



Limited English Proficiency (LEP) Plan

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Hard copy versions will be provided upon request. For more information, please contact:

Wichita Area Metropolitan Planning Organization

271 W 3rd St., Suite 208, Wichita, KS 67202

Office: (316) 779-1313 | Fax: (316) 779-1311

wampo@wampo.org | www.wampo.org

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The Wichita Area Metropolitan Planning Organization (WAMPO) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities.

Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity under the control of WAMPO. Requests for special accommodation and/or language assistance should be made to wampo@wampo.org or by calling (316) 779-1313 at least 48 hours in advance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with WAMPO. Any such complaint must be in writing and filed with WAMPO's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information or to obtain a Title VI Discrimination Complaint Form, please visit www.wampo.org/title-vi or call (316) 779-1313.

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Introduction

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 considered Limited English Proficient, or “LEP.” These individuals are entitled to language assistance under Title VI of the Civil Rights Act of 1964, which includes protections against discrimination on the basis of national origin.

Consistent with Title VI of the Civil Rights Act of 1964 and as outlined in Federal Transit Administration (FTA) Circular 4702.1B, recipients of federal funding must take “reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).” WAMPO is the metropolitan planning organization (MPO) for the greater Wichita area and maintains this plan to document and guide its provisions, as an MPO, to comply with these requirements.

This document includes an analysis of the number of LEP individuals in the region, the extent to which LEP individuals participate in WAMPO’s processes, the resources available to WAMPO to provide language assistance services, and identification of the appropriate mix of LEP services that WAMPO can make available in order to provide meaningful access to the transportation planning process for people with a limited ability to communicate in English.

WAMPO’s Limited English Proficiency (LEP) Policy

WAMPO strives to provide meaningful access to the agency’s programs and activities through its public participation process. The intent of WAMPO’s public participation process is to engage the public and local stakeholders, including those with limited English proficiency.

Limited English Proficiency (LEP) Four-Factor Analysis

Federal Transit Administration (FTA) Circular 4702.1B outlines four factors that should be analyzed to determine the level and extent of language assistance required to sufficiently ensure meaningful access to programs, activities, and services within an MPO’s area of responsibility:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered;
2. The frequency of contact with LEP persons;
3. The nature and importance of the programs, activities, or services provided; and
4. The resources available for LEP outreach and associated costs.

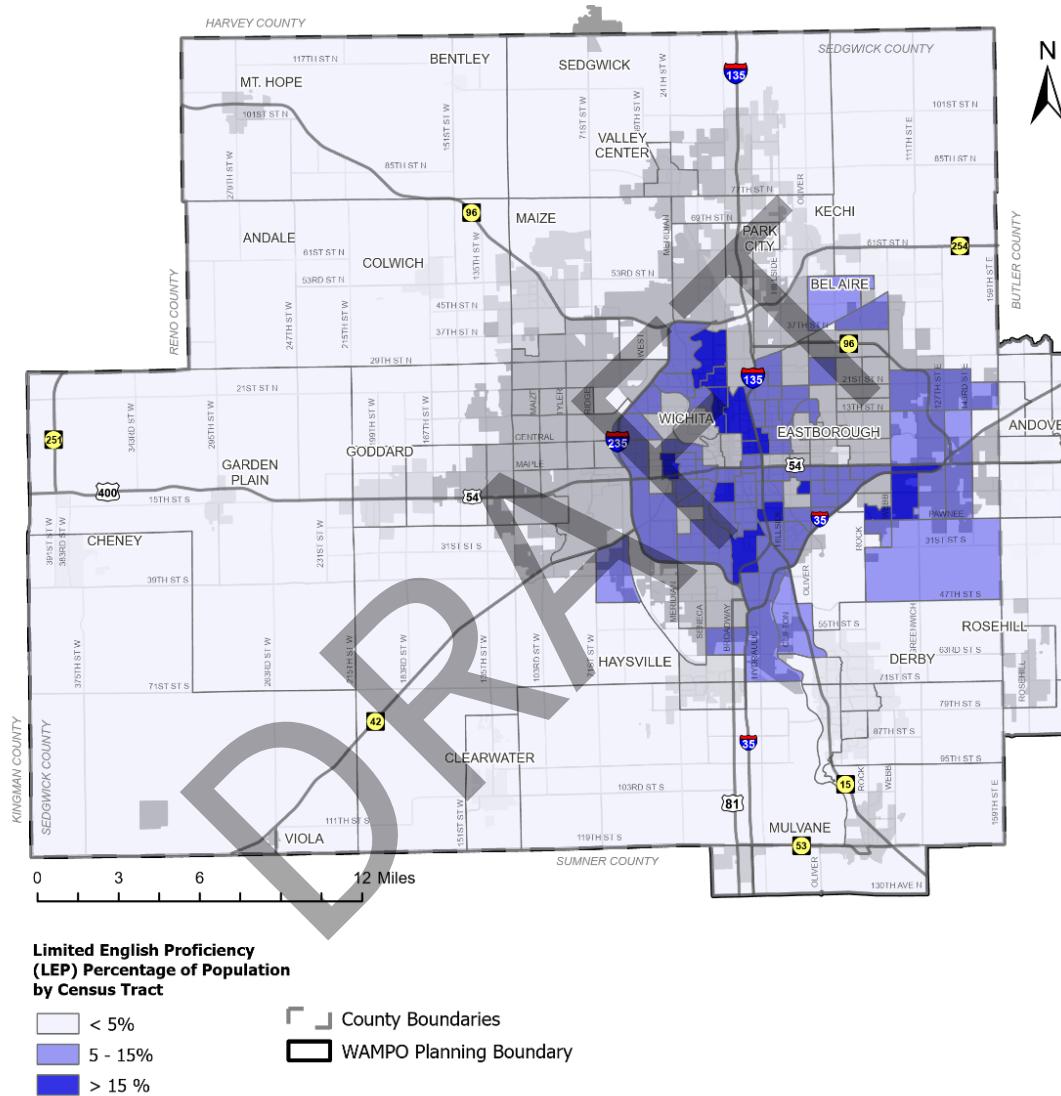
After conducting the four-factor analysis, an organization is considered to be in a better position to implement a cost-effective mix of proactive language assistance measures, target resources appropriately, and respond to requests for LEP assistance.

The four factors were analyzed for the WAMPO region and used to help identify what specific steps WAMPO could take to ensure meaningful access to its programs.

Factor One: Number or Proportion of LEP Persons Eligible to Be Served or Likely to Be Encountered

The LEP population in the WAMPO region makes up about 5.9% of the total population. Map 1 shows the LEP percentage of the population in each WAMPO-region Census Tract.

Map 1: Population Age 5 or Older Considered to Have Limited English Proficiency



To represent WAMPO-region LEP populations as accurately as possible, the most up-to-date data from the U.S. Census Bureau (2019-2023 American Community Survey (ACS) 5-year estimates) were analyzed to estimate the number of LEP persons living in the region. Identifying the LEP population assists WAMPO in determining the likelihood of encountering a person with limited capabilities to speak or read English during the metropolitan transportation planning process.

Data on individuals' language(s) spoken at home were reviewed for the WAMPO region to determine the proportion of the population age 5 or older considered to have limited English proficiency. The ACS categorizes people as speaking English "very well," "well," "not well," or "not at all"; the latter three categories are grouped together as "less than very well." For this analysis, the "less than very well" category is used to define the LEP population in the WAMPO region.

Findings

The most recent U.S. Census Bureau 5-Year (2019 – 2023) American Community Survey (ACS) estimates show the five most common languages in the WAMPO region are English, Spanish, Vietnamese, Arabic, and Chinese. Table 1, below, shows the size of the WAMPO-region LEP population relative to the overall population (age 5 or older).

Table 2: WAMPO-Region Limited English Proficiency (LEP) Profile

Language Category	Population Age 5 or Older	Percent of WAMPO Population Age 5 or Older
English Only	433,708	85.03%
Speaks English & Other Language	46,124	9.04%
LEP*	30,225	5.93%
Total	510,057	100.0%

U.S. Census Bureau, ACS 2019-2023 5-year estimates (C16001)

*Limited English Proficiency (LEP), corresponds to the Census Bureau designation, "speaks English less than very well."

Table 2, below, highlights the non-English languages most commonly spoken by LEP individuals in the WAMPO region:

Table 3: WAMPO Region Languages Spoken by LEP Individuals

Primary Language	Population Age 5 or Older	Percent of WAMPO Population Age 5 or Older
Spanish	18,564	3.64%
Vietnamese	5,389	1.06%
Arabic	850	0.17%
Chinese (incl. Mandarin, Cantonese)	796	0.16%
Other Non-English Languages	4,626	0.91%
Total	30,225	5.93%

U.S. Census Bureau, ACS 2019-2023 5-year estimates (C16001)

Factor Two: Frequency of Contact with LEP Persons

The frequency with which LEP individuals come into contact with WAMPO during the metropolitan transportation planning process is low and reflects the relatively small percentage of the regional population with a limited ability to speak English (5.93%, see Table 1).

WAMPO uses "I SPEAK" language identification cards developed by the U.S. Census Bureau at all WAMPO-hosted meetings, public hearings, and open houses. Information provided on these cards by meeting/hearing/open house attendees and other members of the public with whom WAMPO interacts

is one metric used to track the frequency with which LEP individuals contact WAMPO, in addition to facilitating communication with the LEP individuals who use the cards. To date, these cards have not been utilized by attendees at any WAMPO-sponsored event to indicate what language they speak. However, individuals who have limited English proficiency may have interacted with WAMPO without using the “I SPEAK” cards. For example, during the public engagement process for the development of Metropolitan Transportation Plan 2050 (MTP 2050), which began in 2023 and ended in 2025, bilingual English-Spanish WAMPO staff interacted with members of the public in Spanish during community events.

To date, no formal complaints about LEP procedures have been submitted to WAMPO. Despite this, WAMPO remains committed to exploring additional ways to be proactive and responsive in addressing the accessibility needs of the regional LEP population.

Factor Three: Nature and Importance of the Programs, Activities, or Services Provided

WAMPO does not provide any direct services that require vital, immediate, or emergency assistance, such as medical treatment or services for basic needs (e.g., food or shelter). Rather, WAMPO processes provide individuals with opportunities to be involved in the metropolitan area’s transportation planning. For all, such involvement in WAMPO’s public and stakeholder activities is voluntary and does not require applications, interviews, or other actions prior to participation. WAMPO encourages input from all stakeholders, and steps are taken to make the planning process as open as possible. As part of the efforts to make WAMPO more accessible for LEP populations, the WAMPO website, www.wampo.org, has a feature that translates English text into Spanish and Vietnamese, the two most common languages spoken by LEP individuals in the WAMPO region.

The transportation planning process is designed to identify regional needs and plan for future multimodal transportation projects to address those needs. Transportation improvements resulting from these planning activities have an impact on all residents. The impact of proposed transportation investments is evaluated in the long-range Metropolitan Transportation Plan (MTP) and the short-range Transportation Improvement Program (TIP). Once a project is selected for federal funding, its final planning, design, and construction/implementation are the responsibility of a local or state government agency.

Factor Four: Resources Available for LEP Outreach and Associated Costs

WAMPO gathered information from several translation and interpretation services to estimate the cost of translating its core documents into Spanish and Vietnamese, as shown in Table 3, below, using the cost per word rate schedule for the provider with whom WAMPO has established an on-call contract. It is anticipated that future actual costs would be higher than what is shown in Table 3, due both to the technical nature of many of WAMPO’s core documents and to the additional cost of translating maps and graphics, the text within which is not part of the approximate word counts in Table 3. The estimated cost of fully translating all of WAMPO’s core documents into Spanish and Vietnamese is approximately \$32,725.

Table 4: Estimated WAMPO Core-Document Translation Costs

Core Document		TIP	MTP	Public Participation Plan	UPWP	Total	
Approximate # of words		52,120	79,456	11,992	7,937	151,505	
Cost per word	Spanish	0.078	\$4,065.36	\$6,197.57	\$935.38	\$619.09	\$11,817.39
	Vietnamese	0.138	\$7,192.56	\$10,964.93	\$1,654.90	\$1,095.31	\$20,907.69
Total		\$11,257.92	\$17,162.50	\$2,590.27	\$1,714.39	\$32,725.08	

Source: Mid-American Language Services, 2025

Given the size of the LEP population in the WAMPO region and potential financial constraints, full multi-language translations of large transportation planning documents are not, at this time, considered warranted or an effective way to communicate. However, as detailed in the LEP Implementation Plan, below, WAMPO is committed to engaging all residents in the transportation planning process. Whether a translated executive summary of a given planning document is produced will depend on the availability of resources and the vitality of the document.

Safe Harbor Stipulation

FTA Circular 4702.1B includes a Safe Harbor stipulation so that recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A Safe Harbor stipulation indicates that, as long as a federal funding recipient (e.g., an MPO) 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. However, failure to provide written translations under the specified circumstances does not necessarily mean there is noncompliance, but rather provides recipients with a guide for greater certainty of compliance, in accordance with the above four-factor analysis.

Evidence of compliance with the recipient's written translation obligations under the Safe Harbor stipulation includes providing written translations of vital documents for each eligible LEP language group in the region that is either at least 5% of the overall population or at least 1,000 persons, whichever is less.

The Safe Harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

LEP Implementation Plan

Individuals with limited English proficiency are 5.93% of the population in the WAMPO region. Within that 5.93%, two language categories, Spanish speakers (18,564 people age 5 or older, equal to 3.64% of the regional total) and Vietnamese speakers (5,389 people age 5 or older, equal to 1.06% of the regional total), meet the Safe Harbor stipulation threshold for an eligible LEP language group (1,000 people or 5% of the overall population, whichever is less).

Accessible engagement is an important priority for WAMPO. All of WAMPO's vital Title VI documents are translated into Spanish and Vietnamese:

- Title VI Notice to the Public
- Title VI Complaint Form
- Your Rights Under Title VI (brochure)
- WAMPO Resident's Guide

In addition, WAMPO may produce translations of other documents, when possible and reasonable, based on the requests and needs of the public and as outlined in the WAMPO Public Participation Plan and Title VI Program Manual. WAMPO generally translates the Executive Summary of core documents, such as the Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP), and develops translated versions of public engagement tools, such as community surveys. Upon request, WAMPO will take reasonable steps to provide interpretation during public events and meetings.

WAMPO's strategies to implement the LEP plan and track and provide language assistance services to the LEP population in the region include identifying LEP individuals, providing language assistance upon request, providing notice of available language services to LEP individuals, WAMPO staff training, and monitoring and updating the LEP plan. These strategies are elaborated below.

Identifying LEP Individuals

WAMPO staff use language identification cards when first encountering an LEP individual at a public meeting or event. The U.S. Census Bureau created the language identification cards used by WAMPO. They have the phrase "Mark this box if you read or speak [name of language]" printed in 38 different languages. These cards are made available in the WAMPO offices and at all public meetings. Once an individual's language has been identified, staff evaluate the feasibility of providing translation or interpretation assistance.

The language identification cards can be viewed and downloaded at <https://bit.ly/I-Speak-Language-Identification-Cards>.

Language Assistance

Language assistance is provided for LEP individuals through the translation of key materials, as well as through interpretation assistance for spoken communication (including sign language interpretation) and alternative formats for written materials (such as large print or braille) when necessary and possible.

Language assistance may include the use of over-the-phone/virtual interpretation services, web-based translators, the use of bilingual staff (as available), bringing in competent bilingual interpreters, recruiting community volunteers, or accepting help from family members or friends of LEP individuals, where the LEP individual so desires. WAMPO will attempt to procure professional interpretation and translation services as necessary.

MPO staff will assist LEP individuals to the best of their ability and using all available resources, but cannot guarantee the accuracy of any translation or interpretation provided.

Providing Notice of Available Language Services to LEP Individuals

WAMPO is committed to implementing and/or maintaining the following strategies to notify the public of language assistance services:

- Spanish and Vietnamese translations of vital Title VI documents (see above), as well as additional document translations, when possible, are available on the WAMPO website, www.wampo.org. These documents are also available upon request at the WAMPO offices and are distributed to WAMPO-region libraries.
- WAMPO will collaborate with community-based organizations and other stakeholders to inform LEP individuals about documents available in languages other than English and about language assistance services.
- WAMPO provides Title VI notice, with instructions on how to obtain a Title VI Complaint Form and how to request special accommodations and/or language interpretation in all distributed materials.

WAMPO Staff Training

In order to establish meaningful access to information and services for LEP individuals, staff who regularly interact with the public are briefed on the WAMPO LEP plan and how to assist LEP individuals; this includes how to use language identification cards and the steps for assisting LEP populations (see Appendix A). Training ensures that staff members can effectively work in person and/or by telephone with LEP individuals, as well as handle Title VI complaints. WAMPO management staff are included in this training, even if they do not interact regularly with LEP individuals, to ensure that they fully understand the LEP plan and can reinforce its importance and ensure its implementation by staff.

Monitoring and Updating the LEP Plan

This LEP plan will be reviewed and updated as needed or on a schedule similar to that for the WAMPO Title VI Program Manual (every three years). Updates will consider, to the extent practical:

- Data analyses indicating whether LEP populations have significantly changed in terms of their size, the proportion of the overall population that they constitute, or their geographic distribution within the WAMPO region.
- The number of encounters between WAMPO and LEP individuals.
- How effective the LEP plan has been for communication with LEP individuals.
- Complaints submitted to WAMPO about LEP procedures, which should be reviewed and then documented and addressed in the updated LEP plan.
- Any changes to federal or state guidance that may require particular changes to the LEP plan.

Future updates to this LEP plan will include, to the extent practical:

- Reassessment of the four-factor analysis.
- Documentation of the number of LEP persons likely to be encountered.
- Documentation of any complaints submitted to WAMPO about LEP procedures and any actions taken, if necessary, to address such complaints.
- A general assessment of how the needs of LEP individuals have been and are being addressed.

Complaint Process

To file a complaint regarding discrimination in LEP-related practices or activities, please fill out the Title VI Complaint Form, available at www.wampo.org/title-vi, or contact WAMPO staff for assistance.

Paper copies of the Title VI complaint procedures and forms are also available at the WAMPO offices, 271 W 3rd St., Suite 208, Wichita, KS 67202, and can be provided through the mail upon a request being received at wampo@wampo.org or (316) 779-1313.

Should an LEP complaint be filed, the Title VI review process will be followed. Complaints may also be filed directly with the U.S. Department of Justice. More information can be found at <https://www.justice.gov/actioncenter/submit-complaint>.

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Appendix A: Steps for WAMPO Staff to Assist LEP Population

The information below is provided as a general reference for the steps WAMPO staff will take to assist LEP individuals. The steps are not comprehensive to all situations, but rather are provided as a guide to outline WAMPO's commitment to providing assistance.

Face-to-Face Interaction

Step 1: Once you have ascertained that an individual needs assistance in a language other than English, use the language identification cards to identify the language the individual needs assistance in. You might also use online resources to identify the language and fulfill simple requests, in which case you can skip to Step 7.

Step 2: Once the individual's preferred language has been identified, do your best to let them know you will try to contact someone to assist them in that language.

Step 3: Reference WAMPO internal contact information for staff who may be able to help interpret.

Step 4: If no one is available to interpret, reach out to WAMPO's independent interpretation/translation service provider, as outlined in Appendix B.

Step 5: Call the telephone number listed in Appendix B and wait for an interpreter to answer your call.

Step 6: Put the phone call on speaker and ask the LEP individual for their contact information and the best way to answer their questions.

Step 7: Document any information provided by the LEP individual, anything requested by them, how long the interaction lasted, and the LEP individual's contact information, and save that documentation in the designated WAMPO LEP folder on the WAMPO server.

Step 8: After the interaction is completed, if a paid interpretation/translation service was used, save a copy of the invoice.

Phone Call Interaction

Step 1: Once you have ascertained that an individual needs assistance in a language other than English, do your best to convey a request that they identify the language in which they would feel more comfortable communicating.

Step 2: Once the individual's preferred language has been identified, do your best to let them know you will try to contact someone to assist them in that language.

Step 3: Reference WAMPO internal contact information for staff who may be able to help interpret.

Step 4: If no one is available to interpret, reach out to WAMPO's independent interpretation/translation service provider, as outlined in Appendix B.

Step 5: Call the telephone number listed in Appendix B and wait for an interpreter to answer your call.

Step 6: Turn the phone call into a three-way conference call between yourself, the LEP caller, and the interpretation service, then ask the LEP caller for their contact information and the best way to answer their questions.

Step 7: Document any information provided by the LEP individual, anything requested by them, how long the interaction lasted, and the LEP individual's contact information, and save that documentation in the designated WAMPO LEP folder on the WAMPO server.

Step 8: Once the interaction is completed, if a paid interpretation/translation service was used, save a copy of the invoice.

[**Written Document Translation/Alternative Format Request**](#)

Step 1: Contact WAMPO's independent interpretation/translation service provider, if applicable, and request an estimate to translate the document(s) that was/were the subject of the request.

Step 2: Contact the WAMPO Title VI Coordinator and WAMPO Executive Director for approval to pay for the requested translation(s). Depending on resource availability, WAMPO will commission translations of important documents and make those translations available on the WAMPO website.

Step 3A: If the translation expenditure is approved, let the requester know the timeframe when the finished translation is expected to be available.

Step 3B: WAMPO will make every effort to fulfil the request, but if resources are not available to do so, let the requester know that, because of limited resource availability, WAMPO is unable to fulfill their request at this time. Inform the requester about the other materials that are available on the WAMPO website and encourage the use of various online translation and language-assistance resources, many of which are available at no cost.

Step 4: Document the interaction in its entirety, as best as possible, including any information provided by the requester, what they requested, how long the interaction lasted (if it was in person or over the telephone, as opposed to correspondence via mail, fax, or email), the requester's contact information, and WAMPO response, and save that documentation in the designated WAMPO LEP folder on the WAMPO server.

Appendix B: Translation/Interpretation Services Provider

Placeholder for reference information about Mid-American Language Services (MALS), WAMPO's preferred partner for translation, interpretation, and related language-access services. Information added for reference may include the translation/interpretation services available, rates, and how to submit a translation or interpretation services request with the provider.