

# Language Assistance Plan for Community Transit of United Community Action Partnership

**Revised: August 31, 2016**

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## **Purpose**

The purpose of this Language Assistance 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 subrecipient of 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 completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT'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," dated April 13, 2007, was used in the preparation of this plan.

The plan for Western Community Action contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating the plan

### **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.

We 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 our transit services:

- X 2010-2014 US Census data/American Community Survey data
- X Survey results: 2015 Western Community Action Community Assessment
- Local school district data
- Locally Coordinated Human Services Plan
- Other Human Services data
- Area/Metropolitan Planning Organizations/Regional Development Commission data

- Information from local organizations (religious, legal, social service, etc.) about LEP persons in our service area
- Reports from drivers, dispatchers and others about contact with LEP persons
- Other information: Describe: \_\_\_\_\_

According to data provided by Mn/DOT from the American Community Survey 2010-2014 Three-Year estimates:

- 1) The total number of LEP persons in our service area is 2169.
- 2) The total eligible population in our service area is 91,525.
- 3) The proportion of LEP persons to the total eligible service population is 2.37%.

While the overall population in southwestern Minnesota is declining, we are seeing an increase in the population of diverse cultures. Hispanic/Latino and Black populations have maintained residency with an increase in Asian populations. According to a 2015 community needs assessment conducted by Western Community Action, several large families of Karen/Burmese refugees have moved into our communities.

Factor 2. The frequency with which LEP persons come in contact with our transit programs, activities, or services.

Western Community Action Drivers and Dispatchers have initial contact with LEP persons on a daily basis. Tracking of LEP persons is through our dispatching software but we do not do intakes on all our passengers. Therefore, we would not be able to accurately measure number of people served unless they call or come in to schedule a ride.

According to our passenger data there has been a consistent number of African American, Hispanic, and Native American riders. A slight increase in Asian riders since 2013.

The conclusion drawn from examining this information is that most LEP persons seeking transit services most often speak Spanish, Somali and Hmong/Burmese.

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

Community Transit considers transportation to be an important and essential service for many people living in our service area. The majority of the trips that we provide LEP passengers are for social services such as educational and religious purposes. A trip for medical services is a close second. We have continued to provide rides for our LEP persons to attend Adult Basic Education.

A passenger has limited English language proficiency (LEP) when he/she is not able to speak, read, write or understand the English Language at a level that allows him/her to interact effectively with Community Transit staff. Sometimes it is not easy to identify a person with LEP.

Currently Community Transit drivers and the public have access to rider's guides that have been translated in Spanish. Rider's Guides will answer most questions on how to request a ride.

Dispatchers are usually the first line of contact with most LEP persons. Staff will initiate an offer for language assistance to clients who have difficulty communicating in English or when a client asks for language assistance. Whenever possible, staff are encouraged to follow the passenger's preferences, such as, if a passenger wants a family member or friend to interpret rather than an agency provided interpreter. If a Western Community Action staff person is not available to translate, staff will contact individuals in the area that provide interpreter services. Dispatchers also retrieve and maintain family member contact information who can interpret for their LEP family members as long as it does not violate passenger's data privacy.

Community Transit encourages persons to apply for open staffing positions who can speak multiple languages.

Community Transit continues to request groups that target LEP persons to include ride information as needed. Through the agencies Mobility Management Initiative, travel training courses have been given to these groups. For example, several refugee families have been given travel training in 2015.

Community Transit is committed to the spirit of the Civil Rights Act of 1964. We recognize the importance of providing meaningful access to all persons, including persons with LEP. On a yearly average, Community Transit provides over 150,000 passenger trips serving over 5,000 individuals.

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

Our current budget for marketing to or communicating with LEP persons in their language about transit services that are available to them is \$2,000. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, travel training, etc.

Most LEP rides are set up by a social service and outreach agencies that provides clients with interpretive services. These agencies have access 24-7 through Language Line Service (1-800-367-9559) and contract with individuals able to facilitate completion of necessary ride information.

In addition to our own budget, we utilize Human Service Agencies that have posters and staff hired to help interpret. Head Start and other agencies also provide posters and brochures translated into Spanish, Somali, and Hmong. Public Health has provided posters in different languages to post on our buses and we work closely with Schools and community advocates that can help train LEP persons on how to "Ride Transit".

## **B. Language Assistance Measures**

There is several language assistance measures that are available to Community Transit These include: Check off any items below that are relevant and provide a short narrative to explain your future efforts.

- X Translation of key documents in the following language(s): Hmong and Somali
- X Arranging for availability of oral translators
- X Communication with LEP persons' groups about transit services
- X Posting notices in appropriate languages informing LEP persons of available services
- X Provide travel training for groups of non-english residents with an interpreter present.

**C. Staff Training**

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

- the transit system's Language Assistance Plan
- demographic data about local LEP population
- printed LEP persons' materials
- how to handle verbal requests for transit service in a foreign language
- responsibility to notify transit manager about any LEP persons' unmet needs.

**D. Notice to LEP Persons about Available Language Assistance**

Our transit system plans to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- X signs on buses or at bus stops
- X brochures
- posters
- X sending information to local organizations that work with LEP persons
- telephone messages
- local ads (newspaper , radio, TV)
- X website & Facebook notices
- information tables at local events, grocery stores, pharmacies, and churches
- Other: Describe: \_\_\_\_\_

**E. Annual Monitoring, Evaluating and Updating Plan**

The transit system will review this plan during its annual review with its Mn/DOT transit project manager 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 any complaints from LEP persons or about their needs that were received during the past year.

This plan will be reviewed by our transit system annually. Revisions of this plan will be approved by the Transportation Director and dated.

#### **F. Dissemination of Plan**

This Language Assistance Plan is available on our website at [www.wcainc.org/transit](http://www.wcainc.org/transit).

This plan is also available at no cost in English upon request by telephone, fax, and mail or in person.

If requested to be provided in another language and it is feasible to have it translated, information will be provided at no cost to the requester.

#### **G. Contact Information**

Questions or comments about this plan may be submitted to:

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