

LIMITED ENGLISH PROFICIENCY PLAN



Updated 2026

Limited English Proficiency Plan

Most people living in the United States read, write, speak, and understand English. There are many people, however, for whom English is not their primary language. If those persons have a limited ability to read, write, speak, and/or understand English, they are limited English proficient (LEP). Language barriers can often inhibit or prohibit LEP persons from accessing benefits and services, understanding and exercising rights, fulfilling responsibilities and obligations, and understanding information provided to them regarding federally funded programs, activities, and services.

In an effort to provide continuing, cooperative, and comprehensive transportation planning for residents of the region, the Wasatch Front Regional Council (WFRC) has developed this LEP Plan. The LEP Plan outlines how to identify people who may need language assistance, the ways in which assistance will be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The goal of the LEP Plan is to ensure that all residents of the Wasatch Front region are provided meaningful access to participate in the transportation planning and decision-making process.

Title VI

Consistent with WFRC's Public Participation Plan, WFRC is committed to full compliance with the requirements of Title VI of the Civil Rights Act of 1964.

Title VI states that "no person in the United States, shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Under federal law, language barriers are recognized as a direct extension of national origin; therefore, a failure to provide meaningful access to LEP individuals constitutes national origin discrimination. To prevent this, WFRC has integrated this LEP Plan as a core component of its comprehensive Title VI Plan. Included in the master Title VI Plan is a formal civil rights complaint procedure, which outlines how an individual may submit a grievance, how WFRC will investigate the claim, and the potential resolution scenarios.

Four-Factor Analysis

Pursuant to guidance issued by the U.S. Department of Transportation, WFRC utilizes a structured Four-Factor Analysis to systematically assess regional language needs and determine the reasonable, proactive steps required to ensure equitable access for LEP persons. This plan details each of the following four considerations:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient 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 recipient to people's lives.
4. The resources available to the recipient and costs.

Factor 1 Analysis: The Number or Proportion of LEP Persons in WFRC's Service Area.

WFRC serves a multi-county region comprising Davis, Morgan, Salt Lake, Tooele, and Weber counties, as well as the urbanized portion of Box Elder County (specifically representative of Brigham City, Perry, and Willard City). To analyze the regional demographic profile, WFRC reviewed the 2024 American Community Survey (ACS) 5-Year Estimates (Table C16001). For

the purposes of this Limited English Proficiency (LEP) Plan, individuals who reported speaking English less than “very well” are classified as LEP populations.

The federal Safe Harbor Provision establishes that an agency has strong evidence of Title VI compliance if it provides written translations of vital documents for any literate LEP language group that constitutes 5% of the population or 1,000 individuals within the service area, whichever is less.

As shown in the table below, the regional LEP population totals 108,312 individuals, representing 5.92% of the total regional population. Based on this data, there are five distinct, individual language groups that cross the federal 1,000-person Safe Harbor threshold within the WFRC planning boundaries: Spanish (78,941), Chinese (4,844), Vietnamese (4,008), Russian/Slavic languages (2,552), and Arabic (1,411). Spanish represents the overwhelming majority of the regional LEP population at 72.88%.

While four additional aggregated Census data categories—Other Asian Languages, Indo-European, Korean, and Other Languages—also list counts exceeding 1,000 individuals, WFRC recognizes that these macro-categories (with the exception of Korean, which stands at 1,047) represent blended language groups. WFRC monitors these populations closely and provides targeted language support for specific distinct languages within these categories upon request.

The following table is reflective of those languages for which the persons five years of age and older speak English less than “very well” and meet the Safe Harbor Provision.

	Persons speaking English less than "very well" (LEP)	Percent of Total Population	Share of Limited English Proficiency Population (LEP)
Total Regional Population	1,828,710		
Total Limited English Proficiency (LEP)	108,312	5.92%	
Spanish	78,941	4.32%	72.88%
Vietnamese	4,008	0.22%	3.70%
Russian, Polish, Slavic	2,552	0.14%	2.36%
Arabic	1,411	0.08%	1.30%
Korean	1,047	0.06%	0.97%
Chinese (includes Mandarin)	4,844	0.26%	4.47%
Other Asian Languages	7,215	0.39%	6.66%
Indo-European	6,064	0.33%	5.60%
Other Languages	2,230	0.12%	2.06%

Source: U.S. Census Bureau; American Community Survey, 2024 5-Year Estimates, Table C16001; Geography:

Factor 2 Analysis: The Frequency with Which LEP Individuals Come in Contact with WFRC

WFRC continuously monitors the frequency of its contact with LEP individuals across all regional planning programs, public workshops, and committee meetings. Historically, WFRC records an average of two to four public events per fiscal year where staff members engage directly with LEP individuals, with Spanish identified as the primary non-English language encountered.

To ensure accurate and equitable communication, WFRC does not rely on ad-hoc or unverified translation. While some WFRC staff members possess conversational or professional Spanish language skills and can assist with basic navigation or routing at public workshops, WFRC maintains a formal protocol for technical or formal project feedback. WFRC provides immediate access to professional, qualified language translation and telephone interpretation services at no cost to the individual. Frontline staff are trained to utilize language identification flashcards ("I Speak" cards) at all public workshops to instantly identify an individual's native language and seamlessly connect them with WFRC's contracted professional interpretation vendors.

Factor 3 Analysis: The Importance of the Service Provided by WFRC

WFRC utilizes federal funds to conduct regional transportation and land-use planning. WFRC programs do not include direct-service operations requiring emergency or immediate life-safety assistance, such as medical treatment, housing, or food shelter. Furthermore, WFRC does not mandate applications or interviews as a prerequisite for participating in public events, and all community involvement remains voluntary.

However, the long-range transportation investments and policies directed by WFRC have a profound, long-term impact on the mobility, economic vitality, and environmental health of all regional residents, including LEP populations. The allocation of federal funds is managed through three of WFRC's core work products:

- Transportation Improvement Program (TIP)
- Regional Transportation Plan (RTP)
- Unified Planning Work Program (UPWP)

Because these documents shape regional transit access and infrastructure impacts, inclusive public participation is a priority. While participation is voluntary, WFRC recognizes that a denial of access to the planning process can lead to the systematic exclusion of LEP communities.

Consequently, WFRC identifies specific procedural items as "Vital Documents" that require proactive translation into languages meeting the Safe Harbor threshold. These vital documents include WFRC's Title VI Complaint Procedures, Title VI Complaint Forms, and notices of public comment periods related to the RTP, TIP, and UPWP.

Factor 4 Analysis: The Resources Available and Overall Cost

WFRC weighs the data from the preceding three factors to balance the language access needs of the regional LEP population against the agency's available resources and administrative capacities. To ensure broad access, WFRC maintains a fully responsive, digitally accessible website providing regional planning data, maps, committee packets, and public involvement records. All WFRC public meeting notices and agendas include a bilingual (English and Spanish) statement informing the public that free language translation and auxiliary services are available upon request with 72 hours' notice.

Consistent with Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) guidelines, WFRC defines its vital documents as those critical for accessing regional planning benefits or exercising civil rights, specifically including Title VI Nondiscrimination Notices, Title VI Complaint Procedures, and Title VI Complaint Forms [15]. Because Spanish-speakers represent the overwhelming majority (72.88%) of the regional LEP population, WFRC proactively translates these vital materials into Spanish, making them available online, via mail, and at the WFRC office.

For the remaining distinct language groups that cross the 1,000-person Safe Harbor threshold (Chinese, Vietnamese, Russian/Slavic, Arabic, and Korean), WFRC minimizes administrative costs while maintaining strict federal compliance by utilizing a combined strategy. WFRC provides web-based translation options for core online content and utilizes contracted, on-demand telephone interpretation services for immediate oral translation. WFRC is committed to providing written translation of vital documents into these threshold languages upon request, and coordinates oral translation for any public meeting or workshop when a request is submitted at least 72 hours in advance. Requests for the translation of non-vital, technical planning documents will be evaluated on a case-by-case basis.

Identifying LEP Individuals Who Need Language Assistance

When encountering an LEP individual in an unscheduled or drop-in situation during a public open house, workshop, or community event, staff shall utilize language identification flashcards ("I Speak" cards) developed by the U.S. Census Bureau to identify the individual's primary language. WFRC will maintain these flashcards at all public event registration tables.

While advanced 72-hour notifications are requested and utilized to secure dedicated, on-site professional human interpreters for formal board meetings and scheduled presentations, WFRC does not require prior notice for casual attendance at public open houses.

For spontaneous open house interactions where an advanced request was not received, WFRC staff will immediately utilize free online translation tools and mobile translation utilities to facilitate basic communication, navigate project displays, and determine the native language of the participant. Frontline staff will securely document the individual's name, contact information, and primary language. This intake information will be directed immediately to WFRC's Title VI Administrator to coordinate formal follow-up written translation or professional oral interpretation services at no cost to the individual.

WFRC Staff Training

To ensure the effective implementation of this plan, WFRC mandates regular civil rights and language access training for all agency employees, with special emphasis placed on frontline staff, public engagement coordinators, and project managers who facilitate public open houses.

Training is conducted upon hire for all new employees, with refresher sessions provided to all staff at a minimum of once every three (3) years to coincide with the master Title VI Program update cycle. The training program ensures that all WFRC personnel understand and can execute the following procedures:

- Regulatory Awareness: Understanding the legal definition of Limited English Proficiency (LEP) and its direct connection to Title VI national origin discrimination protections.
- Open House Interaction: Knowing how to access and utilize printed language identification flashcards ("I Speak" cards) at public events to identify a participant's primary language.
- Immediate Assistance Safety Net: Utilizing free online translation utilities and mobile application tools to facilitate basic, real-time communication during spontaneous interactions.
- Intake & Callback Escalation: Accurately documenting an LEP individual's contact information, name, and language preference to immediately escalate the request to the Title VI Administrator for formal, professional translation or oral interpretation follow-up.
- Grievance Routing: Understanding how to properly route any language access or disability discrimination complaints to WFRC's ADA Coordinator / Compliance Administrator.

Monitoring and Updating the LEP Plan

This LEP Plan is designed as a flexible administrative tool that is continuously evaluated to reflect changing regional demographics. At a minimum, WFRC will review and update the LEP Plan every three (3) years as a mandatory component of its Title VI Program submittal package. WFRC will also evaluate and adjust language access provisions dynamically whenever the Public Participation Plan (PPP) is updated on its four-year federal planning cycle, ensuring outreach strategies remain aligned across all regional work products.

WFRC recognizes that the regional demographic profile continues to evolve. To ensure that language access infrastructure matches community needs, the Title VI Administrator will evaluate the following components on an annual basis:

- Encounter Tracking: How many LEP persons were encountered by staff during public open houses, committee meetings, or at the front counter, and were their immediate communication needs met?
- Demographic Shifts: What is the current LEP population profile within the WFRC planning area based on updated Census Bureau or American Community Survey (ACS) data releases?

- **Language Demands:** Has there been an emergent shift in the specific types of distinct languages crossing the Safe Harbor threshold requiring translated materials?
- **Resource Capacity:** Have WFRC's available structural resources—such as mobile translation utilities, staff competencies, or language access budgets—changed?
- **Goal Assessment:** Has WFRC successfully fulfilled the proactive public involvement goals outlined in this LEP Plan, and were any formal Title VI or language access complaints received?
- **Regulatory Alignment:** Have new state or federal regulations concerning LEP or Title VI compliance been enacted that necessitate immediate revisions to WFRC's public engagement processes?
- **Innovative Outreach:** Are there newly available digital platforms, translation technologies, or community partnerships that provide better methods to conduct outreach to regional LEP populations?

Providing Notice to LEP Persons

To ensure that LEP populations are fully aware of their civil rights and the availability of language accommodations, WFRC will feature prominent bilingual (English and Spanish) notification statements on all public meeting agendas, informational packets, workshop flyers, and the official website registry. These notices explicitly state that language translation and auxiliary aids are provided free of charge to the public.

The following standardized text shall be utilized on all official WFRC public engagement materials:

Wasatch Front Regional Council is an Equal Opportunity organization. Public participation is solicited without regard to age, sex, disability, race, color, or national origin. Auxiliary aids or translation services are available upon request by contacting WFRC's Title VI Administrator. Call 801-363-4250 (hearing impaired individuals may use Relay Utah by dialing 711) or email andrea.pearson@wfrc.utah.gov at least 72 hours in advance.

Wasatch Front Regional Council is holding public meetings in person in its office, with a virtual option. Interested attendees are encouraged to visit www.wfrc.utah.gov/committees for more information.

Wasatch Front Regional Council es una organización de Oportunidad Igual. Se solicita la participación del público, sin importar la edad, el sexo, la discapacidad, la raza, color o nacionalidad. Personas que requieren servicios de traducción deben contactar al Administrador de Título VI de WFRC por teléfono a 801-363-4250 (personas con discapacidad auditiva pueden llamar a Spanish Relay Utah - 1-888-346-3162) o por correo electrónico andrea.pearson@wfrc.utah.gov, por lo menos 72 horas antes de la reunión.

Wasatch Front Regional Council está teniendo las reuniones públicas en persona en la oficina, con la opción de asistir virtualmente. Personas interesadas en asistir pueden visitar www.wfrc.utah.gov/committees para obtener más información.

Dissemination of the WFRC Limited English Proficiency Plan

WFRC proactively disseminates this LEP Plan to ensure that regional stakeholders, community partners, and the general public are aware of the agency's commitment to language access and the availability of free accommodation services.

The final, board-approved LEP Plan is integrated into WFRC's comprehensive Title VI Program document and distributed through the following channels:

- Digital Accessibility: The complete plan is posted permanently on the WFRC website in an accessible format that can be easily parsed by screen readers and digital translation utilities.
- Public Notice Taglines: All formal public notices, comment period announcements, and open house invitations include a bilingual tagline (English and Spanish) informing residents that free translation services are available upon request with 72 hours' notice.
- Physical Availability: Printed copies of the master Title VI Program and LEP Plan are available upon request at the WFRC main office reception desk (41 North Rio Grande Street, Suite 103, Salt Lake City, UT 84101).

Any questions or comments regarding this plan should be directed to:

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