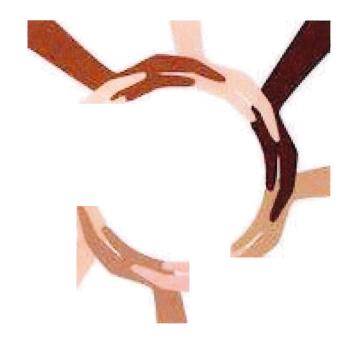
# LIMITED ENGLISH PROFICIENCY PLAN (TITLE VI PROGRAM)



METROPOLITAN PLANNING ORGANIZATION

# Permian Basin

Approved by Policy Board: January 29, 2024

#### **Disclaimer**

The Permian Basin Metropolitan Planning Organization (PBMPO) agrees that as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, and all requirements imposed by or pursuant to Title 49 of Code of Federal Regulations. SA-MPO and any other entities within the MPO boundary that receive Federal or State transportation-related funds, pledge that no person in the United States shall, on the grounds of race, color, national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to any discrimination under any program or activity for which the recipient receives federal financial assistance.

PBMPO agrees and assures that it will promptly take any measures necessary to comply with applicable federal or state regulations, requirements and laws listed within this document.

#### **PURPOSE**

To ensure equal access to all citizens of the Permian Basin community, the Permian Basin Metropolitan Planning Organization has developed a Limited English Proficiency Plan (LEP) to accommodate those whose proficiency is limited in speaking, reading, writing, or understanding English. The purpose of the plan is to guarantee access to those in which English is not their first language, so they can be involved with the transportation planning process. These individuals may be entitled to language assistance with respect to a particular type of service, benefit or encounter.

#### **Staffing and General Organization**

The Permian Basin Metropolitan Planning Organization (PBMPO) strives to provide information to all citizens and individuals within the Metropolitan Planning Area boundary. To ensure that everyone has a voice in the transportation planning process, PBMPO has developed two plans - Public Participation Plan (PPP) and Limited English Proficiency Plan (LEP).

The Public Participation Plan (PPP) was prepared in 2013 and amended June 18<sup>th</sup> of 2018. The PPP exists as a separate document.

The Limited English Proficiency Plan was prepared to guarantee that everyone has a voice, and that no person, group, organization, or entity is discriminated against on the basis of color, national origin, race, gender, affiliation, or any other characteristics protected by law including Articles contained in the Civil Rights Act of 1964, as amended.

Furthermore, PBMPO abides by the American with Disabilities Act of 1990, which states no entity shall discriminate against an individual with a physical or mental disability in connection with transportation planning.

#### **Program Administration and Title VI Coordinator Responsibilities**

The Director of the Permian Basin Metropolitan Planning Organization is responsible for ensuring the implementation of the Title VI program within the metropolitan planning area. As such, the day-to-day administration of the program is the responsibility of the GIS Technician, who also serves as the Title VI Coordinator.

Title VI Coordinator responsibilities include initiating, monitoring, and ensuring that PBMPO comply with Title VI requirements as follows:

- 1. Process, review, and investigate Title VI complaints received by PBMPO in accordance with Complaint Procedures. If any individual believes that he or she or any other program beneficiaries have been subject to unequal treatment or discrimination as to the receipts of services or funding, on the grounds of race, color, national origin, or gender, he or she may exercise their right to file a complaint with PBMPO. Every effort will be made to resolve complaints informally at the local level.
- 2. Collect statistical data (race, color, and national origin) of participants in, and beneficiaries of federally funded transportation and transit programs. Each of the Title VI special emphasis program areas will maintain data to be incorporated in the Title VI updates. Procedures will be reviewed regularly to ensure the data is sufficient to meet the Title VI program administration requirements.
- 3. Review special emphasis program areas to determine the effectiveness of program area activities at all levels. In addition to the day-to-day monitoring, all special emphasis program areas will be reviewed annually to assure effectiveness in their compliance of Title VI provisions. The Title VI Coordinator and program liaisons will coordinate efforts to ensure equal participation in their program areas and activities at all levels.
- 4. When warranted conduct Title VI reviews of recipients of federal aid funds.
- 5. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.
- 6. Develop Title VI information for Public Dissemination and Limited English Proficiency. Ensure dissemination to the public and, where appropriate, in languages other than English. PBMPO will disseminate Title VI Program information to citizens of the community, residents of neighborhoods affected by new transportation construction, and the public.
  - Public dissemination includes posting of public materials, i.e., Agendas, Comment Solicitation Forms, Announcements, or Notices in appropriate locations to ensure compliance with Permian Basin MPOs Public Participation Plan.
- 7. Prepare an Annual Title VI Update Report. The update will report on any accomplishments and changes to the plan occurring during the preceding year.
- Schedule training for Title VI related statutes for appropriate MPO employees. The training will provide comprehensive information on Title VI provisions, its application to program operations, identification of Title VI issues and resolution of complaints.

- 9. Identify and eliminate discrimination when found it is to exist. Work with appropriate offices and departments to establish procedures for promptly resolving deficiencies.
- 10. A list of all Title VI complaints, investigations, and lawsuits received since the last Title VI Program submission will be provided as requested.
- 11. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary within a period not to exceed 90 days. PBMPO will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, procedures will be promptly implemented to resolve Title VI issues, and reducing to writing remedial action agreed necessary within a period not to exceed 90 days.
- 12. Maintain updated legislative and procedural information regarding PBMPOs Title VI Program. This will include federal laws, rules and regulations, local guidelines, PBMPOs Plans and Programs, and updates, and other resource information pertaining to Title VI issues.

# Title VI Complaint Procedures for Programs and/or Activities That Receive Federal or State Transportation Funds

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 relating to any transportation or program or activity administered by PBMPO. These procedures apply to complaints filed against a program and/or activity funded by either the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA).

Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with PBMPO. A formal complaint must be filed within 180 calendar days of the alleged occurrence, or when the alleged discrimination became known to the complainant.

#### **Procedures**

- 1. The complainant must meet the following requirements:
  - a. Complaint shall be in writing and signed by the complainant(s).
  - b. Present the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).

- c. Present a detailed description of the issues including names and job title of perceived parties in the complaint.
- d. Allegations received by mail, fax or e-mail will be acknowledged and processed, once the identity of the complainant and the intent is required to mail a signed, original copy of the letter, fax or e-mail transmittal for PBMPO to be able to process it.
- e. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return to PBMPO for processing.
- f. If required, case files will be submitted to the appropriate authority.
- 2. Acceptance of a complaint will be determined by:
  - a. Whether the complaint is timely filed.
  - b. Whether the allegations involve a covered basis such as race, color, and national origin.
  - c. Whether the allegations involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor; or, in the case of ADA allegations, an entity open to the public.
  - d. The complainant(s) acceptance of reasonable resolution based on the PBMPO's administrative authority.
- 3. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The complainant cannot be located after reasonable attempts.
- 4. The Permian Basin Metropolitan Planning Organization has sole authority for accepting complaints for investigation. Once PBMPO decides to proceed with the investigation, the complainant and the respondent will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a case number and then be logged into PBMPO's records identifying its basis, alleged harm, the race, color, national origin of the complainant(s).
- 5. In cases where PBMPO assumes investigation of the complaint, PBMPO will provide the respondent with the opportunity to respond to the allegations in

writing. The respondent will have ten (10) calendar days from the date of PBMPO's written notification of acceptance of the complaint to furnish his/her response to the allegations.

- 6. Within 40 calendar days of the acceptance of the complaint, the GIS Technician (Title VI Coordinator) will prepare an investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition within 10 days.
- 7. The GIS Technician will address any comments to the preliminary investigative report, the report and its findings will be forwarded to the City of Odessa's Legal Department for review. The legal consultant will review the report, associated documentation, and will provide input within 10 calendar days. There will be a period of 10 calendar days for the legal consultant to discuss the report and any recommendations with the GIS Technician and address any modifications as needed.
- 8. PBMPO's final investigative report and a copy of the complaint will be forwarded to FTA within 60 calendar days of the acceptance of the complaint.
- 9. PBMPO will notify the parties of its preliminary findings.

# Complaint Specifics for Programs and/or Activities That Receive Federal or State Transportation Funds

The above-mentioned procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 relating to any transportation or program or activity administered by PBMPO. These procedures apply to complaints filed against a program and/or activity funded by either the Federal Transit Administration (FTA) or the Federal Highway Administration (FHWA).

Title VI Complaints are to be submitted to:

GIS Technician Permian Basin Metropolitan Planning Organization 9601 Wright Dr. Suite 1 Midland, TX 79706

- Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).
- The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.
- These procedures are part of an administrative process, which does not provide

for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the investigator may be utilized for resolution, at any stage of the process. The investigator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

#### **Title VI Emphasis in Transportation Planning Process**

Permian Basin Metropolitan Planning Organization (PBMPO) annually updates and coordinates plans for transportation planning, improvement programs, and projects. The update informs other jurisdictions of the current planning direction for transportation needs. Projects included in the update are the result of evaluation and prioritization of needs in various areas within the MPO boundary. The evaluation process includes input from local jurisdictions and organizations, private entities, various groups, and individual citizens.

In addition, PBMPO utilizes a comprehensive transportation planning process, which incorporates input from the general public. The process further entails the monitoring and collection of varied data pertaining to transportation issues. PBMPO also coordinates the establishment of new transportation corridors within the boundary.

#### Title VI Responsibilities

- 1. Ensure all aspects of the transportation planning process comply with Title VI.
- 2. Ensure participation of a cross section of various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic organizations and participating in roundtable meetings in minority communities when applicable.
- 3. Assist in gathering and organizing information for internal annual Title VI update reports.
- 4. Review the Unified Planning Work Program and other directives to ensure compliance with Title VI program requirements.
- 5. Gather statistical data on program participation regarding race, color, and national origin.

#### **LEP Individuals: Four Factor Analysis**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program that receives Federal financial assistance. Title VI and its implementing regulation require that FA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

According to the 2020 Census, the largest non-English speaking segment of the area reveals that Spanish is the language spoken at home. As such, PBMPO will consider publishing some of its publications, communications, and advertising in English and Spanish when deemed applicable.

Strategies to provide meaningful access to LEP persons to ensure that they can communicate effectively will be achieved by applying the four-factor analysis process provided as a guideline from the U.S. Department of Justice to determine LEP needs. The application of this four-factor analysis is included in Appendix D of this Program.

#### **LEP Individuals Defined**

Persons who do not speak English as their primary language and have a limited ability to read, speak, write or understand English may be considered Limited English Proficient or LEP.

#### **Determining the Need**

PBMPO makes every effort possible and takes reasonable steps to ensure meaningful access to the information and services it provides. To do this, the MPO uses the four-factor analysis as a guide to determine reasonable actions.

- Factor 1: The number and proportion of LEP persons in the MPO boundary area.
- Factor 2: The frequency with which LEP persons encounter MPO programs.
- Factor 3: The importance of the service provided by MPO programs.
- Factor 4: The resources available and overall cost to the MPO.

The Department of Transportation (DOT) gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above.

#### Public Participation and Outreach Procedures for LEP Individuals

PBMPO is responsible for utilizing its Public Participation Plan (PPP) that was developed in consultation with interested parties pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and subsequent legislation. The procedures outlined below are intended to afford an expanded list of interested parties with an opportunity to comment on transportation plans and programs.

PBMPO strives to provide timely information to the public and opportunities for public participation. Key objectives of the public participation process are to:

- Provide opportunities for citizens to help shape the area's future through a public comment process that is open and accessible to the public, stakeholders, and policymakers.
- Work with community groups to create opportunities for all segments of the public to learn and become informed about issues and proposals under consideration that may affect their neighborhoods.
- Look for opportunities to seek comment from low-income, elderly, disabled, and minority communities that may not typically participate in the urban planning process.
- Disseminate clear, concise, and timely information to citizens, affected agencies, and interested parties.
- Make information on transportation projects and programs available in a variety of formats, mediums, and languages to reach a larger audience.
- Provide timely responses to concerns and comments raised by the public regarding the development and implementation of regional transportation plans, programs, and projects.
- Ensure that all comments received for plans, projects, or transportation related issues are considered and incorporated into the deliberation regarding proposed plans and programs.

The procedures outlined in the PPP allow public interaction between the MPO Policy Board, Technical Advisory Committee, Citizen Advisory Committee, and staff. The PPP includes public participation procedures for the following planning documents: the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), the Public Participation Plan (PPP), and any other transportation planning initiatives and/or studies or projects that have a significant scope or affect to the community.

Keeping the citizens and stakeholders informed about transportation planning and transportation related projects is always a priority of PBMPO and we are committed to reaching as many individuals and organizations as possible. Therefore, information concerning transportation planning will be distributed in a variety of outlets, which include internet, website, newsletter, social media, and media. PBMPO will make every attempt to complete requests for materials and information in a non-English format.

#### TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the American with Disabilities Act of 1990, for alleged discrimination in any program or activity administered with Federal or State funds.

These procedures do not deny the right of the complainant to file formal complaints with other Federal or State agencies to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible.

The option of informal mediation meeting(s) between the affected parties and PBMPO may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination under Title VI and related statues may file a complaint.

The following measures will be taken to resolve Title VI complaints:

- 1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address, and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age, limited English), and date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.
- 2. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the PBMPO Title VI Coordinator (GIS Technician). Under these circumstances, the Complainant will be interviewed, and PBMPO Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- 3. When a complaint is received, the Title VI coordinator will provide written acknowledgement to the Complainant, within ten (10) days by registered mail.
- 4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for determination of no investigative merit.
- 5. Within 15 business days from receipt of a complete complaint, PBMPO will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Department Director of his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

- a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
- b. If the complaint is to be investigated, the notification shall state the grounds of PBMPO's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6. When PBMPO does not have sufficient jurisdiction, the GIS Technician or his/her authorized designee will refer the complaint to the appropriate Federal or State agency holding such jurisdiction.
- 7. If the complaint has investigative merit, the GIS Technician or his/her designee will fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be completed. The report will include a narrative description of the incident, summaries of all the people interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the GIS Technician will notify the appropriate authorities, and an extension will be requested.
- 8. The GIS Technician or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days of the receipt of the complaint.
- 9. If the Complainant is dissatisfied with PBMPO's resolution of the complaint, he/she has the right to file a complaint with the Federal Transit Administration and/or the Federal Highway Administration within 180 days of the alleged occurrence to the following address:

Federal Transit Administration Office of Civil Rights Region 6 819 Taylor Street, Room 8A36 Fort Worth, TX 76102 Telephone: (817) 978-0550

Federal Highway Administration U.S. Department of Transportation Office of Civil Rights 1200 New Jersey Avenue, SE 8<sup>th</sup> Floor E81-105 Washington, DC 20590

#### **Appendix A: LEP Certification Form**

#### Limited English Proficiency (LEP) Certification Form

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", indicates that differing treatment based upon a person's inability to speak, read, write, or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its' respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies, which receive federal funds, including transit providers, and Lead Agencies, which receive federal assistance through the Texas Department of Transportation (TxDOT).

The Limited English Proficiency Plan prepared by the Permian Basin Metropolitan Planning Organization addresses responsibilities as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et se, and its implementing regulations, which state that no person shall be subjected to discrimination based on race, color, or national origin.

The undersigned, known as the Permian Basin Metropolitan Planning Organization, hereby certifies that it has adopted this LEP Plan and will take responsible steps to carry out said Plan to all counties served and ensure meaningful access to the benefits, services, information, and activities for individuals who are Limited English Proficient (LEP). The undersigned has agreed to work together formally with Stakeholders and Planning Partners to coordinate activities and prevent violations of the law, including regulations applicable to this entity or its officers or employees and that the LEP program satisfies the requirements of Executive Order 13166.

Permian Basin Metropolitan Planning Organization

Title: Executive Director

Date: June 2, 2023

List of Counties served: Ector, Martin, Midland

## **Appendix B: Complaint Form**

# Permian Basin Metropolitan Planning Organization Civil Rights Complaint Form

Name:
Address:
Telephone Numbers:
(Home)(Work)
Electronic Mail Address:
Are you filing this complaint on your own behalf?
Yes _ No _
If not, please supply the name and relationship of the person for whom you are complaining:
Please explain why you have filed for a third party.
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. [written correspondence required]
Yes _ No _
Have you previously filed a Title VI complaint with PBMPO? Yes No_
If yes, what was your PBMPO Complaint Number?
[Note: This information is needed for administrative purposes; we will assign the same complaint number to the new complaint.]
Have you filed this complaint with any of the following agencies?
Transit Provider Department of Transportation
Department of Justice Equal Employment Opportunity Commission

Other Have you filed a lawsuit regarding this complaint? Yes No
If yes, please provide a copy of the complaint form.
[Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the court.]
Name of individual, group, entity complaint is against:
Contact person:Title:
Telephone number:
On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.
Please sign here:
Date:
[Note - We cannot accept your complaint without a signature and date.]

Please mail your completed form to: Title VI Program Coordinator, 9601 Wright Dr. Suite 1, Midland, TX 79706

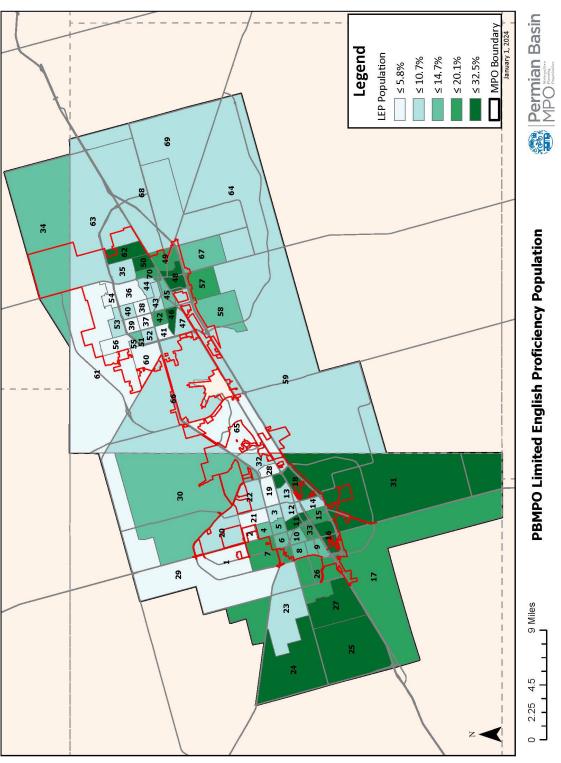
#### **Appendix C: Public Notice**

The Permian Basin Metropolitan Planning Organization herby gives public notice that it is our policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Restoration Act of 1987, and related statues 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, national origin, be excluded from the participation n, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which PBMPO receives federal financial assistance.

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 PBMPO. Any such complaint must be in writing and filed with the Permian Basin Metropolitan Planning Organization Title VI Coordinator (GIS Technician) within one hundred eight (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from PBMPO's office at no cost to the complainant or by calling 325-481-2800.

## Appendix D : LEP Analysis of the Permian Basin MPO

### LEP Analysis Permian Basin MPO



	Permian Basin MPO Limited English Proficiency Population							
Map ID	Census Tract	County	Total population 5 years and over	Population age 5+ who have limited English ability	Percent of population age 5+ who have limited English ability			
25	28.01	Ector County	6703	2176	32.5			
31	30.03	Ector County	5015	1471	29.3			
50	17	Midland County	4347	1252	28.8			
62	101.22	Midland County	1181	336	28.5			
48	14	Midland County	5187	1465	28.2			
46	12	Midland County	5572	1524	27.4			
11	15	Ector County	4114	1018	24.7			
27	28.04	Ector County	4740	1125	23.7			
16	20	Ector County	2918	681	23.3			
18	23	Ector County	3320	774	23.3			
24	27.02	Ector County	7475	1712	22.9			
49	15	Midland County	5008	1005	20.1			
57	101.17	Midland County	2369	470	19.8			
15	19	Ector County	4921	963	19.6			
7	8	Ector County	3353	644	19.2			
17	22	Ector County	4760	878	18.4			
33	31	Ector County	3033	533	17.6			
70	102	Midland County	2493	439	17.6			
42	4.02	Midland County	4326	737	17			
26	28.03	Ector County	3534	598	16.9			
34	9501	Martin County	1501	221	14.7			
51	101.05	Midland County	2934	431	14.7			
45	11	Midland County	4057	576	14.2			
9	11	Ector County	5519	776	14.1			
4	5	Ector County	3679	499	13.6			
5	6	Ector County	3906	503	12.9			
30	30.02	Ector County	3977	494	12.4			
6	7	Ector County	3846	473	12.3			
8	10	Ector County	4762	588	12.3			
10	13	Ector County	5210	637	12.2			
67	101.27	Midland County	2621	308	11.8			
58	101.18	Midland County	3088	341	11			

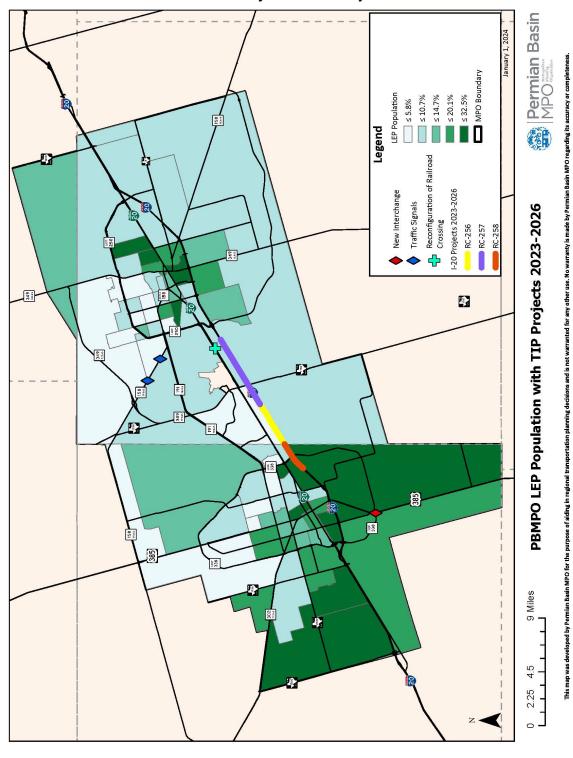
Namp ID   Census Tract   County   Total population 5 years   Population age 5+ who have limited   Have limited English ability   Percent of population 3 years   Population 3 y	glish ability
22         25.03         Ector County         5704         602         10.6           20         25.01         Ector County         8929         935         10.5           23         27.01         Ector County         6227         628         10.1           59         101.19         Midland County         4521         446         9.9           69         101.29         Midland County         4850         473         9.8           14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         3937         362         9.2           63         101.23         Midland County         3937         362         9.2           64         101.26         Midland County         3933         339         8.5           55         101.15         Midland County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3	
20         25.01         Ector County         8929         935         10.5           23         27.01         Ector County         6227         628         10.1           59         101.19         Midland County         4521         446         9.9           68         101.29         Midland County         4850         473         9.8           14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           63         101.23         Midland County         10345         922         8.9           66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5467         441         8.1	
23         27.01         Ector County         6227         628         10.1           59         101.19         Midland County         4521         446         9.9           69         101.29         Midland County         4850         473         9.8           14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           66         101.23         Midland County         10345         922         8.9           68         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7 <tr< td=""><td></td></tr<>	
69         101.19         Midland County         4521         446         9.9           69         101.29         Midland County         4850         473         9.8           14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           63         101.23         Midland County         10345         922         8.9           66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         2379         184         7.7           64         101.24         Midland County         3973         298         7.5      <	
69         101.29         Midland County         4850         473         9.8           14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           66         101.23         Midland County         10345         922         8.9           66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         3373         298         7.5           13         17         Ector County         5106         355         7	
14         18         Ector County         3570         348         9.7           53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           63         101.23         Midland County         10345         922         8.9           66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         2379         184         7.7           64         101.24         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9	
53         101.07         Midland County         3888         368         9.5           44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           63         101.23         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7	
44         6         Midland County         3666         341         9.3           43         5         Midland County         10345         922         8.9           66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           <	
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63 101.23 Midland County 10345 922 8.9 66 101.26 Midland County 8283 713 8.6 3 4 Ector County 3973 339 8.5 55 101.15 Midland County 2509 207 8.3 12 16 Ector County 5467 441 8.1 52 101.06 Midland County 5943 458 7.7 64 101.24 Midland County 2379 184 7.7 40 3.05 Midland County 3973 298 7.5 13 17 Ector County 5106 355 7 68 101.28 Midland County 3723 258 6.9 35 1 Midland County 5434 366 6.7 32 30.04 Ector County 5069 313 6.2 54 101.08 Midland County 2863 166 5.8 36 2 Midland County 4943 243 4.9 41 4.01 Midland County 2935 142 4.8 65 101.25 Midland County 4578 205 4.5 60 101.2 Midland County 5859 260 4.4	
66         101.26         Midland County         8283         713         8.6           3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9	
3         4         Ector County         3973         339         8.5           55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8	
55         101.15         Midland County         2509         207         8.3           12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5	
12         16         Ector County         5457         441         8.1           52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
52         101.06         Midland County         5943         458         7.7           64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
64         101.24         Midland County         2379         184         7.7           40         3.05         Midland County         3973         298         7.5           13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
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13         17         Ector County         5106         355         7           68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
68         101.28         Midland County         3723         258         6.9           35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
35         1         Midland County         5434         366         6.7           32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
32         30.04         Ector County         5069         313         6.2           54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
54         101.08         Midland County         2863         166         5.8           36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
36         2         Midland County         4943         243         4.9           41         4.01         Midland County         2935         142         4.8           65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
41     4.01     Midland County     2935     142     4.8       65     101.25     Midland County     4578     205     4.5       60     101.2     Midland County     5859     260     4.4	
65         101.25         Midland County         4578         205         4.5           60         101.2         Midland County         5859         260         4.4	
60 101.2 Midland County 5859 260 4.4	
39 3.04 Midland County 3589 155 4.3	
21 25.02 Ector County 5792 233 4	
29 30.01 Ector County 966 35 3.6	
37 3.02 Midland County 4845 167 3.4	
1 1 Ector County 3363 104 3.1	
61 101.21 Midland County 3650 102 2.8	
28 29 Ector County 3008 79 2.6	
19 24 Ector County 4278 94 2.2	
2 3 Ector County 1997 37 1.9	
56 101.16 Midland County 4362 71 1.6	
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71 9800 Midland County 0 0 0	

U.S. Department of Justice Civil Rights Division LEP.gov

2022 Limited English Proficiency Data for Permian Basin MPO

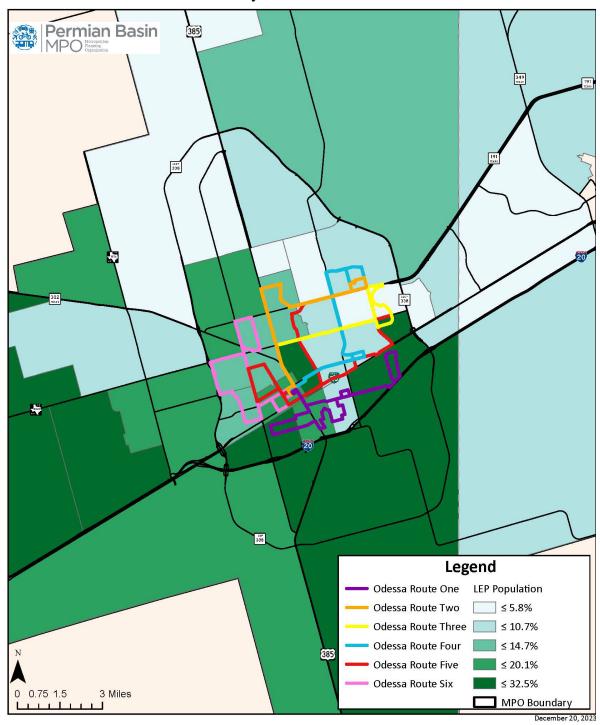
**Appendix E: LEP Analysis with TIP Projects** 

LEP Analysis with TIP Projects



Appendix F: LEP Analysis with EZ-Rider Routes by City

LEP Analysis with EZ-Rider Routes



**EZ-Rider Routes in Odessa and Limited English Proficiency Population** 

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