Limited English Proficiency Plan
[TRANSIT AGENCY NAME]
DATE

TITLE VI COORDINATOR
NAME AND WORKING TITLE OF THE TITLE VI COORDINATOR
ADDRESS
PHONE NUMBER

INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the **(TRANSIT AGENCY'S)** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency 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 seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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 understand English is a type of national origin discrimination. It directs each 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 all **(TRANSIT AGENCY)** departments receiving federal grant funds.

Plan Summary

The **(TRANSIT AGENCY)** has developed this ***Limited English Proficiency Plan*** to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the **(TRANSIT AGENCY)** used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the **(TRANSIT AGENCY).**
2. The frequency with which LEP persons come in contact with **(TRANSIT AGENCY)** services.
3. The nature and importance of services provided by the **(TRANSIT AGENCY)** to the LEP population.
4. The interpretation services available to the **(TRANSIT AGENCY)** and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. **The number or proportion of LEP persons in the service area who may be served or are likely to require (TRANSIT AGENCY) services.**

   The **(TRANSIT AGENCY)** staff reviewed the 2000 U.S. Census Report and determined that xx persons in **(TRANSIT AGENCY)** [x.x%] of the population] speak a language other than English. Of those xx persons xx [x.x%] have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a .xx% of the overall population in the service area. In (TRANSIT AGENCY'S) service area, of those persons with limited

English proficiency, xx speak Spanish, xx speak Indo-European, and xx speak Asian or other Pacific Islander Languages.

2. **The frequency with which LEP persons come in contact with (TRANSIT AGENCY) services.**
   The **(TRANSIT AGENCY)** staff reviewed the frequency with which the board/council, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the (TRANSIT AGENCY) has had no requests for interpreters and no requests for translated program documents. The board/council, office staff and bus/van drivers have had very little contact with LEP persons.

3. **The nature and importance of services provided by the (TRANSIT AGENCY) to the LEP population.**
   There is no large geographic concentration of any type of LEP individuals in the service area for the **(TRANSIT AGENCY)**. The overwhelming majority of the population, xx.x%, speak only English. As a result, there are few social, service, professional and leadership organizations within the **(TRANSIT AGENCY)** service area that focus on outreach to LEP individuals. The **(TRANSIT AGENCY)** board/council, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

4. **The resources available to the (TRANSIT AGENCY), and overall costs to provide LEP assistance.**
   The (TRANSIT AGENCY) reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the city would pay a fee.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to **(TRANSIT AGENCY)** services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the **(TRANSIT AGENCY)** staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All **(TRANSIT AGENCY)** staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All **(TRANSIT AGENCY)** staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

- When the **(TRANSIT AGENCY)** sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures
Although there is a very low percentage in the **(TRANSIT AGENCY)** of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

1. The **(TRANSIT AGENCY)** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
- Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.
- Language interpretation will be accessed for all other languages through a telephone interpretation service.

STAFF TRAINING

The following training will be provided to all staff:
- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the (TRANSIT AGENCY) will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

The **(TRANSIT AGENCY)** weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, the **(TRANSIT AGENCY)** does not have a formal outreach procedure in place, as of 2010. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the **(TRANSIT AGENCY)** will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Monitoring and Updating the LEP Plan - The **(TRANSIT AGENCY)** will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the **(TRANSIT AGENCY)** service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the **(TRANSIT AGENCY's)** financial resources are sufficient to fund language assistance resources needed.
- Determine whether the **(TRANSIT AGENCY)** fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

DISSEMINATION OF THE (TRANSIT AGENCY) LEP PLAN

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at xxxxxxxxxx.