

Denver Regional Council of Governments

Limited English Proficiency (LEP) Plan

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INTRODUCTION

Most persons living in the United States read, write, speak, and understand English. There are many persons, however, for whom English is not their primary language. If those persons 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, LEP persons 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 (DRCOG) 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 (USDOT);
- Older Americans Act (OAA);
- U.S. Department of Housing and Urban Development (HUD); and
- U.S. Department of Energy (DOE).

DRCOG is committed to engaging and involving all residents of the Denver region, including those with LEP, in its activities. Therefore, in accordance with the best practice standards for public involvement, together with assistance from the Colorado Department of Transportation (CDOT) and other federal agencies, DRCOG has developed this *Limited English Proficiency (LEP) Plan*. The LEP Plan outlines:

- how persons who may need language assistance are identified;
- the ways in which assistance is provided;
- staff training required; and
- how LEP persons are notified assistance is available.

The goal of the LEP 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 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 therewith, 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 USDOT 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 August 11, 2000, issued Executive Order 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 LEP persons can meaningfully access those programs and activities. That 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 13166, the 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).

USDOT and LEP Policy Guidance

In accordance with Executive Order 13166, the USDOT, on December 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 August 11, 2000, Guidance, the USDOT identifies four factors that should be considered by a recipient of federal funds in assessing the needs of LEP persons and implementing a plan to address those needs.

The four factors include:

- 1) the number or proportion of LEP persons served or encountered in the eligible service population;
- 2) the frequency with which LEP individuals come in contact with the

programs, activities, or services;

- 3) the nature and importance to LEP persons of your programs, activities, and services; and
- 4) the resources available to the recipient and costs.

The greater the number or proportion of eligible LEP persons, 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 LEP persons have meaningful access to critical services without unduly burdening the local agency.

OAA Guidance on “Targeting” Services

In accordance with the OAA and the Colorado Department of Health and Human Services, State Unit on Aging Rule Manual Volume 10, Area Agencies on Aging (AAAs) 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.

LEP ASSESSMENT FOR THE DRCOG PLANNING AREA

Factor 1: The number or proportion of LEP persons served or encountered in the eligible service population of the DRCOG region

The DRCOG region consists of nine entire counties (Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, Gilpin, and Clear Creek) and a portion of Weld County. To understand the profile of persons that may participate in DRCOG activities, the most recent United States Census data was used. For the purposes of this LEP Plan, persons who identified themselves as speaking English less than “very well” are considered LEP persons. Tables 1 and 2, below, summarize the relevant information derived from the United States Census Bureau 2007-2011 American Community Survey (ACS).

Table 1 shows top individual languages spoken at home in the DRCOG region by the number of LEP persons 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. The total number of LEP persons in the DRCOG region is approximately 222,499, or 8 percent of the total population of 2.8 million.

Table 1: Individual Language Spoken at Home by LEP Persons (5 years and older) in the DRCOG Region – 2007-2011 (LEP = Speak English less than "very well")

	Language Spoken at Home	Total	% of Total Pop.
1	Spanish or Spanish Creole	161,576	5.72%
2	Vietnamese	10,017	0.35%
3	Chinese	6,469	0.23%
4	Russian	6,266	0.22%
5	Korean	5,609	0.20%
6	African languages	5,600	0.20%
7	Other Asian	2,728	0.10%
8	Arabic	2,565	0.09%
9	Other	2,149	0.08%
10	German	2,058	0.07%
	Other non-English Languages	17,461	0.62%
	Total LEP	222,499	7.88%
	Total Population	2,823,844	-
<i>Source: U.S. Census Bureau (2007-2011 American Community Survey)</i>			

Table 2, also derived from the 2007-2011 ACS, shows the top five languages spoken by LEP persons, by county, within the DRCOG planning area. Geographic concentrations of LEP persons speaking certain languages will be considered for specific events or project outreach.

Table 2: Language Spoken by LEP Persons (5 years and older) in the DRCOG Region by County – 2007-2011 (LEP = Speak English less than “very well”)

	Adams		Arapahoe		Boulder		Broomfield		Clear Creek		Denver		Douglas		Gilpin		Jefferson		SW Weld		DRCOG Region	
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
Spanish or Spanish Creole	44,272	10.2%	33,259	5.9%	12,820	4.4%	998	1.8%	28	0.3%	55,797	9.4%	2,547	0.9%	72	1.4%	9,294	1.7%	2,489	4.1%	161,576	5.7%
Vietnamese	2,475	0.6%	1,883	0.3%	378	0.1%	205	0.4%	0	0.0%	3,248	0.6%	122	0.0%	0	0.0%	1,592	0.3%	114	0.2%	10,017	0.4%
Chinese	714	0.2%	1,639	0.3%	921	0.3%	209	0.4%	0	0.0%	1,464	0.2%	858	0.3%	0	0.0%	630	0.1%	34	0.1%	6,469	0.2%
Russian	1,010	0.2%	2,183	0.4%	212	0.1%	0	0.0%	0	0.0%	2,014	0.3%	233	0.1%	0	0.0%	522	0.1%	92	0.2%	6,266	0.2%
Korean	234	0.1%	3,211	0.6%	500	0.2%	44	0.1%	0	0.0%	647	0.1%	456	0.2%	0	0.0%	517	0.1%	0	0.0%	5,609	0.2%
Other Language	5,227	1.2%	10,717	1.9%	2,532	0.9%	635	1.2%	5	0.1%	7,415	1.3%	1,770	0.6%	32	0.6%	4,139	0.8%	89	0.1%	32,561	1.2%
Total LEP Persons	53,932	12.4%	52,892	9.4%	17,363	5.9%	2,091	3.8%	33	0.4%	70,585	12.0%	5,986	2.1%	104	2.0%	16,694	3.1%	2,818	4.7%	222,498	7.9%
Total Population	434,295	-	563,508	-	293,205	-	54,592	-	9,083	-	590,507	-	280,643	-	5,241	-	532,243	-	60,527	-	2,823,844	-

Source: U.S. Census Bureau (2007-2011 American Community Survey)

Factor 2: The frequency with which LEP individuals come in contact with DRCOG programs, activities, or services

The previous analysis showed that approximately 8 percent of the region's population is LEP persons, with the majority speaking Spanish or Spanish Creole. To date, DRCOG has received no requests, formal or otherwise, by LEP persons seeking the translation of documents or interpreters at public meetings.

LEP interaction with other specific activities:

- **Transportation/MPO Activities:** 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 (e.g., as compared to a public transit agency). Approximately 50 people have completed Spanish language versions of surveys conducted for the Regional Transportation Plan and Metro Vision Plan between 2001 and 2007. For the 2010 Household Travel Survey, 91 households completed the Spanish language travel diary, using assistance from Spanish-speaking interpreters.
- **AAA Division Activities:** This division receives on average 12 requests per year regarding its services from persons speaking Spanish or other languages.
- **Way to Go Program Activities (formerly RideArrangers):** In the past, the RideArrangers/Way to Go Program has received, on average, 12 requests for Spanish language assistance per year.

Factor 3: The nature and importance of the program, activity, or service provided by DRCOG

DRCOG uses federal funds for many 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 sites;
- providing assistance to persons wishing to carpool, vanpool, or use other alternative modes of travel; and
- providing referral assistance to persons with aging-related questions regarding themselves, a family member, or an acquaintance.

DRCOG itself does not directly provide immediate emergency assistance services such as medical treatment or shelter. However, the AAA Division does refer persons 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 LEP persons.

For transportation activities, DRCOG and its planning partners evaluate the impact of proposed transportation investments on disadvantaged population groups, including LEP persons, as part of its Environmental Justice evaluation process in three major areas. They include:

- the Unified Planning Work Program (UPWP)
- the Transportation Improvement Program (TIP)
- the Metro Vision Regional Transportation Plan (MVRTP)

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 to allow residents to learn about and follow DRCOG activities. While LEP persons 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. This type of engagement is critical, as the feedback received at the local level can then be communicated to 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 LEP persons within the DRCOG 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 LEP Implementation Plan described below uses cost-efficient and productive measures to ensure language barriers are not preventing LEP persons from participating meaningfully in DRCOG's activities.

LEP IMPLEMENTATION PLAN

Safe Harbor and DRCOG

Federal law provides a “Safe Harbor” provision so a recipient of federal funds, like DRCOG, can ensure it complies with its Title VI obligation to provide written translations of its documents to LEP persons, 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 LEP program. Many documents DRCOG prepares are more than 50-100 pages in length. Accordingly, DRCOG finds it is more appropriate to adhere to the following policies:

- Oral interpretation options will be provided to LEP persons to access, learn about, and comment on DRCOG’s documents.
- DRCOG will provide Spanish-language versions of key documents as appropriate. DRCOG will consider the length, popularity, service function (e.g., ridesharing and aging assistance) or critical nature of such documents (e.g., surveys to solicit public input) to LEP persons.
- DRCOG will provide web-based translation options on its new website, scheduled for completion by the end of 2013.
- Specific requests for translated versions of documents will be considered upon request.

Identifying Persons Who May Need Language Assistance

When encountering an LEP person whose language is unknown, DRCOG staff will use *Language Identification Flashcards* to identify that person’s primary language (see Appendix A). Copies will be stored in DRCOG’s main lobby and four largest public meeting rooms (Independence, Monarch, Wolf Creek, and Cottonwood). *Language Identification Flashcards*, as developed by the United States Census Bureau, bear the phrase “Mark this box if you read or speak [name of language]” translated into 38 different languages. The LEP person can then denote the 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>.

As part of the LEP, DRCOG will also make the *Language Identification Flashcards* available to the public through its website, so LEP persons contacting DRCOG online can

communicate their primary language to DRCOG staff. DRCOG staff can then use that information to provide language assistance to the LEP person. DRCOG will also make the *Language Identification Flashcards* available at all public meetings or events. Once a LEP person's primary language is identified using the flashcards, DRCOG staff will assess the feasibility of providing written translation service and/or oral interpretation assistance for the LEP person.

For DRCOG activities focused on a specific geographic area of the region, US Census and Colorado Department of Education data will be consulted to determine if there are high concentrations of specific LEP groups in the area. DRCOG will maintain separate maps depicting concentrated areas of the five largest non-English speaking language groups (Spanish or Spanish Creole, Vietnamese, Chinese, Korean, and Russian) (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.
- If the individual speaks Spanish or another language fluent to someone on DRCOG staff, a DRCOG employee may be used as a first response interpreter. For in-office assistance, an email will be sent immediately to all DRCOG staff to determine if there is a person on-site who speaks the desired language.
- DRCOG also contracts with a telephone interpreter service for translation, when needed.

Pages of the DRCOG website may be translated into a number of different languages using free online translation services such as *Google Translate*. Similarly, agendas, minutes, and other documents posted online may be translated as well.

DRCOG staff possesses limited in-house translation capabilities or expertise to assist LEP persons, 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 LEP persons have a meaningful opportunity to participate in DRCOG activities and receive applicable services.

Staff Training

Applicable current and incoming staff members will be briefed on the DRCOG LEP Plan, language identification flashcards, and how to assist LEP persons. Staff will also be instructed to immediately inform a designated person in the Communications and Marketing Division who will maintain a record of language assistance requests so needs may be accurately assessed in the future.

Monitoring and Updating the LEP Plan

This LEP Plan will be updated as needed. Non-English products produced and activities conducted will be monitored, along with the tracking of specific LEP requests received and responses provided.

Updates to the LEP Plan may consider the following factors:

- How many LEP persons were encountered or requested services? Were their needs met? Does analytical data regarding website use reveal unique information?
- What is the current LEP population in the DRCOG planning area?
- Has there been a change in the types of languages where 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 LEP Plans been approved requiring changes to the LEP Plan or DRCOG's process for addressing LEP persons?

Dissemination and Provision of Notice

This LEP Plan (in English and in Spanish) will be posted on the DRCOG website www.drcog.org.

Copies of this LEP Plan will also be available at DRCOG. Any person or agency requesting a copy of the LEP Plan will be provided a copy.

Complaints

Anyone discriminated against or excluded from a federally funded program, activity, or service on the basis of LEP may file a complaint following the procedures and using the form in Appendix D and also available at www.drcog.org.

Should an LEP complaint be filed, DRCOG's Discrimination Complaint Procedure will be followed (see Appendix D).

Appendix A

Language Identification Flashcards

<input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p>	1. Arabic
<input type="checkbox"/> <p>Խոսողու՞մ ե՞նք նշու՞մ կատարե՞ք այս քառակուսու՞մ, եթե խոսու՞մ կամ կարդո՞ւմ եք հայերեն:</p>	2. Armenian
<input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p>	3. Bengali
<input type="checkbox"/> <p>ល្អប្រសើរណាស់បើអ្នកប្រើប្រាស់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p>	4. Cambodian
<input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p>	5. Chamorro
<input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p>	6. Simplified Chinese
<input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p>	7. Traditional Chinese
<input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p>	8. Croatian
<input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p>	9. Czech
<input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p>	10. Dutch
<input type="checkbox"/> <p>Mark this box if you read or speak English.</p>	11. English
<input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p>	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 beszél 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 ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță 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 квадратичић 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"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	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

Appendix B

LEP Maps

Maps of concentrated areas of the five largest non-English speaking language groups
(Spanish or Spanish Creole, Vietnamese, Chinese, Russian, and Korean)

Figure B-1
Limited English Proficiency (LEP) Persons:
Spanish or Spanish Creole Language

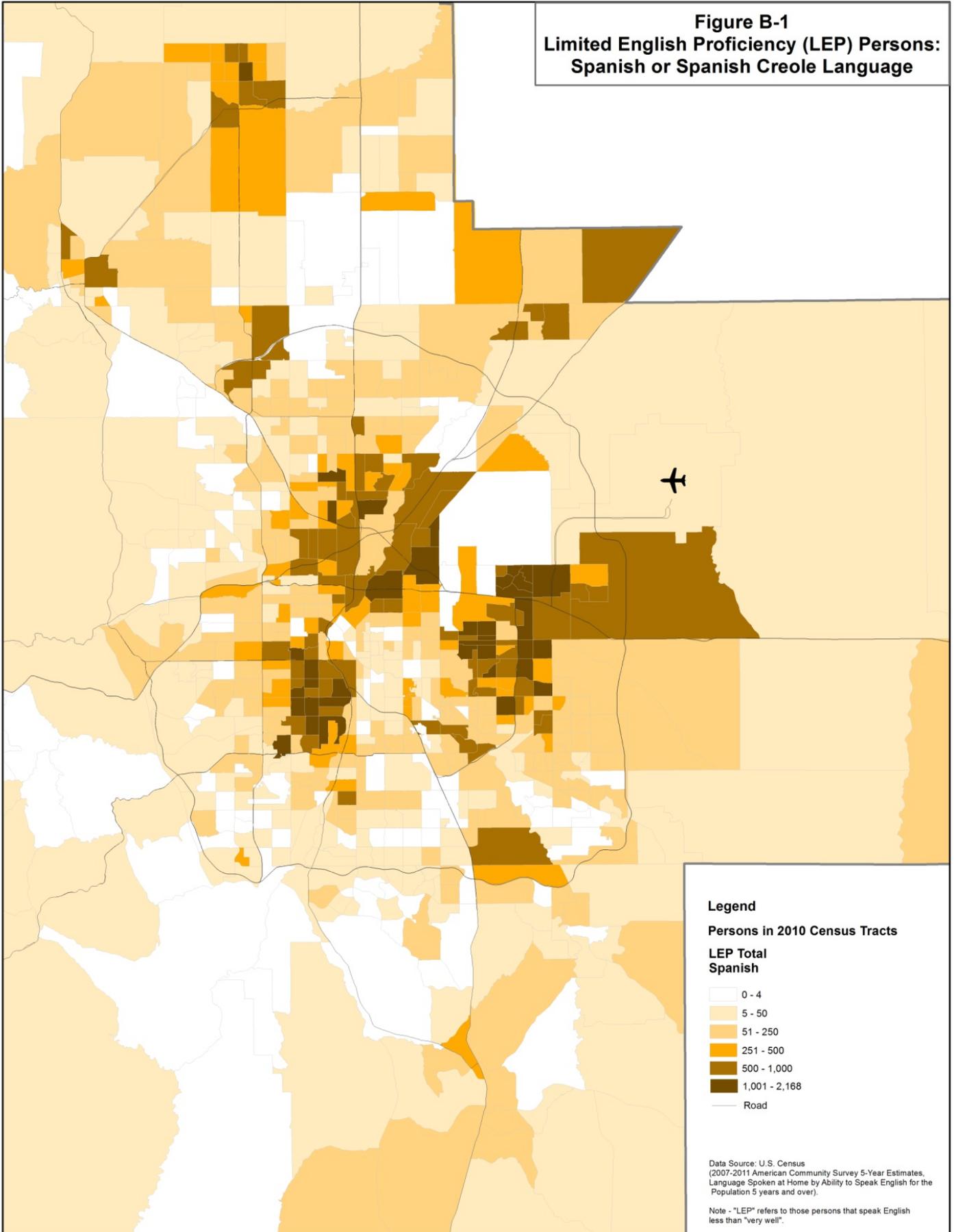


Figure B-2
Limited English Proficiency (LEP) Persons:
Vietnamese Language

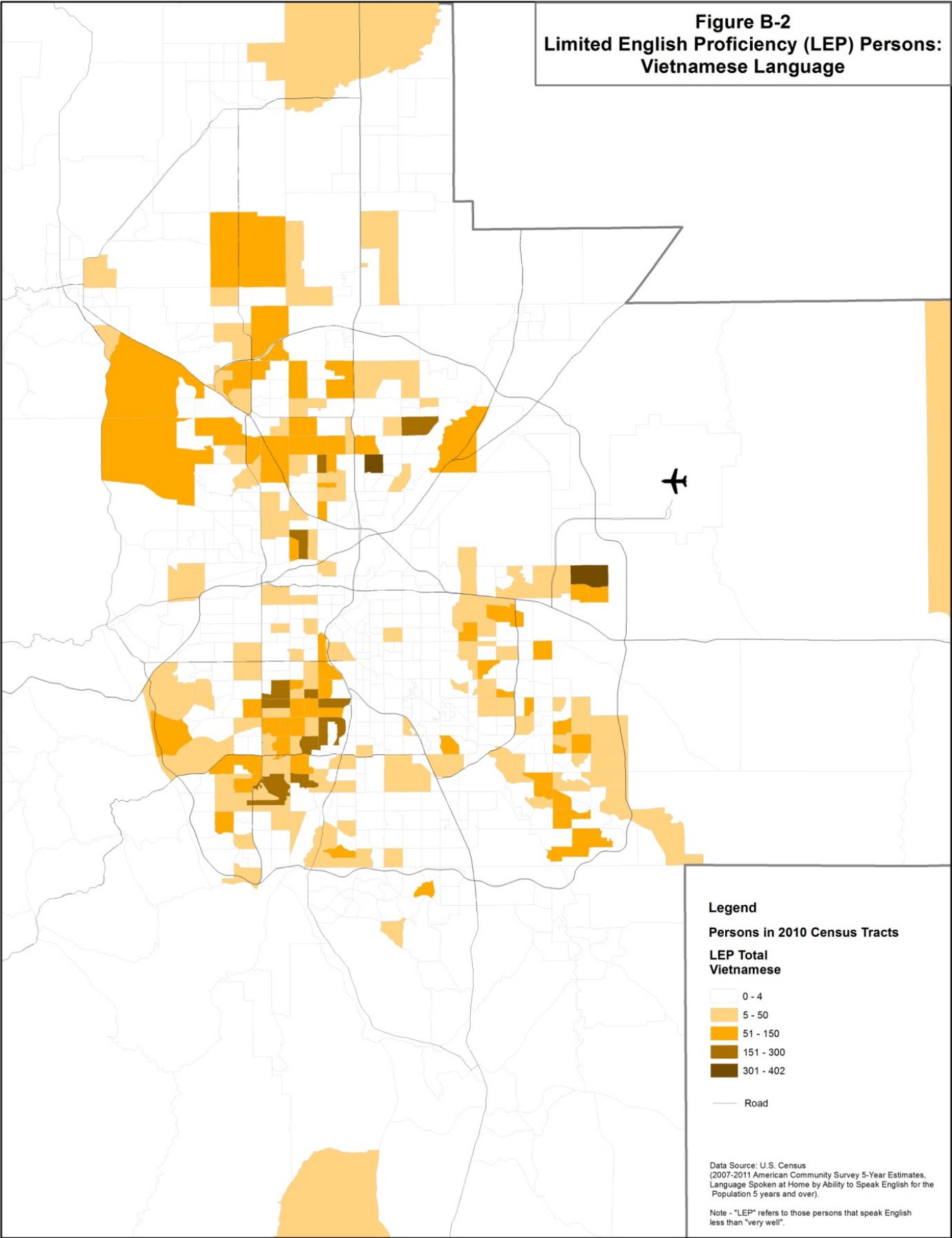


Figure B-3
Limited English Proficiency (LEP) Persons:
Chinese Language

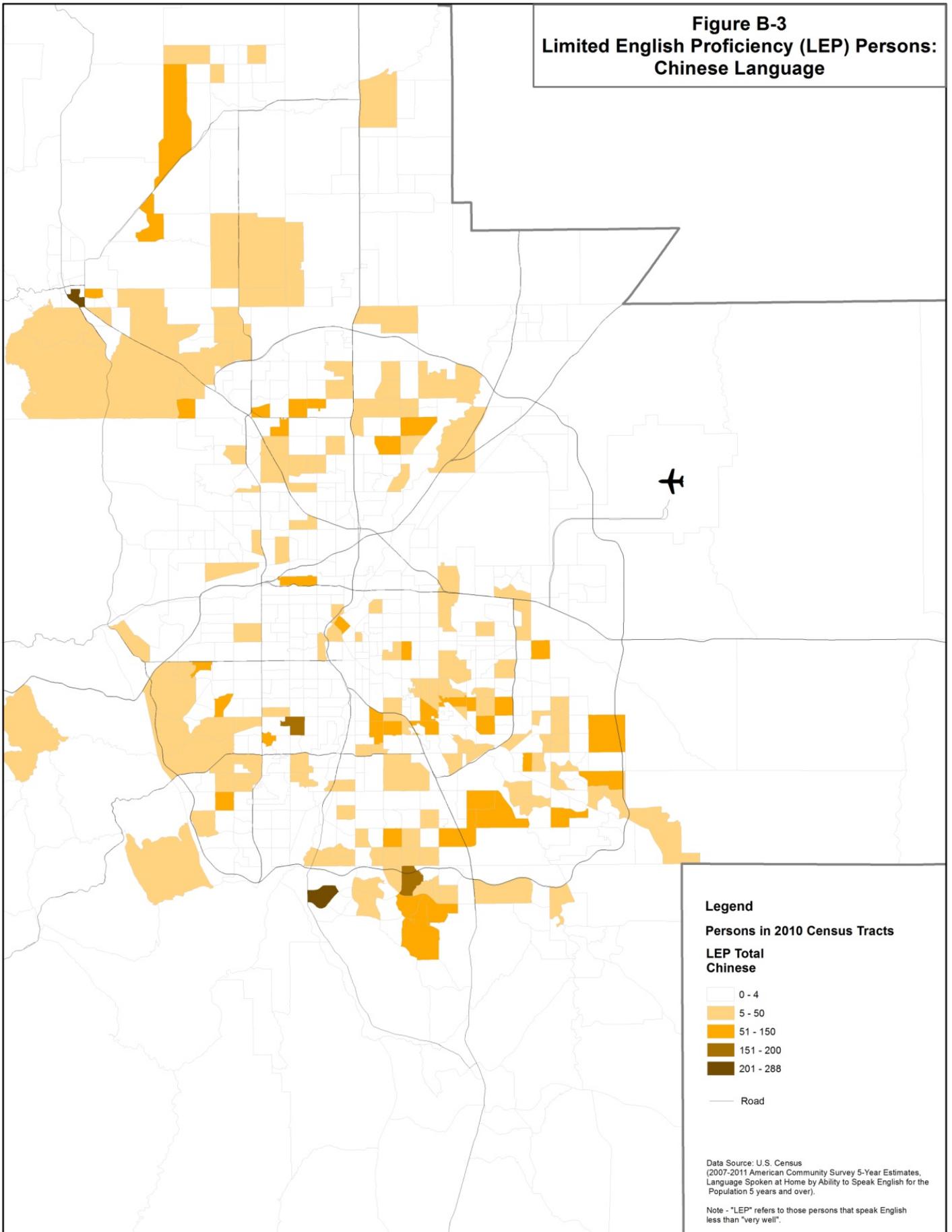
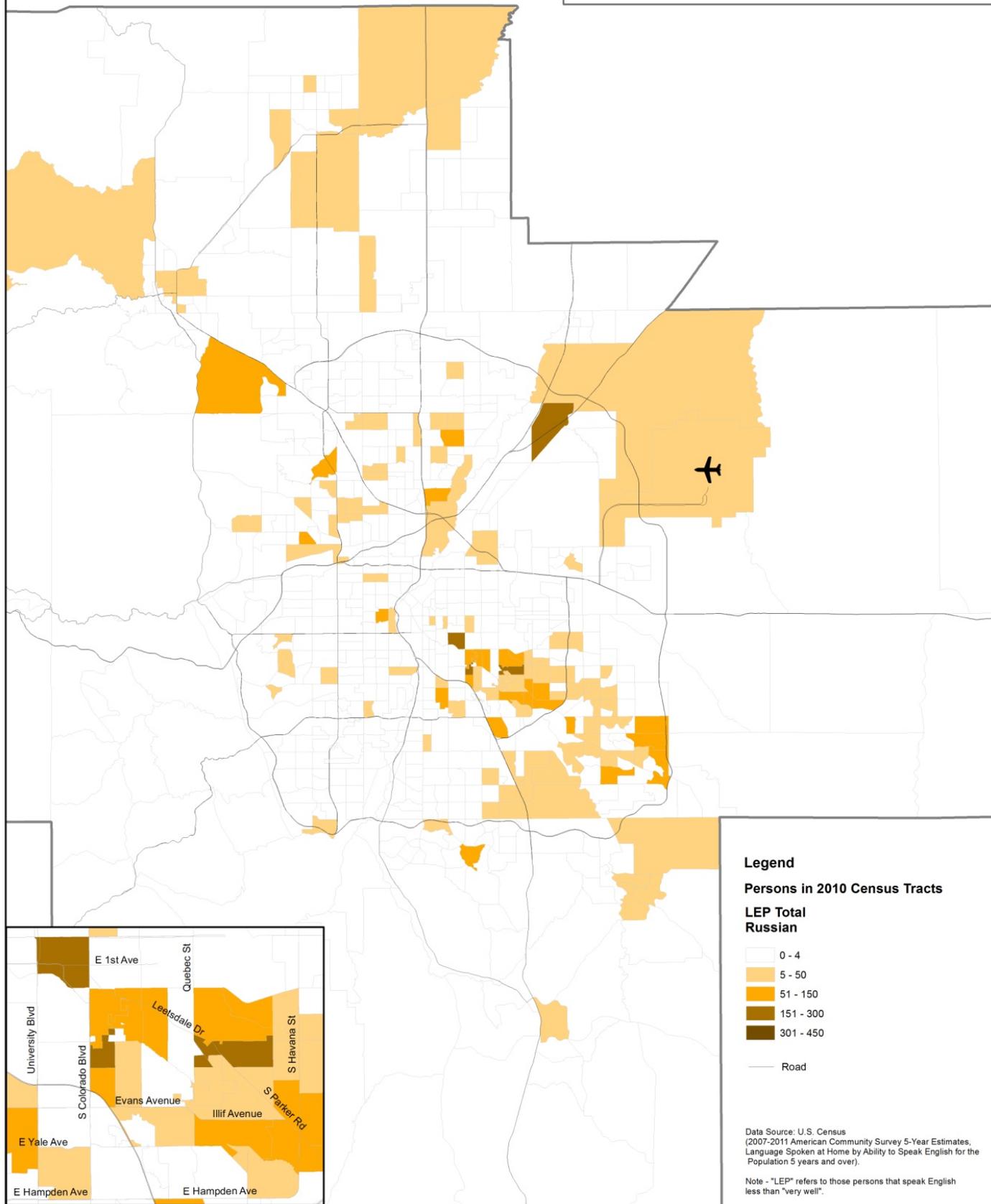
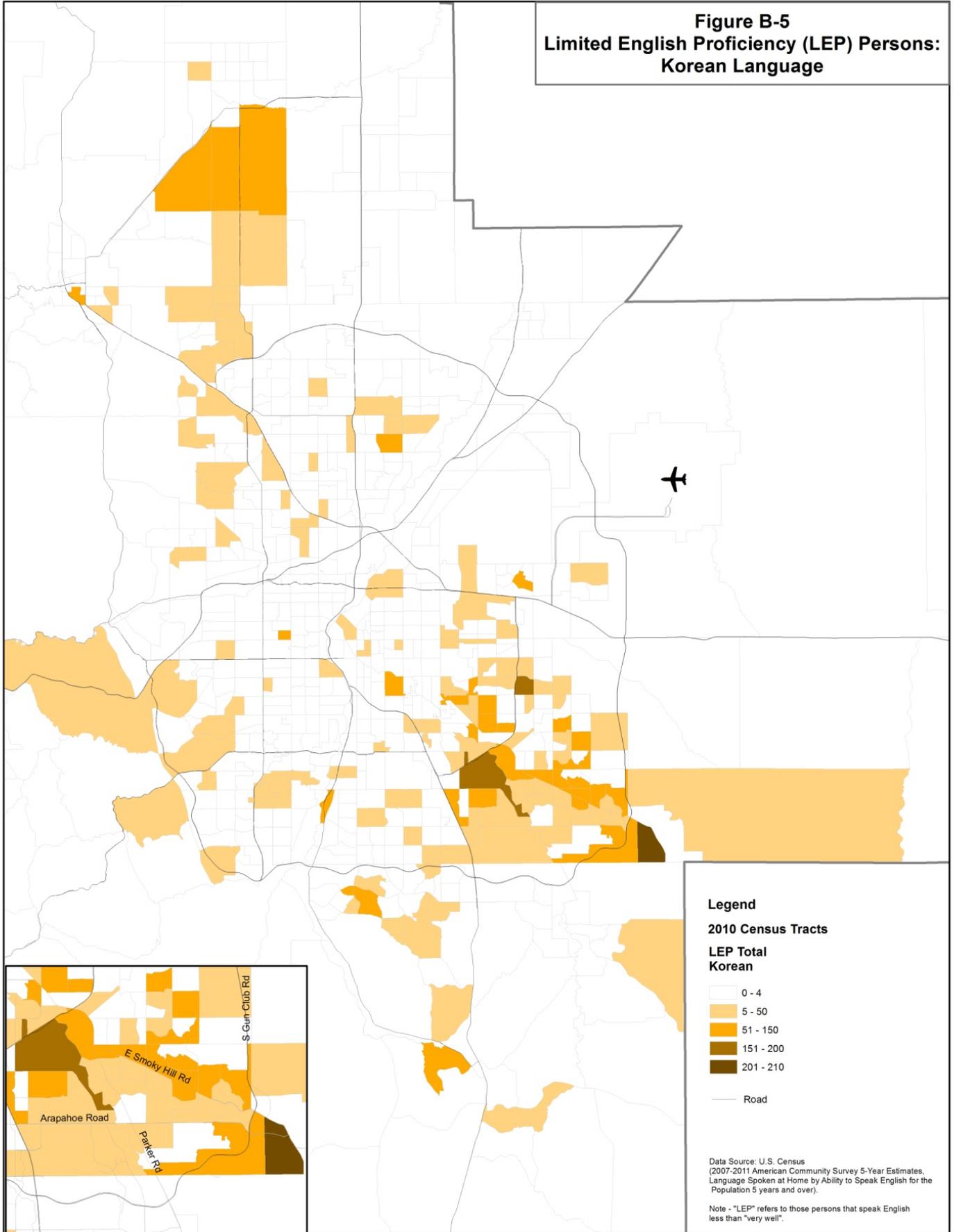


Figure B-4
Limited English Proficiency (LEP) Persons:
Russian Language



**Figure B-5
Limited English Proficiency (LEP) Persons:
Korean Language**



Appendix C

English Language Learners per School District

Colorado Department of Education (Fall 2012 Pupil Membership Data)

Appendix D

Title VI Complaint Procedures and Form

Denver Regional Council of Governments Discrimination Complaint Procedure

The Denver Regional Council of Governments (“DRCOG”) adheres to Title VI of the Civil Rights Act of 1964, a nondiscrimination law which provides that no person 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. Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection; specifically: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender); Age Discrimination Act of 1975 (age); and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability).

Herein follows the DRCOG complaint procedure to assist any individual or group that believes their rights have been violated in a discriminatory manner or they have been treated in a disparate manner because of their race, color, national origin, gender, age, or disability.

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

The following steps will be followed in processing discrimination complaints against DRCOG or a recipient of funds from DRCOG:

1. A complainant must contact the Coordinator (303-455-1000). If a complaint is made to any other DRCOG staff member, that staff member will refer the complainant to the Coordinator. The Coordinator will be available to answer questions regarding the complaint procedure. A written Complaint Form must be completed, signed and filed with the Coordinator in order to commence review of a complaint under this Procedure. The written complaint must be filed within 180 days from the date of the alleged discrimination.
2. Upon receipt of the complaint, the Discrimination Complaint Coordinator will conduct an initial determination of the sufficiency of the complaint to be a potential violation of Title VI or other nondiscrimination statute.
3. If it is determined that the complaint does not meet the basic criteria to be a potential violation of Title VI or other nondiscrimination statute, 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 or other nondiscrimination statute, then an investigation will be conducted by a trained investigator. The investigation will be completed within 60 days from the date it is determined the complaint is sufficient.
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 and a copy of the report and final notice of findings will be sent to the Coordinator. The Coordinator will send a final notice of findings by certified mail to the complainant at the address provided by the complainant to the Coordinator. The notice will include a description of those actions, if any, that will be taken regarding the matters which were the subject of the complaint.
6. In the final notice, the complainant will be given information on whether the decision may be appealed and, if so, how to appeal the decision directly with the state or federal funding agency. Any appeal must be commenced by the complainant submitting a request in writing within 30 days of receipt of the final notice. The appeals request should include information detailing why the complainant believes the decision was made in error.

How to File a Complaint

If you believe that you and/or any person(s) under your care have been discriminated against by DRCOG or by any organization that receives funds from DRCOG for any of its programs, services, facilities or activities, contact DRCOG's Discrimination Complaint Coordinator (303-455-1000), then complete the attached Discrimination Complaint Form, sign it, and submit it to the address shown on the form.

The following resource is available:

Colorado Department of Transportation, HQ Center for Equal Opportunity
(303) 757-9303, or (800) 925-3427

**DENVER REGIONAL COUNCIL OF GOVERNMENTS
DISCRIMINATION 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?			Yes*	No
Yes	*If you answered "yes" to this question, go to Section III.			
No	If you answered "no", please state the name of and relationship you have to 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.			Yes	No
Section III				
I believe the alleged discrimination I experienced was based on (check all that apply):				
Title VI <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		Other Federal Non-Discrimination Statutes <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: _____ _____ _____ _____ _____ _____ _____				

**DENVER REGIONAL COUNCIL OF GOVERNMENTS
DISCRIMINATION COMPLAINT FORM**

Section IV

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply and list the name of the agency/court:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court: _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section V

Have you <u>previously</u> filed a discrimination complaint with DRCOG?	Yes	No
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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, Contracts Department
Discrimination Complaint Coordinator
1290 Broadway, Suite 700
Denver, CO 80203

303 455-1000