaPorte, Seymour, and Vincennes. Indiana has 92 counties which are divided amongst the six districts.

*Crawfordsville District:* Contains 14 counties (Benton, Boone, Clay, Clinton, Fountain, Hendricks, Montgomery, Owen, Parke, Putnam, Tippecanoe, Vermillion, Vigo and Warren)

*Fort Wayne District:* Contains 14 counties (Adams, Allen, DeKalb, Elkhart, Grant, Huntington, Kosciusko, LaGrange, Miami, Noble, Steuben, Wabash, Wells, Whitley.

*Greenfield District:* Contains 16 counties (Blackford, Delaware, Fayette, Hamilton, Hancock, Henry, Howard, Jay, Madison, Marion, Randolph, Rush, Shelby, Tipton, Union and Wayne)

*LaPorte District:* Contains 13 counties (Carroll, Cass, Fulton, Jasper, Lake, LaPorte, Marshall, Newton, Porter, Pulaski, St. Joseph, Starke and White) in this northwest Indiana district.

*Seymour District:* Contains 19 counties (Bartholomew, Brown, Clark, Dearborn, Decatur, Floyd, Franklin, Harrison, Jackson, Jefferson, Jennings, Johnson, Monroe, Morgan, Ohio, Ripley, Scott, Switzerland and Washington

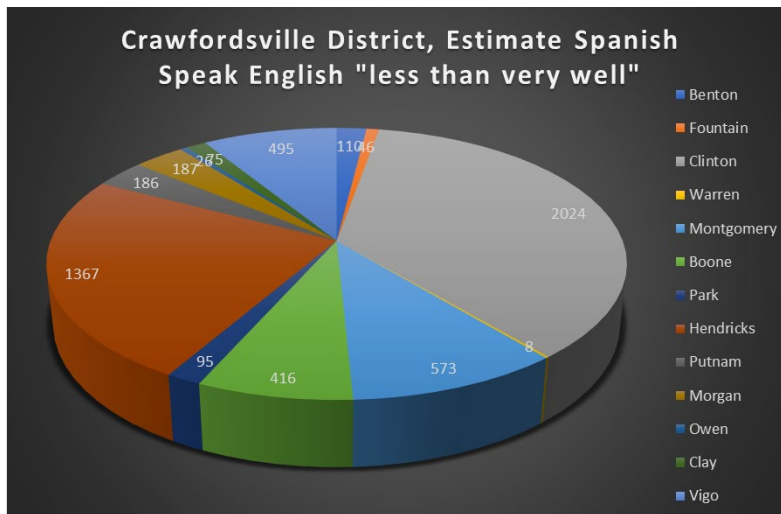
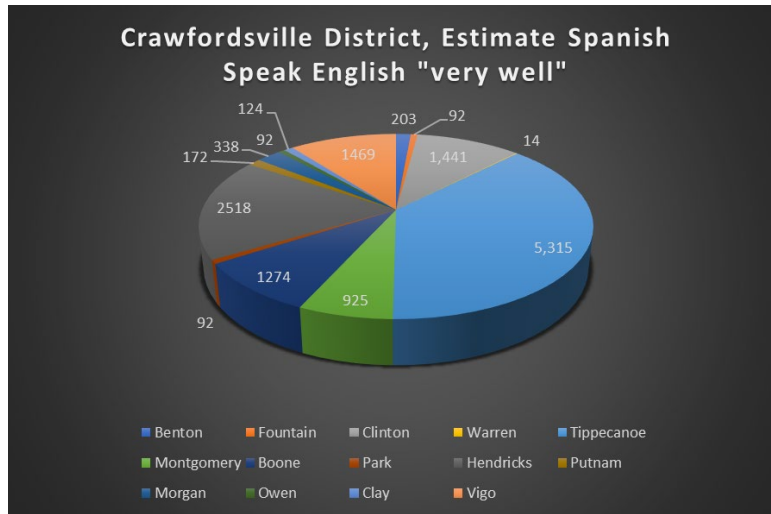
*Vincennes District:* Contains 16 counties (Crawford, Daviess, Dubois, Gibson, Greene, Knox, Lawrence, Martin, Orange, Perry, Pike, Posey, Spencer, Sullivan, Vanderburgh and Warrick)



Data from US Census Bureau C16001 Language Spoken at Home for the Population 5 years and Over are depicted in the following Charts which shows the LEP breakdown of Spanish Speaking population per county, per each district.



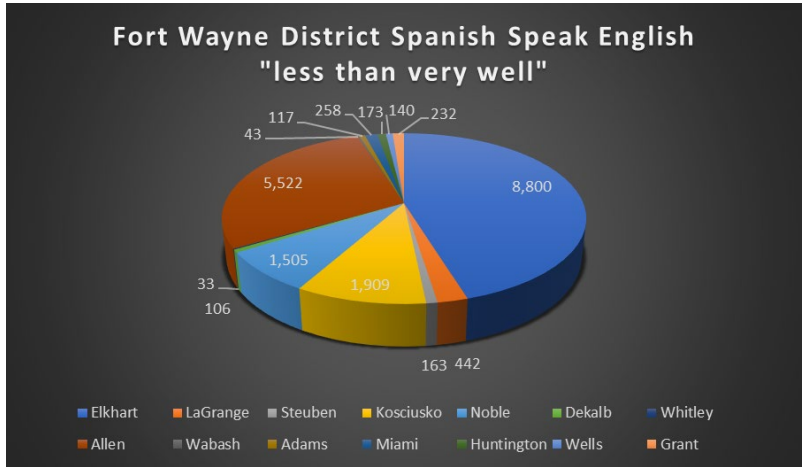
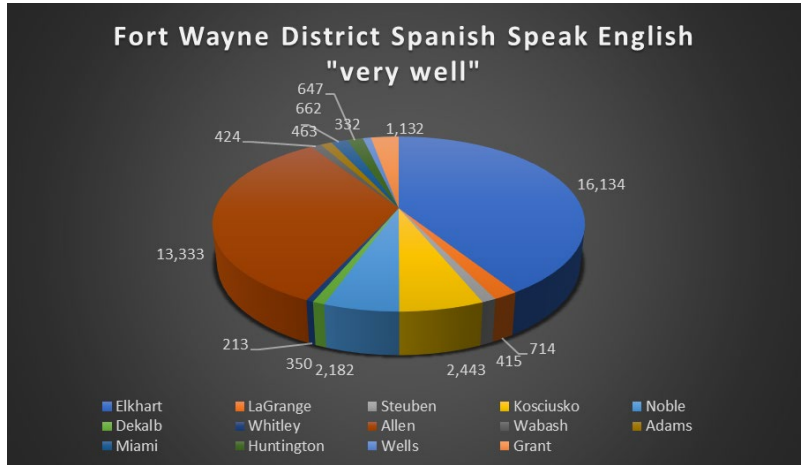
## CRAWFORDSVILLE DISTRICT



County	Total Residents	Percentage "less than very well"
Benton	8,115	1.35%
Boone	65,326	.64%
Clay	24,794	.30%
Clinton	30,730	6.59%
Fountain	15,464	.29%
Hendricks	162,483	.84%
Montgomery	35,673	1.61%
Owen	20,098	.13%
Parke	15,354	.62%
Putnam	35,043	.53%
Tippecanoe	175,399	2.01%
Vigo	100,614	.49%
Vermillion	14,699	.46%
Warren	8,003	.10%

[American Community Survey C16001](#)

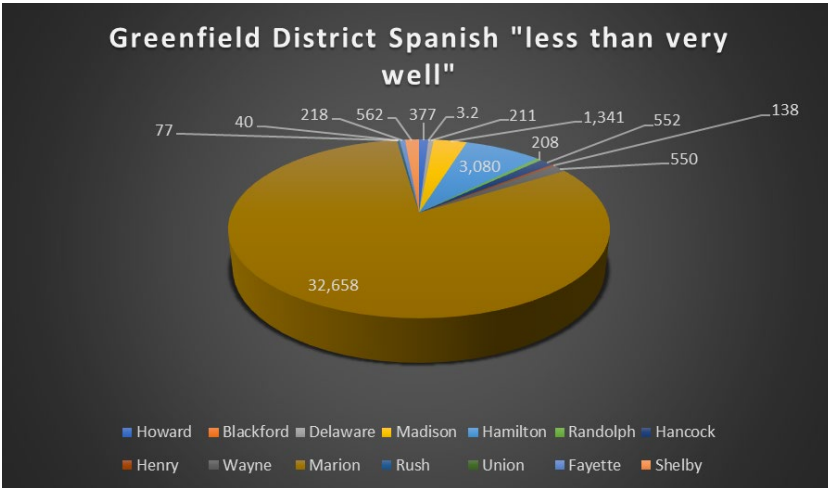
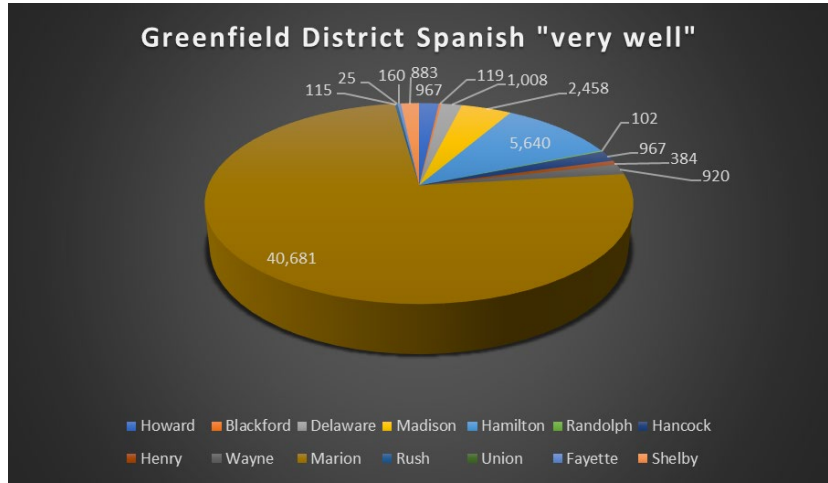
## FORTWAYNE DISTRICT



American Community Survey C16001

County	Total Residents	Percentage "less than very well"
Adams	32,427	.36%
Allen	355,363	1.56%
Dekalb	40,303	.26%
Elkhart	40,594	2.94%
Grant	63,061	.37%
Huntington	34,520	.50%
Kosciusko	75,111	2.54%
LaGrange	36,483	1.21%
Miami	34,162	.76%
Noble	44,260	3.40%
Steuben	32,550	.50%
Wabash	29,509	.16%
Wells	26,366	.53%
Whitley	31,898	.10%

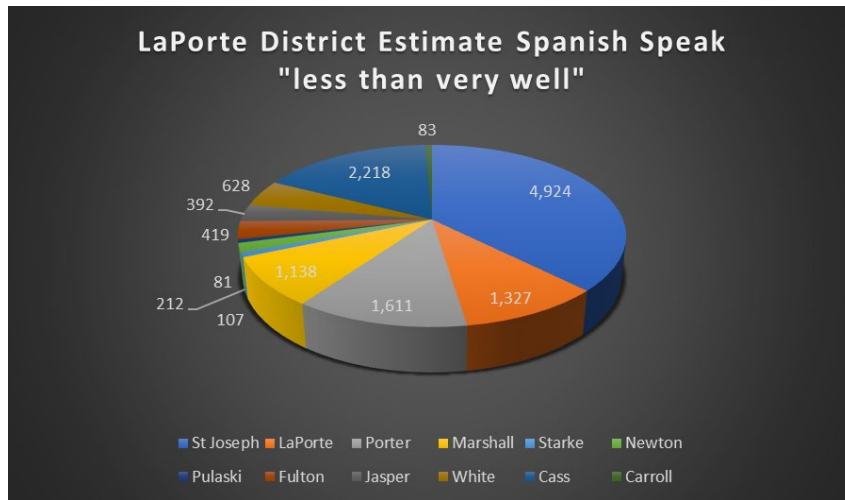
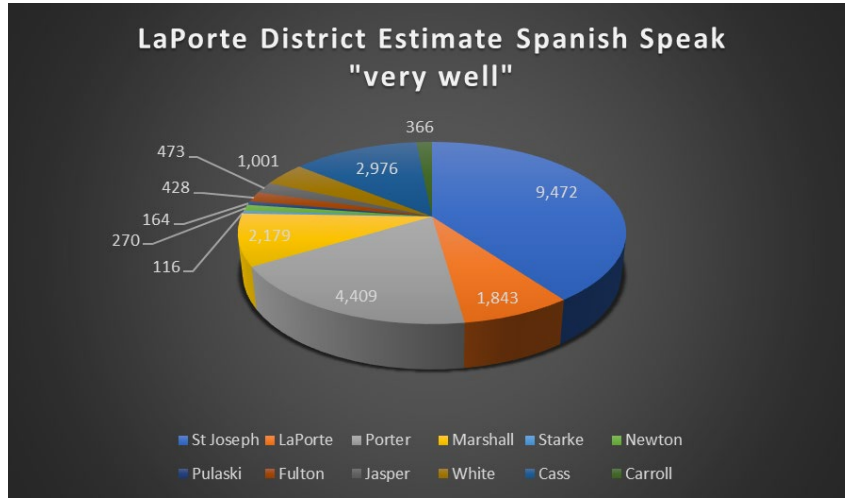
## GREENFIELD DISTRICT



County	Total Residents	Percentage "less than very well"
Blackford	11,520	.26%
Delaware	106,993	.20%
Fayette	22,140	.98%
Hamilton	320,238	.96%
Hancock	74,072	.75%
Henry	46,403	.30%
Howard	78,350	.51%
Jay	19,171	.31%
Madison	122,926	1.10%
Marion	900,462	3.63%
Randolph	23,168	.90%
Rush	15,779	.49%
Shelby	42,292	1.33%
Tipton	14,438	.13%
Union	6,654	.60%
Wayne	62,719	88%

[American Community Survey C16001](#)

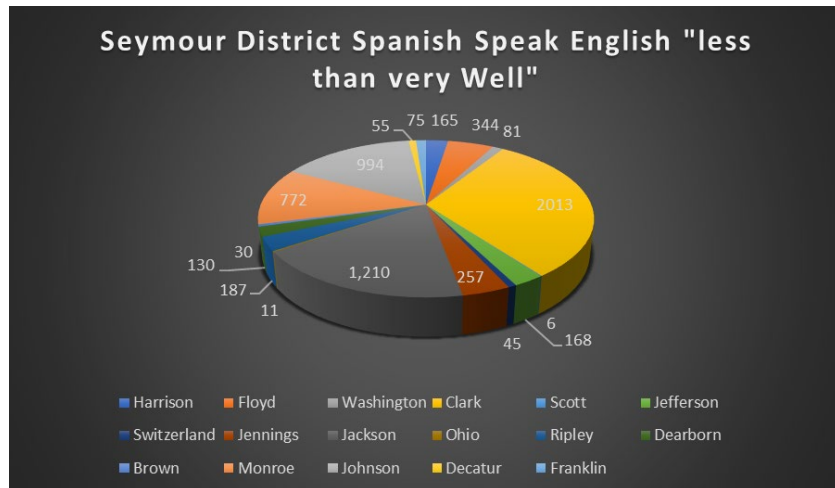
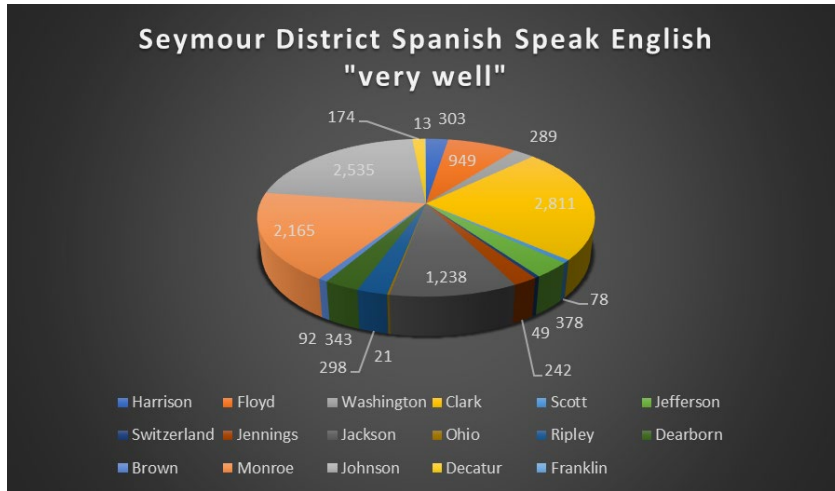
## LAPORTE DISTRICT



County	Total Residents	Percentage "less than very well"
Carroll	19,185	.43%
Cass	35,714	6.21%
Fulton	19,178	2.18%
Jasper	31,163	1.26%
Lake	466,670	3.36%
LaPorte	105,750	1.25%
Marshall	43,279	2.62%
Newton	13,104	1.62%
Porter	163,259	.99%
Pulaski	11,835	.68%
St. Joesph	254,803	1.93%
Starke	21,817	.49%
White	23,116	2.71%

[American Community Survey C16001](#)

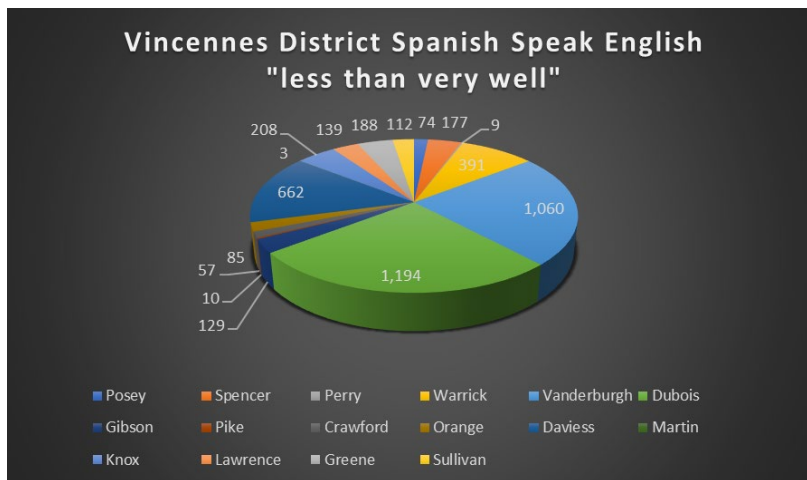
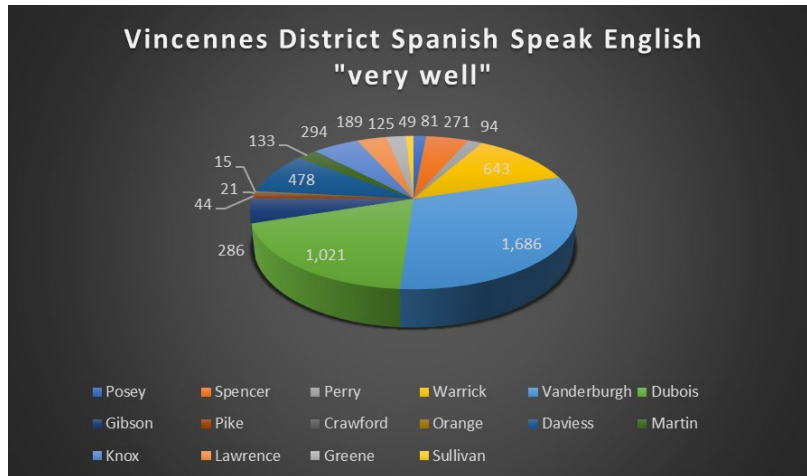
## SEYMOUR DISTRICT



County	Total Residents	Percentage "less than very well"
Bartholomew	14,830	.20%
Brown	14,830	.20%
Clark	112,898	1.78%
Dearborn	47,863	.27%
Decatur	24,771	.22%
Franklin	21,448	.35%
Floyd	75,057	4.59%
Harrison	37,371	4.42%
Jackson	42,764	2.82%
Jefferson	31,198	.54%
Jennings	25,958	.99%
Johnson	149,796	.66%
Monroe	134,208	.58%
Morgan	67,470	.28%
Ohio	5,617	.20%
Ripley	27,185	.69%
Scott	22,893	.03%
Switzerland	9,311	.48%
Washington	26,440	.31%

[American Community Survey C16001](#)

## VINCENNES DISTRICT



County	Total Residents	Percentage "less than very well"
Crawford	9,898	.58%
Daviess	30,595	2.16%
Dubois	40,592	5.10%
Gibson	30,968	.42%
Greene	29,245	.64%
Knox	34,355	.61%
Lawrence	42,584	.33%
Martin	9,294	.03%
Orange	18,568	.46%
Perry	18,084	.05%
Pike	11,547	.09%
Posey	23,945	.31%
Spencer	18,908	.94%
Sullivan	19,598	.57%
Vanderburgh	169,189	.63%
Warrick	59,914	.62%

[American Community Survey C16001](#)

### **Summary of Factor One**

Spanish speakers are by far the most LEP populous and widespread throughout the state, with Spanish being the only language that meets the safe harbor threshold in Indiana districts. The district-level data assists INDOT in giving guidance on language access to its recipients throughout the state.

### **Factor #2: The frequency with which LEP individuals come in contact with the program**

The program/project must be evaluated in relationship to the number of persons who are within the program/project area, and the number of times they have frequented the program or activity. For public meetings, a sign-in sheet or survey is utilized to capture the demographic data of the participants. Planners and project managers must provide notice to LEP persons within the project/program area so that they are aware of any programs/projects that may affect their quality of life. Programs, services, and activities that have potential impact for LEP persons include but are not limited to:

- Public involvement and public engagement meetings/hearings for construction projects affecting LEP communities or individuals
- Welcome Centers and rest areas
- Roadside assistance drivers
- Transportation maintenance workers
- Transit
- Sub-recipients
- Requests for permits
- Real estate transactions/condemnation
- Payment of tolls at Indiana Toll Roads
- Internet access: INDOT websites must be accessible to LEP persons
- Requests for certifications, licenses
- Phone communications: notices/greetings in languages other than English

### **Factor #3: The Importance of INDOT's Service to People's Lives**

INDOT's services affect every community member. INDOT produces and distributes public safety and public service announcements for estimated travel times, notices for road closures to make construction zones safer; to reduce distracted and intoxicated driving; and to increase pedestrian, bicycle, and motorcycle safety. It is essential that INDOT effectively communicate its safety and public service announcements to the entire community, including non-English speakers. Further, INDOT is a large employer, and spends millions of dollars annually contracting work from DBEs. INDOT's planning

process relies on input from the public. INDOT's services are therefore important to every citizen including LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

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

As the state transportation agency responsible for coordinating the statewide transportation planning process, INDOT must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups and communities of concerns, are part of the evaluation process. INDOT provides oversight and helps ensure that LEP and other protected classes of persons are not overlooked in the transportation planning process. In doing so, INDOT's FY 2024-2028 Statewide Transportation Improvement Program (STIP) is a key document in the Federal transportation planning and programming process. Impacts to communities are recognized early and monitored continually throughout the transportation decision-making process. One method for this is through enhanced public outreach and participation methods at all points of the statewide transportation planning process ensuring meaningful participation by citizens, including LEP populations.

Additionally, INDOT continues to strive to improve its data collection efforts to better track the actual number of LEP individuals encountered in the delivery of services so that INDOT may continue to evaluate the effectiveness of its LEP Implementation Plan. Training provided to INDOT employees in person or via the online module contains information about LEP requirements and tools INDOT uses to gather information on an ongoing basis about LEP needs.

INDOT's LEP information gathering tools include the use of the following:

- Internal LEP Report Form
- "I Speak" Cards
- Ability of the public to request language services and translation services
- Use of demographic information, not limited to but including census information to determine whether LEP resources and / or alternative advertising measures should be considered as part of public involvement activities.
- Employee language questionnaires



## 5. INDOT'S FIVE-POINT LEP PLAN

### 1. Provide Notice to LEP Persons using all means reasonably calculated to provide meaningful access

USDOT LEP guidance says:

“Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.”

As a recipient of Federal Funds, INDOT must make reasonable efforts to notify the public of its eligibility for benefits, programs, and services in a language they understand. Methods used to inform LEP individuals about language assistance services may include translating outreach materials into other languages, updating non-English content in key languages on the main page of the program website and providing public service messages in non-English media describing INDOT's programs.

Some notification actions include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (brochures, booklets, pamphlets, flyers) that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Using a telephone voice mail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English for important events.
- Providing notices on non-English language radio and television stations about the availability of language assistance services for important events.
- Providing presentations and notices at schools and religious organizations for important events or where community involvement is critical.
- Providing a document translation (and/or interpretation services) request form/notice translated into other languages when INDOT is aware that significant number of persons will be impacted by INDOT programs or activities who speak a language other than English, regardless of county- wide census data.
- Publish the LEP Plan on the INDOT's website to ensure public accessibility.
- Provide LEP translation services on INDOT's website.
- With advance notice, provide interpreter services at any meeting or public hearing.

- Interpreter to include foreign language and signs for the hearing impaired.

## **2. Translate Vital Documents**

A document is considered vital if it contains critical information for obtaining services or benefit or is required by law. To further assist INDOT employees in determining whether a document should be considered vital INDOT employees should consider whether the document’s core purpose is related public engagement activities. Public engagement activities may include:

- Solicitation of public comments
- Circulation of document for public inspection and feedback before translating it
- Circulation of public notices

Public information related to key INDOT procedures, projects, or activities which may be reasonably likely to have a significant impact on an LEP population. INDOT program areas requiring interaction with the public as a daily part of their delivery of services should assess the LEP population and the frequency and importance of contact with LEP persons to ascertain the necessity for translating vital documents. Examples of vital documents that require consideration for translation into Spanish (Indiana’s largest LEP population) include the following:

- Notices of proposed public hearings regarding proposed transportation plans, projects, or changes.
- Emergency transportation information, such as road closures.
- Notices of reduction, denial or termination of services or benefits.
- Signs in reception areas and other points of initial entry.
- Notices advising LEP persons of free language assistance.
- Statements about the services available and the right to free language assistance services in brochures, booklets, outreach, and recruitment information, and other materials routinely disseminated to the public.
- Applications or instructions regarding participating in a program or activity or to receive benefits or services.
- Consent forms.

The determination whether a document (or the information it solicits) is “vital” will depend on the importance of the program, information, encounter, or service involved, and the

consequence to the LEP person if the information in question is not accurate or received in a timely manner. Where appropriate, program managers are encouraged to create a plan for consistently determining what documents are “vital” to the meaningful access of the LEP populations they serve.

Where program managers are engaged in community outreach efforts as part of the division’s programs and activities, they should regularly assess the needs of the populations frequently encountered or affected by the program to determine whether certain critical outreach materials should be translated.

### **3. Interpretation Services**

INDOT recognizes the need for greater oral and written communication with limited and non-English speaking persons located within the state. Central Office and each District office attempt to identify the language needs within its jurisdiction and current bilingual staff resources to meet those needs. Where communication of key or vital information is involved, INDOT employs the use of interpretation and translation services to ensure effective communication can be achieved. Best practices suggest that:

- INDOT should develop a listing of local Community-Based Organizations (CBO’s) and other stakeholders that includes the specific language skills available among each CBO's staff and volunteers. This often occurs as part of our EJ analysis during the environmental stage of project planning.
- When INDOT bilingual staff resources are insufficient to meet language assistance needs, INDOT staff should assist LEP persons in securing volunteer interpretive services from advocacy groups. In addition, INDOT employs the use of interpretation services when a request is made or when the threshold is met for the safe harbor requirement.
- Translations of commonly requested documents, bilingual staff and telephone interpreter services should be made available at locations that are readily accessible to the public, such as information desks, security checkpoints, and on public information telephone lines.

- Programs should not rely on family members or friends to translate or interpret for LEP persons. If the LEP customer insists upon using a friend or family member, it should be allowed only after language services have been offered and refused. Minor children should not be used to interpret, except in emergencies. Our LEP report form tracks whether or not this practice is occurring, when and how often.
- Each INDOT component, program or activity identified as warranting language assistance measures should budget for language services to ensure that adequate resources exist for interpreters, translation and review of documents, and outreach. Notwithstanding any limitations of the current budget, programs should include language assistance resources as items in their future budget requests. Programs should be prepared to justify any failure to request funding for language assistance where the data indicates a need for such assistance.

#### **4. Staff Training**

INDOT staff should be properly trained so they know and understand their obligations to provide meaningful access to information and services for LEP persons. INDOT's current in-person and online training materials for employees include LEP requirements and policies. Training will be updated as these policies change. INDOT will review the necessity for additional training. This training must be mandatory for staff who have the potential to interact or communicate with LEP individuals, staff whose job it is to arrange for language assistance services and managers. Training shall explain how staff can identify the language needs of an LEP individual, access and provide the necessary language assistance services, work with interpreters, request document translations and track the use of language assistance services. Bilingual staff members who communicate "in-language" to LEP individuals or who serve as interpreters or translators, should be assessed and receive regular training on proper interpreting and translation techniques, ethics, specialized terminology and topics as needed

#### **5. Multilingual Staffing**

In-house multilingual staffing is a cost-effective way to provide language services to LEP individuals. When needs dictate, bilingual ability should be considered. The challenge with this approach is that very few individuals self-identify as both bilingual and willing to provide translation services. Best practices suggest that:

- INDOT create a directory of multilingual staff willing to volunteer their language

skills on an as needed basis.

- Bilingual staff should be trained and versed in the standards of the interpreting profession.

Bilingual staff or contractors should be assessed for bilingual proficiency, interpretation skills and sensitivity to the special confidentiality issues raised by interpreting for others. Individuals providing interpretative services should possess a level of fluency and comprehension appropriate to the specific nature, type, and purpose of information at issue. Bilingual staff should be encouraged and enabled to access interpreter and translation training. The list of INDOT's LEP Staff volunteers are found in the appendices herein.

## **6. LEP MONITORING AND UPDATING**

INDOT's Title VI Manager is responsible for monitoring and implementation of the Limited English Proficiency Plan. The Plan will be reviewed annually to determine whether updates are needed. The Title VI Manager will:

1. Coordinate identification of language service needs and strategies so that INDOT employees will have access to appropriate language services in their interactions with LEP individuals.
2. Ensure the agency's compliance with the LEP Policy and Plan.
3. Provide notice of the language assistance services in the following areas:
  - a) Posters in public areas.
  - b) "I Speak" language identification cards at reception area.
  - c) INDOT Website.
4. Conduct an annual review analyzing changes in:
  - a) Census data.
  - b) Current LEP populations affected or encountered.
  - c) Frequency of encounters with LEP language groups.
  - d) The nature and importance of activities to LEP individuals.
  - e) The availability of resources, including technological advances, sources of additional resources, and the cost incurred.
  - f) Whether the existing LEP Plan is meeting the needs of LEP individuals.
  - g) Whether INDOT employees understand the LEP Plan, and how to implement.

h) Whether identified sources for assistance are still available.

INDOT's Title VI Program Manager is:

Taffanee Keys  
Civil Rights Counsel  
100 N. Senate Ave. Room N758-PQ  
Indianapolis, IN 46204  
[tkeys@indot.in.gov](mailto:tkeys@indot.in.gov)

## **7. LEP COMPLAINT PROCEDURE**

The Title VI regulations provide that INDOT must investigate whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI or its regulations which are inclusive of LEP.

Complaints of discrimination involving LEP, Title VI, and related nondiscrimination statutes will be investigated using the INDOT Title VI complaint procedures included in INDOT's Title VI Implementation Plan. INDOT's Title VI Implementation Plan can be found at:

<https://www.in.gov/indot/accessibility-and-non-discrimination/nondiscrimination-at-indot/>

Questions or comments regarding this LEP Plan or questions related to Title VI should be directed to:

Taffanee Keys  
Attorney Senior (Civil Rights Counsel)  
Prequalification – Policy & Compliance  
Indiana Government Center North  
100 N. Senate Ave., Room N758-PQ  
Indianapolis, IN 46204  
1-855-INDOT4U (463-6848)  
[tkeys@indot.in.gov](mailto:tkeys@indot.in.gov)

## **APPENDICES**

- i) LEP Report Form
- ii) Language Questionnaire
- iii) Multi-lingual Employee Volunteer List
- iv) Language Identification Cards
- v) Title VI Public Involvement Survey

## LIMITED ENGLISH PROFICIENCY (LEP) REPORT

**USE OF FORM:** This form should be used to record and report communications with or requests for services from individuals and / or entities in need of language services. If there is a language barrier between an INDOT employee in an individual or group interaction, please provide as much information regarding the interaction as possible on this form.

**TRANSMITTAL:** Please complete this form and deliver it by mail, facsimile, or e-mail to:

Taffanee Keys  
 Attorney Senior (Civil Rights Counsel)  
 Prequalification – Policy & Compliance  
 Indiana Government Center North  
 100 N. Senate Ave., Room N758-PQ  
 Indianapolis, IN 46204  
 Email: [tkeys@indot.in.gov](mailto:tkeys@indot.in.gov)

Date of Form Completion:	INDOT Employee Completing Form:	INDOT Employee Job Title / Role:	INDOT Employee Work Phone:
Date of LEP Issue:	Was there a request for language services? [ ] YES [ ] NO	If requested, by whom:	INDOT Employee E-mail:
Contact Type: <input type="checkbox"/> Individual face-to-face <input type="checkbox"/> Individual by phone <input type="checkbox"/> Individual in writing <input type="checkbox"/> Agency-sponsored Public Meeting <input type="checkbox"/> Event (describe below) <input type="checkbox"/> Contact by outside organization <input type="checkbox"/> Other (please describe below)		Level of Language Barrier: <input type="checkbox"/> Communication was not possible <input type="checkbox"/> Communication was significantly impaired. <input type="checkbox"/> Communication was partially possible <input type="checkbox"/> Communication was possible due to interpretation provided by a non-INDOT sponsored interpreter. <i>Was this interpreter a minor</i> [ ] YES [ ] NO <input type="checkbox"/> Communication was possible due to language services provided by interpreter or translator retained by INDOT or the forum in which the services were required.	
Number of people requiring language services:			
Language for which LEP services were required:	How was this determined: [ ] I Speak Cards [ ] Self-identified [ ] Other (describe)	Type of services needed: (check all that apply) [ ] In person interpretation [ ] Telephone interpretation [ ] Written material translation [ ] Other	

*Please use the back of this form if additional information is required. Contact Taffanee Keys with any questions.*

[www.in.gov/dot/](http://www.in.gov/dot/)  
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## LIMITED ENGLISH-PROFICIENCY REPORT FORM



# Language Questionnaire

Your assistance is needed! As a recipient of federal funds, the Indiana Department of Transportation (INDOT) is required to evaluate its programs and activities for language accessibility, and to develop a procedure for gathering statistical data regarding participants and beneficiaries of its federal-aid highway programs and activities (23 CFR §200.9(b)(4)). INDOT distributes this voluntary survey to fulfill that requirement.

You are not required to complete this questionnaire. Submittal of this information is voluntary; however, we ask you to complete the questionnaire as you may be able to assist others by translating important information if needed. INDOT will use the survey responses to monitor its programs and activities for compliance with Title VI of the Civil Rights Act of 1964, as amended (Title VI) and its related statutes and regulations. If you have any questions regarding INDOT's responsibilities under Title VI, please contact INDOT's Title VI/ADA Program Manager, Taffanee Keys at 100 N Senate N758-PQ, Indianapolis, IN 46204, e-mail: [tkeys@indot.in.gov](mailto:tkeys@indot.in.gov).

**Please submit the completed survey to your Human Resources Manager.**

## Employee Contact Information

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

Work Division/District: \_\_\_\_\_

Work Phone Number: \_\_\_\_\_

Work Email Address: \_\_\_\_\_

Survey Completion Date: \_\_\_\_\_

## Questions

1. Do you speak, write, and/or read another language in addition to English?  Yes  No
2. If you speak more than one language, would you be willing to volunteer to provide language assistance as needed, if there is a need for translation or interpreter assistance?  Yes  No

***If you answered yes to questions 1 and 2, please proceed to question 3; however, if you answered no to either question, you have completed the questionnaire.***

## MULTI-LINGUAL EMPLOYEE VOLUNTEER LIST

Last Name	First Name	Phone	Email	District	Language 1	Native Speaker	Language 2	Native Speaker	Language 3	Native Speaker	Language 4	Native Speaker	Proficiency	Notes	Input Date
McCrary	Bake			Seymour	American Sign Language										2/20/2012
Torres	Theresa				American Sign Language		Spanish						Limited		10/17/2012
Harrison	Terry	(765) 683-1097	<a href="mailto:tharrison@indot.in.gov">tharrison@indot.in.gov</a>	Greenfield	American Sign Language										
Ringle	Paul	(219) 866-7422	<a href="mailto:pringle@indot.in.gov">pringle@indot.in.gov</a>	LaPorte	American Sign Language										
Tucker	Tabi	(812) 895-7302	<a href="mailto:ttucker@indot.in.gov">ttucker@indot.in.gov</a>	Vincennes	American Sign Language										
Tlahun	Abachew	(317) 467-3946	<a href="mailto:atlahun@indot.in.gov">atlahun@indot.in.gov</a>	Greenfield	Amharic								Fluent/High		
Al-Jundub	Amjad M.	(317) 945-7666	<a href="mailto:amj-aljundub@indot.in.gov">amj-aljundub@indot.in.gov</a>	Greenfield	Arabic										
Dughalish	Khail	(812) 895-7377	<a href="mailto:kdughalish@indot.in.gov">kdughalish@indot.in.gov</a>	Vincennes	Arabic										
Griffey	Darcy	(219) 325-7591		LaPorte	Armenian										
Sarkar	Ahfd	(268) 797-1886	<a href="mailto:arhfd1@students.iou.edu">arhfd1@students.iou.edu</a>	Fort Wayne	Bangali									Co-op	1/9/2012
Kwong	U-Chung Alex	(765) 361-5188	<a href="mailto:ukwong@indot.in.gov">ukwong@indot.in.gov</a>	Crawfordsville	Chinese (Cantonese)		Chinese (Mandarin)						Intermediate/High	Intermediate Cantonese	
Tsai	Jenlien	(812) 897-4402	<a href="mailto:tsai@indot.in.gov">tsai@indot.in.gov</a>	Vincennes	Chinese (Mandarin)								Fluent/High		
Azail	Shahina M.	(317) 467-3973	<a href="mailto:shahina@indot.in.gov">shahina@indot.in.gov</a>	Greenfield	Farsi		Hindi		Urdu		Arabic		Intermediate/High		
Maksoori	Hamid	(812) 305-5003	<a href="mailto:hmaksoori@indot.in.gov">hmaksoori@indot.in.gov</a>	Vincennes	Farsi								Fluent/High		
Swope	Bruce	(574) 936-4057		LaPorte	French		Greek						Limited/Intermediate	Limited Greek Translation	
Devlin	Chris	(812) 524-3952		Seymour	French										3/5/2012
Carrow	Tom	(317) 697-5961	<a href="mailto:tcarrow@indot.in.gov">tcarrow@indot.in.gov</a>	Greenfield	German								Limited/Intermediate		
Mina	Robert			Fort Wayne	German								Fluent/High		11/28/2011
Roe	Alex	(765) 480-6049		Greenfield	German										
Skinner	Wayne	(219) 325-7554	<a href="mailto:wskinner@indot.in.gov">wskinner@indot.in.gov</a>	LaPorte	German								Limited		
Patel	Utpal	(317) 467-3976	<a href="mailto:upatel@indot.in.gov">upatel@indot.in.gov</a>	Greenfield	Hindi		Urdu		Gujarati				Fluent/High	Limited Urdu	
Hamelman	Josep	(812) 524-3952	<a href="mailto:jhamelman@indot.in.gov">jhamelman@indot.in.gov</a>		Italian										
Ostrega	Barb	(219) 325-7503	<a href="mailto:boostrega@indot.in.gov">boostrega@indot.in.gov</a>	LaPorte	Polish		Spanish						Limited/Intermediate	Limited Spanish Skills	
Rogers	Michael	(317) 467-3472	<a href="mailto:mrogers@indot.in.gov">mrogers@indot.in.gov</a>	Greenfield	Spanish		Irish						Limited/Intermediate		
Alonzo	Elizabeth	(268) 969-8274	<a href="mailto:ealonzo@indot.in.gov">ealonzo@indot.in.gov</a>	Fort Wayne	Spanish								Limited/Intermediate		
Bowman	Sarah	(260) 696-8265	<a href="mailto:sbowman@indot.in.gov">sbowman@indot.in.gov</a>	Fort Wayne	Spanish								Limited/Intermediate		
Bravo	Jesse				Spanish										10/31/2011
Cox	Edward	(812) 524-3762	<a href="mailto:ecox@indot.in.gov">ecox@indot.in.gov</a>	Seymour	Spanish								Limited		
De LaRosa	Jesse	(812) 890-9258		Vincennes	Spanish								Intermediate/High		
Flores	Steven	(812) 524-3969	<a href="mailto:sflores@indot.in.gov">sflores@indot.in.gov</a>	Seymour	Spanish								Limited/High	Limited (Translation)	
Gomez	Mario	(219) 808-2082	<a href="mailto:management110@yahoo.com">management110@yahoo.com</a>	LaPorte	Spanish										
Hess	Robert Lee	(317) 467-3952	<a href="mailto:rhess@indot.in.gov">rhess@indot.in.gov</a>	Greenfield	Spanish								Limited	Former Peace Corp Volunteer	
Mendoza	Eva Maria Uribe	(812) 867-9017	<a href="mailto:emendoza@indot.in.gov">emendoza@indot.in.gov</a>		Spanish		X								10/17/2012
Ravilla	Dawn		<a href="mailto:dravilla@indot.in.gov">dravilla@indot.in.gov</a>		Spanish										10/17/2011
Reyes	Graca	(317) 467-3900	<a href="mailto:greses@indot.in.gov">greses@indot.in.gov</a>	Greenfield	Spanish								Fluent/High		
Rodriguez	Arlene			Fort Wayne	Spanish								Intermediate/High	Seasonal Employee	12/12/2011
Romeo, Jr.	Raul	(219) 939-3900		LaPorte	Spanish								Fluent/High		
Winebrinner	Robert Blane				Spanish								Intermediate		11/28/2011
Colyester	Maricor	(812) 524-3968	<a href="mailto:mcolyester@indot.in.gov">mcolyester@indot.in.gov</a>	Seymour	Tagalog		Cebuano						Limited	High Cebuano (Interpretation)	

Last Updated 5/7/2012



## Language Identification Card

I work for the U.S. Census Bureau. Is someone here now who speaks English and can help us?  
If not, someone may contact you who speaks \_\_\_\_\_.

### Español (Spanish 02)

Trabajo para la Oficina del Censo de los EE. UU. ¿Se encuentra alguien que hable inglés y pueda ayudarnos? Si no, alguien que habla español podría comunicarse con usted.

### 普通话、广东话 (Chinese simplified)

我是美国人口普查局的工作人员。请问您这里有没有会说英语的人可以帮助我们？

(Mandarin 03): 如果没有，可能会有会讲普通话的人与您联系。

(Cantonese 04): 如果没有，可能会有会讲广东话的人与您联系。

如果您閱讀繁體中文，請參閱第2頁（普通話或廣東話）(Chinese traditional on pg 2)

### Tiếng Việt (Vietnamese 05)

Tôi làm việc cho Cục Thống Kê Dân Số Hoa Kỳ. Hiện có ai ở đây biết nói tiếng Anh và có thể giúp quý vị và tôi không? Nếu không, một nhân viên nói tiếng Việt có thể sẽ liên lạc với quý vị.

### 한국어 (Korean 06)

저는 미국 인구조사국에서 일하고 있습니다. 여기 계신 분 중에서, 영어를 하실 수 있어서 저희를 도와주실 수 있는 분이 혹시 계신지요? 없으시면, 한국어를 하시는 분이 연락을 드릴 수도 있습니다.

### Русский (Russian 07)

Я представляю Бюро переписи населения США. Присутствует здесь кто-нибудь, кто говорит по-английски и мог бы помочь нам? Если нет, то тогда возможно, с Вами свяжется наш сотрудник, говорящий по-русски.

### العربية (Arabic 08)

أنا أعمل بـمكتب الإحصاء الأمريكي. هل يوجد شخص هنا يتكلم الإنجليزية و يمكنه ان يساعدنا الآن؟ إذا لا، فقد يتصل بكم شخص يتكلم اللغة العربية.

### Tagalog (Tagalog 09)

Nagtatrabaho ako para sa Kawanihan ng Senso ng U.S. Mayroon ba rito ngayong nagsasalita ng Ingles at maaaring tumulong sa amin? Kung wala, maaaring may kumontak sa inyo na nagsasalita ng Tagalog.

### Polski (Polish 10)

Jestem pracownikiem Urzędu Spisu Ludności USA. Czy w tej chwili jest tu ktoś, kto mówi po angielsku i może nam pomóc? Jeżeli nie, może skontaktować się z Państwem ktoś, kto mówi po polsku.

### Français (French 11)

Je travaille pour le Bureau de recensement des États-Unis. Y a-t-il quelqu'un ici qui parle anglais et qui pourrait nous aider? Sinon, quelqu'un qui parle français pourrait vous contacter.

### Kreyòl Ayisyen (Haitian Creole 12)

Mwen travay pou Biwo Resansman Etazini. Èske gen yon moun la ki pale anglè ki ka ede nou? Si pa genyen, yon moun isit la ki pale kreyòl ka rele ou.

### Português (Portuguese 13)

Trabalho para a Agência do Censo dos EUA. Há alguém aqui, agora, que fale inglês e que possa nos ajudar? Caso não haja, uma pessoa que fala português poderá entrar em contato com você.

### 日本語 (Japanese 14)

私はアメリカ合衆国国勢調査局の係員です。こちらには英語を理解できこの調査にご協力いただける方がいらっしゃいますか？もしない場合は、日本語を話す係員があなたに連絡をすることがあります。

D-ID (09-19-19)

## Demographics Form

Thank you for taking a few minutes to complete this survey. **Answering the following questions is optional** but your response will be extremely helpful in ensuring the fairness and equity of INDOT's public involvement process. Submissions will be kept confidential and separate from any personally identifiable information so that respondents will remain anonymous. These questions are not listed in any particular order.

### What is your race?

- Black or African American    American Indian or Alaskan Native    Asian    Hispanic or Latino  
 White    Native Hawaiian or Other Pacific Islander    Prefer to self-describe: \_\_\_\_\_

### What is the primary language spoken in your home?

- English    Spanish    Other (Please specify): \_\_\_\_\_

### Was the project information translated into other languages appropriately?

- Yes    No    Not Applicable

### How many people live in your household?

- 1 - 2    3 - 5    6 +

### What are the age ranges of those living in your household? (Check all that apply.)

- Under 18    19 - 44    45 - 64    65 +

### What is your annual household income?

- Less than \$10,000    \$10,000 - \$24,999    \$25,000 - \$49,999    \$50,000 - \$74,999  
 \$75,000 - \$99,999    \$100,000 - \$149,999    \$150,000 +

### What is the highest level of education completed by members of your household?

- None    Elementary school    Middle school    High school    College/university  
 Graduate degree    Other (Please specify): \_\_\_\_\_

### Do any individuals living in your home have a physical or mental impairment which substantially limits one or more major life activities?

- Yes    No    Prefer not to answer

Please suggest additional ways you think INDOT can improve inclusiveness of our public outreach efforts:

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Thank you for helping INDOT improve its  
public involvement practices!

Please submit this page only:

Email [insert\\_email@indot.IN.gov](mailto:insert_email@indot.IN.gov) or mail to:

Attn: Public Involvement

Indiana Department of Transportation

100 N Senate Ave.

Indianapolis, IN 46204