

SOUTHWESTERN PENNSYLVANIA COMMISSION LIMITED ENGLISH PROFICIENCY PLAN



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INTRODUCTION

As a Metropolitan Planning Organization (MPO), SPC is committed to ensuring residents who use the southwest region's roadways can participate in SPC programs, obtain information, and engage our services. As part of this effort we developed the "Limited English Proficiency" plan.

"Limited English Proficient," or "LEP" individuals, include those who know a bit of English but need assistance, and those who don't speak English at all as their primary language. People who are multi-lingual, or those who speak one or more languages in addition to being proficient in English, are not LEP.

This plan was developed to reduce communication barriers and increase participation in SPC public events, meetings, services, and community programs.

STATE AND REGIONAL HISTORY

In Pennsylvania (PA), Limited English Proficiency (LEP) reflects the state's rich cultural heritage and its efforts to support non-English-speaking communities. Over the years, PA has seen significant LEP populations, particularly in urban areas like Pittsburgh and Philadelphia, where many immigrant communities have settled.

In the early 20th century, PA's industrial boom attracted immigrants from Europe, Asia, and Latin America. Many of these individuals faced language barriers, which limited their access to education, healthcare, and employment opportunities. Over time, advocacy groups and local governments began to address these challenges by implementing language access programs and bilingual education initiatives.

By the 21st century, PA had developed more comprehensive strategies to support LEP individuals. For example, the state has mapped LEP populations by county and judicial district to better understand their needs and allocate resources effectively. The southwestern region (SW PA), which includes cities like Pittsburgh and counties such as Allegheny, Fayette, and Washington, has long been a hub for well-rounded communities.

During the late 19th and early 20th centuries, SW PA experienced a surge in immigration, particularly from Europe. Immigrants from Italy, Poland, Germany, and other countries arrived to work in the coal mines, steel mills, and railroads that defined the region's economy. Many of these newcomers faced language barriers, which limited their access to education, healthcare, and civic participation.

Over time, local governments and community organizations began to address the needs of LEP populations. Churches, ethnic societies, and schools played a crucial role in providing language support and fostering integration. In more recent decades, the region has seen an increase in immigrants from Latin America and Asia, further expanding the LEP population.

Regionally, southwestern Pennsylvania continues to support LEP individuals through various programs and initiatives. Organizations like the Greater Pittsburgh Literary Council, and local school districts offer English as a Second Language (ESL) programs, while healthcare providers and public services, like the Southwestern Pennsylvania Commission, work to ensure all residents can access programs and services by reducing communication barriers.

All of these efforts aim to ensure that LEP individuals can fully participate in society while preserving their cultural heritage.

BACKGROUND

The Southwestern Pennsylvania Commission

SPC is the MPO for a ten-county region of Southwest Pennsylvania. SPC's member governments include Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Lawrence, Washington, and Westmoreland counties and the city of Pittsburgh. As such, it is the federally mandated transportation policy board comprised of representatives from local, state, and federal governments, transit agencies, and other stakeholders. SPC is responsible for transportation planning and programming for the ten-county region. Any transportation project or program to be constructed or conducted within the SPC region and to be financed with federal transportation funds must receive approval by SPC before any federal funds can be expended. In addition, any transportation project deemed to be regionally significant, regardless of the source(s) of funding, must receive SPC approval to proceed.

Public Participation Plan

SPC is required by federal regulations to consider public input into the transportation planning process. SPC's Public Participation Plan (PPP) provides a framework for SPC's transportation planning processes in order to facilitate a proactive public participation process and comply with federal participation requirements. The PPP identifies strategies and tools to enhance effective public participation in SPC's transportation planning activities. Activities in the PPP are also coordinated with the statewide transportation planning public involvement and consultation processes associated with statewide transportation planning processes.

SPC's goal is to foster significant and ongoing two-way communication with our region's residents. Education and public outreach are essential parts of our responsibility to inform the public about the transportation planning process.

Inform and Educate the Public

SPC works diligently to make information accessible to the public and to provide timely public notice. We provide public information that is accurate, understandable and pertinent to regional transportation planning and engagement activities through the

use of varied communication tools. In addition to informing the public, SPC makes every effort to educate the public about the planning process and provide supportive policy, program, and technical information. Educating the public supports informed public contribution and continued engagement by the public. Education is enhanced through the use of visualization tools that help the public understand and relate to SPC's various planning activities.

Reach Out and Build Connections

SPC continues to develop methods and opportunities for the LEP population to participate in the transportation planning process, including minority, and non-English speaking. It is a continual priority to increase the engagement of participants in activities through building new relationships with organizations and communities that serve these populations.

Engage the Public and Encourage Continued Participation

SPC encourages continued public participation by ensuring an engagement process that is meaningful. This includes providing ways to engage and communicate with the public, responding to all comments and questions in a timely manner, using our network of partners for help with responses as needed, and providing other opportunities for further engagement and education.

The concept of two-way communication between SPC and the public is a key element to developing our planning goals and outcomes. We encourage input, respond in a reasonable and timely manner, and include comments as feedback to decision-makers to shape the planning process. It is important to note that all regular meetings of the Commission feature a public comment opportunity.

Use Public Input to Shape Policies, Plans, and Programs

SPC documents all input received from the public. This documentation provides a record of all comments and assists SPC staff and committees in reviewing public input, which is used in the development of transportation plans and programs. The process of incorporating public input into transportation planning documents is transparent and consistent with the provisions outlined in the Public Participation plan. SPC informs the public of decision-making process for each activity in which public comment is solicited. This is presented to the public at the beginning of each planning activity and throughout the engagement process.

Evaluate Public Participation Strategies

In order to sustain best practices in public participation, SPC continually monitors the public engagement process and has developed a framework for evaluating and improving it and the strategies that guide how SPC engages the public.

PUBLIC PARTICIPATION PANELS

SPC provides a unique and active opportunity for participation by bringing planning directly to residents in each county through Public Participation Panels (Panels). Panels are a key element of SPC's public participation and outreach program. SPC works in partnership with a panel of residents and business representatives in each county to provide citizens with direct, ongoing access to the regional planning and decision-making process. The panels help promote public awareness of the regional transportation planning process and public participation opportunities to communities throughout southwestern Pennsylvania.



- County Commissioners in each county (in Allegheny County, the County Executive and the Mayor of Pittsburgh) appoint Panel members in accordance with the general guidance for panel composition stated below.
- The membership of the Panels is designed to be representative of each county's diverse interests.
- Due to the varied nature of the Panels, each one is provided general operational guidance, but may deviate from or reflect other panels activities as necessary through consultation with SPC staff and the Commission.
- A minimum of fifteen members are appointed to each Panel.
- Terms of Panel members last for two years, corresponding to the TIP update cycle.
- Each county may choose to appoint either co-chairpersons or a chairperson and vice-chairpersons, who are collectively referred to as "Chairpersons."
- Persons interested in service on a Panel are encouraged to contact their County Commissioners (in Allegheny County, the County Executive and the Mayor of Pittsburgh).
- SPC provides County Commissioners with the most recent community demographics of their county's population.

POLICY

Individuals who do not speak English as their primary language, and who have a limited ability to read, speak, write, or understand English can be Limited English Proficient, or LEP. SPC developed this LEP plan in an effort to reduce language barriers and expand community engagement to all residents who utilize southwestern Pennsylvania's roadways and who wish to participate in SPC public events, meetings, service, and community programs.

COMMUNITY DEMOGRAPHICS

SPC takes reasonable steps to ensure meaningful engagement with our programs and activities by LEP individuals. The starting point in determining reasonable steps is to conduct an individualized assessment for SPC, using a four-factor analysis.

Factor One: The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity, or service

Using U.S. Census Bureau 2018-2022 American Community Survey (ACS) 5-year estimates, the population of the Southwestern Pennsylvania region over the age of five-years is 2,444,570. It was determined that approximately 6% (130,432) of that population speak a language other than English at home. Approximately 34% of the 130,432 persons over five-years old who speak a language other than English at home speak English less than “very well.” This represents 1.6% of the total population of the region over five-years old.

Table 1 illustrates the number of LEP individuals at the County Level:

SPC REGION & COUNTY LEP POPULATION ESTIMATES

Based on 2018-2022 5-Year Estimates from the American Community Survey

<i>Geography Name</i>	<i>Population 5 Years and Over</i>	<i>Speaks only English at Home</i>	<i>Limited English Proficiency</i>	<i>Margins of Error¹</i>	<i>Limited English Proficiency %</i>
SPC Region	2,444,570	2,314,138	39,046	±2,035	1.6%
Allegheny County	1,181,910	1,090,112	27,805	±1,703	2.4%
Armstrong County	62,556	61,057	534	±161	0.9%
Beaver County	159,468	154,457	1,474	±408	0.9%
Butler County	185,105	179,128	1,895	±401	1.0%
Fayette County	121,995	118,466	672	±176	0.6%
Greene County	34,033	33,230	146	±83	0.4%
Indiana County	79,600	75,523	1,532	±312	1.9%
Lawrence County	81,554	78,412	1,158	±294	1.4%
Washington County	199,288	193,229	1,854	±355	0.9%
Westmoreland County	339,061	330,524	1,976	±347	0.6%

Notes: ¹Margins of Error were approximated through a method outlined by census documentation. This method sees the aggregating of Standard Errors and applying the critical Z-score of a 90% Confidence Level.

Source Table: C16001, August 2024

Table 2 illustrates the language subpopulations most frequently spoken by LEP individuals in the region. As illustrated, individuals speaking Spanish, and Chinese make up the largest group, followed by Indic, Italian, and Vietnamese.

SPC REGION LEP ESTIMATES BY DETAILED LANGUAGE SPOKEN AT HOME OTHER THAN ENGLISH

Based on 2018-2022 5-Year Estimates from the American Community Survey

<i>Category</i>	<i>Estimate¹</i>	<i>Margins of Error²</i>	<i>% of Total</i>	<i>% of LEP Population</i>
Population 5 Years and Over	2,444,570	±4,349	100.00%	-
Speaks only English at home	2,314,138	±5,309	94.66%	-
Limited English Proficiency	39,046	±2,072	1.60%	100.00%
Spanish	8,351	±788	0.34%	21.39%
Chinese (incl. Mandarin, Cantonese)	5,534	±699	0.23%	14.17%
Nepali, Marathi, or other Indic languages	4,260	±914	0.17%	10.91%
Italian	1,976	±399	0.08%	5.06%
Vietnamese	1,435	±435	0.06%	3.68%
Arabic	1,359	±411	0.06%	3.48%
German	1,345	±346	0.06%	3.44%
French (incl. Cajun)	1,336	±402	0.05%	3.42%
Yiddish, Pennsylvania Dutch or other West Germanic languages	1,330	±246	0.05%	3.41%
Other languages of Asia	1,146	±422	0.05%	2.93%
Russian	1,065	±264	0.04%	2.73%
Korean	1,047	±346	0.04%	2.68%
Telugu	697	±255	0.03%	1.79%
Swahili or other languages of Central, Eastern, and Southern Africa	683	±427	0.03%	1.75%
Japanese	643	±233	0.03%	1.65%
Portuguese	604	±223	0.02%	1.55%
Hindi	577	±222	0.02%	1.48%
Gujarati	570	±275	0.02%	1.46%
Ukrainian or other Slavic languages	565	±212	0.02%	1.45%
Tagalog (incl. Filipino)	543	±189	0.02%	1.39%
Greek	415	±159	0.02%	1.06%
Yoruba, Twi, Igbo, or other languages of Western Africa	383	±202	0.02%	0.98%

Serbo-Croatian	347	±191	0.01%	0.89%
Tamil	344	±191	0.01%	0.88%
Bengali	304	±215	0.01%	0.78%
Other or Unspecified languages	245	±273	0.01%	0.63%
Haitian	240	±230	0.01%	0.61%
Urdu	215	±124	0.01%	0.55%
Persian (incl. Farsi, Dari)	213	±172	0.01%	0.55%
Thai, Lao, or other Tai-Kadai languages	203	±140	0.01%	0.52%
Khmer	199	±183	0.01%	0.51%
Malayalam, Kannada, or other Dravidian languages	175	±150	0.01%	0.45%
Other Indo-European languages	169	±108	0.01%	0.43%
Polish	140	±91	0.01%	0.36%
Hebrew	112	±119	0.00%	0.29%
Amharic, Somali, or other Afro-Asiatic languages	97	±124	0.00%	0.25%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	92	±118	0.00%	0.24%
Punjabi	78	±114	0.00%	0.20%
Hmong	8	±112	0.00%	0.02%
Other Native languages of North America	1	±115	0.00%	0.00%
Armenian	0	±118	0.00%	0.00%
Navajo	0	±118	0.00%	0.00%

¹Estimates in Red signify LEP Populations that meet Department of Justice “safe harbor” thresholds.

The DOJ defines these thresholds as an eligible LEP Language population that constitutes at least 5% of the considered population or an LEP Language population that is at least a 1,000

²Margins of Error were approximated through a method outlined by census documentation.

This method sees the aggregating of Standard Errors and applying the critical Z-score of a 90% Confidence Level

Source Table: B16001, August 2024



The concentrations of these four language groups are mostly located in Allegheny County, specifically in and around the city of Pittsburgh, the urban core of the region. There are also pockets of Spanish-speaking LEP individuals around the cities of Washington, Uniontown, Connellsville, and the boroughs of Canonsburg, Charleroi, Donora, Indiana, and Waynesburg. The maps in Appendix A depict the concentrations of LEP individuals in the language groups above the regional average of LEP concentrations (1.6%).

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

The more frequent the contact with a particular language group, the more likely that sufficient language services are needed. If an LEP person from a specific language group utilizes a program or service on a daily basis, SPC has greater language assistance requirements than if the person's frequency of contact with the program or service is unpredictable or infrequent. Improving how LEP individuals communicate with SPC may increase contact with those individuals when appropriate outreach measures are followed.

The next factor to be considered in the LEP Assessment is the frequency with which LEP persons encounter the services of SPC programs and services.

SPC provides transportation planning and programming services on behalf of the ten-county region, and serves as the regional forum for transportation decision making. Decisions made by the Commission affect the residents, including LEP individuals, of the ten-county service area. Public input is routinely sought in the development and advancement of key planning processes, including the Long-Range Transportation Plan (LRTP) and other key initiatives. During these public comment periods, comments are solicited from interested parties. To date, SPC has received no comments or requests for information in a language other than English.

Factor Three: The nature and importance of the program, activity, or service provided by the MPO to the LEP community

SPC utilizes state and federal funds to plan for improvements to the surface transportation system. This planning is multimodal and includes a wide range of strategies, programs, and services aimed at improving accessibility, mobility, safety, and quality of life for all users. No element of the SPC program requires the compulsory participation of area residents, nor does SPC administer or oversee any programs or services that impose involuntary restrictions on area residents. Involvement by any person with SPC or its committees and forums is completely voluntary.

The Commission takes steps to ensure that all segments of the population, including LEP persons, have the opportunity to be involved throughout the transportation planning process. Based on SPC's responsibility for coordinating the planning and programming of transportation investments in the southwestern Pennsylvania region, potential interest in the planning process by the public, and any effects on the public's quality of life resulting from SPC functions; the following planning documents were identified as vital products of the Commission's metropolitan planning process:

1. **Public Participation Plan (PPP)** – provides a framework for SPC's transportation planning processes in order to facilitate a proactive public participation process and comply with federal participation plan requirements.

2. **The Long-Range Transportation Plan (LRTP)** – establishes a regional vision and outlines the policy direction guides all planning and programming undertaken at SPC.
3. **The Transportation Improvement Program (TIP)** – is a program of the highest priority transportation improvements and programs to be implemented in the next four years with federal, state, and local funds.

Factor Four: The resources available to the MPO and costs to provide language assistance services

Based on the language data and assessment used in Factor 1, as well as financial constraints, full multi-language translations or large transportation plan documents is not considered to be warranted at this time. In that regard, SPC will make summaries of the PPP, LRTP, and TIP available in Spanish. As identified in Table 2, Spanish is the language the SPC staff is most likely to encounter.

SPC will provide translation and/or interpretation services, upon request, for the vital products of the metropolitan planning process, identified in Factor 3. Furthermore, all public meeting notices and notices for public comment periods are classified as vital services requiring translation services. To facilitate this process, SPC uses a standardized template for public meeting and comment period notices.

SPC will continue to provide in both English and Spanish notifications for newspaper advertisements. SPC also offers the Google® Translator* tool on its website. This tool allows for real-time, in place translation of the SPC website in more than 100 languages.

MEETING REQUIREMENTS AND IMPLEMENTATION

The following section provides details about how SPC provides assistance to LEP persons by disseminating LEP information to the public, training staff, and monitoring the LEP Plan.

Identifying LEP Persons in Need of Language Assistance

SPC takes the following actions in order to identify LEP individuals during meetings, events, and throughout the planning process:

- Record requests for language assistance and encounters with LEP individuals at meetings, events, and throughout the public involvement process
- Utilize U.S. Census Bureau's "I Speak Cards" at the sign-in table in order to assist identifying language needs for future meetings and events
- Leave "take one" instructions for using Google® Translator* to navigate SPC webpages and documents.

- Post a notice of available language assistance on the SPC website and in the SPC office reception area.

LANGUAGE ASSISTANCE

SPC utilizes the following measures to offer interpretation and translation assistance to LEP individuals:

Interpretation

- When an interpreter is requested, either in person or via telephone, the SPC staff will first determine what language is required via the “I Speak Cards” or by utilizing a web-based tool such as Google® Translator*. These tools offer the translation of web pages and documents as well as online and instant speech translations through a PC or smart phone application.
- Provide oral interpretation services for public meetings. SPC partners with local interpretation, and translation providers for these services. A request for such service must be made in advance, preferably with 72-hours’ notice, as requested by the service provider. Should a request be made with less than 72 hours’ notice, SPC will attempt to provide the service utilizing the best resources available at the time.

Translation

- Offer translated copies of materials (may be in alternative formats), and plan summaries in Spanish, the most common language as identified in Factor One of the Four Factor Analysis. SPC partners with local interpretation and translation service providers that can provide these services upon request.
- Continue to offer a translator tool on SPC’s website for instant translations of website content. As referenced in Factor Four of the Four Factor Analysis, SPC offers the Google® Translator* tool on its website. This tool allows for real-time, in place translation of the SPC website in more than 100 languages.

** The Google® Translator tool is provided on SPC’s website as a convenience for site visitors and is not intended or used by SPC in place of providing professional translation and interpretation services*

SPC Staff Training

SPC staff members who interact with the public are provided access to the LEP Plan and offered training on procedures and available services. Training topics may include:

- LEP program responsibilities
- Use of LEP language assistance “I Speak Cards”

- Language assistance resources offered
- Documentation of requests for language assistance

Providing Notices to LEP Individuals

Concluding the Four Factor Analysis, SPC has determined that it will offer and provide language assistance services in requested languages at no cost. Examples of notifications undertaken by SPC include:

- Signage in the SPC office's reception area, which states that free language assistance is available
- SPC states in outreach and vital documents that language services are available.
- Include translated meeting notices, and public notices, in three of the identified languages from Factor One, on the SPC website. Requests for any of the fifteen languages included in the Indic language group will be translated as requested.
- Distribute meeting notices, and public notices to organizations that target LEP groups.
- Include statements in notices for public meetings and participation opportunities announcing that SPC will provide assistance related to sight, language, or hearing with three day's advance notice.
- Working through SPC's public participation panels and community-based organizations to inform LEP individuals of SPC's programs and services, including LEP services.
- Include notices in local Spanish language newspapers, non-English media outlets, and community service organizations regarding the availability of LEP services.

MONITORING AND UPDATING THE LEP PLAN

SPC takes the following steps to monitor, review, and update its LEP Plan, as needed, to ensure LEP individuals can engage its programs and services.

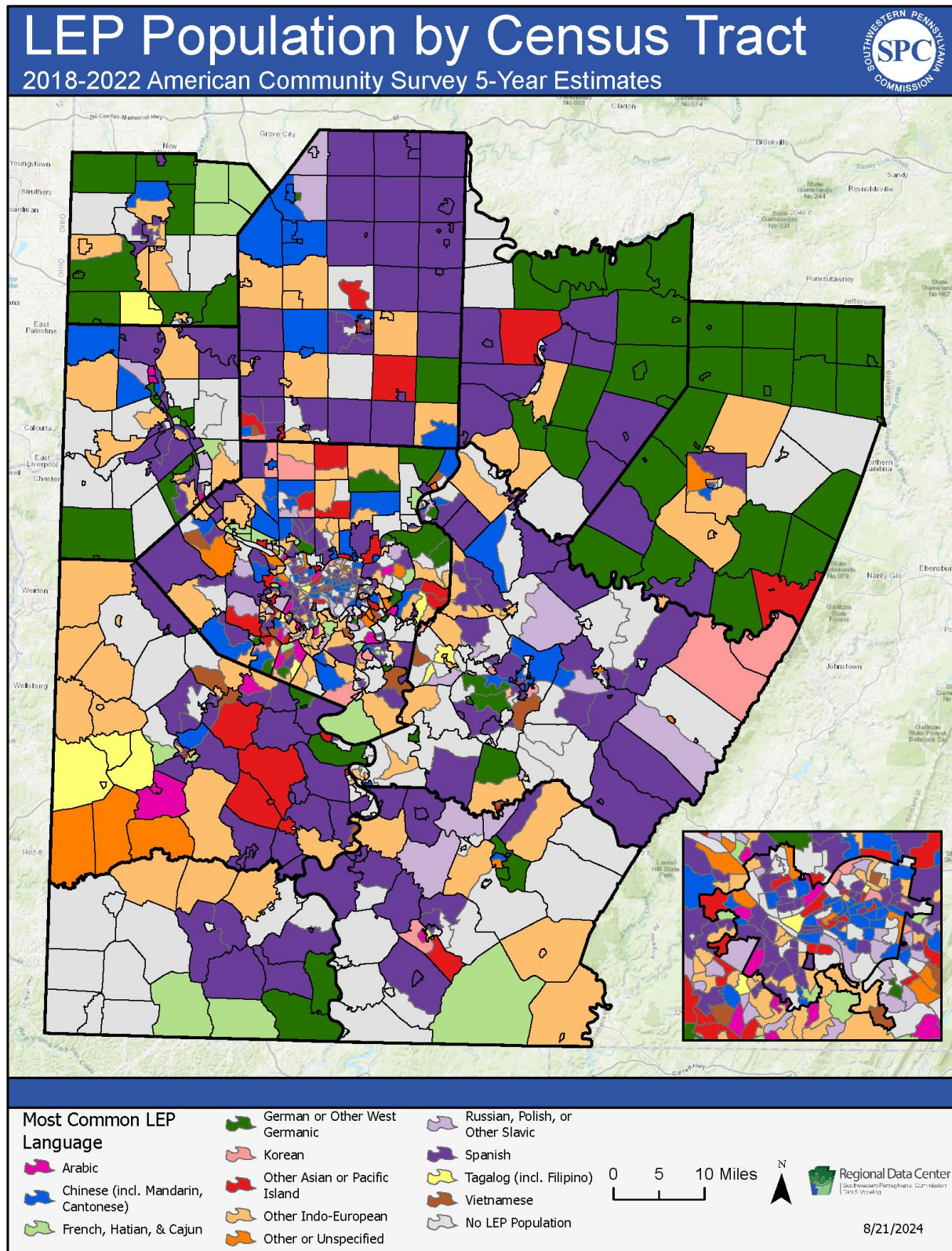
- Every four years, SPC will review and update, as necessary, the demographic data of the southwest region's LEP populations.
- Review the frequency of contact with LEP individuals (i.e., requests for LEP services) and adjust strategies as necessary.
- Evaluate the availability of resources, including technological advances

- Review any feedback received from LEP individuals on the effectiveness of SPC's LEP services
- Review the potential need for expansion of services or programs.
- Determine the nature and importance of programs, services, and activities to LEP individuals.

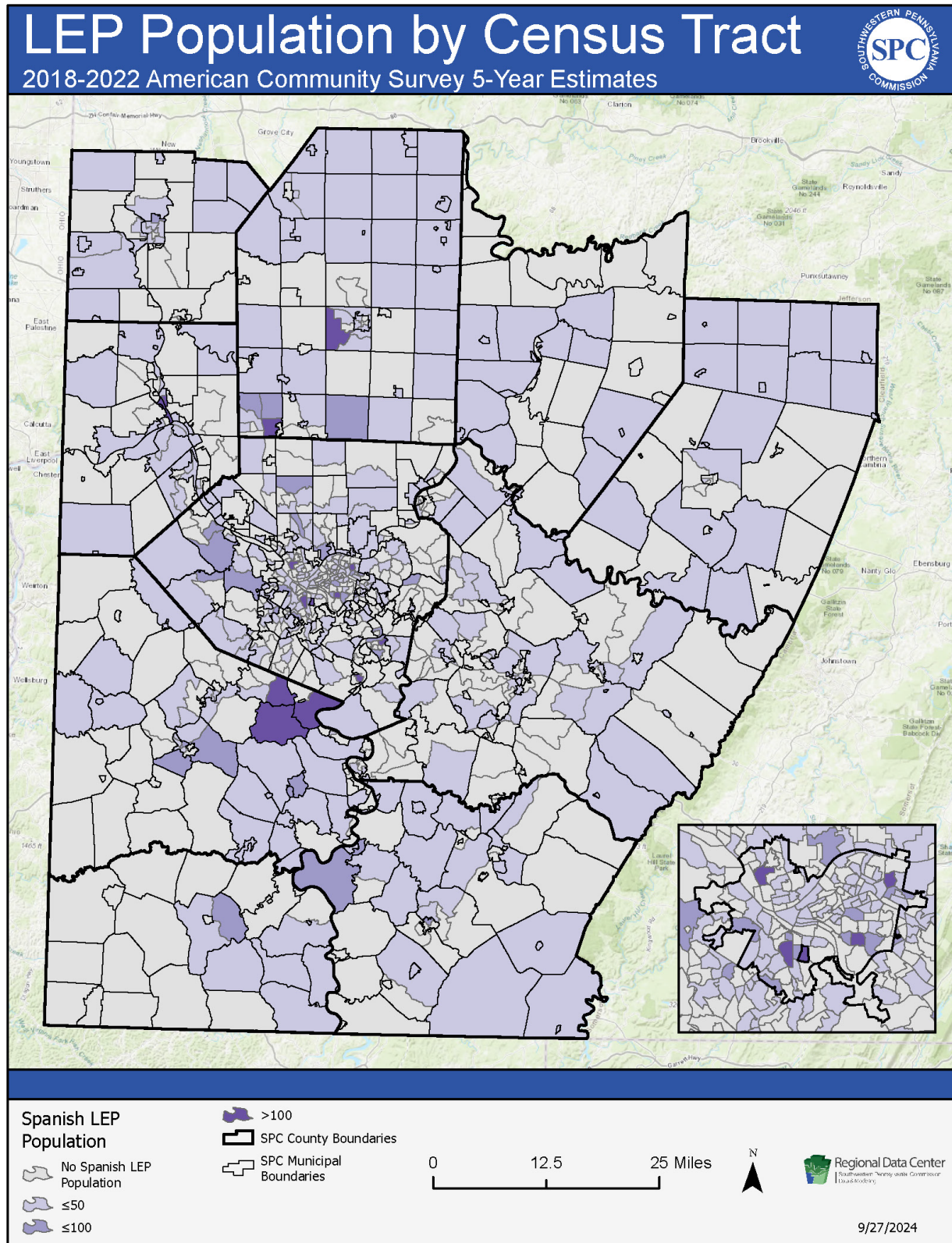
APPENDIX A

- [Map 1: Most Common LEP Languages](#)
- [Map 2: Spanish](#)
- [Map 3: Chinese](#)
- [Map 4: Other Indo-European Languages](#)

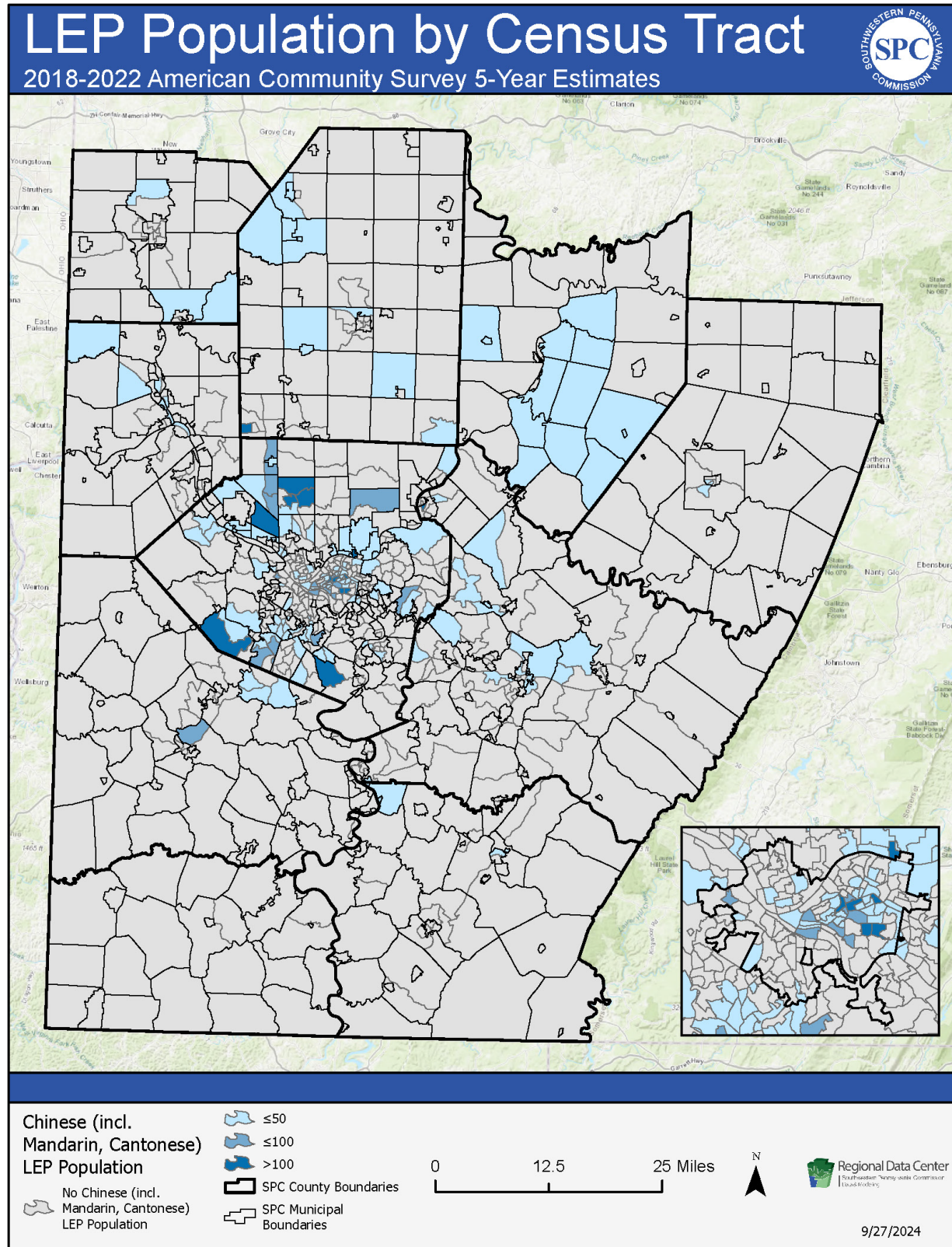
MAP 1: Most Common LEP Languages



Map 2. Spanish



Map 3: Chinese



Map 4: Other Indo-European Languages

