



Limited English Proficiency (LEP) and Four Factor Analysis Webinar

July 28, 2022

Title VI Branch

Office of Civil Rights (OCR)

Poll #1



Training Overview

- **Why have an LEP Program?**
- **Why do a Four Factor Analysis?**
- **How to Conduct an LEP Four-Factor Analysis?**



Why have an LEP Program?

- **It's the law/requirement.**
- **It is the right thing to do; to not discriminate.**
- **It minimizes/mitigates the impact on LEP communities, and the recipient receives the LEP communities' buy-in.**



LEP Example

- <https://youtu.be/tMI3Ct3fjlo>

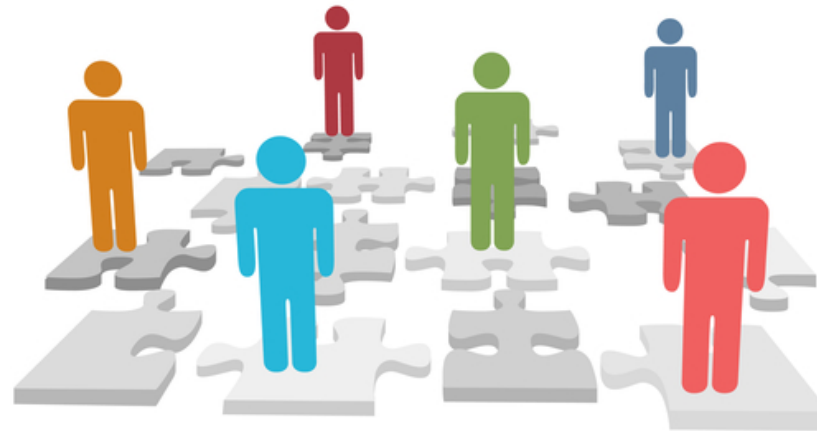
Why do a Four Factor Analysis?

- **Determine the language needs for the project or service area.**
- **Gather data to include in the Language Access Plan.**



How to do an LEP Four-Factor Analysis?

[FHWA's U.S. Census – Limited English Proficiency Data Collection Walkthrough](#)



LEP Four-Factor Analysis

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; and
4. The **resources** available to the grantee/recipient or agency, and costs.

Factor 1

The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

- Interpretation (oral) vs. Translation (written)
- Use demographic data available
 - U.S. Census Bureau
<http://data.census.gov>
 - Other federal/state/local agency data



Factor 1 (cont.)

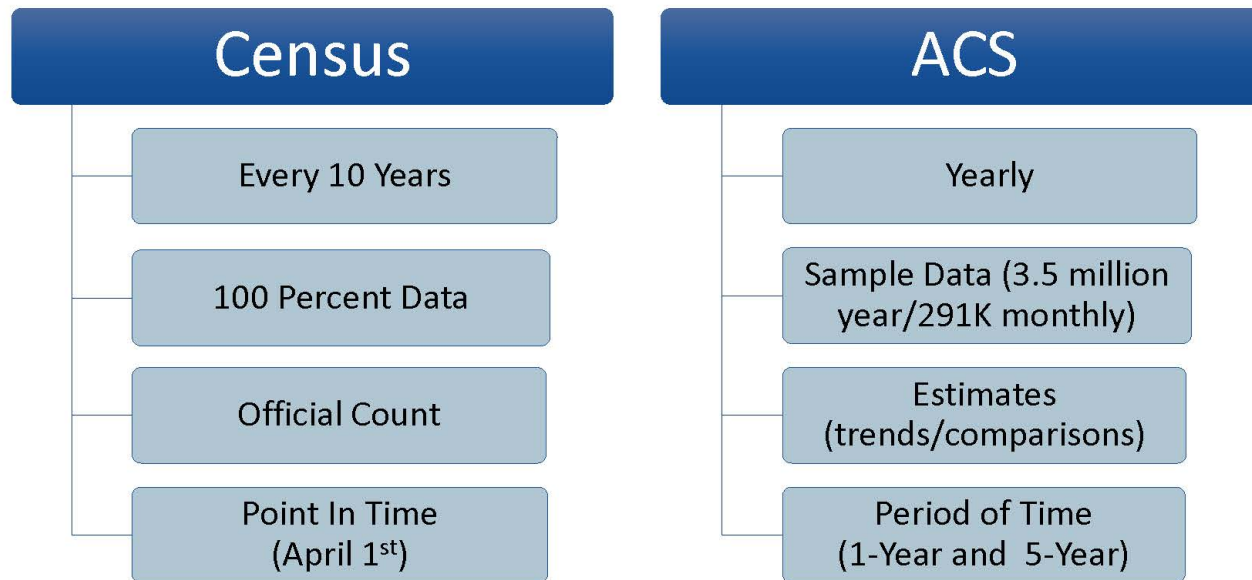
- When determining the need for translations (written), use the **safe harbor** rule.

Table 1

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

Factor 1 (cont.)

Differences Between Decennial Census and ACS



Factor 1 (cont.)

ACS Period Estimates

1-Year
Estimates

- Geographies of 65,000 or more

5-Year
Estimates

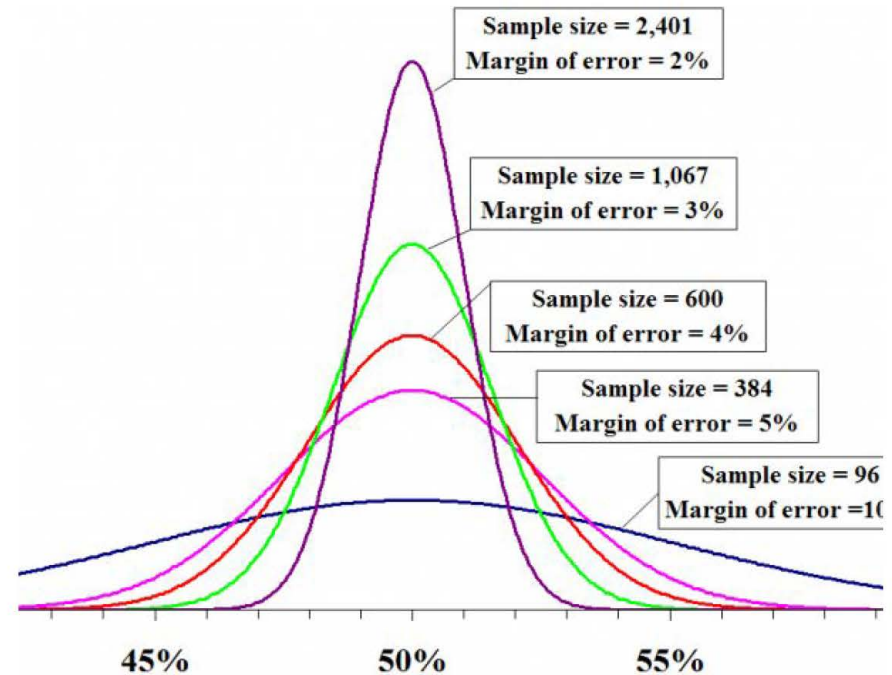
- All geographies

Factor 1 (cont.)

1-Year Estimates = More Recent, Less Accurate
5-Year Estimates = Less Recent, More Accurate

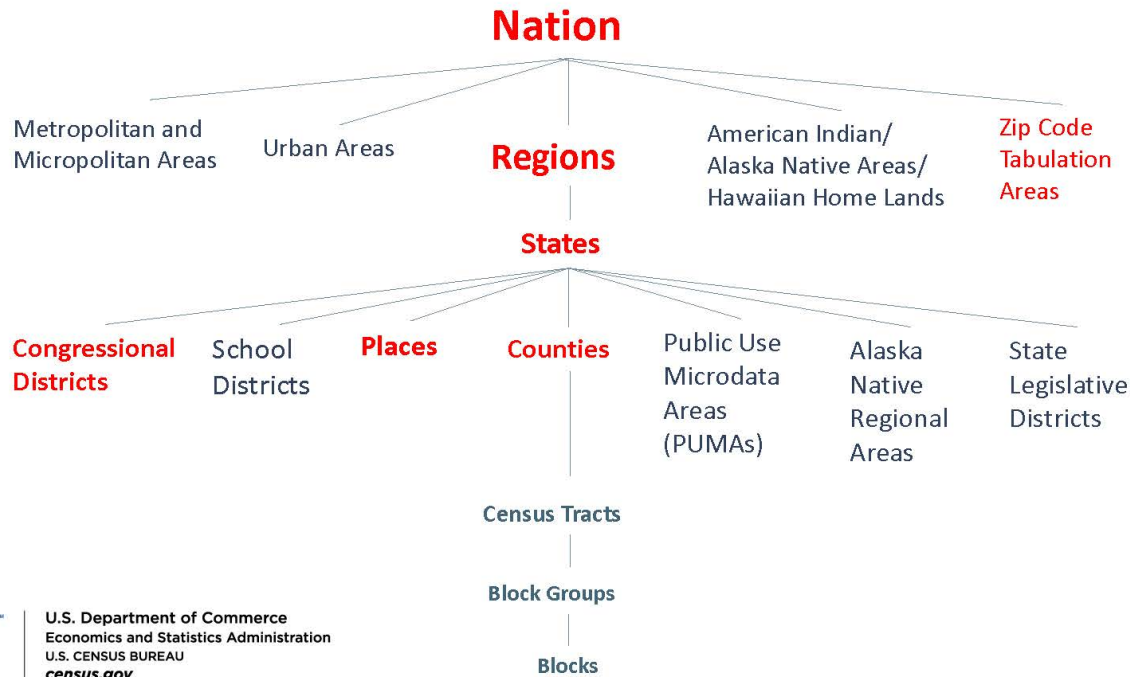
We don't recommend comparing 1-Year to 5-Year Estimates.

When comparing 5-Year Estimates, compare non-overlapping periods.



Factor 1 (cont.)

Available Geographic Areas



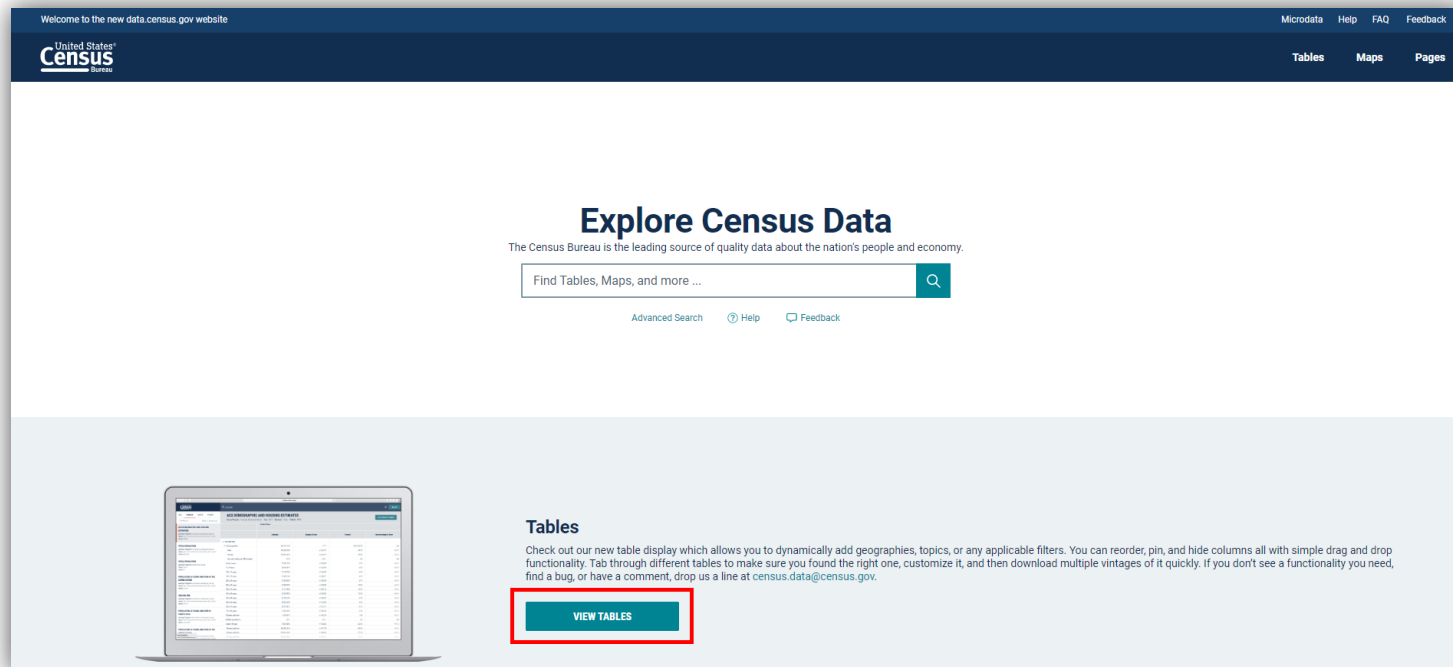
Factor 1 (cont.)

- U.S. Census Bureau Example #1

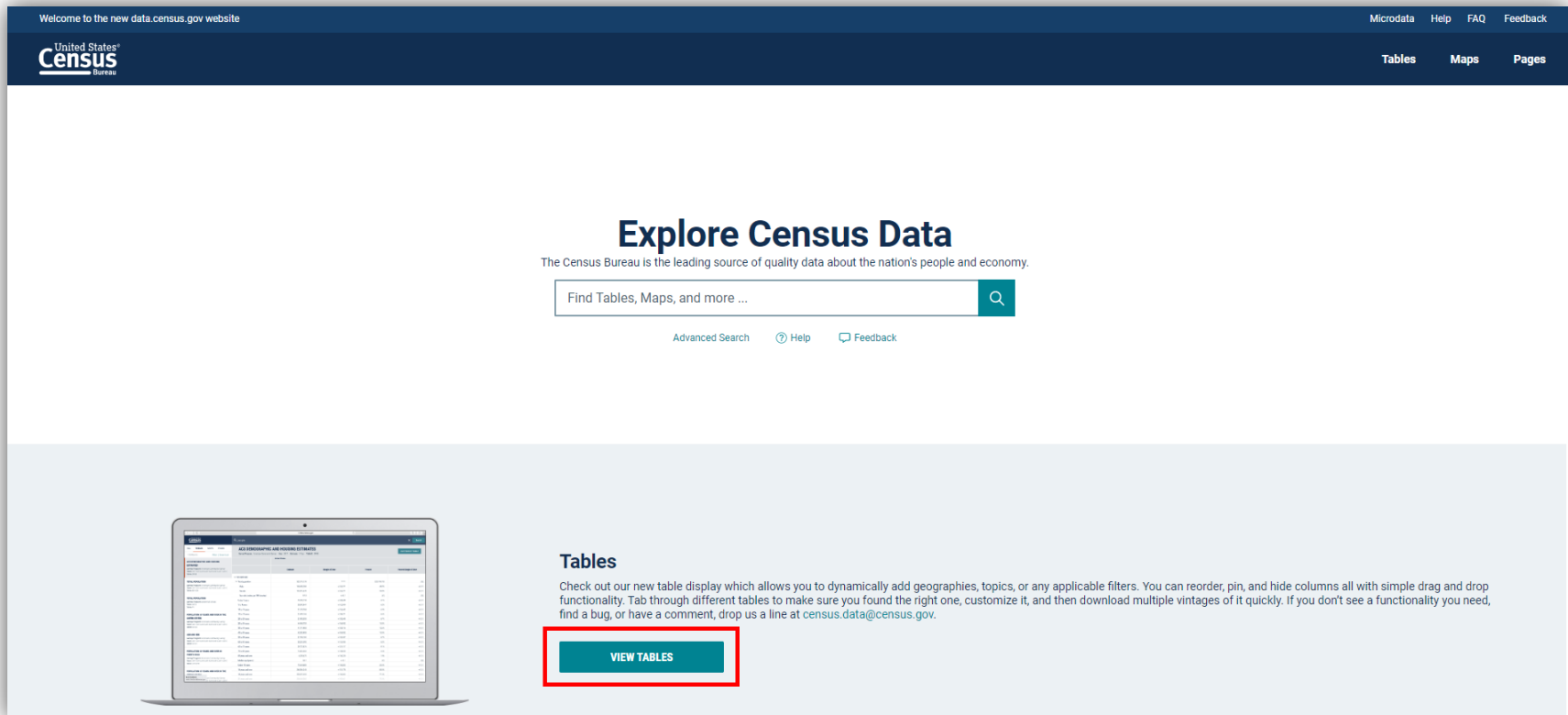
The example that follows will demonstrate how to gather this data through a simple search to download the **C16001** table data at the tract level for Los Angeles County, California from the 5-year ACS.

Factor 1 (cont.)

Step 1: First, navigate to <https://Data.Census.Gov>, scroll to the middle of the page, and click on “VIEW TABLES.”



Factor 1 (cont.)



Welcome to the new data.census.gov website

United States Census Bureau

Microdata Help FAQ Feedback

Tables Maps Pages

Explore Census Data

The Census Bureau is the leading source of quality data about the nation's people and economy.

Find Tables, Maps, and more ...

Advanced Search Help Feedback

Tables

Check out our new table display which allows you to dynamically add geographies, topics, or any applicable filters. You can reorder, pin, and hide columns all with simple drag and drop functionality. Tab through different tables to make sure you found the right one, customize it, and then download multiple vintages of it quickly. If you don't see a functionality you need, find a bug, or have a comment, drop us a line at census.data@census.gov.

VIEW TABLES

Factor 1 (cont.)

Step 2: At the top of the page, click on the text box that says “Search” near a magnifying glass icon. Type “**C16001**” (without quotes) and click on the “**Search**” button. It may take a moment for the page to load.

Factor 1 (cont.)

United States Census Bureau

C16001

Advanced Search

All Tables Maps Pages

Microdata Help FAQ Feedback

1 Filter

Clear all

C16001

Find a Filter

Search

Codes >

Geography >

Surveys >

Topics >

Years >

1 Result

View: 10 | 25 | 50

Download Table Data

American Community Survey

C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

Notes Geos Years Topics Surveys Codes Hide Transpose Margin of Error Restore Excel CSV ZIP Print Map

United States		
Label	Estimate	Margin of Error
▼ Total:	306,919,116	±3,608
Speak only English	240,826,040	±186,836
▼ Spanish:	40,537,337	±116,986
Speak English "very well"	24,587,755	±65,450
Speak English less than "very well"	15,949,582	±73,989
▼ French, Haitian, or Cajun:	2,060,712	±18,836
Speak English "very well"	1,480,593	±14,564
Speak English less than "very well"	580,119	±9,021
▼ German or other West Germanic languages:	1,400,064	±11,256
Speak English "very well"	1,118,666	±9,587
Speak English less than "very well"	281,398	±5,555

Factor 1 (cont.)

Step 3: Click the “**Product**” box at the top of the page and select “**2020: ACS 5-Year Estimates Detailed Tables**” from the drop-down menu. This page will display a larger **C16001** table with many options. For now, click on the “**Geographies**” button near the top-left of the page to show the geography selection box.

Factor 1 (cont.)

United States Census Bureau

C16001

Advanced Search

All Tables Maps Pages Microdata Help FAQ Feedback

1 Filter

Clear all

C16001

1 Result

View: 10 | 25 | 50 Download Table Data

American Community Survey

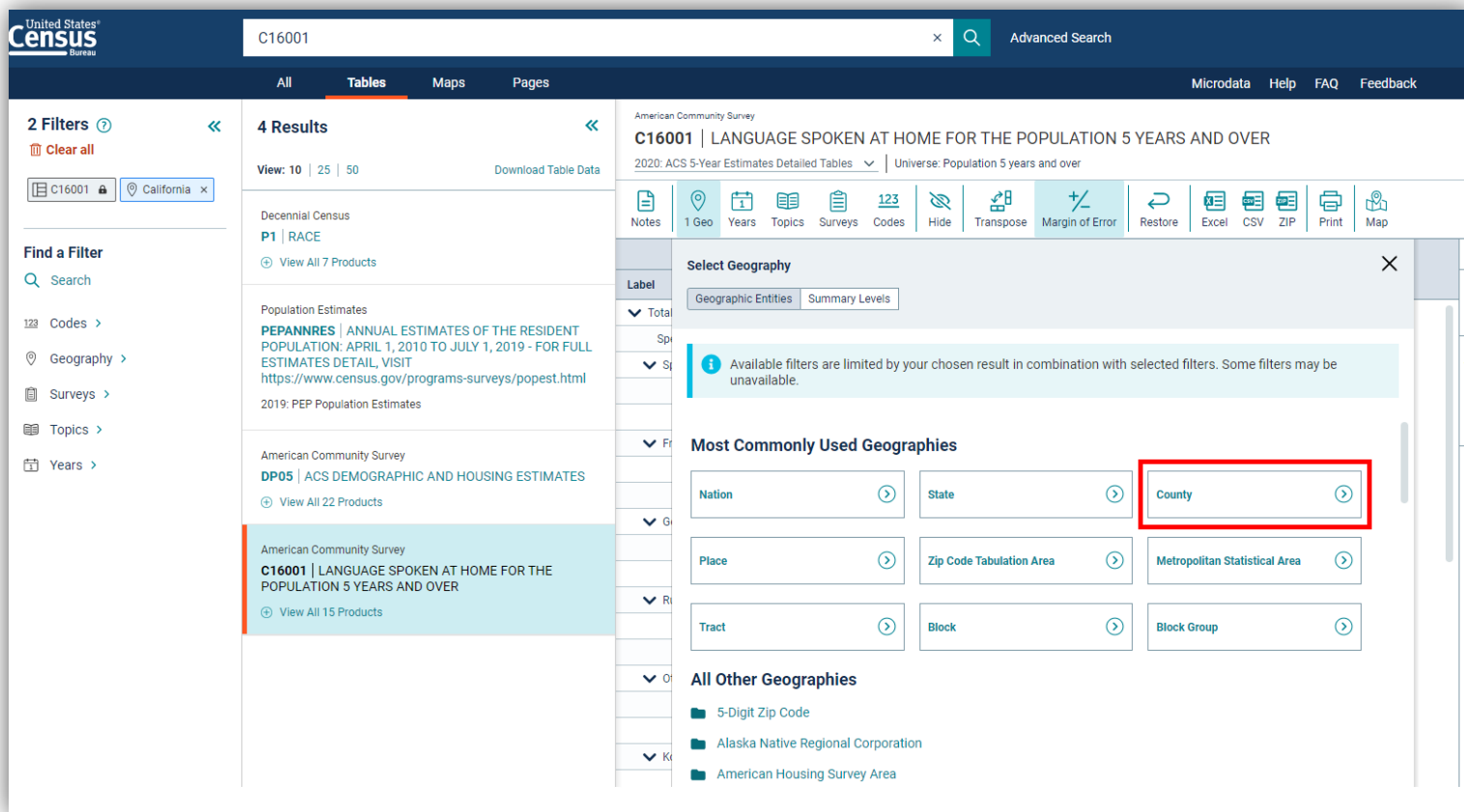
C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

Notes Geos Years Topics Surveys Codes Hide Transpose Margin of Error Restore Excel CSV ZIP Print Map

United States		Estimate	Margin of Error
Label			
▼ Total:		306,919,116	±3,608
Speak only English		240,826,040	±186,836
▼ Spanish:		40,537,337	±116,986
Speak English "very well"		24,587,755	±65,450
Speak English less than "very well"		15,949,582	±73,989
▼ French, Haitian, or Cajun:		2,060,712	±18,836
Speak English "very well"		1,480,593	±14,564
Speak English less than "very well"		580,119	±9,021
▼ German or other West Germanic languages:		1,400,064	±11,256
Speak English "very well"		1,118,666	±9,587
Speak English less than "very well"		281,398	±5,555

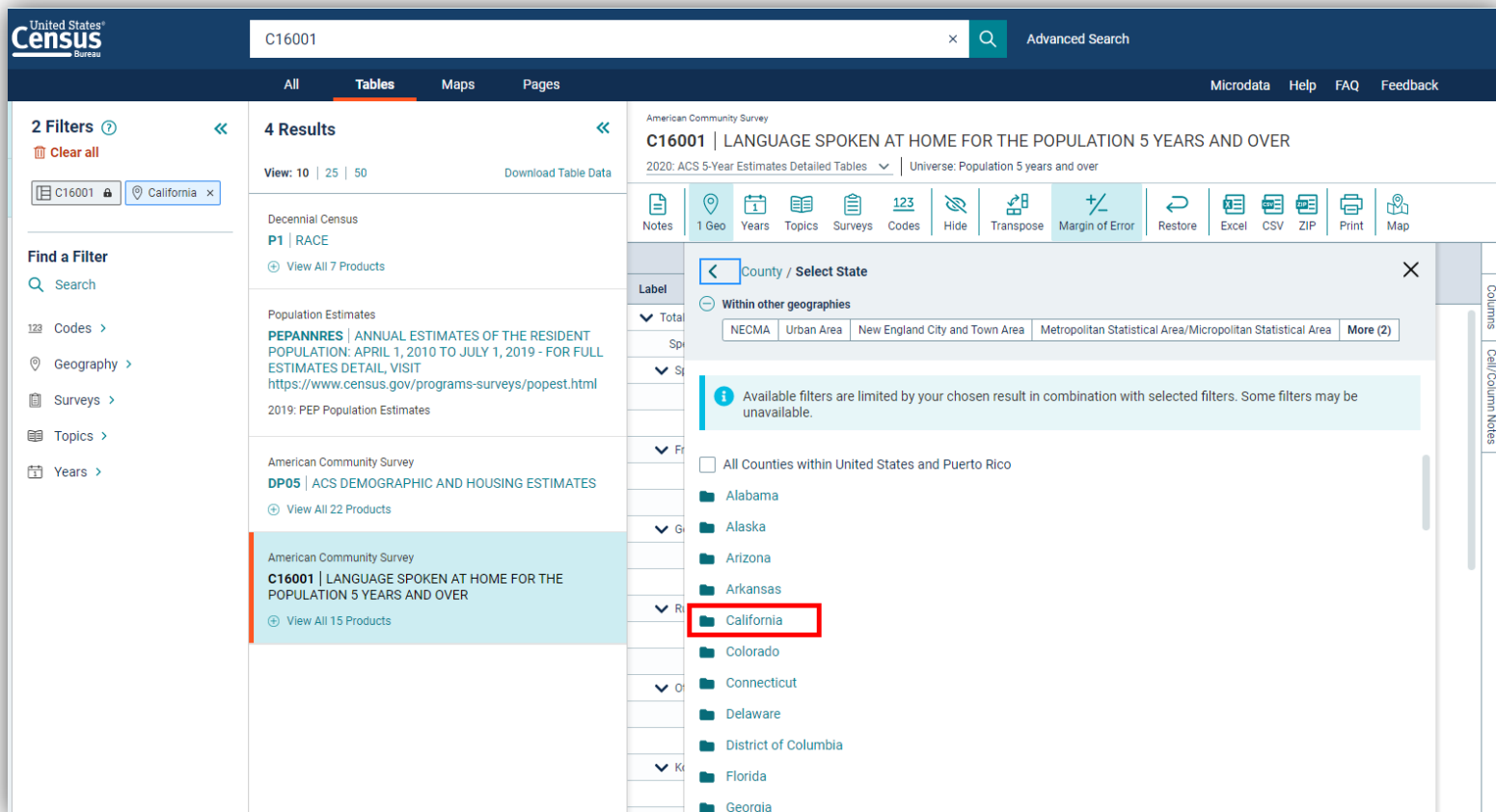
Factor 1 (cont.)



The screenshot displays the Census Bureau data tool interface. At the top, the search bar contains 'C16001' and the page title is 'C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER'. The interface is divided into several sections:

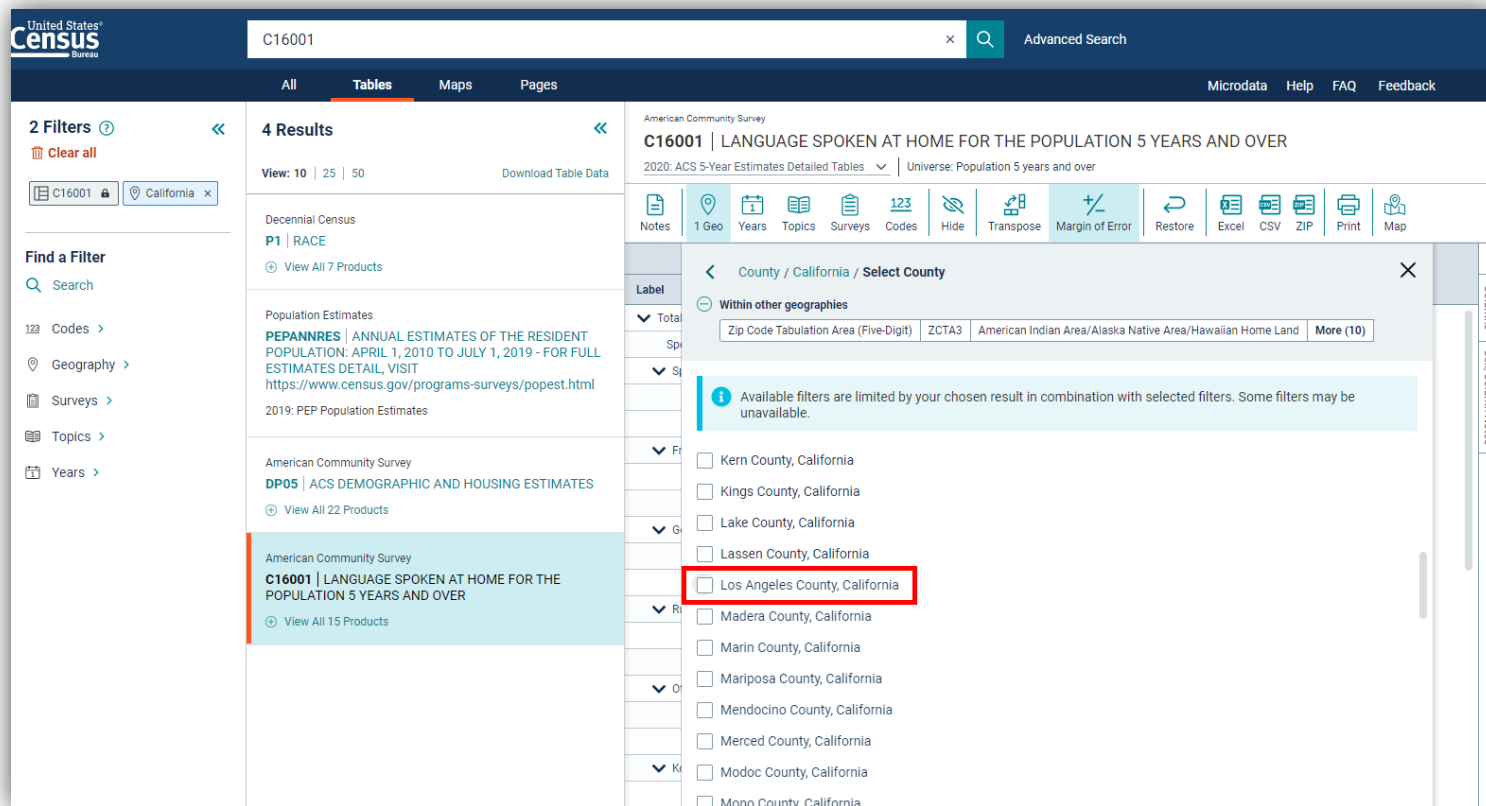
- Filters:** Shows '2 Filters' including 'C16001' and 'California'.
- Results:** Lists '4 Results' with details for 'PEPANNRES | ANNUAL ESTIMATES OF THE RESIDENT POPULATION: APRIL 1, 2010 TO JULY 1, 2019 - FOR FULL ESTIMATES DETAIL, VISIT https://www.census.gov/programs-surveys/pepest.html' and 'C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER'.
- Geography Selection:** A 'Select Geography' panel is open, showing 'Most Commonly Used Geographies' with 'County' highlighted in a red box. Other options include Nation, State, Place, Zip Code Tabulation Area, Metropolitan Statistical Area, Tract, Block, and Block Group.
- Tools:** A toolbar at the top right includes options for Notes, 1 Geo, Years, Topics, Surveys, Codes, Hide, Transpose, Margin of Error, Restore, Excel, CSV, ZIP, Print, and Map.

Factor 1 (cont.)



The screenshot shows the United States Census Bureau data portal interface. At the top, the search bar contains 'C16001' and 'Advanced Search'. The main navigation bar includes 'All', 'Tables', 'Maps', and 'Pages'. The left sidebar shows '2 Filters' (C16001 and California) and a 'Find a Filter' section. The main content area displays '4 Results' for the table 'C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER'. A dropdown menu for 'County / Select State' is open, showing a list of states with 'California' highlighted in a red box. Other states listed include Alabama, Alaska, Arizona, Arkansas, Colorado, Connecticut, Delaware, District of Columbia, Florida, and Georgia. A message box states: 'Available filters are limited by your chosen result in combination with selected filters. Some filters may be unavailable.'

Factor 1 (cont.)



The screenshot shows the United States Census Bureau website interface. The search bar at the top contains 'C16001'. The main content area displays search results for 'C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER'. On the left, there are filters for 'C16001' and 'California'. The results list includes 'American Community Survey' and 'C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER'. A dropdown menu is open for 'County / California / Select County', showing a list of California counties. The 'Los Angeles County, California' option is highlighted with a red box. Other counties listed include Kern, Kings, Lake, Lassen, Madera, Marin, Mariposa, Mendocino, Merced, Modoc, and Mono.

Factor 1 (cont.)

United States Census Bureau

C16001 Advanced Search

All **Tables** Maps Pages

American Community Survey

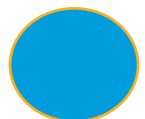
C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

Notes | 1 Geo | Years | Topics | Surveys | Codes | 123 | Hide | Transpose | Margin of Error | Restore | Excel | CSV | ZIP | Print | Map

Los Angeles County, California

Label	Estimate
▼ Total:	9,447,621
Speak only English	4,148,408
▼ Spanish:	3,657,846
Speak English "very well"	2,199,669
Speak English less than "very well"	1,458,177
▼ French, Haitian, or Cajun:	42,488
Speak English "very well"	35,984
Speak English less than "very well"	6,504
▼ German or other West Germanic languages:	26,797
Speak English "very well"	23,856
Speak English less than "very well"	2,941
▼ Russian, Polish, or other Slavic languages:	68,972
Speak English "very well"	40,298
Speak English less than "very well"	28,674
▼ Other Indo-European languages:	370,326
Speak English "very well"	227,962
Speak English less than "very well"	142,364
▼ Korean:	167,915
Speak English "very well"	68,397
Speak English less than "very well"	99,518
▼ Chinese (incl. Mandarin, Cantonese):	386,759
Speak English "very well"	158,330
Speak English less than "very well"	228,429



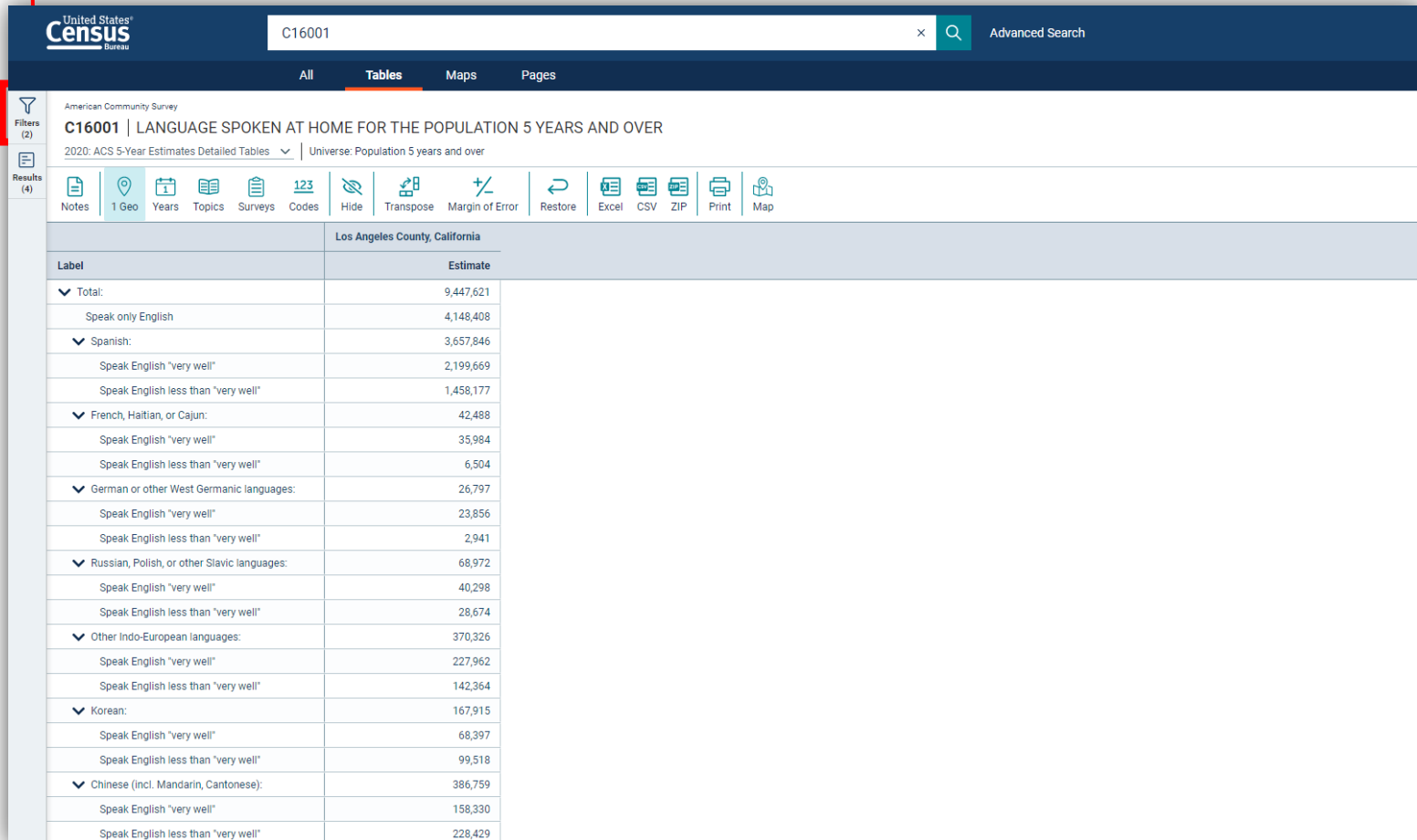
Factor 1 (cont.)

- U.S. Census Bureau Example #2

The example that follows will demonstrate how to gather this data through a simple search to download the **C16001** table data at the tract level for zip code **91214** in Los Angeles County from the 5-year ACS.

Click here

Factor 1 (cont.)



United States Census Bureau
C16001
Advanced Search

American Community Survey
C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER
2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

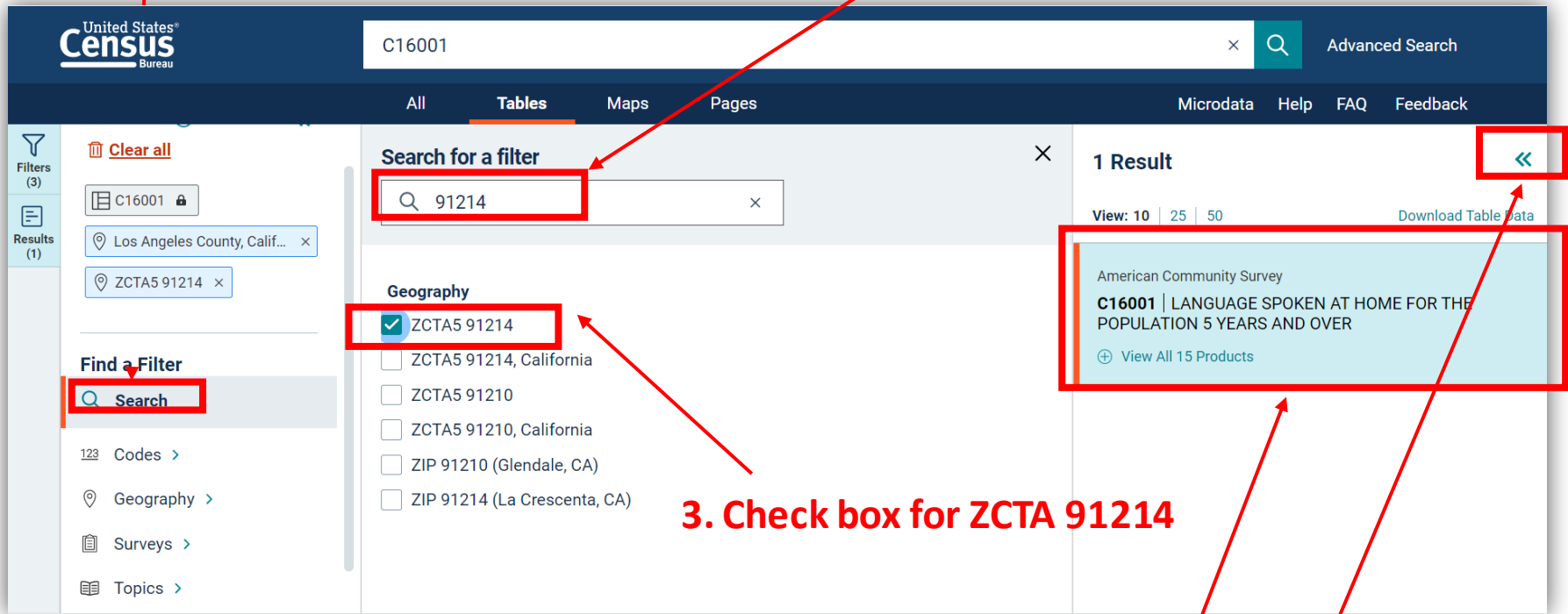
Notes | 1 Geo | Years | Topics | Surveys | Codes | Hide | Transpose | Margin of Error | Restore | Excel | CSV | ZIP | Print | Map

Los Angeles County, California	
Label	Estimate
▼ Total:	9,447,621
Speak only English	4,148,408
▼ Spanish:	3,657,846
Speak English "very well"	2,199,669
Speak English less than "very well"	1,458,177
▼ French, Haitian, or Cajun:	42,488
Speak English "very well"	35,984
Speak English less than "very well"	6,504
▼ German or other West Germanic languages:	26,797
Speak English "very well"	23,856
Speak English less than "very well"	2,941
▼ Russian, Polish, or other Slavic languages:	68,972
Speak English "very well"	40,298
Speak English less than "very well"	28,674
▼ Other Indo-European languages:	370,326
Speak English "very well"	227,962
Speak English less than "very well"	142,364
▼ Korean:	167,915
Speak English "very well"	68,397
Speak English less than "very well"	99,518
▼ Chinese (incl. Mandarin, Cantonese):	386,759
Speak English "very well"	158,330
Speak English less than "very well"	228,429

Factor 1 (cont.)

1. Click here

2. Enter 91214



United States Census Bureau

C16001

Advanced Search

All **Tables** Maps Pages

Microdata Help FAQ Feedback

Filters (3)

Clear all

C16001

Los Angeles County, Calif...

ZCTA5 91214

Find a Filter

Search

123 Codes >

Geography >

Surveys >

Topics >

Search for a filter

91214

Geography

ZCTA5 91214

ZCTA5 91214, California

ZCTA5 91210

ZCTA5 91210, California

ZIP 91210 (Glendale, CA)

ZIP 91214 (La Crescenta, CA)

1 Result

View: 10 | 25 | 50

Download Table Data

American Community Survey

C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

View All 15 Products

3. Check box for ZCTA 91214

4. Select C16001 and collapse field

Factor 1 (cont.)

United States Census Bureau

C16001 Advanced Search

All **Tables** Maps Pages

American Community Survey

C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

Notes 2 Geos Years Topics Surveys Codes 123 Hide Transpose Margin of Error Restore Excel CSV ZIP Print Map

Los Angeles County, California ZCTA5 91214

Label	Estimate	Estimate
▼ Total:	9,447,621	29,749
Speak only English	4,148,408	16,212
▼ Spanish:	3,657,846	2,323
Speak English "very well"	2,199,669	1,681
Speak English less than "very well"	1,458,177	642
▼ French, Haitian, or Cajun:	42,488	86
Speak English "very well"	35,984	76
Speak English less than "very well"	6,504	10
▼ German or other West Germanic languages:	26,797	157
Speak English "very well"	23,856	157
Speak English less than "very well"	2,941	0
▼ Russian, Polish, or other Slavic languages:	68,972	78
Speak English "very well"	40,298	52
Speak English less than "very well"	28,674	26
▼ Other Indo-European languages:	370,326	4,621
Speak English "very well"	227,962	3,523
Speak English less than "very well"	142,364	1,098
▼ Korean:	167,915	3,987
Speak English "very well"	68,397	1,835
Speak English less than "very well"	99,518	2,152
▼ Chinese (incl. Mandarin, Cantonese):	386,759	437
Speak English "very well"	158,330	299
Speak English less than "very well"	228,429	138

Poll #2



Factor 1 (cont.)

United States[®]
Census
Bureau

C16001

All **Tables** Maps Pages

American Community Survey

C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

Notes | 2 Geos | Years | Topics | Surveys | Codes | Hide | Transpose | Margin of Error | Restore | Excel | CSV | ZIP | Print | Map

	Los Angeles County, California	ZCTA5 91214
Label	Estimate	Estimate
▼ Spanish: <ul style="list-style-type: none"> Speak English "very well" Speak English less than "very well" 	3,657,846	2,323
▼ French, Haitian, or Cajun: <ul style="list-style-type: none"> Speak English "very well" Speak English less than "very well" 	42,488	86
	35,984	76
	6,504	10

Poll #3



Factor 1 (cont.)

United States Census Bureau

C16001

All **Tables** Maps Pages

American Community Survey

C16001 | LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER

2020: ACS 5-Year Estimates Detailed Tables | Universe: Population 5 years and over

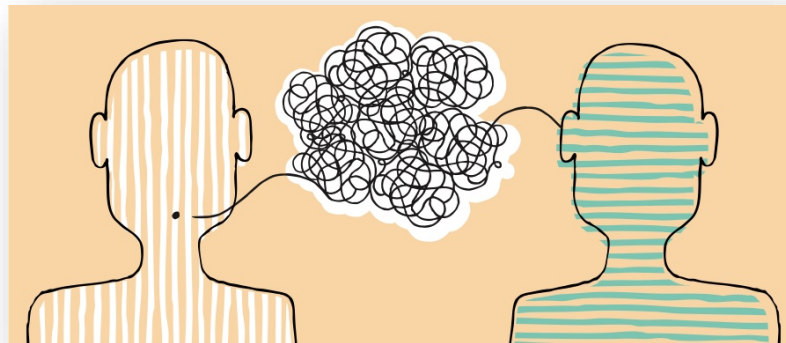
Notes | 2 Geos | Years | Topics | Surveys | Codes | Hide | Transpose | Margin of Error | Restore | Excel | CSV | ZIP | Print | Map

	Los Angeles County, California	ZCTA5 91214
Label	Estimate	Estimate
Speak English less than "very well"	142,364	1,098
▼ Korean:	167,915	3,987
Speak English "very well"	68,397	1,835
Speak English less than "very well"	99,518	2,152
▼ Chinese (incl. Mandarin, Cantonese):	386,759	437
Speak English "very well"	158,330	299
Speak English less than "very well"	228,429	138

Factor 2

The **frequency** with which LEP individuals come in contact with the program.

- Review demographic data collected through surveys by the agency. These data are voluntary and are used for research purposes.



Factor 3

The **nature and importance** of the program, activity, or service provided by the program to people's lives.

- Vital documents include, for example: **applications, consent and complaint forms; notices of rights and disciplinary action; notices advising LEP persons** of the availability of free language assistance.


Factor 4

The resources available to the grantee/recipient or agency, and costs.

- Be proactive and budget for services.
- Use resources or services provided by nonprofit organizations or other agencies, if available.

LEP Resources

- Title VI LEP Resource Page: <https://dot.ca.gov/programs/local-assistance/guidance-and-oversight/title-vi/lep>
- [Caltrans' Language Access Plan](#)
- Volunteer Bilingual Employees
- Tele-interpreting Contracts (i.e. LanguageLine Solutions)



Quick Reference Guide
ACCESSING INTERPRETING SERVICES

CALTRANS Office of Civil Rights

HOW TO ACCESS AN INTERPRETER

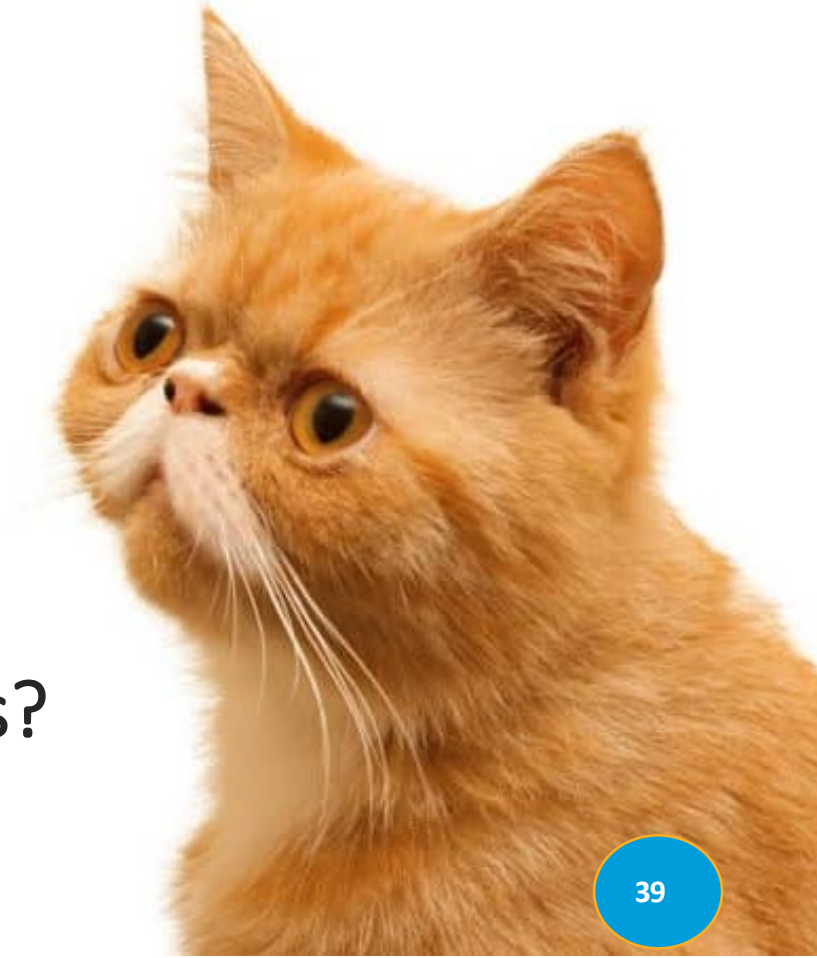
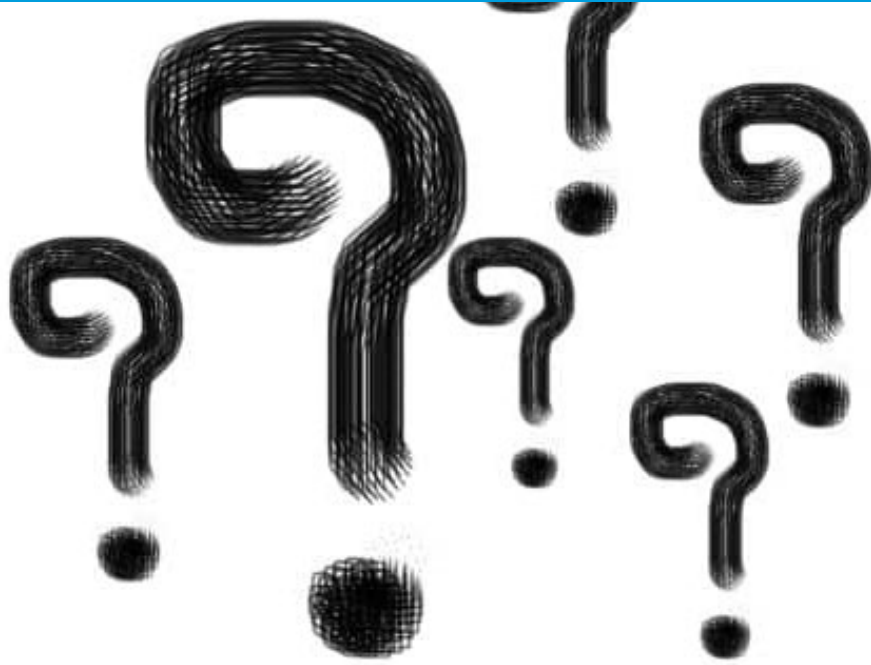
■ **When Receiving a call:**

1. Use your phone's conference feature to place the Limited English Proficient (**LEP**) speaker on hold.
2. Dial **1-877-245-0386**
3. Provide your Client ID #
4. Select the language you need
 - a. Press 1 for Spanish
 - b. Press 2 for all other languages and state the name of the language you

Dissemination of Title VI Information: LEP



<https://dot.ca.gov/programs/civil-rights/title-vi>



Questions?

Contact Us

- Glenda Collins: glenda.collins@dot.ca.gov
(916) 639 – 6392.
- Cathy Ly: cathy.ly@dot.ca.gov (279) 234 – 8191.
- Loi Tran: loi.tran@dot.ca.gov (916) 879 – 5528.

