Title VI LEP Four Factor Analysis and Implementation Plan

Tyler Area Metropolitan Planning Organization

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Title VI LEP Four Factor Analysis for Tyler Area Metropolitan Planning Organization

Purpose

The purpose of this Language Assistance Implementation Plan (hereinafter “plan”) is to meet Federal Transit Administration’s (FTA’s) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a recipient of Federal Transit Administration (FTA) funds, this transit system is pledged to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The U.S. Department of Transportation’s FTA Office of Civil Rights’ publication “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers” was used in the preparation of this plan.

Contents

This plan contains:

A. A needs assessment based on the four-factor analysis
B. Implementation Plan
C. Contact Information

A. LEP Needs Assessment – the Four-Factor Analysis

Factor 1. The number or proportion of LEP persons in our service area who may be served or are likely to encounter a transit program, activity, or service.

“The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed (emphasis added). Ordinarily, persons ‘‘eligible to be served, or likely to be directly affected, by’’ a recipient’s programs or activities are those who are in fact, served or encountered in the eligible service population. This population will be program-specific, and includes persons who are in the geographic area that is part of the recipient’s service area...When considering the number or proportion of LEP individuals in a service area, recipients should consider LEP parent(s) whose English proficient or LEP minor children and dependents encounter the services of DOT recipients.
Recipients should first examine their prior experiences with LEP individuals and determine the breadth and scope of language services that are needed. In conducting this analysis, it is important to: Include language minority populations that are eligible beneficiaries of recipients’ programs, activities, or services but may be underserved because of existing language barriers; and consult additional data, for example, from the census, school systems and community organizations, and data from state and local governments, community agencies, school systems, religious organizations, and legal aid entities.

The focus of the analysis is on lack of English proficiency, not the ability to speak more than one language. Note that demographic data may indicate the most frequently spoken languages other than English and the percentage of people who speak that language but speak or understand English less than well. People who are also proficient in English may speak some of the most commonly spoken languages other than English.” (DOT LEP Guidance Section V (1)).

The Tyler Area Metropolitan Planning Organization (MPO) assessed the following information (as checked) about LEP persons to determine the number or proportion of LEP persons who might use or want to use transit services:

___X___ Map showing City of Tyler with concentrations of LEP persons
___X___ U.S. Census Bureau, 2007-2011 American Community Survey
___X___ Tyler 21 Comprehensive Plan, 20-year plan creating a strategic framework for future actions for the City of Tyler and serving as a roadmap for future growth.
___X___ Rider Survey results (English/Spanish versions)
___X___ Reports from drivers, dispatchers, other about contact with LEP persons
___X___ Local school district data

**Summary**

According to U.S. Census Bureau, 2007-2011 American Community Survey and Tyler 21-specific projections:

- The total number of LEP persons in Tyler Transit’s service area (city limits) is 8,047.
- The total eligible population in Tyler Transit’s service area is 104,083.
- The proportion of LEP persons to the total eligible service population is 9%.
- Of the 9% LEP persons, 89.2% speak Spanish.

**On-Board Transit Passenger Survey**

The on-board transit passenger survey was conducted during the spring of 2010 as part of a Transit Route Study. The survey was administered on-board by Tyler Transit drivers. The purpose of the survey was to gather input from riders regarding issues and opportunities relating to transit use and planning...
for Tyler. The survey was given to passengers as they boarded the bus; they then completed it while on-board and returned it as they exited the bus. The survey was administered in both English and Spanish versions, but results were not compiled separately. In order to reach out for more input from LEP persons, staff wrote a letter in Spanish with information about the purpose of the survey and encouraging participation.
Concentrations of LEP persons within City of Tyler

Most of Tyler’s Hispanic population resides inside of Loop 323 in the city’s older neighborhoods with concentration in neighborhoods north and east of downtown, particularly in the area east of North Broadway Avenue and north of East Front Street.
Population and Land Use Trends

Between 1950 and 2006, the population of the City of Tyler grew two and a half times, while its land area quadrupled in size. The story of Tyler's demographic and physical growth over the second half of the twentieth century is part of the larger American story of prosperity, automobile travel, suburbanization and the decline of downtowns during the same period. But at the beginning of the twenty-first century, Tyler, like many other communities, is finding that a half-century of sprawling, suburban style growth has also brought some unintended and unwanted consequences. Understanding recent and current trends in population growth and how land is used in Tyler is the first step towards creating a new plan to guide future growth.

Tyler began in 1847 as the county seat of newly-created Smith County with a 200-acre (0.8 square mile) land purchase. Planned in 28 blocks around a central square where the county courthouse was located, the city had a population of 1,021 by 1860. While the city population grew tenfold by 1910, Tyler's physical growth was modest throughout the late nineteenth and early twentieth centuries, as most new development clustered around the downtown business district in compact commercial areas and residential neighborhoods. The Tyler region's oil boom attracted many new residents in the 1930s, when the city grew an average of 6.5% annually, and by 1970 the city had annexed enough land to encompass 12.7 square miles.

Population growth continued to be very robust in the 1940s and 1950s but, though still substantial, began to moderate during the 1960s. With new annexations, the city grew to 25.2 square miles by 1970. From the late 1960s, growth south of Loop 323 accelerated as...
result of the dynamics of school desegregation and the emergence of new forms of retailing—symbolized by the opening of Broadway Square Mall in 1975. This expansion in land area paralleled national trends in post-World War II development as low-density, automobile-oriented residential and commercial development consumed large amounts of land outside of downtown and close-in areas. The fiscal benefits to the city of the growing retail and commercial districts on south Loop 323 and on Broadway south of Loop 323, as well as residents' desire for city services, encouraged the City to annex another 37.2 square miles between 1970 and 2008, more than doubling the city's land area. Today, in 2007, the city covers an area of almost 53 square miles with over 101,000 people. Now that the city has a population of over 100,000, its extraterritorial jurisdiction (ETJ) extends five miles from its corporate boundaries in all directions. The ETJ covers an additional 378 square miles in central and southern Smith County.
As the county seat of Smith County, Tyler serves as its employment, civic, cultural, and retail center. It is also the center of the Tyler Metropolitan Statistical Area (MSA), a geographic unit defined by the federal government for the purposes of measuring and reporting data on a metropolitan area. An MSA is an area that contains a core-urban area of at least 50,000 people. The Tyler MSA has been defined as identical to Smith County; therefore, the Tyler MSA includes both the city and the county population.
The city's proportion of county population has been declining significantly since 1970, when the city accounted for almost 50% of the county's population. This is a result of suburban-style residential growth in smaller cities, such as Whitehouse and Noonday, as well as in unincorporated parts of the county. Since 1970 Smith County has been growing faster outside the city than within the city limits. During the 1990s, county population growth, not counting the city, was about 2% a year, about twice the annual rate of growth within the city limits.

Tyler's city and ETJ land areas contain over 42% of Smith County's land area and approximately 47% of the county's population. Although ETJ residents are not residents of the city, the land within the ETJ is governed by Tyler's subdivision regulations. This limited land use control outside of the city boundary allows city government some ability to plan for future physical development and prevents conflicts with neighboring municipalities over annexation.
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The city's influence, however, stretches beyond the ETJ and MSA boundaries. Tyler functions as a regional center, particularly for retail, medical services, and employment, and state officials estimate that over 270,000 people enter Tyler each day for work, entertainment, shopping, medical services, government business, or cultural events. Tyler's location in the heart of East Texas means that the city effectively serves over 675,000 people who live within a 40- to 50-mile driving distance of Tyler. Tyler regularly draws workers, shoppers, and cultural patrons from a nine-county radius that includes Anderson, Cherokee, Gregg, Henderson, Rusk, Upshur, Van Zandt, Wood, and Smith counties. Tyler's influence is particularly strong on counties to the south and east, which are more rural in nature and farther away from the Dallas-Fort Worth Metroplex that lies approximately 90 miles northwest of Tyler.

THE TYLER REGION

Source: Texas State Data Center GIS data

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POPULATION FACTS

- **AGE AND GENDER COMPOSITION (2000):**
  - Median age: 24 years
  - 26% under 18 years old
  - 15% aged 65 or older
  - 47% male
  - 53% female

- **HOUSEHOLDS (2000):**
  - Total households: 32,528
  - Median income since 1990
  - 66% are family households (persons related by blood or marriage)
  - 43% of all households are married-couple households
  - 21% of all households are married couples with their own children under 18 years old
  - 36% of all households are single-person households
  - 5% are other non-family households
  - 6% are unrelated single persons living together
  - 14.5% of all households are headed by women
  - 19% of all households are single-parent households

- **RACIAL ETHNIC COMPOSITION (2000):**
  - 56% White, non-Hispanic
  - 26% African-American, non-Hispanic
  - 16% Hispanic/Latino; all races
  - 2% Other, non-Hispanic
  - Tyler Independent School District enrollment, 2005-2006:
    - 34% Hispanic
    - 24% African-American
    - 22% White

- **LANGUAGE SPOKEN AT HOME (2000):**
  - 14.7% of the population age 5 and older speaks Spanish at home
  - 1.5% speaks a language other than English or Spanish at home
  - 8.1% of the population age 5 and older speaks English less than “very well”

- **DISABILITY (2000):**
  - 16% of persons in the age group 5-20 have a disability
  - 22% of persons in the age group 21-64 have a disability
  - 44% of persons who are 65 and older have a disability

- **EDUCATIONAL ATTAINMENT (2000):**
  - 25% of the population has a bachelor’s degree or higher
  - 15% does not have a high-school diploma

- **INCOME (1999):**
  - Median household income: $34,162; median family income: $43,618
  - 51% of households have incomes of less than $50,000
  - 10% of households have incomes of $100,000 or more
  - 13% of families have incomes below the poverty level; over half of these are single-parent households
  - 4% of individuals have incomes below the poverty level
  - 24% of children under 16 live below the poverty level
  - 12% of elderly households live in poverty

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A. Population

POPULATION DATA SOURCES
The discussion of population trends in this chapter is based on several sources of data: 1) U.S. Census Bureau 2000 data and 2005 American Community Survey estimates; 2) population projections produced by the Texas State Data Center; and 3) a 2005 demographic study commissioned by the City and prepared by PASA Demographics of College Station, TX, a firm employed by the Tyler Independent School District (T.I.S.D.) to make enrollment projections. The Census Bureau’s American Community Survey (ACS) is administered to sample households on a yearly basis and measures population and housing data. ACS data have a 95% probability of accuracy.

ADJUSTED CITY POPULATION TOTALS
Unlike the Census Bureau and Texas State Data Center, PASA Demographics uses more detailed building permit data, annexation data, and school enrollment records in its projections. First, the PASA study estimated the Census 2000 undercount at 1,447 residents, resulting in a total of 86,097 city residents instead of 85,650. Drawing on school enrollment and other data, PASA also determined that some 16,064 new residents entered the city between 2000 and 2005 – over 3,000 new households. Most of these new residents were Hispanic and they settled inside Loop 323, many of them east of downtown and in North Tyler. They were attracted to Tyler by employment opportunities in the manufacturing and food products industries. The population surge in the early years of the decade, combined with the undercount of population growth during the 1990s, boosted Tyler’s estimated 2005 population to 101,660. This figure will be used as the baseline in this comprehensive plan, unless otherwise indicated. However, because the 2005 PASA estimate does not include a detailed analysis of population composition by race, household type, income, or other characteristics, data and estimates from the Census Bureau will be used to provide a general understanding of Tyler’s population characteristics.

RACIAL/ETHNIC COMPOSITION
During the 1990s and early 2000s, Tyler’s population grew more diverse. In 1990, 62% of Tyler’s residents were white (non-Hispanic), 28% were African-American (non-Hispanic), and less than 9% were Hispanic. By 2000, an influx of new Hispanic residents had significantly altered the city’s ethnic composition.

Source: U.S. Census 2000
Tyler's Hispanic population doubled, and the composition shifted to 16% white (non-Hispanic), 26% African-American (non-Hispanic), and 16% Hispanic. Since non-whites and Hispanics are typically undercounted more often than whites, the increase in diversity is likely to be somewhat higher than shown in the 2000 census data. For 2005, the Census Bureau estimated additional changes in the city's racial/ethnic composition: the population was 20% Hispanic, 28% African-American, and 52% white. Given the Hispanic character of the 2000-2005 in-migration, Tyler's population may be over 20% Hispanic now.

Source: U.S. Census 2000
Most of Tyler's African-American and Hispanic population resides inside of Loop 323 in the city's older neighborhoods. Neighborhoods in the northeastern part of the city, in traditional African-American neighborhoods near Texas College, along Palace Avenue, near the former Butler College, and along Old Noonday Road tend to have a higher percentage of African-American residents. The Hispanic/Latino community is more concentrated in neighborhoods north and east of downtown, particularly in the area east of North Broadway Avenue and north of East Front Street. Tyler's white residents are more concentrated south of Front Street and to the southeast and south.
AGE COMPOSITION

Tyler's median age in 2000 was 34.1 years old, which was slightly higher than the state median (32.3) but lower than Smith County's median age (35.5). About a quarter of the city's population is under 18 years old. The percentage of younger adults in Tyler is decreasing. In 1990, 20% of Tyler's population was between the ages of 15 and 19; by 2000, that age group had shrunk to 25% of the population, and 2009 Census Bureau estimates placed this group at less than 25% of Tyler's population. This young adult age cohort comprised a smaller percentage of overall population all over the U.S. in 2000, because it is made up of the smaller “baby bust” generation born in the 1970s. Communities everywhere are competing to retain and attract this group of younger workers.

Tyler also has a large population of senior citizens. The city markets itself as a retirement destination, its affordable cost of living attracts many new seniors, and it has two hospitals and a strong medical sector. Tyler's senior population accounted for 15.2% of the city's population in 2000 and was estimated at 15.4% in 2005 by the Census Bureau. In any case, this is a significantly greater percentage than in the state of Texas as a whole, where the 65 and older age group was estimated to make up only 9.6% of the population in 2005.
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**Age Composition in Tyler, 1990-2005**

![Bar chart showing age composition in Tyler from 1990 to 2005.]

**Source:** U.S. Census Bureau

**Estimates from the U.S. Census Bureau’s 2005 American Community Survey**

**Census and Estimated Age Composition in Tyler and Texas, 1990-2005**

<table>
<thead>
<tr>
<th></th>
<th>1990 % of Population</th>
<th>2000 % of Population</th>
<th>2005 % of Population</th>
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<td></td>
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<td>Texas</td>
<td>Tyler</td>
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<tr>
<td>Under 10</td>
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<tr>
<td>65 and above</td>
<td>8.4</td>
<td>7.7</td>
<td>8.0</td>
</tr>
</tbody>
</table>

**Source:** U.S. Census Bureau

*Estimates from the U.S. Census Bureau’s 2005 American Community Survey*

**Household Composition**

The number of households in the City of Tyler increased by 17% between 1990 and 2000. Over 65% of Tyler’s 32,155 households in 2000 were family households (persons related by blood or marriage, but not necessarily with children), but only 47% of all households were married-couple households and 21% were married couples with their own children under age 18. Ten percent of the family households were single-parent households. In 2000, 36% of all households were single-person households. The remainder lived in households with non-relatives or in group quarters such as dormitories. The average number of persons per household in 2000 was 2.48, and the average family size was 3.12 persons.

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Although Tyler is a family-oriented city, the majority of its households do not include children. In 2000, 53% of all Tyler households included children under 18, and the Census Bureau estimates that in 2005, 56% of the city's households included children under 18. Many family and non-family households also include senior residents: over 32% of all households in 2000 had at least one person aged 60 or older, and over 36% included at least one person aged 65 or older.

Like the overall population growth rate, the rate of household growth is greater in the southern part of the city and in the southern part of Smith County outside the Tyler city limits. Van Zandt County also is experiencing relatively high growth rates because it is just outside the eastern edge of the Dallas Metroplex.
PUBLIC SCHOOL POPULATION

Tyler Independent School District (T.I.S.D.) is the largest school district in East Texas and includes two high schools, six middle schools, 16 elementary schools, and three alternative/special education schools. T.I.S.D.'s boundaries include most of the city of Tyler. Total T.I.S.D. enrollment for the 2005-2006 school year was 18,002 students. In 2005-2006, the racial and ethnic composition of the public school population was 52% white, 34% African-American, and 24% Hispanic, with a greater percentage of minority students than the city's population as a whole. This suggests that many white families send their children to one of Tyler's parochial schools. T.I.S.D. enrollment has been increasing steadily since 2000 at a rate of around 2% per year and is projected to reach approximately 19,375

1 Small portions of the eastern side of Tyler fall within the Chapel Hill Independent School District and the Whitehouse Independent School District.

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INCOME PROFILE

Tyler's median household and family incomes are lower than the county's and the state's. The county has a smaller percentage of single-person households, who typically have lower median incomes than family households, than the city, and the city also has a larger number of households living in poverty. Disparities between household and family incomes reflect the difference between households with one earner and those with more than one.

Census Bureau estimates suggest income disparities grew in Tyler during 1999-2005. Over 51% of Tyler's households had incomes of less than $35,000 in 1999; by 2005 this total had risen to 54%. The percentage of households earning more than $50,000 also rose slightly between 1999 and 2005 from 13% to 14%, while the percentage of households earning $100,000 per year during this period rose from 10% in 1999 to 11% in 2005. Tyler's income levels are somewhat lower than Smith County's and Smith County in general has more households in the middle income ranges than Tyler.
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<table>
<thead>
<tr>
<th>Household Income</th>
<th>Percentage of Tyler Households in 1999</th>
<th>Percentage of Tyler Households in 2005*</th>
<th>Percentage of Smith County Households in 1999</th>
<th>Percentage of Smith County Households in 2005*</th>
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<tr>
<td>Less than $10,000</td>
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<td>$65,000 and above</td>
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<td>11.2</td>
<td>9.1</td>
<td>11.3</td>
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</table>

Source: U.S. Census Bureau
*U.S. Census Bureau’s 2005 American Community Survey

INDIVIDUALS AND HOUSEHOLDS LIVING IN POVERTY

Tyler has a higher number of individuals living in poverty than the Texas average. Nearly one in three Tyler children are estimated to be living in poverty. Senior citizens in Tyler, however, are less likely to be poor than in the state as a whole.

In 1999, 16% of Tyler’s households had incomes that fell below the poverty level, as compared to 14% in Texas. Over half of these households in poverty in Tyler were headed by single parents. Almost one-quarter of all children in Tyler lived in poverty, and 12% of residents aged 65 or older also lived in poverty. By 2005, the Census Bureau estimated that over 22% of Tyler residents lived in poverty, in comparison to the state average of 18%. Two-thirds of the working-age individuals in poverty in Tyler were women, whereas only 58% of the working-age individuals in poverty in Texas were women. The number of children in poverty in Tyler is estimated to have increased to 34% in 2005, a number significantly higher than the state average of 25%. However, the number of seniors in poverty declined to only 8% in 2005. For the same year, 17% of all Texas residents 65 or older were living in poverty. The decrease in Tyler’s number of seniors in poverty may reflect the impact of older, more affluent retirees and empty nester households moving into the city.

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### POVERTY STATUS, 1999 AND 2005

<table>
<thead>
<tr>
<th></th>
<th>1999 % of Households in Poverty</th>
<th>2005 % of Households in Poverty</th>
<th>1999 % of Individuals in Poverty</th>
<th>2005 % of Individuals in Poverty</th>
<th>1999 % of Children under 18 in Poverty</th>
<th>2005 % of Children under 18 in Poverty</th>
<th>1999 % of Seniors (over 65) in Poverty</th>
<th>2005 % of Seniors (over 65) in Poverty</th>
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<td>12.9</td>
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<td>Texas</td>
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<td>24.0</td>
<td>12.8</td>
<td>12.7</td>
</tr>
</tbody>
</table>

**Source:** U.S. Census Bureau

* U.S. Census Bureau’s 2006 American Community Survey (ACS)

### GEOGRAPHICAL DISTRIBUTION OF HOUSEHOLDS BY INCOME

Households in areas south of Fifth Street had higher median incomes in 1999 than in other parts of the city. The poorest households were in downtown and certain neighborhoods north and west of downtown and in the Butler College and St. Louis neighborhoods.

### MEDIAN HOUSEHOLD INCOME IN 1999 BY BLOCK GROUP

[Map showing geographical distribution of median household income]

**Source:** U.S. Census Bureau
EDUCATIONAL ATTAINMENT AND EMPLOYMENT

The majority of Tyler's residents over 25 years old in 2000 had earned a high-school diploma, and 8% had gone on to complete a bachelor's degree. An additional 6% had completed a master's degree, and 4% had earned a professional or doctoral degree. Only 3% of Tyler residents had not completed any education beyond high school.

CITY OF TYLER RESIDENT OCCUPATIONS IN 2000

In Tyler, as elsewhere, an employment transition from manufacturing and agriculture to services has been underway for a long time and jobs in the Tyler MSA are predominantly service jobs. In 2000, 57% of Tyler residents aged 16 and older were in the work force, with the majority in services of some kind. In 2005, Tyler's top five employers were Trinity Mother Frances Health Center, East Texas Medical Center, Brookshire Grocery Company, Tyler Independent School District (T.I.S.D.), and Travel Company.

The Tyler MSA is a major employment center in East Texas, and the City of Tyler includes many of the MSA's jobs. Almost 97,000 workers were in the Tyler MSA labor force in 2005. Many of these workers drive into the city from homes in Smith County and surrounding counties. In 2000, almost 19% of Tyler MSA employees commuted from other counties to work in Smith County. Except for a dip in jobs during the 2000 recession, the Tyler MSA has seen regular employment growth. The number of jobs grew at a fairly steady rate of two to three percent between 2002 and 2005. The Tyler MSA's continued job growth since 2002 has depended primarily on the city's health care industry, construction jobs, hospitality services, transportation/warehousing jobs, and professional and business services. From 1990 to 2005, the Tyler MSA's health care jobs grew over 110%, hospitality jobs increased by almost
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85%, and its professional and business services jobs also increased by over 53%. During the same period, manufacturing jobs declined by 14% and natural resource-related jobs (oil and gas) decreased by over 25%. In 2003, health care, government, retail, hospitality, and manufacturing accounted for over 50% of the Tyler MSA’s employment. Continued growth is forecast to 2010 in the Tyler MSA, with employment growth (1.8% per year) slightly outpacing population growth (1.7% per year for the MSA as whole) and retail sales growth expanding much faster at 6.8% per year.

POPULATION PROJECTIONS

Demographers always emphasize that population “projections” are not “predictions.” The reliability of projections more than ten years in the future declines with each succeeding year. Population change is made up of net natural increase (births minus deaths) and net migration (immigration minus emigration), both of which can take unpredictable turns, especially migration. Population projections are made based on judgments about the likelihood of existing trends continuing. The population projections below use data from PASA Demographics for the City of Tyler in 2006 and 2013 and from the Census Bureau and the Texas State Data Center for Smith County in 2006 and 2013.

City of Tyler Population Projections

Tyler’s rapid increase in population between 2000 and 2005 appears to be attributable to the city’s location along an immigration path from Mexico during those years. In addition, Tyler had a high number of births relative to deaths and also annexed several large tracts of land during this period. It appears that the immigration flow slowed in 2006, as school enrollments stabilized in 2005-2006 after four years of growth. PASA Demographics’ population projections suggest that Tyler will not continue to grow at a rate of 4% per year, as it did in 2000-2005. The transition from white and African-American workers to Hispanic workers in certain industries in Tyler is complete and few new jobs in these industries are expected to be available to additional Hispanic immigrants. This reduction in manufacturing and food industry employment possibilities is expected to slow in-migration. PASA Demographics project that by 2015 the city should gain approximately 2,857 persons in five-year increments (or 5,734 persons in ten years) due to net in-migration. Any future annexations are not defined or included in the projections. Births over deaths are estimated as 5,628 for the City over the ten-year projections period. In sum, there should be approximately 111,722 persons in the City of Tyler by 2015. This represents a ten-year growth rate of 11%, or 1.1% per year between 2006 and 2015, which is a return to average growth rates.

The 2015 estimate of future population also tracks well with the projected number of public and private school students being added to the population (using the past two years – Fall 2004 relative to Fall 2006 – to establish a rate of growth). The growth rate for retirees is expected to be slightly higher than that of the school-aged population.

Using PASA Demographics’ 2005 and 2015 estimates as a foundation, population and household projections for the City of Tyler in 2015 are below, based on the following assumptions:

- No new annexations
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- Single-person households will continue to comprise 45% of all households.
- The average household size is 2.5 persons (for other households).
- 2005-2015 annual population growth rate of 1.2%.
- 2015-2025 annual population growth rate of 1.5%.

The population growth rates used here are somewhat more aggressive than historic rates under the assumption that quality of life improvements and continued economic growth will attract more residents to Tyler.

<table>
<thead>
<tr>
<th>CITY OF TYLER POPULATION AND HOUSEHOLD PROJECTIONS, 2005-2025</th>
<th>2005</th>
<th>2015</th>
<th>2025</th>
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<tbody>
<tr>
<td>TOTAL CITY POPULATION*</td>
<td>101,100</td>
<td>122,722</td>
<td>135,630</td>
</tr>
<tr>
<td>Annual population growth rate</td>
<td>—</td>
<td>1.2%</td>
<td>1.5%</td>
</tr>
<tr>
<td>Total city households</td>
<td>49,464</td>
<td>50,089</td>
<td>51,882</td>
</tr>
<tr>
<td>Average household size**</td>
<td>2.5</td>
<td>2.5</td>
<td>2.5</td>
</tr>
<tr>
<td>New single-person households</td>
<td>—</td>
<td>1,388</td>
<td>2,029</td>
</tr>
<tr>
<td>Total single-person households**</td>
<td>12,129</td>
<td>13,267</td>
<td>15,306</td>
</tr>
<tr>
<td>New other households</td>
<td>—</td>
<td>2,237</td>
<td>4,734</td>
</tr>
<tr>
<td>Total other households</td>
<td>23,526</td>
<td>31,962</td>
<td>36,206</td>
</tr>
<tr>
<td>New total households</td>
<td>—</td>
<td>4,526</td>
<td>6,763</td>
</tr>
</tbody>
</table>

* 2005 and 2015 population estimates provided by PSEA Demographics.
** Percentage of household types and average persons per household based on 2000 Census. Assumptions exclude: 1) 2.5 persons per household and 2) 95% of households are single-person households.

The population between 2005 and 2015 would grow by 28,470 persons or 1,424 persons a year on average. Using the population projections above and assuming average household size and percent of single-person households to be the same as in the 2000 Census, future additional households are as follows:

- 2005-2015: 4,625 new households of which 1,388 would be single-person households.
- 2015-2025: 6,763 new households of which 2,029 would be single-person households.

The total number of new households to be accommodated in these two decades would be 11,388 (average 569 per year) of which 3,417 would be single-person households.

**Smith County Population Projections**

Growth rates are higher in Smith County. Using the Texas State Data Center 2005 estimate for Smith County plus the addition of the PESA 2005 estimate of additional population, and assuming 2.5% annual growth rate, the population of Smith County, not including the current City of Tyler population, can be estimated as:

66 TYLER 21 COMPREHENSIVE PLAN
- 2005: 99,918
- 2015: 128,572
- 2025: 159,023

Assuming 2.6 persons per household (as in the 2000 Census for Smith County), the number of households would be:

- 2005: 18,410
- 2015: 49,431 (11,011 new households)
- 2025: 61,509 (12,058 new households)

The total number of new households to be accommodated in the twenty years between 2005 and 2025 would be 23,079 (1.154 per year).
Factor 2. The frequency with which LEP persons come in contact with transit programs, activities, or services.

“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed (emphasis added). The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily. Recipients should also consider the frequency of different types of language contacts, as frequent contacts with Spanish-speaking people who are LEP may require certain assistance in Spanish, while less frequent contact with different language groups may suggest a different and/or less intensified solution. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual’s program or activity contact is unpredictable or infrequent. However, even recipients that serve LEP persons on an unpredictable or infrequent basis should use this balancing analysis to determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate. It may be as simple as being prepared to use a commercial telephonic interpretation service to obtain immediate interpreter services. Additionally, in applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.” (DOT LEP Guidance Section V(2)).

The LEP populations that Tyler Area Metropolitan Planning Organization (MPO) comes in contact with speak primarily Spanish. The Spanish speaking passengers are primarily located inside of Loop 323 within the city’s older neighborhoods. Spanish-speaking passengers are concentrated in neighborhoods north and east of downtown, particularly in the area east of North Broadway Avenue and north of East Front Street. These passengers use transit buses for work, school, medical appointments and retail needs. Tyler Transit’s bus drivers and office staff have frequent contact with both languages.

Transportation services provide an important link to the LEP population and their community.

Factor 3. The nature and importance of programs, activities, or services provided to the LEP population.

“The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed (emphasis added). The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual...” (DOT LEP Guidance Section V(3)).
“...providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.” (DOT LEP Guidance Section V (4)).

The MPO considers transit to be an important and essential service for many people living in the service area. Overall passenger numbers indicate that ridership continues to outperform the previous years. For the current fiscal year, ridership is up 6.1% over the previous period. The MPO does not track LEP passengers separately, but know that public transportation is an important need especially during the school year and colder weather months for all passengers, including LEP persons. Workers rely on the system all year round.

Factor 4. The resources available to our transit system and the overall cost to provide language assistance.

“A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. (emphasis added). Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, ‘reasonable steps’ may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.

Resource and cost issues, however, can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, affected populations, and Federal agencies.” (Section V(4)).

Tyler Transit’s current budget for marketing to or communicating with all eligible passengers about transit services, including LEP persons, is $7,000. This funds staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc. During 2011, Tyler Transit implemented a new route system and schedule with all new marketing materials in both English and Spanish. In addition to the marketing budget, staff resources provide assistance to LEP persons.

Tyler Transit’s website is available in Spanish which includes schedules, route maps as well as hours of operation and fares. Route/schedule maps and information about ADA paratransit services are available in both languages. In 2010, the MPO adopted an updated Paratransit Plan which defines policies and procedures for ADA complementary service and has been translated into Spanish.

The agency employs a part-time bus driver that is fluent in Spanish and English who is assisting with translation of new public documents and materials. The City of Tyler Communications Department provides access to translation services and the system also has access to Spanish translation through a cooperative agreement with the East Texas Council of Government GOBUS, the regional rural transit provider.

The City employs Spanish speaking staff in the Police, Fire and Water Departments. As part of the new system implemented, there is a plan to provide buses with translation cards with common
phrases printed including bus rules and procedures, such as the cost of the fare and that the fare is due upon boarding.

B. Implementation Plan

Task 1. Identifying LEP Individuals Who Need Language Assistance

“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

One way to determine the language of communication is to use language identification cards (or ‘‘I speak cards’’), which invite LEP persons to identify their language needs to staff. Such cards, for instance, might say, ‘‘I speak Spanish’’ in both Spanish and English, or ‘‘I speak Vietnamese’’ in both English and Vietnamese. To reduce costs of compliance, the Federal Government has made a set of these cards available on the Internet. The Census Bureau’s ‘‘I speak card’’ can be found and downloaded at http://www.usdoj.gov/crt/cor/13166.htm.

When records are normally kept of past interactions with members of the public, the language of the LEP person can be included as part of the record. In addition to helping employees identify the language of LEP persons they encounter, this process will help in future applications of the first two factors of the four-factor analysis. In addition, posting notices in commonly encountered languages notifying LEP persons of language assistance will encourage them to self-identify.” (DOT LEP Guidance Section VII (1)).

In order to determine the language of communications, the MPO will create basic written information that drivers or staff can provide to those with limited English proficiency. In addition, the MPO will also begin to print and distribute the “I Speak” language identification cards to bus drivers, supervisors and staff to be completed FY 2012. These wallet cards will assist people with limited English proficiency when they are traveling without an interpreter.
Task 2. Language Assistance Measures

“An effective LEP plan would likely include information about the ways in which language assistance will be provided. For instance, recipients may want to include information on at least the following:

- Types of language services available.
- How recipient staff can obtain those services.
- How to respond to LEP callers.
- How to respond to written communications from LEP persons.
- How to respond to LEP individuals who have in-person contact with recipient staff.
- How to ensure competency of interpreters and translation services.” (DOT LEP Guidance Section VII (2)).

As the dominant alternate language is Spanish, the MPO plans to make all materials and assistance available in Spanish as well as English. Language measures currently used and planned to be used by the MPO to address the needs of LEP persons include the following:

- Making public information documents available in Spanish.
  This includes:
  - Fixed route maps/schedules, paratransit brochures, and paratransit plan completed in FY 2011.
  - Paratransit eligibility application and notification letters to be completed in FY 2012.

- The MPO’s website at www.tylerareampo.org is being translated into Spanish and will be complete in 2012.
- Arranging for availability of oral and written translators as needed by staff. Job postings encourage bilingual applicants and there are translators available in the City’s Police, Fire, Development Services and Water Departments.
- Posting notices in Spanish informing LEP persons of available services and upcoming public meetings.
- Working with community groups to verify the competency of interpreters and translations services.
Task 3. Training Staff

“Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:

- Staff knows about LEP policies and procedures.
- Staff having contact with the public (or those in a recipient’s custody) is trained to work effectively with in-person and telephone interpreters.

Recipients may want to include this training as part of the orientation for new employees. Recipients have flexibility in deciding the manner in which the training is provided, and the more frequent the contact with LEP persons, the greater the need will be for in-depth training. However, management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff.” (DOT LEP Guidance Section VII (3)).

To ensure effective implementation of this plan, the MPO will schedule training during orientations for new staff and for all relevant employees on an annual basis to review:

- The MPO’s Four Factor Analysis and Implementation Plan
- Demographic data about local LEP population
- Printed materials for LEP persons
- Procedures to handle verbal requests for transit service in a foreign language
- Responsibility to notify transit director about any LEP persons’ unmet needs
Task 4. Providing Notice to LEP Persons

“Once an agency has decided, based on the four factors, that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge (emphasis added). Recipients should provide this notice in languages LEP persons would understand. Examples of notification that recipients should consider include:

- **Posting signs in intake areas and other entry points.** This is important so that LEP persons can learn how to access those language services at initial points of contact. This is particularly true in areas with high volumes of LEP persons seeking access to certain transportation safety information, or other services and activities run by DOT recipients.

  For instance, signs in intake offices could state that free language assistance is available. The signs should be translated into the most common languages encountered and should explain how to get the necessary language assistance. The Social Security Administration has made such signs available at [http://www.ssa.gov/multilanguage/langlist1.htm](http://www.ssa.gov/multilanguage/langlist1.htm). DOT recipients could, for example, modify these signs for use in programs, activities, and services.

- **Stating in outreach documents that language services are available from the agency.** Announcements could be in, for instance, brochures, booklets, and in outreach and recruitment information. These statements should be translated into the most common languages and could be ‘‘tagged’’ onto the front of common documents.

- **Working with community-based organizations and other stakeholders to inform LEP individuals of the recipients’ services, including the availability of language assistance services.**

- **Using an automated telephone voice mail attendant or menu system.** The system could be in the most common languages encountered. It should provide information about available language assistance services and how to get them.

- **Including notices in local newspapers in languages other than English.**

- **Providing notices on non-English-language radio and television stations about the available language assistance services and how to get them.**

- **Providing presentations and/or notices at schools and religious organizations.”** (DOT LEP Guidance Section VII (4)).
The MPO plans to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Signs on buses or at bus stops
- Brochures
- Posters or flyers for local organizations that work with LEP persons
- Investigate allowing telephone messages
- Website notices
Task 5. Monitoring and Updating the LEP Plan

“Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees.

In addition, recipients should consider whether changes in demographics, types of services, or other needs require annual reevaluation of their LEP plan. Less frequent reevaluation may be more appropriate where demographics, services, and needs are more static. One good way to evaluate the LEP plan is to seek feedback from the community.

In their reviews, recipients may want to consider assessing changes in:
- Current LEP populations in the service area or population affected or encountered.
- Frequency of encounters with LEP language groups.
- Nature and importance of activities to LEP persons.
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
- Whether existing assistance is meeting the needs of LEP persons.
- Whether staff knows and understands the LEP plan and how to implement it.
- Whether identified sources for assistance are still available and viable.

In addition to these five elements, effective plans set clear goals, management accountability, and opportunities for community input and planning throughout the process.” (DOT LEP Guidance Section VII (5)).

The MPO will review this plan during its annual review with the TxDOT public transportation coordinator by:
- Assessing its effectiveness (e.g., comparing numbers of LEP persons served by year, number of requests for language assistance received during the year),
- Assessing the sufficiency of staff training and budget for language assistance,
- Reviewing current sources for assistance to ensure continuing availability, and
- Reviewing and evaluating response for any complaints from LEP persons about their needs that were received during the past year.

The MPO will review this plan annually; revisions will be approved and dated accordingly.

Dissemination of Plan

This Four Factor Analysis and Implementation Plan will be available on the MPO’s website at www.tylerbus.org. It is also available upon request. If requested to be provided in Spanish and it is feasible to have it translated, it will be provided to the requester.
C. Contact Information

Questions or comments about this plan may be submitted to:

Name: Barbara Holly
Title: Executive Director
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Telephone: 903-595-7231
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