



Limited English Proficiency Plan

September 2021



Disclaimer

This document was prepared and published by the Denver Regional Council of Governments and is prepared in cooperation with and financial assistance from the following public entities: The Federal Highway Administration, the Federal Transit Administration and the Colorado Department of Transportation. To receive these documents in accessible formats, such as in languages other than English, please call 303-455-1000 or email drcog@drcog.org so we can coordinate your request.

Acronyms

AAA: Area Agency on Aging

ACS: American Community Survey

CDOT: Colorado Department of Transportation

COG: Council of Governments

DOJ: United States Department of Justice

DOT: United States Department of Transportation

DRCOG: Denver Regional Council of Governments

EJ: Environmental Justice

EO: Executive Order

FHWA: Federal Highway Administration

FTA: Federal Transit Administration

HHS: United States Department of Health and Human Services

HUD: United States Department of Housing and Urban Development

LEP: Limited English Proficiency

MPO: Metropolitan Planning Organization

OAA: Older Americans Act

RPC: Regional Planning Commission

RTD: Regional Transportation District

RTP: Regional Transportation Plan

TIP: Transportation Improvement Program

UPWP: Unified Planning Work Program

UZA: Urbanized Area

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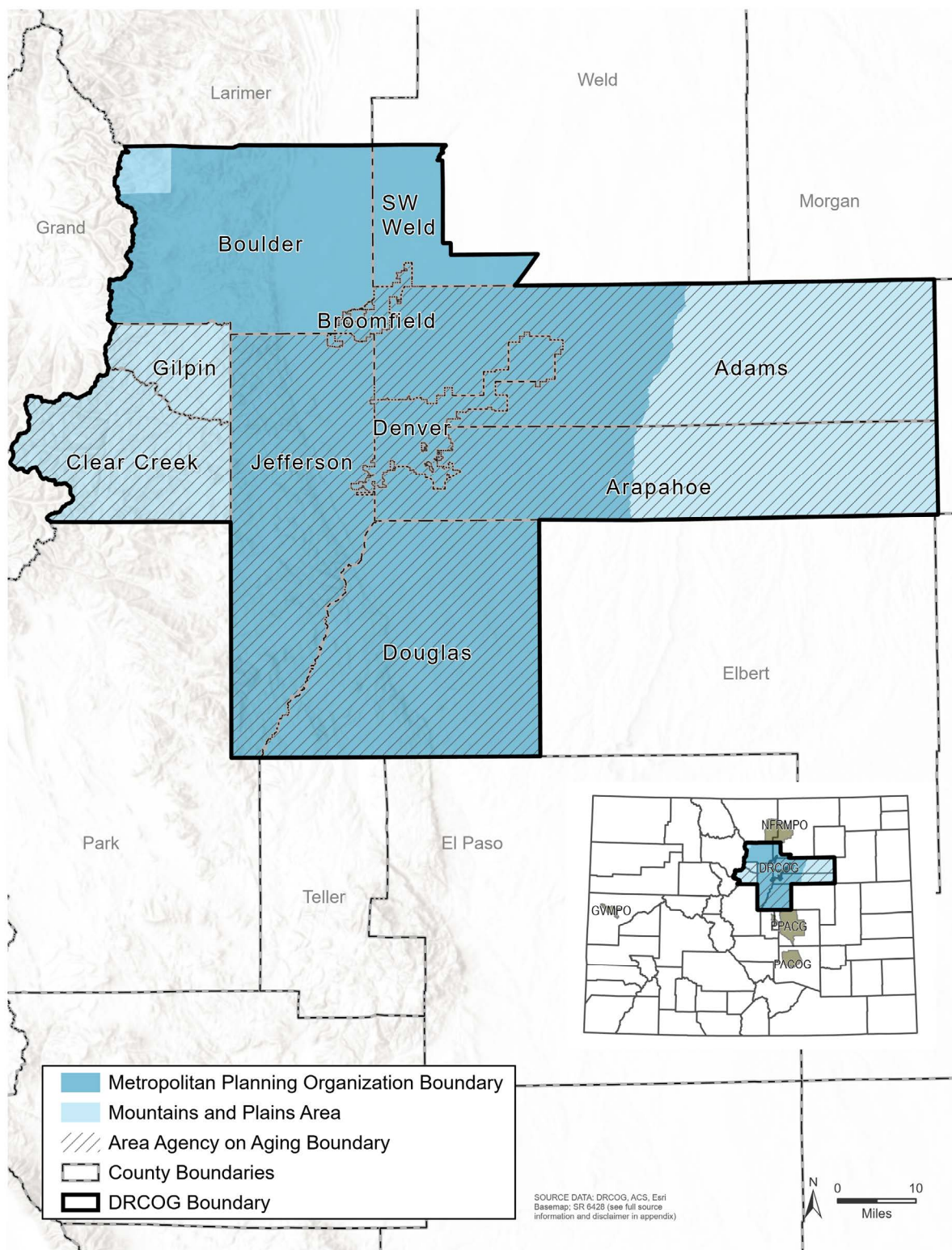
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Introduction

Map 1.1 The DRCOG planning area



Background

The Denver Regional Council of Governments is a planning organization through which local governments collaborate to establish guidelines, set policy and allocate funding in the areas of transportation and personal mobility, growth and development, and aging and disability resources.

- DRCOG is a council of governments, serving as a planning organization, technical assistance provider and forum for local member governments.
- DRCOG functions as a regional planning commission per Colorado state statute and prepares the plan for the physical development of the region, known as Metro Vision.
- DRCOG is the federally designated Area Agency on Aging, planning and providing comprehensive services to address the needs of the region's population of older adults and people living with disabilities.
- DRCOG serves as the metropolitan planning organization for the region carrying out the metropolitan transportation planning process for four urbanized areas, encompassing slightly more than 3,600 square miles.

DRCOG's planning area covers Adams, Arapahoe, Boulder, Clear Creek, Douglas, Gilpin and Jefferson counties, the City and County of Broomfield and the City and County of Denver, and southwest Weld County.

Limited English proficiency

According to the U.S. Census Bureau, most people who live in the U.S. read, write, speak and understand English. There are many people, however, for whom English is not their primary language. If those individuals have a limited ability to read, write, speak or understand English, they are considered limited English proficient, or "LEP." Language barriers often inhibit, or prohibit, people with limited English proficiency from accessing benefits and services, from understanding and exercising rights, from fulfilling responsibilities and obligations, and from understanding information provided to them regarding federally funded programs, activities and services.

The Denver Regional Council of Governments receives funding from several federal sources for its activities. For example, in the past funding has come from or through the:

- U.S. Department of Transportation.
- Older Americans Act.
- U.S. Department of Housing and Urban Development.
- U.S. Department of Energy.

DRCOG is committed to engaging and involving all residents of the Denver region, including those with limited English Proficiency, in its activities. Therefore, in accordance with the best practice standards for public involvement, together with assistance from the Colorado

Department of Transportation, the Federal Highway Administration and the Federal Transit Administration, DRCOG has developed the Limited English Proficiency Plan. The Limited English Proficiency Plan outlines:

- How individuals who may need language assistance are identified.
- The ways in which assistance is provided.
- Staff training required.
- How individuals with limited English proficiency are notified that assistance is available.

The goal of the Limited English Proficiency Plan is to ensure all residents of the DRCOG region can, to the fullest extent practicable, participate in DRCOG activities.

Title VI and Executive Order No. 13166

Section 601 of Title VI of the Civil Rights Act of 1964, codified as amended (42 U.S.C. §2000d), provides that no person in the United States shall “on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Consistent with, and in accordance with, Section 602 of Title VI, (42 U.S.C. § 2000d-1), the Department of Justice promulgated regulations prohibiting recipients of federal funds from “utilizing criteria or methods of administration which have the effect of subjecting

individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin.” The Department of Transportation later promulgated nearly identical regulations - See 49 C.F.R. § 21.5(b) (vii) (2).

To further clarify rights protected by Title VI, President William J. Clinton, on Aug. 11, 2000, issued Executive Order No. 13166, Improving Access to Service for Persons with Limited English Proficiency. The order requires each federal agency to examine its programs and activities and to develop and implement plans so individuals with limited English proficiency can meaningfully access those programs and activities. The executive order includes the following statement:

Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.

In conjunction with Executive Order No. 13166, the U.S. Department of Justice issued a general guidance document setting forth various principles for agencies to consider in developing guidance documents for recipients of federal funds. (See Enforcement of Title VI of the Civil Rights Act of 1964 — National Origin Discrimination against Persons with Limited English Proficiency, 65 Fed. Reg. 50123).

Department of Transportation and limited English proficiency policy guidance

In accordance with Executive Order No. 13166, the U.S. Department of Transportation, on Dec. 14, 2005, issued its Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons. Adopting the framework established by the Department of Justice in its Aug. 11, 2000, guidance, the U.S. Department of Transportation identifies four factors that should be considered by a recipient of federal funds in assessing the needs of individuals with limited English proficiency and implementing a plan to address those needs.

The four factors include:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
- 2) The frequency with which LEP individuals come in contact with the program.
- 3) The nature and importance of the program, activity, or service provided by the program to people's lives.
- 4) The resources available to the grantee/recipient or agency, and costs.

The greater the number or proportion of eligible individuals with limited English proficiency, the greater the frequency with which they will have contact with a program, activity or service and the more likely enhanced language services will be needed. The intent is to strike a balance ensuring individuals with limited English proficiency have meaningful access to critical services without unduly burdening the local agency.

Older Americans Act guidance on "targeting" services

In accordance with the Older Americans Act and the Colorado Department of Human Services, State Unit on Aging Rule Manual Volume 10, area agencies on aging are required to target older adults who are in some way socially or economically disadvantaged. This includes, but is not limited to, giving "preference and priority in the delivery of services ... to older adults with limited English proficiency." It is expected that each contracted service provider has a policy in place detailing how to do so.

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Limited English proficiency
assessment of the Denver region

Background

The Denver Regional Council of Governments planning area consists of nine entire counties and county equivalents (Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Jefferson and Gilpin) as well as southwest Weld County. DRCOG used the most recent census data to understand the profile of individuals that may participate in DRCOG activities.

For the purposes of the Limited English Proficiency Plan, people five years and older who identified themselves as speaking English less than “very well” are considered to be individuals with limited English proficiency. Map 2.1 and Tables 2.1 and 2.2 summarize the relevant information derived from the U.S. Census Bureau 2015-2019 American Community Survey.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

Map 2.1 illustrates the geographic distribution of individuals 5 years old and older with limited English proficiency in the Denver Regional Council of Governments’ planning area. The total number of people with limited English proficiency in the Denver region is approximately 215,060, or 8% of the total population age 5 and older of 2.85 million.

Map 2.1 Distribution of individuals with limited English proficiency

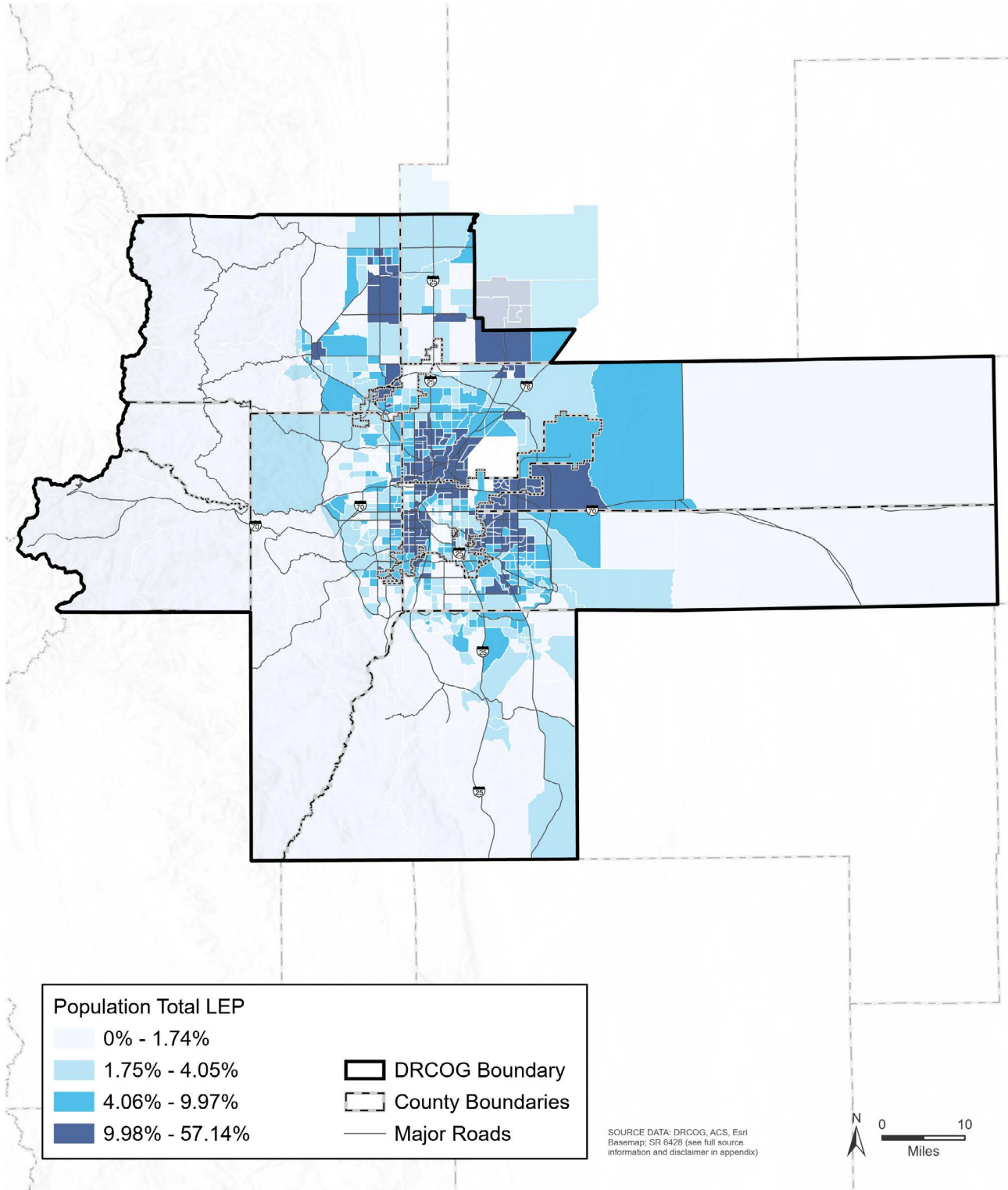


Table 2.1: Individual language spoken at home by individuals 5 years and older with limited English proficiency

Language	Total	Percent
Spanish or Spanish Creole	148,704	5.22%
Vietnamese	9,807	0.34%
Chinese	8,452	0.30%
African languages	7,328	0.26%
Korean	5,965	0.21%
Russian	5,907	0.21%
Other Asian languages	4,159	0.15%
Other Indic languages	3,437	0.12%
Arabic	2,922	0.10%
French (including Patois, Cajun)	2,014	0.07%
<i>Other non-English languages</i>	<i>16,365</i>	<i>0.57%</i>
Total population with limited English proficiency	215,060	7.55%
Total regional population	2,850,084	100%

Table 3.1, derived from the 2015-2019 American Community Survey, shows top individual languages spoken at home in the Denver region by the number of individuals 5 years old and older with limited English proficiency that speak those particular languages. Spanish or Spanish Creole is by far the most common non-English language spoken at home. The second-most common language is Vietnamese.

DRCOG staff has developed maps B.1 through B.5 in [Appendix B](#) to illustrate the geographic distribution of the top five non-English language groups in the Denver region.

Table 3.2, also derived from the 2015-2019 American Community Survey, shows the top 10 languages spoken

by people 5 years old and older with limited English proficiency, by county, within the DRCOG planning area. Geographic concentrations of people with limited English proficiency who speak certain languages is considered for specific events or project outreach.

In addition to the regional data presented on the previous pages, the U.S. Department of Transportation and the Colorado Department of Transportation recommend consulting school board data because it is easy to obtain, reliable and accurate. Such data for the entire state, compiled by the Colorado Department of Education, is available in [Appendix C](#) as a map limited to the Denver region.

Table 2.2: Language spoken by individuals 5 years and older with limited English proficiency by county

	Adams		Arapahoe		Boulder		Broomfield		Clear Creek	
Language	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Spanish or Spanish Creole	41,742	9.62%	27,494	4.84%	10,412	3.54%	1,381	2.42%	25	0.29%
Vietnamese	1,757	0.40%	2,485	0.44%	241	0.08%	164	0.29%	0	0.00%
Chinese	1,209	0.28%	2,022	0.36%	1,059	0.36%	238	0.42%	0	0.00%
African languages	925	0.21%	3,893	0.69%	41	0.01%	0	0.00%	0	0.00%
Korean	425	0.10%	3,358	0.59%	626	0.21%	76	0.13%	0	0.00%
Russian	679	0.16%	2,296	0.40%	414	0.14%	0	0.00%	0	0.00%
Other Asian languages	714	0.16%	1,791	0.32%	418	0.14%	21	0.04%	0	0.00%
Other Indic languages	846	0.19%	828	0.15%	453	0.15%	42	0.07%	0	0.00%
Arabic	40	0.01%	1,303	0.23%	115	0.04%	57	0.10%	0	0.00%
French	121	0.03%	726	0.13%	185	0.06%	32	0.06%	0	0.00%
Total county population	434,033		567,763		294,169		57,015		8,740	

Denver		Douglas		Gilpin		Jefferson		Southwest Weld	
Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
51,224	8.47%	3,235	1.13%	83	1.53%	9,243	1.77%	3,865	5.64%
3,502	0.58%	413	0.14%	0	0.00%	1,224	0.23%	21	0.03%
2,230	0.37%	840	0.29%	0	0.00%	820	0.16%	34	0.05%
2,374	0.39%	10	0.00%	0	0.00%	85	0.02%	0	0.00%
569	0.09%	532	0.19%	0	0.00%	367	0.07%	12	0.02%
1,406	0.23%	133	0.05%	0	0.00%	979	0.19%	0	0.00%
766	0.13%	191	0.07%	0	0.00%	157	0.03%	101	0.15%
873	0.14%	162	0.06%	0	0.00%	213	0.04%	20	0.03%
1,065	0.18%	113	0.04%	0	0.00%	222	0.04%	7	0.01%
530	0.09%	150	0.05%	0	0.00%	260	0.05%	10	0.01%
604,938		286,824		5,429		522,660		68,513	

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

The previous analysis showed that approximately 8% of the region's population age 5 and older are individuals with limited English proficiency, with the majority speaking Spanish or Spanish Creole. Since the previous Limited English Proficiency Plan was completed in 2018, DRCOG has received no requests, formal or otherwise, by individuals with limited English proficiency seeking the translation of documents or interpreters at public meetings. DRCOG staff has proactively translated several documents into Spanish and secured an interpreter for at least one public event to assist with possible language assistance needs.

DRCOG has interacted with individuals with limited English proficiency in other specific activities, including:

- Metropolitan Planning Organization: DRCOG staff do not provide direct critical services to individuals. Activities are focused on regional planning efforts and allocation of funds to transportation projects to be implemented by other agencies and local governments. Thus, there is limited contact with the general public at large (as compared with a public transit agency). DRCOG staff used Spanish-language surveys, videos and online engagement tools with easy translation features during development of the 2050 Metro Vision Regional Transportation Plan from 2019 to 2021.
- Area Agency on Aging: The division receives about 6,700 requests per year regarding its services from individuals who speak Spanish or other languages. Included in the yearly total are nearly 700 uses of the phone interpretation service; about 4,400 requests in case management; 260 requests for the State Health Insurance Assistance Program; 450 requests for options counseling; and about 1,000 requests for navigators. DRCOG staff who speak multiple languages other than English complete much of this translation activity.
- Way to Go program: In the past, the Way to Go program has received, on average, 22 requests for Spanish-language assistance per year.

Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives.

DRCOG uses federal funds for activities such as:

- Planning for long-range and short-range transportation projects to be implemented by other agencies and local governments.
- Administering contracts with entities that conduct health screenings or deliver meals to homes or congregate dining sites.
- Aiding persons wishing to carpool, vanpool or use other travel modes.

- Providing referral assistance to individuals with aging-related questions for themselves, family members or acquaintances.

DRCOG itself does not directly provide immediate emergency assistance services such as medical treatment or shelter, however, staff of the Area Agency on Aging division provide referrals for individuals requiring such assistance.

Involvement in DRCOG's activities is entirely voluntary. Anyone can participate in the planning process or access services by contacting DRCOG staff (in person or via phone, email or by visiting the DRCOG website) or attending an event or meeting. DRCOG encourages participation by all residents of the region, including individuals with limited English proficiency.

As part of the transportation programming and planning process, DRCOG and its planning partners examine the effects of transportation funding throughout the region in order to identify any disparate or disproportionate effect on its vulnerable populations. DRCOG's major plans and programs for which its staff perform these types of analyses include:

- Metro Vision Regional Transportation Plan.
- Transportation Improvement Program

DRCOG encourages public input and involvement from all residents or their representatives. DRCOG posts agendas for all meetings, which are open to the public,

on the DRCOG website. DRCOG staff is available to address community organizations as requested. DRCOG staff fields inquiries from the public regarding transportation projects, other planning activities and aging services. DRCOG frequently updates its website so residents can learn about and follow DRCOG activities.

While individuals with limited English proficiency are encouraged to participate directly in DRCOG's regional activities, they are often more engaged at the local level with DRCOG member governments or in association with local projects. Local engagement is essential, as the feedback received at the local level can then be communicated to staff involved with DRCOG's regional programs.

Factor 4: The resources available to the recipient and costs.

The fourth factor of the analysis weighs the preceding three factors to assess the needs of individuals with limited English proficiency within the Denver region compared with the resources available to DRCOG and the costs of providing access. DRCOG is committed to offering all residents in the region the opportunity to participate in and receive services from DRCOG's activities. The Limited English Proficiency Implementation Plan described below uses cost-efficient and productive measures to ensure language barriers are not preventing individuals with limited English proficiency from participating meaningfully in DRCOG's activities.

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Implementation plan

Safe Harbor

Federal law provides a “Safe Harbor” provision so a recipient of federal funds, such as the Denver Regional Council of Governments, can ensure it complies with its Title VI obligation to provide written translations of its documents to individuals with limited English proficiency, as applicable. A “Safe Harbor” means that if the recipient has created a plan for the provision of written translations under a specific set of circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

DRCOG has determined that written translations of every core document would be so burdensome as to defeat the legitimate objectives of the DRCOG Limited English Proficiency plan. Many documents DRCOG prepares are more than 50 pages in length. Accordingly, DRCOG finds it is more appropriate to adhere to the following policies:

- Provide oral interpretation options to individuals with limited English proficiency to access, learn about and comment on DRCOG’s documents.
- Provide Spanish-language versions of key documents as appropriate. DRCOG will consider the length, popularity, service function (for example Way to Go services and aging assistance) or essential nature of such documents (for example, surveys to solicit public input) to individuals with limited English proficiency.
- Provide web-based translation options on the DRCOG website drcog.org.

- Consider specific requests for translated versions of documents upon request.

Identifying individuals who may need language assistance

When encountering an individual with limited English proficiency whose language is unknown, DRCOG staff use Language Identification Flashcards to identify the person’s primary language see [Appendix A](#). Copies are stored in DRCOG’s main lobby and public meeting rooms (Aspen, Birch, Douglas Fir, Black Canyon, Maroon Bells, Mesa Verde, Red Rocks, Royal Gorge, Seven Falls and Trail Ridge). Language Identification Flashcards, as developed by the U.S. Census Bureau, bear the phrase “Mark this box if you read or speak [name of language]” translated into 38 languages. The individual with limited English proficiency can then denote their language and staff can respond as appropriate to provide or obtain assistance. The Language Identification Flashcards may be downloaded at no cost at: <http://www.lep.gov/ISpeakCards2004.pdf>.

DRCOG also makes the Language Identification Flashcards available to the public through its website, so individuals with limited English proficiency contacting DRCOG online can communicate their primary language to DRCOG staff. DRCOG staff can then use that information to provide language assistance to the person with limited English proficiency. DRCOG also makes the Language Identification Flashcards available at all public meetings. Once an individual’s primary language is identified using the flashcards, DRCOG staff will assess the feasibility of providing written translation service or oral interpretation assistance for the person with limited English proficiency.

For DRCOG activities focused on a specific geographic area of the region, its staff consult U.S. Census Bureau and Colorado Department of Education data to determine whether there are high concentrations of specific groups of people with limited English proficiency in the area. DRCOG maintains maps depicting concentrated areas of the five largest non-English speaking language groups (Spanish or Spanish Creole, Vietnamese, Chinese, African Languages and Korean) see [Appendix B](#).

Language assistance measures

If DRCOG receives a request for assistance in a language other than English, staff members will follow these steps, as needed.

- Take the person's name and contact information.
- Use the Language Identification Flashcards, if needed, to determine the person's primary language
- For transportation demand management services, including Schoolpool, if assistance cannot be provided in the required language and formal interpretation is required, staff use the telephone interpreter service, Certified Languages International at 1-800-225-5254. This service is offered at no charge to the caller, with DRCOG paying the provider fee.

The DRCOG website may be translated using free online translation services such as Google Translate. Similarly, agendas, minutes and other documents posted online can be translated as well. DRCOG website is also accessible for people with disabilities, demonstrated by a place to click to enlarge the font, magnify text, adjust line spacing or increase contrast if

needed. Website users can also choose to display the site in modes specific to the needs of people who have seizures, cognitive disabilities, ADHD or who prefer to use keyboard navigation of the site.

DRCOG staff may possess limited in-house translation capabilities or expertise to assist individuals with limited English proficiency, and cannot accurately assess or guarantee the accuracy of translation services provided by others. Within its limited budget and capabilities, DRCOG pledges it will, to the best of its abilities, ensure people with limited English proficiency have a meaningful opportunity to participate in DRCOG activities and receive applicable services.

Staff training

Current and incoming staff members whose jobs include interacting with the public are briefed on the DRCOG Limited English Proficiency Plan, trained in using the Language Identification Flashcards and provided with information on assisting people with limited English proficiency. Staff are also instructed to immediately inform the Communications and Marketing division's public engagement planner, who will maintain a record of language assistance requests so needs may be accurately assessed in the future.

Monitoring and updating the Limited English Proficiency Plan

The Limited English Proficiency Plan will be updated every three years in connection with the required regular three-year update of the Title VI Implementation Plan. Non-English products produced, and activities conducted, will be monitored, along with the tracking of specific limited English proficiency requests received and responses provided.

Updates to the Limited English Proficiency Plan may consider the following factors:

- How many individuals with limited English proficiency were encountered or requested services? Were their needs met? Does analytical data regarding website use reveal valuable information?
- What is the current population of individuals with limited English proficiency in the DRCOG planning area?
- Has there been a change in the types of languages for which translation services are needed?
- Have DRCOG's available resources, such as technology, staff and financial costs, changed?
- Were any complaints received?
- Have new federal or state regulations concerning Limited English Proficiency plans been approved requiring changes to the Limited English Proficiency Plan or DRCOG's process for addressing individuals with limited English proficiency?

Dissemination and provision of notice

The Limited English Proficiency Plan is posted on the DRCOG website in both English and Spanish. Copies of the Limited English Proficiency Plan are also available at DRCOG. DRCOG will provide a copy of the Limited English Proficiency Plan to any person or agency upon request.

Public accommodation and accessibility

DRCOG promotes full accommodation and access to its meetings by publishing the following statement on its meeting agendas: "Attendees can request additional aids or services, such as interpretation or assistive listening devices, by calling 303-480-6701 or emailing [meeting organizer email address]. Please notify DRCOG at least 48 hours in advance so we can coordinate your request."

Additionally, in the summer of 2021 DRCOG developed the following document accommodation statement that will be included on documents as appropriate: "To receive these documents in accessible formats, such as in languages other than English, please call 303-455-1000 or email drcog@drcog.org so we can coordinate your request."

Complaint procedures and forms

Any individual that believes that they have been subjected to discrimination or retaliation, by any of the Denver Regional Council of Governments programs, services or activities, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes may file a written complaint. All written complaints received by DRCOG shall be reviewed immediately.

See [Appendix D](#) for the full complaint procedures and forms at the time of plan adoption. Visit the DRCOG website to see the latest versions of these documents.



Appendix A: Language Identification Flashcards

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|---|------------------------|
| <input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> Խոսողո՞ւմ ե՞նք նշո՞ւմ կատարե՞ք այս քանակուսում, եթե խոսում կամ կարդում եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> ល្អមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | 12. Farsi |

- | | | |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français. | 13. French |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | 14. German |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | 15. Greek |
| <input type="checkbox"/> | Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | 17. Hindi |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | 18. Hmong |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | 20. Ilocano |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano. | 21. Italian |
| <input type="checkbox"/> | 日本語を読んだり、話せる場合はここに印を付けてください。 | 22. Japanese |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | 23. Korean |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົມສາລາວ. | 24. Laotian |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish |

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- | | | |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această casuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратикћ уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้กาเครื่องหมายลงในช่องนี้ถ้าท่านอ่านหรือพูดภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> | Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | 37. Vietnamese |
| <input type="checkbox"/> | באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |

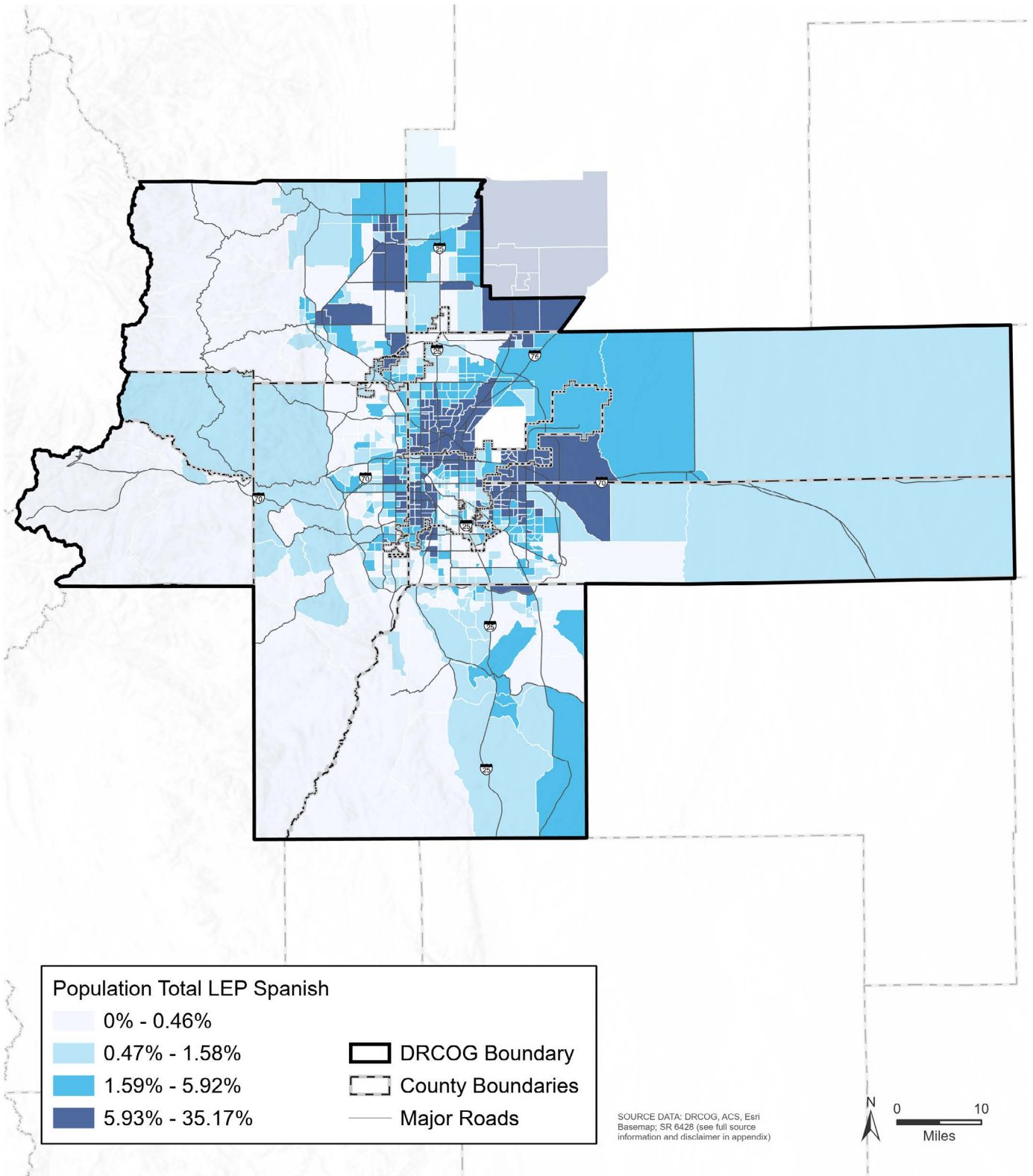
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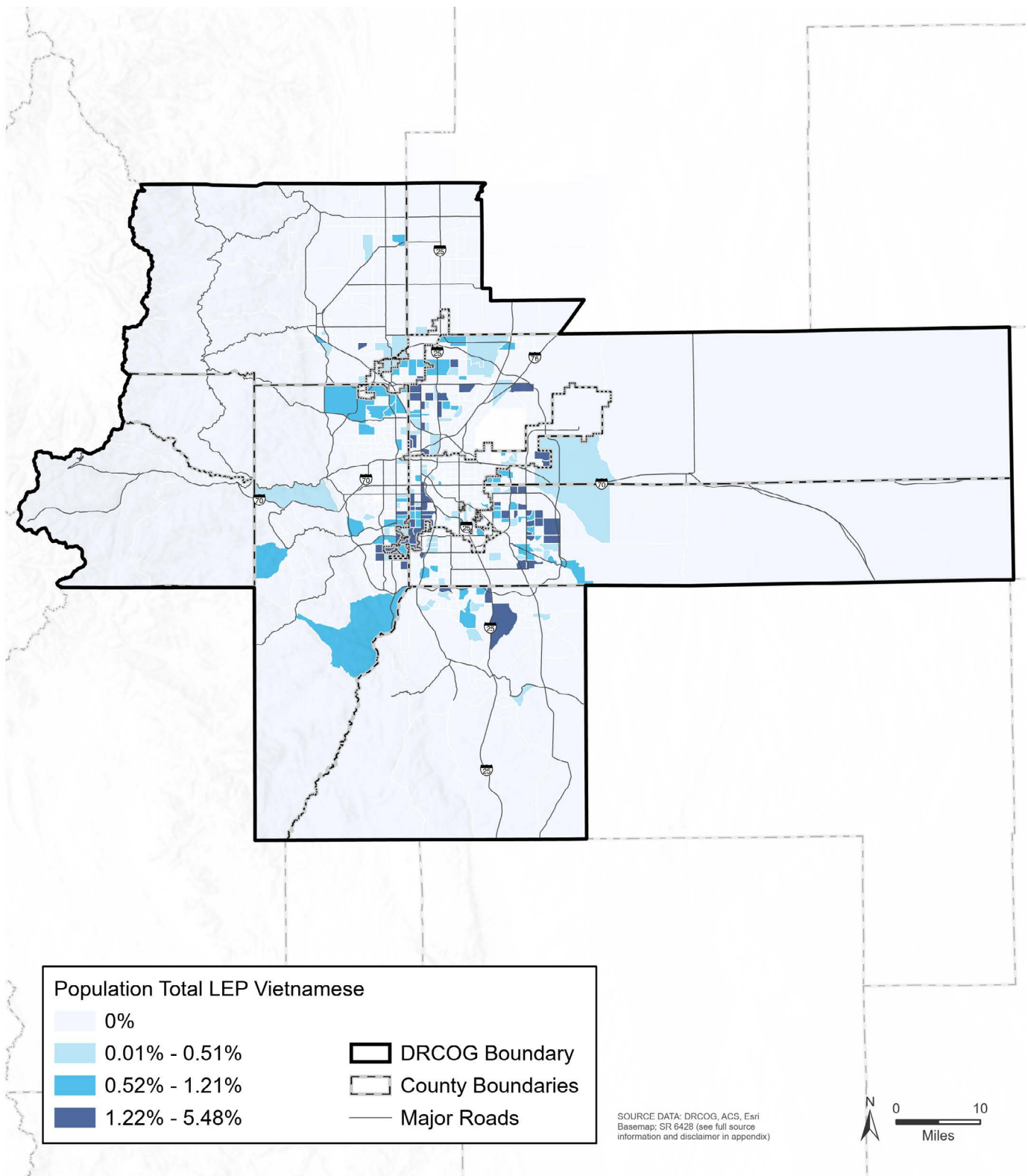


Appendix B: Top five non-English speaking language groups

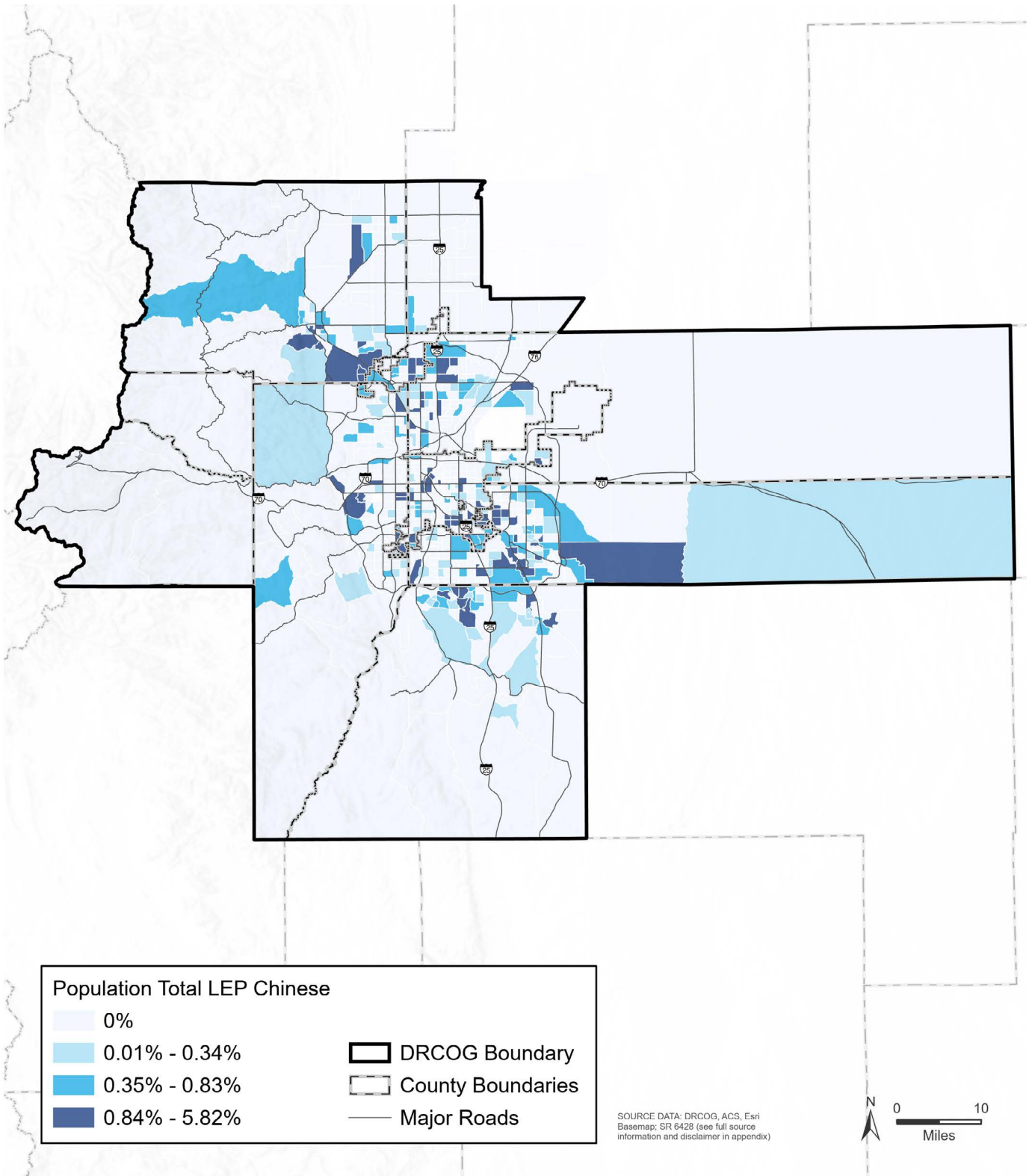
Map B.1: Individuals with limited English proficiency: Spanish or Spanish Creole language



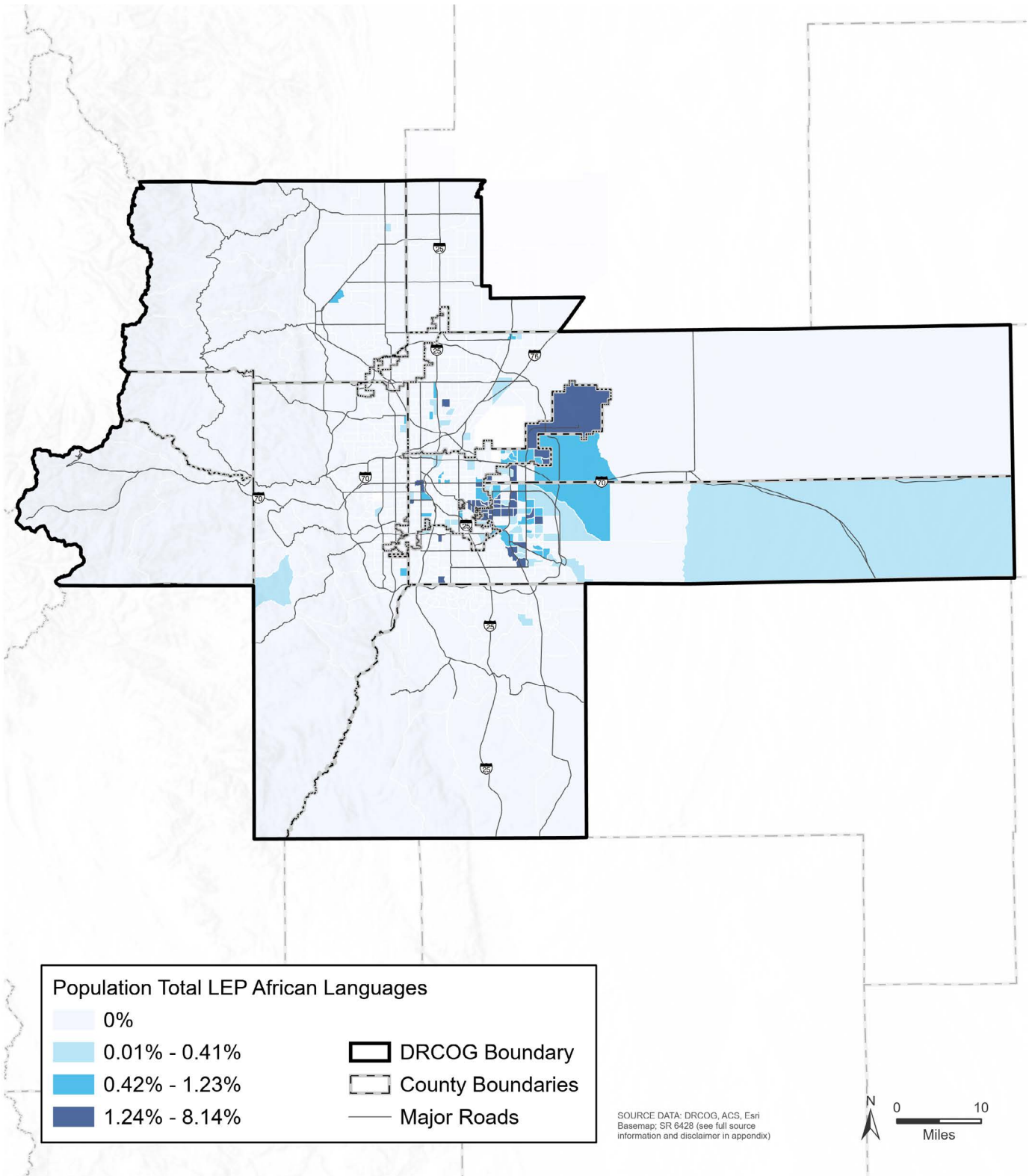
Map B.2: Individuals with limited English proficiency: Vietnamese language



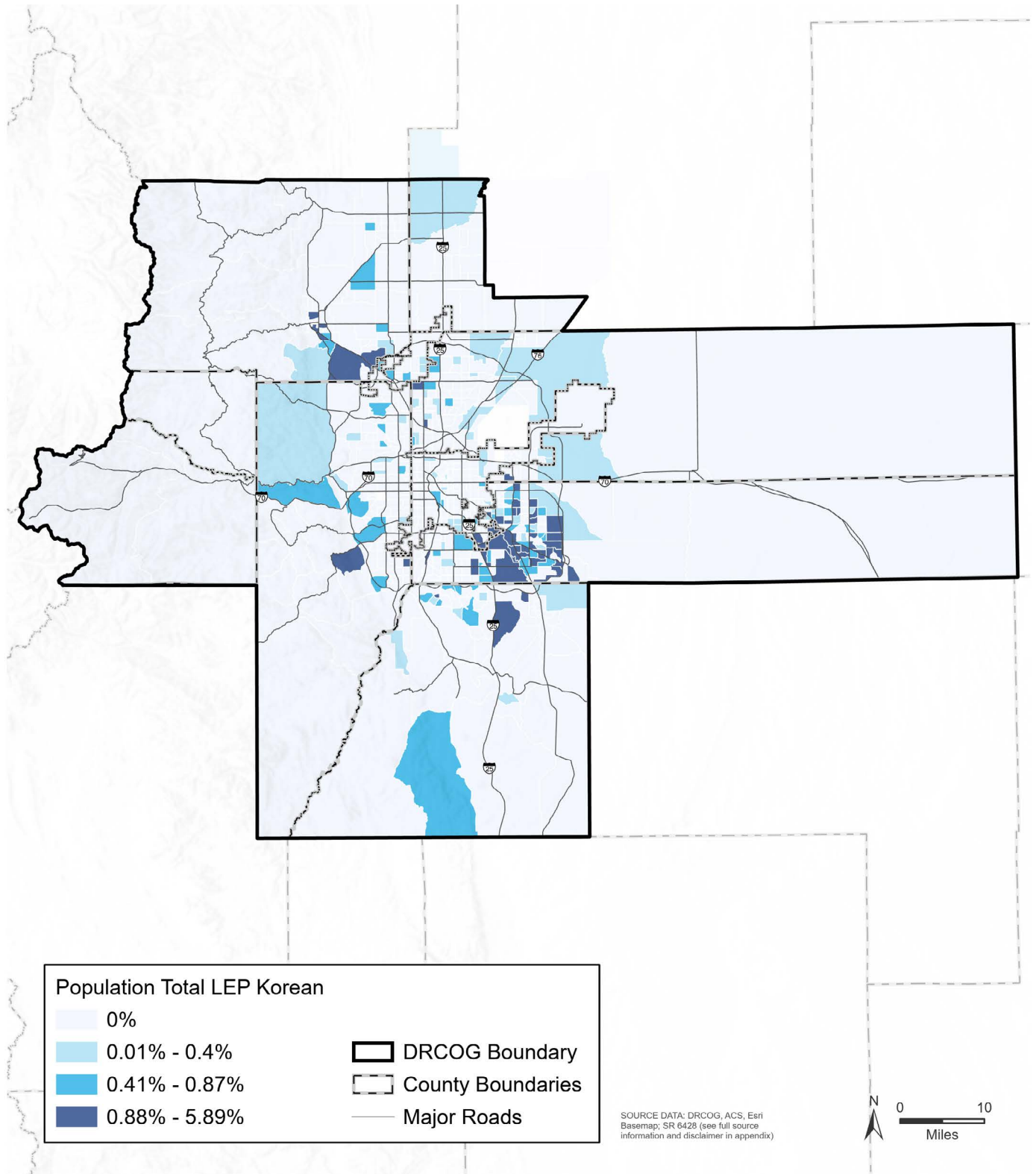
Map B.3: Individuals with limited English proficiency: Chinese language



Map B.4: Individuals with limited English proficiency: African languages



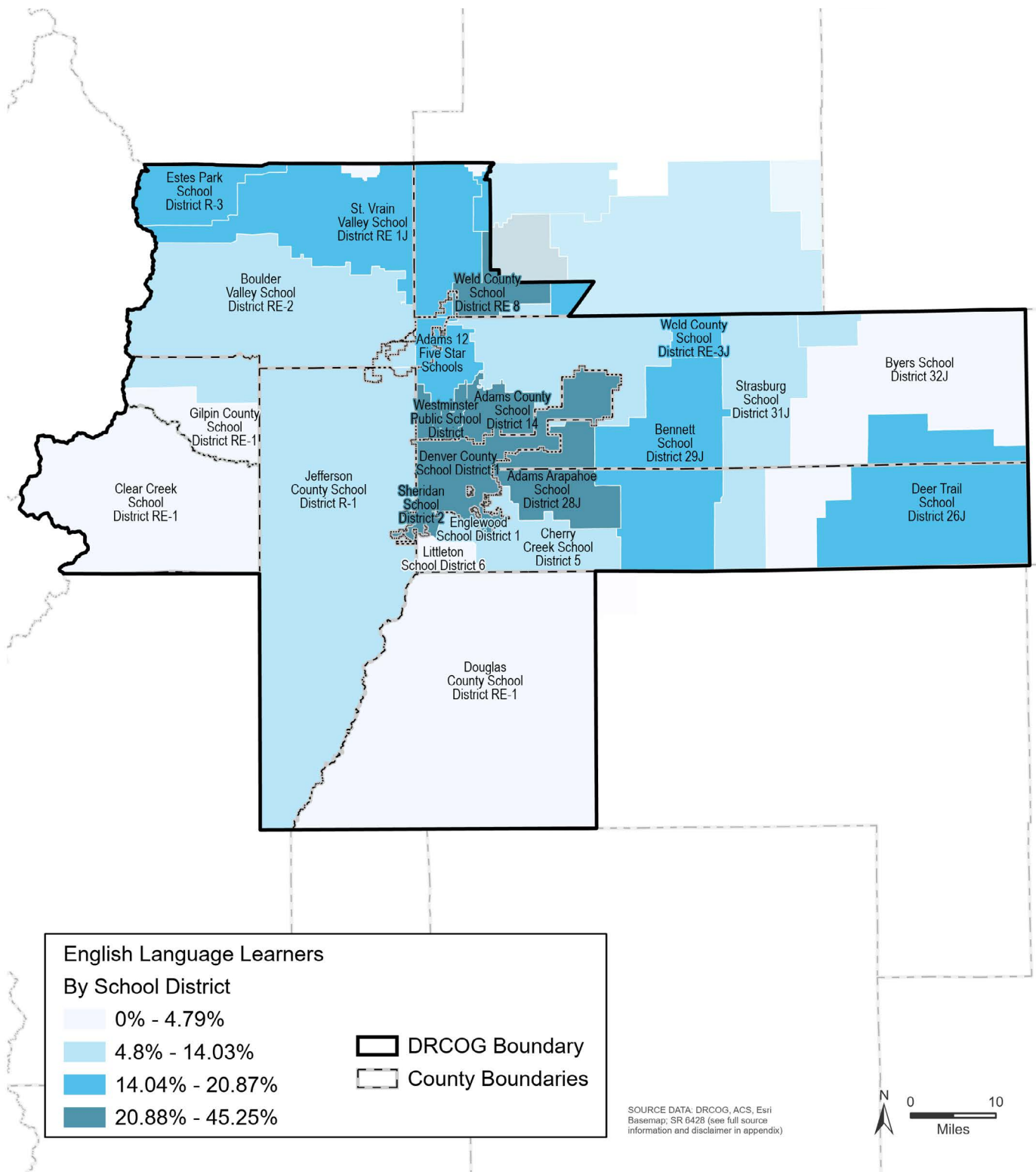
Map B.5: Individuals with limited English proficiency: Korean language





Appendix C: English-language learners per school district

Map C.1: Percent of students who are English-language learners per school district





Appendix D: Complaint procedures and forms

Nondiscrimination complaint procedures

The Denver Regional Council of Governments (“DRCOG”) follows Title VI of the Civil Rights Act of 1964, a nondiscrimination policy in which no person 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 federally funded program activity.

Herein follows the DRCOG complaint procedure to assist anyone who believes they have been negatively impacted.

DRCOG’s Title VI Coordinator (“Coordinator”) is available to review any concerns about potential violations.

In order to file a formal Title VI complaint against DRCOG or a recipient of federal funds from DRCOG, the following steps need to be followed:

- 1) The complainant will contact the Coordinator. If a complaint is received by any other DRCOG staff member, that staff member will refer the complaint to the Coordinator.
- 2) The Coordinator will conduct an initial determination of the sufficiency of the complaint to be a potential violation of Title VI.
- 3) If it is determined that the complaint does not meet the basic criteria to be a violation of Title VI, then a determination will be made on whether the issue can be informally resolved or administratively closed. That determination will be communicated to the complainant.
- 4) If it is determined that the complaint meets the basic criteria of a potential violation of Title VI, then an

investigation will be conducted by an investigator. The investigation will be completed within 60 days from the date it is determined the complaint is sufficient. A formal notice will be sent to the complainant.

- 5) The level and method of investigation will be determined on a case-by-case basis and is at the discretion of the investigator. A final report of findings from the investigation will be prepared by the investigator. A final notice of findings will be sent to the complainant by DRCOG. If the investigation is conducted by a Regional Civil Rights Specialist, a copy of the report and final notice of findings will be sent to the Coordinator. The final notice will include the process for filing an appeal of the decision.
- 6) A complainant may appeal a decision by submitting a request in writing within 30 days of the final notice. The request should include information detailing why the complainant believes the decision was made in error. The complainant will be given information on how to appeal this decision directly with the state or federal funding agency in the final notice.

How to file a complaint:

If you believe that you and/or any person(s) under your care have been discriminated against by any organization that receives funds from DRCOG for any of its programs, services, facilities or activities, please complete a discrimination complaint form as found attached. Please provide:

- 1) Your full name, address, telephone number and the name of the person who you believe has discriminated against you.
- 2) The name of the organization that you believe has discriminated, its address and telephone number, and any other identifying information.
- 3) A description of the actions that you believe were discriminatory (dates of actions, names of those who you believe discriminated, and witnesses).
- 4) Any other information that you believe necessary to support your complaint. Please send copies of relevant documents, and keep originals.

To file with DRCOG:

Denver Regional Council of Governments
Title VI Coordinator
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

The following resources are available:

Colorado Department of Transportation
Civil Rights and Business Resource
Center Title VI Coordinator
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088

Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, CO 80228
Phone: 720-963-3000
Fax: 720-963-3001

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 888-446-2511

In some cases, DRCOG must forward complaints to either the Federal Highway Administration or Federal Transit Administration, or the Colorado Department of Transportation for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the federal employee handling your complaint.

Nondiscrimination complaint form

Section I					
Name:					
Address:					
Home phone:			Work phone:		
Email:					
Accessible format requirements?	Large print		Audiotape		
	TDD		other		
Section II					
Are you filing this complaint on your own behalf?			<input type="checkbox"/> Yes*	<input type="checkbox"/> No	
*If you answered "yes" to this question, go to Section III					
If you answered "no", please state the name and relationship of the person for whom you are filing this complaint:	Name:				
	Relationship:				
Please explain why you have filed for a third party:					
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			<input type="checkbox"/> Yes*	<input type="checkbox"/> No	
Section III					
I believe the alleged discrimination I experienced was based on (check all that apply):					
Title VI			Other Federal Non-Discrimination Statutes		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Gender	<input type="checkbox"/> Age	<input type="checkbox"/> Disability
Date of Alleged Discrimination (Month, Day, Year):					

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who you believe discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use a separate page and attach it to this form.

Name of agency complaint is against:

Contact person:

Title:

Phone:

Explanation:

Section IV

You may attach any written materials or other information that you think are relevant to your complaint. By signing below you acknowledge that the information in this complaint is true and accurate to the best of your knowledge and belief.
Signature and date required below:

Signature

Date

Please submit this form in person at the address below or mail this form to:

Denver Regional Council of Governments

Title VI Coordinator

1001 17th St., Suite 700

Denver, CO 80202

Phone: 303-455-1000

Procedimiento de demanda contra la discriminación

El Consejo de Gobierno Regional de Denver ("DRCOG") se adhiere al Título VI del Acta de Derechos Civiles de 1964, una ley para la no discriminación que establece que ninguna persona, por motivos de raza, color o nacionalidad, deberá ser excluida de participar, recibir el rechazo de los beneficios, o estar sujeta a la discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.

A continuación, aparece el procedimiento del Consejo de Gobierno Regional de Denver (DRCOG) para presentar demandas y asistir a cualquier persona que sienta que haya sido impactada de manera negativa.

El Coordinador de demandas contra la Discriminación del DRCOG ("Coordinador") está disponible para revisar cualquier preocupación sobre posibles violaciones.

Para presentar una demanda formal bajo el Título VI contra el DRCOG o un receptor de fondos federales de DRCOG, se deberán seguir los siguientes pasos:

- 1) El demandante debe comunicarse con el coordinador. Si se formula una demanda a cualquier otro miembro del personal del DRCOG, ese miembro del personal derivará al demandante al Coordinador.
- 2) El Coordinador realizará una determinación inicial de la suficiencia de la demanda para determinar si es una potencial violación del Título VI.
- 3) Si se determina que la demanda no cumple con los criterios básicos para ser una potencial violación del Título VI, entonces se determinará si el problema se puede resolver de manera informal o cerrar a nivel administrativo. Esta determinación será comunicada al demandante.
- 4) Si se determina que la demanda cumple con los criterios básicos de una posible violación del Título VI, entonces se llevará a cabo una investigación con un investigador. La investigación se completará dentro de los 60 días a partir de la fecha en que se determine que la demanda es suficiente. Se enviará una notificación formal al demandante.
- 5) El nivel y el método de investigación se determinarán caso por caso, y quedarán a discreción del investigador. Un informe final de los resultados de la investigación será preparado por el investigador. Una notificación final de todos los hallazgos le será enviada al demandante por parte de DRCOG. Si la investigación es llevada a cabo por un especialista regional de derechos civiles, entonces una copia del reporte y la notificación final de los hallazgos será enviada al coordinador. La notificación final incluirá detalles del proceso para apelar la decisión.
- 6) Todo demandante puede apelar la decisión presentando una solicitud por escrito dentro de un plazo de 30 días de haber recibido la notificación final. Dicha solicitud deberá incluir información detallada sobre el por qué el demandante considera que la decisión se tomó de manera equivocada. En la notificación final, el demandante recibirá información en cuanto a cómo apelar la decisión directamente ante la agencia financiera estatal o federal.

Cómo presentar una demanda :

Si considera que usted o cualquier persona bajo su cuidado ha sido discriminada por cualquier organización que recibe fondos del DRCOG para cualquiera de sus programas, servicios, instalaciones o actividades, por favor complete el Formulario de Queja contra la Discriminación adjunto. Favor de proveer:

- 1) Su nombre completo, dirección y número telefónico, y el nombre de la persona que usted considera que ha sido discriminada.
- 2) El nombre de la organización que usted considera que ha sido discriminadora, la dirección y teléfono de dicha entidad y cualquier otro tipo de información que ayude a identificar dicho sitio;
- 3) Una descripción de las acciones que usted considera discriminatorias (fechas de tales acciones, nombres de las personas que han discriminado, y testigos)
- 4) Cualquier otro tipo de información que usted crea necesaria para sustentar su queja. Favor de enviar copias de documentos relevantes, y mantenga los originales con usted.

Para presentarla con DRCOG:

Consejo de Gobierno Regional de Denver
Coordinador del Título VI
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

Los siguientes recursos están disponibles:

Departamento de Transportación de Colorado
Centro de Recursos para Negocios y Derechos Civiles
Coordinador del Título VI
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088

Administración Federal de Carreteras -
División de Colorado
12300 West Dakota Ave., Suite 180
Lakewood, CO 80228
Phone: 720-963-3000
Fax: 720-963-3001

Administración Federal de Tránsito
Oficina de Derechos Civiles
Atención: Equipo de quejas
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
Phone: 888-446-2511

Formulario de queja contra la discriminación

Sección I					
Nombre:					
Dirección:					
Teléfono particular:			Teléfono laboral:		
Correo electrónico:					
¿Requisitos Formato Accesibles?	Letras grandes		Cinta de Audio		
	TDD		Otro		
Sección II					
¿Presenta esta demanda por usted?			<input type="checkbox"/> Si*	<input type="checkbox"/> No	
*Si respondió "sí" a esta pregunta, vaya a la Sección III					
Si respondió "no", por favor indique el nombre y parentesco de la persona por la que presenta esta queja:	Nombre:				
	Relación:				
Favor de explicar el motivo por el que presenta la demanda por un tercero:					
Favor de confirmar que usted obtuvo el permiso de la persona agraviada para completar esta demanda en nombre de un tercero			<input type="checkbox"/> Si	<input type="checkbox"/> No	
Sección III					
Creo que la discriminación que he sufrido se basó en (marcar todos los que correspondan):					
Titulo VI			Other Federal Non-Discrimination Statutes		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Nacionalidad	<input type="checkbox"/> Genero	<input type="checkbox"/> Edad	<input type="checkbox"/> Discapacidad
Fecha de la supuesta discriminación (Mes, día, año):					

Explique tan claramente como le sea posible lo que sucedió y el motivo por el que usted cree que lo discriminaron. Describa todas las personas que hayan estado involucradas. Incluya el nombre e información de contacto de la(s) persona(s) que considere que lo han discriminado (si lo sabe) como también nombres e información de contacto de cualquier testigo. Si necesita más espacio, por favor use otra hoja y adjúntela a este formulario.

Nombre de la agencia contra la cual se presenta la demanda:

Persona de contacto:

Cargo:

Teléfono:

Explicación:

Sección IV

Puede adjuntar todos los materiales escritos u otra información que usted considere importante para sustentar su demanda.

Al firmar abajo, usted reconoce que la información de esta demanda es verídica y de buena fe según su entender y conocimiento.

Firma y fecha a continuación:

Signature

Date

Favor de presentar este formulario en persona a la dirección a continuación, o envíelo por correo a: Consejo Regional de Gobiernos de Denver
Coordinador de Título VI
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000



Appendix E: Map information

Disclaimer

DRCOG makes no claims, representations or warranties, express or implied, concerning the validity (express or implied), the reliability or the accuracy of the data herein, including the implied validity of any uses of such data. DRCOG shall have no liability for the data or lack thereof, or any decisions made or action not taken in reliance upon any of the data.

Map information

Distribution of individuals with limited English proficiency

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Individuals with limited English proficiency: Spanish or Spanish Creole language

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Individuals with limited English proficiency: Vietnamese language

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Individuals with limited English proficiency: Chinese language

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Individuals with limited English proficiency: African languages

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Individuals with limited English proficiency: Korean language

DRCOG Vulnerable Populations Data (American Community Survey (ACS) 2015-2019), Table B16001, Language spoken at home by ability to speak English for the population 5 years and over.

Percent of students who are English-language learners per school district

2020-21 Instructional Program by District, The Colorado Department of Education.



Limited English Proficiency Plan

Denver Regional Council of Governments
1001 17th St., Suite 700, Denver, CO 80202
drcog.org 303-455-1000