



# Limited English Proficiency (LEP) Plan

Colorado Department of Transportation  
Civil Rights & Business Resource Center  
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## **I. Introduction**

In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, CDOT's Policy Directive 604.0, "Policy on Non-Discrimination" provides that no person on the ground of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of CDOT or of any department or agency to which CDOT extends federal financial assistance. This Policy Directive further explains, "CDOT shall seek to communicate with LEP populations and provide LEP individuals meaningful access to CDOT programs and activities."

Limited English Proficiency (LEP) persons are individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English. For LEP persons, language can be a barrier to accessing the benefits of program services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information regarding federally assisted programs or activities. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally assisted programs or activities may violate the prohibition against national origin discrimination under Title VI of the Civil Rights Act of 1964. CDOT, as a recipient of federal financial assistance, has an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important services.

The purpose of this document is to establish a standard approach in effectively communicating with LEP persons and to provide guidance to CDOT staff on how to provide meaningful access to LEP persons. Additionally, this document provides guidance to the CDOT program areas identified in the Title VI Implementation plan in creating a language assistance plan that will outline the reasonable steps to be taken to provide effective communication and meaningful access to LEP persons for each employee involved in the identified program area.

This document does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against CDOT. However, LEP persons that feel they have been denied meaningful access may file a discrimination complaint based upon national origin under Title VI of the Civil Rights Act. CDOT's discrimination complaint form and complaint procedure can be found at <https://www.codot.gov/business/civilrights>.

## **II. Authorities**

The following are the relevant federal authorities and resources that require CDOT staff to provide LEP persons with meaningful access to programs, activities, and services:

- Title VI of the 1964 Civil Rights Act
- Executive Order No. 13166 (Aug. 16, 2000) – Improving Access to Services for Persons with Limited English Proficiency
- Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, U.S. Department of Transportation, (Dec. 14, 2005)
- Policy on Non-Discrimination, Colorado Department of Transportation Policy Directive 604.0 (Jan. 27, 2014)

### **III. Definitions**

**LEP-** Limited English Proficiency (LEP) persons are individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English

**Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not unreasonably restricted, delayed, or inferior as compared to access to programs or activities provided to English proficient individuals.

**Vital Document** – Paper or electronic material that is critical for access to the CDOT’s services, programs, and activities, or contains information about procedures and processes required by law. Classification of a document as “vital” depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP individual if the information in question is not provided accurately or in a timely manner.

**Effective Communication** – Sufficient communication to provide the LEP individual with meaningful access to the services that otherwise are available to the public.

**Reasonable Steps-** Steps taken or language assistance services provided to ensure effective communication with an LEP individuals (i.e. interpretation/translations services etc.)

**Eligible Service population-** The LEP population served by the program or project and that is encountered or likely to be encountered by the program or project.

**Safe Harbor-**The Safe Harbor Provision outlines the circumstances that can provide agencies a safe harbor regarding the translation of written materials for LEP populations. It stipulates that a grantee is in compliance if each eligible LEP language group has written translation of vital documents.

## **IV. CDOT Staff Responsibilities**

CDOT staff must take reasonable steps to ensure that communication with an LEP individual is as effective as communications with others when providing similar programs and services. This section will provide CDOT staff with a framework for developing, modifying, and implementing their own methods in providing language assistance to LEP persons. As a state agency, CDOT staff has the potential to interact with the public, including LEP persons, in many ways.

Potential interactions with LEP persons for CDOT staff can include the following:

- Program applicants and participants;
- Hotline or information line calls to CDOT;
- CDOT outreach programs;
- Visits to CDOT buildings;
- Public meetings and hearings hosted by CDOT;
- Public access to agency websites;
- Written materials or complaints submitted by members of the public;
- Contact with Bustang or subrecipient transit operators; and
- Brochures intended for public distribution.

It is important to examine the manner in which the CDOT staff interacts with the public and/or LEP individuals (e.g. in-person, virtual, correspondence) as this can dictate the type of language assistance services provided.

### **A. Language Identification**

At the point of first contact with an LEP individual, CDOT staff must determine his/her primary language and use the appropriate language assistance services. Identifying an LEP person and his/her language helps provide consistent and meaningful access to the program or activity sought. The following are examples of ways to identify an LEP person's primary language:

- Self-identification by the LEP individual or companion
- Verification by a bilingual staff member
- Posting notices in commonly encountered languages to notify LEP individuals of language assistance may encourage them to identify themselves to CDOT staff
- Use "I speak" cards to identify the language needs of the LEP person when first encountered. The "I speak" cards should be made visible and available to the public. A sample "I speak" card is available online at <http://www.lep.gov/ISpeakCards2004.pdf>.

When public meetings or hearings are held, enable an LEP individual to request language assistance ahead of time to ensure translation or interpretation services can be provided at the meeting or hearing. An example of proactively providing language assistance for an in-person meeting or hearing is to set up a sign-in table and have a staff member, if possible, that speaks the predominant language (reference Appendix A) attend the meeting/hearing to greet and briefly speak to each attendee in order to informally gauge his/her ability to speak and understand English.

After identifying the language spoken by the LEP person encountered or likely to be encountered,

CDOT staff will need to consider which language services to provide. The next section will discuss language assistance services in detail.

## **B. Language Assistance Services**

Effective communication with LEP individuals requires CDOT staff to have language assistance services in place. There are two primary types of language assistance services: oral and written. The service should be tailored to the needs of the LEP person and will be dependent on the CDOT project or program. The correct mix of services should be based on what is both necessary and reasonable.

### Oral Language Services (Interpretation)

Interpretation is the act of listening to something in one language and orally translating it into another language. When interpretation is needed and is reasonable, it should be provided in a timely manner to be effective. CDOT staff will inform LEP persons that interpretation services will be provided at no charge and upon request. Staff should provide language assistance at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of an undue burden on or delay in important rights, benefits, or services. There are many ways to utilize interpreter services. The following are interpretation options that can be used by CDOT staff:

1. CDOT staff has the option of using a professional interpretation service. The State of Colorado has a price agreement with CTS Language Link for professional translation and interpretation services. CTS Language Link offers an over-the-phone interpretation service for \$0.57 per minute. A list of languages for the interpretation service is attached as **Appendix C**. CTS Language Link also can translate written documents into more than 100 languages.
2. Bilingual CDOT staff can also be used for interpretation services. Maintaining a list of bilingual employees will be helpful when utilizing this service. In an effort to ensure the interpretation is effective, consider the following when using a staff member:
  - Does the interpreter demonstrate proficiency and the ability to communicate information accurately in both English and in the other language?
  - Does the interpreter have knowledge in both languages of any specialized terms or concepts related to the program or activity?
3. CDOT staff may also consider using a telephone voicemail menu, in the most commonly encountered languages, that provides information about available language assistance services and how to receive these services.
4. Although CDOT staff may not require LEP individuals to provide their own interpreter services, if the LEP person chooses to do so and uses a minor, caution should be exercised due to potential issues with competency, confidentiality, or conflict of interest.

It is best practice to ensure interpreters can be made available at public meetings and notification should be provided to the public regarding the availability of interpreter services upon request. Notifications for meetings must be in an appropriate language. The language to include in notices regarding language assistance services can be found in **Appendix D**.

### Written Language Services (Translation)

Translation is the replacement of a written text from one language into an equivalent written text in another language. It is important to ensure that documents vital to the program or project are provided in English and any other regularly encountered languages. A document is considered vital if it contains information critical for obtaining services or is required by law. Vital documents must be translated at no charge to the LEP individuals.

The extent of CDOT's obligation to provide written translations of documents should be determined on a case-by-case basis. Because translation is a one-time expense, consideration should be given to whether the upfront cost of translating a document should be amortized over the likely lifespan of the document. Spanish translation for statewide and regional audiences is recommended based on LEP data for Colorado.

CDOT staff should create a plan for consistently determining, over time and across various activities, which documents are "vital" to the meaningful access of LEP populations they serve. Awareness of rights or services is an important part of "meaningful access," as lack of awareness may effectively deny LEP individuals meaningful access.

Examples of written materials that could be considered "vital" include:

- Permit forms;
- Markings, signs, and packaging for hazardous materials;
- Notices of public hearings and other outreach materials;
- Signs in reception areas and other public areas;
- Notices advising LEP persons of free language assistance;
- Applications or instructions on how to participate in a program or activity or to receive benefits or services; and
- Consent forms.

CDOT serves the public for the state of Colorado; therefore, all documents that are vital to providing meaningful access to people at a statewide or regional level must be translated into the language that is most commonly spoken by LEP persons. According to census data, the most commonly spoken LEP language in Colorado is Spanish. For example, the Civil Rights & Business Resource Center has created a page in Spanish that contains information about the public's rights to equal access and nondiscrimination.<sup>1</sup> Information available on this webpage is considered "vital" because it notifies the public of its rights under Title VI of the Civil Rights Act 1964 and the Americans with Disabilities Act.

Google Translate and other automated translation services can be a tool for translating basic

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<sup>1</sup> <https://www.codot.gov/business/civilrights/espanol.html>



information in limited circumstances. For example, various CDOT websites can be translated into other languages using Google Translate. However, caution should be used when using automated translation to convey vital information. The U.S. Department of Labor recommends using automated translation only if someone is capable of reviewing and correcting the translation to ensure that it is conveying the intended message.<sup>2</sup> While CDOT’s website can be translated into several languages using Google Translate, it also contains Spanish information that was professionally translated. The following CDOT websites are available in Spanish using Google Translate:

- CDOT website – <https://www.codot.gov/>
- Bustang – [www.ridebustang.com](http://www.ridebustang.com)
- Statewide Transportation Plan – [www.coloradotransportationmatters.com](http://www.coloradotransportationmatters.com)

### *Safe Harbor*

An additional consideration regarding the translation of documents is the safe harbor rule. The U.S. Department of Transportation’s LEP guidance establishes a “safe harbor” regarding the requirement to translate vital documents.<sup>3</sup> A “safe harbor” means that providing written translation under the following circumstances serves as strong evidence of compliance:

- CDOT provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.
- If there are fewer than 50 persons in a language group that reaches the 5% trigger, vital written materials do not need to be translated. Rather, CDOT staff may provide written notice in the primary language of the LEP group, of the right to receive competent oral interpretation of those written materials, free of cost.

For vital documents related to a smaller or localized audience, staff must decide whether to conduct the four-factor analysis or safe harbor analysis. Failure to provide translations under the safe harbor does not mean there is noncompliance. The safe harbor is meant to provide greater certainty of compliance than can be provided by the fact-intensive, four-factor analysis. The safe harbor only applies to the translation of written documents. It does not affect the requirement to provide meaningful access to LEP individuals through oral language services. As a state agency, CDOT engages with members of the public from throughout the state; therefore it is important that CDOT’s efforts to ensure meaningful access are tailored to the specific program or activity’s public audience.

## **V. CDOT Program Area Responsibilities**

CDOT program areas listed in CDOT’s Title VI Implementation Plan are subject to CDOT’s

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<sup>2</sup>The U.S. Department of Labor’s presentation “Machine Translation: Ensuring Meaningful Access for Limited English Proficient Individuals” (June 24, 2014) discusses the pitfalls of relying on machine translations. [http://www.dol.gov/oasam/programs/crc/062414Machine\\_TranslationWebinar.pdf](http://www.dol.gov/oasam/programs/crc/062414Machine_TranslationWebinar.pdf)

<sup>3</sup>70 Fed. Reg. 239 at 74095.

annual reporting to the Federal Highway Administration (FHWA), and regularly consider approaches to effectively communicate with LEP persons. This section provides guidance to each program area on how to develop an effective language assistance strategy specific to their program or activity.

In developing an effective language assistance strategy, the following should be considered:

- The population served pursuant to the four-factor analysis
- Efforts to provide language assistance services by language
- Efforts to train employees to provide timely and reasonable language assistance to LEP populations
- Efforts to provide notice to LEP persons about the availability of language assistance

#### **A. Conducting a four-factor analysis**

This section is intended to assist CDOT program managers and project staff in conducting a four-factor analysis, which includes a fact-dependent, individualized assessment performed by CDOT program managers on a programmatic and project level to determine how much language assistance and outreach to conduct for specific programs and activities. The four-factor analysis includes<sup>4</sup>:

1. Number or proportion of LEP persons eligible to be served or likely to be encountered by a CDOT program, activity, or service;
2. Frequency in which LEP individuals come into contact with CDOT;
3. Nature and importance of the program, activity, or service provided by CDOT to people's lives; and
4. Resources available to CDOT and costs.

CDOT program area managers must complete this four-factor analysis and use the results to determine the program area's language assistance strategy for ensuring meaningful access to LEP persons.

*Factor #1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a CDOT program, activity, or service.*

The greater the number or proportion of LEP persons in the eligible service population, the more likely language services are needed. This population will be program or project-specific and includes persons in the geographic area that are part of CDOT's service area. The eligible service population includes persons eligible to be served, or likely to be directly affected by the activity. Demographic data about the populations of the service area, past encounters with LEP persons, and information from community organizations, governments, and school systems can all be used to evaluate the service population and the number or proportion of LEP persons likely to be encountered. The focus of the analysis is on the lack of English proficiency, not the ability to

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<sup>4</sup> A more detailed outline of the four-factor analysis is available in Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, U.S. Department of Transportation, 70 Fed. Reg. 239 (Dec. 14, 2005). Additional guidance can also be found at [www.lep.gov](http://www.lep.gov).

speak more than one language.

As a starting point, Appendix A contains demographic data for LEP individuals at a statewide and county level. Program area staff should use the demographic data in Appendix A as a starting point for identifying LEP populations likely to be affected or encountered for a particular CDOT program, activity, or project. Counties are listed by CDOT Region (as shown in Appendix B). The demographic data is from the most recently available U.S. Census Bureau's 2019 ACS 5-Year Estimate data.<sup>5</sup>

The following are other available resources for demographic information:

- [Federal Interagency Working Group on Limited English Proficiency](#)
- [U.S. Census Bureau](#)
- U.S. Department of Education (<https://ocrdata.ed.gov/>)
- [National Center for Education Statistics](#)
- The Civil Rights and Business Resource Center

*Factor #2: The frequency in which LEP individuals come into contact with CDOT.*

The CDOT program area or project manager must consider the frequency with which they have or should have contact with LEP individuals. The more frequent the contact, the more likely enhanced language services will be needed. If an LEP individual accesses a program or service on a daily basis, CDOT has greater duties than if the same individual's contact is unpredictable or infrequent. Additionally, staff must consider whether appropriate outreach to LEP person could increase the frequency of contact with LEP groups.

*Factor #3: The nature and importance of the program, activity, or service provided.*

During this step, The CDOT program area or project manager must assess the nature and importance of the activity, information or services provided. Language services are more likely needed the more important the activity, information, service, or program because there are greater consequences of the contact to LEP individuals. Staff must determine whether denial or delay of access to service or information could have serious implications for the LEP individual. Information from community organizations and past contact with LEP persons can help aid this analysis.

*Factor #4: The resources available to CDOT and costs.*

The CDOT program area or project manager must identify their available resources to determine the reasonable steps needed to provide meaningful access for LEP persons. "Reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Staff should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. CDOT is a large statewide entity that serves a significant number of LEP individuals. U.S. Department of Transportation guidance states that large entities "should ensure that the resource limitations are well

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<sup>5</sup> Available as of September 24, 2021.

substantiated before using this fact as a reason to limit language assistance.”<sup>6</sup> Thus, reasons for limiting language assistance based on cost should be documented.

Identifying available resources includes: (1) creating an inventory of language assistance measures currently being provided; (2) determining what, if any, additional services are needed to provide meaningful access; (3) analyzing the budget for language assistance expenses; and (4) considering cost effective practices for providing language services.

## **B. Implementing Language Assistance**

### Monitoring and Updating LEP efforts

Managers and supervisors in each program area are responsible for ensuring that meaningful access to LEP persons are provided in their respective divisions/programs. For example, the Highway Safety Office hosts one public meeting per quarter and provides language assistance information in the meeting notices. A strategy for providing meaningful access to LEP persons should be a part of appropriate procedure manuals to ensure that employees are aware of their obligations for compliance. Managers and supervisors are also responsible for tracking all of their program’s encounters with LEP individuals and providing meaningful access.

The CRBRC will monitor language assistance annually to evaluate their effectiveness in serving LEP individuals and report to the Federal Highway Administration in CDOT’s annual Title VI Goals and Accomplishments Report. The annual evaluation will include:

- Identifying LEP population served
- Assessing the current level of services delivered to LEP individuals by each program area
- Reviewing LEP training received by CDOT employees
- Reviewing activities by each program area
- Evaluating complaints (both at the regional level and the headquarters level)

### Training Staff on Language Assistance

CDOT program managers must ensure new staff members are trained on the language assistance measures for each program. The CRBRC is available to assist with information and training requests as needed.

### Providing Notice to LEP Persons

CDOT program area staff must notify LEP persons that language assistance services are available free of charge. Notice must be provided in languages LEP persons would understand. The statement in **Appendix D** should be included in all public meeting notices, provided that project staff may change the contact information in the notice if they are providing interpretation services and do not need assistance from the CRBRC. CDOT’s accessibility and nondiscrimination public notice includes information about obtaining free translation and interpretation services. The notices are available in English and Spanish at

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<sup>6</sup> 70 Fed. Reg. 239 at 74092.

<https://www.codot.gov/business/civilrights/complaints>.

CDOT programs that conduct outreach activities and produce outreach materials (brochures, booklets, pamphlets, flyers, etc.) for statewide and regional audiences must also provide notice to Spanish-speaking LEP populations that language assistance services are available free of charge. CDOT program area or project staff can take the following measures in providing notice to LEP persons:

- Post materials at intake areas and other entry points so LEP individuals can learn how to access language services.
- Make the LEP individual aware that he/she has the option of having an interpreter without charge, or of using his/her own interpreter.
- Attach onto documents, in the most common languages, that language services that are available from CDOT. Consider using a telephone voicemail menu in the most common languages encountered. The menu would provide information about available language assistance services and how to receive those services.
- Work with community-based organizations and other stakeholders to inform LEP individuals of CDOT services, including the availability of language assistance services.
- Provide notices in local newspapers or social media in languages other than English.

For outreach activities aimed at a localized audience, CDOT program areas must refer to the four-factor analysis to determine whether and in what form notices should be provided. Colorado LEP data by county is provided in Appendix A. Notices can also be provided on outreach materials by working with community-based organizations and other stakeholders, and by using media aimed at LEP audiences.

### Complaints

LEP persons can submit discrimination complaints directly to the Civil Rights and Business Resource Center. Complaint forms can be found in English and in Spanish at:

<https://www.codot.gov/business/civilrights/complaints>.

### Subrecipient Obligations

Subrecipients are recipients that indirectly receive federal financial assistance through CDOT. Subrecipients include but are not limited to cities, counties, consultants, contractors, suppliers, universities, colleges, planning agencies, and other recipients of Federal-aid highway funds.

CDOT does provide information and resources to its subrecipients. Accordingly, subrecipients should tailor the framework for their language assistance plan using the resources provided on the CRBRC website at <https://www.codot.gov/business/civilrights/titlevi/fhwa-subrecipients>

CDOT staff is encouraged to consult with CRBRC on the development of additional language assistance measures or on how best to respond to specific language assistance requests. The CRBRC may also be able to provide funding and additional resources for language assistance measures.



VOIANCE:  
<http://interpret.voiance.com/6-ways-to-build-an-effective-language-access-policy-and-implementation-plan/>

## APPENDIX A

### Colorado LEP Demographic Data

Colorado has a total population of 5,431,434 people. Colorado has a total Limited English Proficient (LEP) population of 202,397, which is 3.73% of Colorado’s overall population.<sup>7</sup>

#### Demographic data by county and CDOT Transportation Region

CDOT is geographically structured into five Transportation Regions. The following pages contain LEP demographic data for each CDOT Transportation Region and the counties within in each region using U.S. Census data for people who do not speak English as their primary language and speak English “less than very well.”<sup>8</sup>

Census data is also supplemented with data from the Colorado Department of Education.<sup>10</sup> The presence of English Language Learners in schools may indicate the presence of greater LEP populations. In addition to the languages listed in the U.S. Census tables, the following pages also list additional languages found in the school data.

CDOT Region 1						
County	Total Population	Total LEP Population	Total LEP Percent	LEP	Percent	Languages
Adams	467,689	52,950	11.32%			
				42,549	9.10%	Spanish
				3,019	0.65%	Other Indo-European languages
				6,000	1.28%	Asian and Pacific Island languages
				1,382	0.30%	Other languages
Arapahoe	604,148	52,304	8.66%			
				26,395	4.37%	Spanish
				7,486	1.24%	Other Indo-European languages
				12,265	2.03%	Asian and Pacific Island languages
				6,158	1.02%	Other languages
Boulder	307,715	13,566	4.4%			
				7,810	2.54%	Spanish
				1,820	0.59%	Other Indo-European languages

<sup>7</sup> 2019 ACS 5-Year Estimates (Table B16001) data from the U.S. Census available as of September 24, 2021.

<sup>8</sup> Based on 2019 ACS 5-Year Estimates (Table S1601) data from the U.S. Census available as of September 24, 2021. Complete data for specific languages was not available at this time.

				3,576	1.16%	Asian and Pacific Island languages
				360	0.12%	Other languages
Broomfield	64,188	1,975	3.1%			
				912	1.42%	Spanish
				311	0.48%	Other Indo-European languages
				689	1.07%	Asian and Pacific Island languages
				63	0.10%	Other languages
Clear Creek	9,120	149	1.6%			
				75	0.82%	Spanish
				18	0.20%	Other Indo-European languages
				17	0.19%	Asian and Pacific Island languages
				39	0.43%	Other languages
Denver	662,746	64,073	9.7%			
				48,632	7.34%	Spanish
				4,232	0.64%	Other Indo-European languages
				7,322	1.10%	Asian and Pacific Island languages
				3,887	0.59%	Other languages
Douglas	316,161	7,059	2.2%			
				2,450	0.77%	Spanish
				2,153	0.68%	Other Indo-European languages
				2,338	0.74%	Asian and Pacific Island languages
				118	0.04%	Other languages
Gilpin	5,874	73	1.2%			
				44	0.75%	Spanish
				21	0.36%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				8	0.14%	Other languages
Jefferson	544,918	16,326	3.0%			
				9,488	1.74%	Spanish
				2,301	0.42%	Other Indo-European languages
				3,999	0.73%	Asian and Pacific Island languages
				538	0.10%	Other languages



CDOT Region 2						
County	Total Population	Total LEP Population	Total LEP Percent	LEP	Percent	Languages
Baca	3,381	122	3.6%			
				119	3.52%	Spanish
				3	0.09%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Bent	5,590	377	6.7%			
				373	6.67%	Spanish
				0	0.00%	Other Indo-European languages
				4	0.07%	Asian and Pacific Island languages
				0	0.00%	Other languages
Crowley	5,590	220	3.9%			
				215	3.85%	Spanish
				0	0.00%	Other Indo-European languages
				5	0.09%	Asian and Pacific Island languages
				0	0.00%	Other languages
Custer	4,727	155	3.3%			
				37	0.78%	Spanish
				118	2.50%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
El Paso	651,807	23,954	3.7%			
				16,061	2.46%	Spanish
				2,224	0.34%	Other Indo-European languages
				5,011	0.77%	Asian and Pacific Island languages
				658	0.10%	Other languages
Fremont	45,474	1,779	3.9%			
				1,317	2.90%	Spanish
				128	0.28%	Other Indo-European languages
				107	0.24%	Asian and Pacific Island languages
				227	0.50%	Other languages
Huerfano	6,447	141	2.2%			

				119	1.85%	Spanish
				0	0.00%	Other Indo-European languages
				22	0.34%	Asian and Pacific Island languages
				0	0.00%	Other languages
Kiowa	1,312	16	1.2%			
				13	0.99%	Spanish
				3	0.23%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Las Animas	13,646	537	3.9%			
				470	3.44%	Spanish
				39	0.29%	Other Indo-European languages
				13	0.10%	Asian and Pacific Island languages
				15	0.11%	Other languages
Otero	17,205	709	4.1%			
				601	3.49%	Spanish
				0	0.00%	Other Indo-European languages
				108	0.63%	Asian and Pacific Island languages
				0	0.00%	Other languages
Park	17,160	17	0.1%			
				9	0.05%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				8	0.05%	Other languages
Prowers	11,208	898	8.0%			
				862	7.69%	Spanish
				6	0.05%	Other Indo-European languages
				10	0.09%	Asian and Pacific Island languages
				20	0.18%	Other languages
Pueblo	156,378	3,451	2.2%			
				3,093	1.98%	Spanish
				193	0.12%	Other Indo-European languages
				116	0.07%	Asian and Pacific Island languages

				49	0.03%	Other languages
Teller	23,626	86	0.4%			
				1	0.00%	Spanish
				58	0.25%	Other Indo-European languages
				11	0.05%	Asian and Pacific Island languages
				16	0.07%	Other languages
County	Total Population	Total LEP Population	Total LEP Percent	LEP	Percent	Languages
Delta	29,057	863	3.0%			
				714	2.46%	Spanish
				60	0.21%	Other Indo-European languages
				89	0.31%	Asian and Pacific Island languages
				0	0.00%	Other languages
Eagle	51,594	6,245	12.1%			
				5,757	11.16%	Spanish
				239	0.46%	Other Indo-European languages
				249	0.48%	Asian and Pacific Island languages
				0	0.00%	Other languages
Garfield	55,070	5,505	10.0%			
				5,286	9.60%	Spanish
				143	0.26%	Other Indo-European languages
				76	0.14%	Asian and Pacific Island languages
				0	0.00%	Other languages
Grand	14,728	227	1.5%			
				198	1.34%	Spanish
				0	0.00%	Other Indo-European languages
				29	0.20%	Asian and Pacific Island languages
				0	0.00%	Other languages
Gunnison	16,063	322	2.0%			
				316	1.97%	Spanish
				0	0.00%	Other Indo-European languages

				6	0.04%	Asian and Pacific Island languages
				0	0.00%	Other languages
Hinsdale	820	0	0.0%			
				0	0.00%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
				0	0.00%	
Jackson	1,228	46	3.7%			
				46	3.75%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Lake	7,552	455	6.0%			
				412	5.46%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				43	0.57%	Other languages
Mesa	142,616	2,790	2.0%			
				2,283	1.60%	Spanish
				220	0.15%	Other Indo-European languages
				259	0.18%	Asian and Pacific Island languages
				28	0.02%	Other languages
Moffat	12,238	647	5.3%			
				627	5.12%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				20	0.16%	Other languages
Montrose	39,351	2,809	7.1%			
				2,600	6.61%	Spanish
				30	0.08%	Other Indo-European languages
				179	0.45%	Asian and Pacific Island languages
				0	0.00%	Other languages

Pitkin	17,108	725	4.2%			
				519	3.03%	Spanish
				206	1.20%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Rio Blanco	5,983	78	1.3%			
				78	1.3%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Routt	23,972	574	2.4%			
				419	1.75%	Spanish
				31	0.13%	Other Indo-European languages
				26	0.11%	Asian and Pacific Island languages
				98	0.41%	Other languages
Summit	29,340	2,559	8.7%			
				1,964	6.69%	Spanish
				309	1.05%	Other Indo-European languages
				10	0.03%	Asian and Pacific Island languages
				276	0.94%	Other languages
<b>CDOT Region 4</b>						
<b>County</b>	<b>Total Population</b>	<b>Total LEP Population</b>	<b>Total LEP Percent</b>	<b>LEP</b>	<b>Percent</b>	<b>Languages</b>
Cheyenne	1,809	90	5.0%			
				67	3.70%	Spanish
				3	0.17%	Other Indo-European languages
				20	1.11%	Asian and Pacific Island languages
				0	0.00%	Other languages
Elbert	24,576	157	0.6%			
				144	0.59%	Spanish
				13	0.05%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages

				0	0.00%	Other languages
Kit Carson	7,022	552	7.9%			
				533	7.59%	Spanish
				19	0.27%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Larimer	327,055	8,959	2.7%			
				5,130	1.57%	Spanish
				1,568	0.48%	Other Indo-European languages
				1,852	0.57%	Asian and Pacific Island languages
				409	0.13%	Other languages
Lincoln	5,277	350	6.6%			
				331	6.27%	Spanish
				1	0.02%	Other Indo-European languages
				9	0.17%	Asian and Pacific Island languages
				9	0.17%	Other languages
Logan	20,730	734	3.5%			
				626	3.02%	Spanish
				33	0.16%	Other Indo-European languages
				75	0.36%	Asian and Pacific Island languages
				0	0.00%	Other languages
Morgan	26,465	3,045	11.5%			
				2,345	8.86%	Spanish
				70	0.26%	Other Indo-European languages
				95	0.36%	Asian and Pacific Island languages
				535	2.02%	Other languages
Phillips	3,931	332	8.4%			
				332	8.45%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Sedgwick	2,082	55	2.6%			
				53	2.55%	Spanish
				0	0.00%	Other Indo-European languages

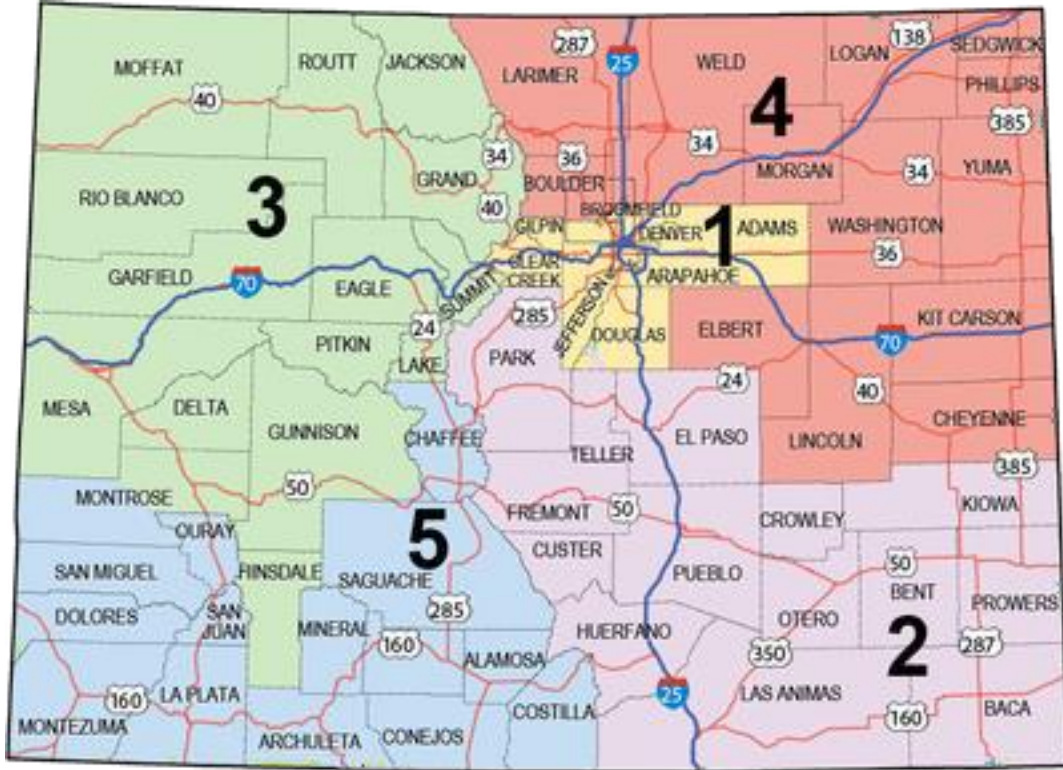
				2	0.10%	Asian and Pacific Island languages
				0	0.00%	Other languages
Washington	4,615	80	1.7%			
				61	1.32%	Spanish
				12	0.26%	Other Indo-European languages
				7	0.15%	Asian and Pacific Island languages
				0	0.00%	Other languages
Weld	283,292	18,858	6.7%			
				17,005	6.00%	Spanish
				338	0.12%	Other Indo-European languages
				1,054	0.37%	Asian and Pacific Island languages
				461	0.16%	Other languages
Yuma	9,277	1,003	10.8%			
				983	10.60%	Spanish
				20	0.22%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
<b>CDOT Region 5</b>						
<b>County</b>	<b>Total Population</b>	<b>Total LEP Population</b>		<b>LEP</b>	<b>Percent</b>	<b>Languages</b>
Alamosa	14,991	1,399	9.3%			
				1,174	7.83%	Spanish
				8	0.05%	Other Indo-European languages
				24	0.16%	Asian and Pacific Island languages
				193	1.29%	Other languages
Archuleta	12,651	203	1.6%			
				184	1.45%	Spanish
				4	0.03%	Other Indo-European languages
				15	0.12%	Asian and Pacific Island languages
				0	0.00%	Other languages
Chaffee	18,816	484	2.6%			
				299	1.59%	Spanish
				54	0.29%	Other Indo-European languages

				116	0.62%	Asian and Pacific Island languages
				15	0.08%	Other languages
Conejos	7,588	458	6.0%			
				409	5.39%	Spanish
				40	0.53%	Other Indo-European languages
				9	0.12%	Asian and Pacific Island languages
				0	0.00%	Other languages
Costilla	3,589	571	15.9%			
				571	15.91%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Dolores	1,735	6	0.3%			
				0	0.00%	Spanish
				6	0.35%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
La Plata	52,717	617	1.2%			
				449	0.85%	Spanish
				24	0.05%	Other Indo-European languages
				70	0.13%	Asian and Pacific Island languages
				74	0.14%	Other languages
Mineral	809	4	0.5%			
				0	0.00%	Spanish
				4	0.49%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Montezuma	24,654	470	1.9%			
				168	0.68%	Spanish
				18	0.07%	Other Indo-European languages
				128	0.52%	Asian and Pacific Island languages
				156	0.63%	Other languages
Ouray	4,591	7	0.2%			



				2	0.04%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				5	0.11%	Other languages
Rio Grande	10,658	649	6.1%			
				603	5.66%	Spanish
				46	0.43%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
Saguache	6,246	507	8.1%			
				495	7.93%	Spanish
				0	0.00%	Other Indo-European languages
				12	0.19%	Asian and Pacific Island languages
				0	0.00%	Other languages
San Juan	564	23	4.1%			
				23	4.08%	Spanish
				0	0.00%	Other Indo-European languages
				0	0.00%	Asian and Pacific Island languages
				0	0.00%	Other languages
San Miguel	7,747	377	4.9%			
				237	3.06%	Spanish
				27	0.35%	Other Indo-European languages
				113	1.46%	Asian and Pacific Island languages
				0	0.00%	Other languages

**APPENDIX B**  
**Map of CDOT Regions**



## APPENDIX C

### CTS Language Link Interpretation language list

#### INTERPRETATION LANGUAGE LIST

CTS LanguageLink provides spoken Interpretation Services in 240+ languages and/or dialects. If you do not see your target language listed here, please contact a CTS LanguageLink representative for more information at +1 800-208-2620.

<b>A</b>	Acholi	Duala	Ho
	Afrikaans	Dutch	Hunanese
	Akan	Edo	Hungarian
	Albanian	<b>E</b>	Iban
	American Sign Language	Efik	Ibang
	Amharic	Estonian	Icelandic
	Arabic	Ethiopian	Igbo (Ibo)
	Armenian	Ewe	Ilocano
	Ashanti	<b>F</b>	Indonesian
	Assyrian	Farsi (Persian)	Italian
	Azerbaijani	Fijian	<b>J</b>
<b>B</b>	Bambara	Filipino	Jaaxanke
	Basque	Finnish	Jakartanese
	Bassa	Flemish	Japanese
	Behdini	French	Javanese
	Belarusian	French Canadian	<b>K</b>
	Bengali	French Creole	Kakwa
	Bosnian	Frisian (West)	Kanjobal
	Bulgarian	Fujianese	Kankanay
	Burmese	Fukinese	Kannada
<b>C</b>	Cantonese	Fula	Karen
	Cape Verde	Fulani	Kashmiri
	Catalan	Fuzhou	Kayah
	Cebuano	<b>G</b>	Kazakh
	Chabacano	Ga	Khmer (Cambodian)
	Chaldean	Gaelic	Kikamba
	Cham	Ganda	Kikuyu
	Chamorro	Garre	Kinyarwanda
	Chau-jo	Georgian	Kirghiz
	Cherokee	German	Kirundi
	Chinese	Gilaki	Korean
	Choujo	Grebo	Kosrae
	Chuukese	Greek	Kpelle
	Creole	Greenlandic	Krahn
	Croatian	Gujarati	Kurdish
	Czech	<b>H</b>	Lakota
<b>D</b>	Danish	Haitian Creole	Laotian
	Dari (Persian)	Haka Burmese	Latin
	Dimli	Hakka	Latvian
	Dinka	Harari	Lebanese
		Hausa	Liberian
		Hebrew	Lingala
		Hindi	
		Hmong	

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## INTERPRETATION LANGUAGE LIST

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M	Lithuanian	P	Papiamento	T	Tagalog
	Luganda		Pashto		Tahitian
	Luo (Dhuluo)		Polish		Taiwanese
	Maay		Ponapean		Tajiki
	Macedonian		Portuguese		Tamal
	Malagasy		Portuguese Brazilian		Tamang
	Malay		Portuguese Creole - Cape Verdean Creole		Tamil
	Malayalam		Potwari		Tarasco
	Malaysian		Pulaar		Tatar
	Maltese		Punjabi		Telugu
	Mam		Quechua		Teochew
	Mandarin		Quiche		Thai
	Mandingo		Rhade		Thai Dam
	Mandinka		Romanian		Tibetan
	Mankon		Rundi		Tigrigna – Tigrinya
	Marathi		Russian		Toishanese
	Marshallese		Samoan		Tokelau
	Maylay	Sara	Tongan		
	Meru	Serbian	Trukese (Chuukese)		
	Mien	Serbo Croatian	Tshiluba		
Mina	Shanghainese	Tsonga			
Mixteco	Shona	Tswana			
Mixteco Alto	Sichuan	Turkish			
Mixteco Bajo	Sicilian	Turkmen			
Moldovan	Sindhi	Twi			
Mongolian	Sinhala	U	Ukrainian		
Moroccan Arabic	Sinhalese	Urdu			
Myanmar	Slovak	Uzbek			
N	Nahuati	Slovenian	V	Vangali	
	Navajo	Somali	Vietnamese		
	Nepali	Soninke	Visayan (Cebuano)		
	Newari	Sorani	W	Welsh	
	Nigerian	Sotho	Wolof		
	Norwegian	Spanish (European)	Wu		
	Nuer	Spanish (Latin America)	Y	Yi	
	O	Ojibay	Spanish (Mexican)	Yiddish	
		Oromifa	Sudanese	Yoruba	
		Oromo	Swahili	Z	Zapoteco
P	Pahari	Swedish	Zulu		
	Palauan	Syrian			
	Pampangan				

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## APPENDIX D

### Statement to Include in Public Meeting Notices

The following statement shall be included in all public meeting notices, provided that project staff may change the contact information in the notice if they are providing interpretation services and do not need assistance from the CRBRC.

***Interpretation & Translation Services:** CDOT provides reasonable language assistance free of charge upon request. Contact the Civil Rights & Business Resource Center at (800) 925-3427 to make translation or interpretation requests related to any CDOT public meeting or service.*

***Servicios de interpretación y traducción:** El CDOT proporciona ayuda razonable en otros idiomas a pedido. Comuníquese con el Centro de Recursos de Negocios y Derechos Civiles (Civil Rights & Business Resource Center, CRBRC) en el (800) 925-3427 para solicitar traducciones o interpretaciones en relación con cualquier reunión pública o servicio del CDOT.*

If the contact person listed in the public meeting notice receives a request for translation or interpretation services, the contact person shall consult with the Title VI specialist in the CRBRC.