

# Language Assistance Plan for Tri-CAP Transit Connection

DATE adopted or approved by Transit System: October 13, 2010

## 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 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 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*" was used in the preparation of this plan.

## Contents

This plan 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 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:

- \_\_\_\_\_ GIS map showing transit service area and concentrations of LEP persons (Attachment A)
  - ✓ 2000 US Census data
- \_\_\_\_\_ Survey results
  - ✓ Reports from drivers, dispatchers, others about contact with LEP persons
- \_\_\_\_\_ Local school district data
- \_\_\_\_\_ Human Services Dept. data
  - ✓ Information from local organizations (religious, legal, social service, etc.) about LEP persons in our service area
- \_\_\_\_\_ Other information. Describe: \_\_\_\_\_

According to data provided by Mn/DOT from the 2000 US Census:

- The total number of LEP persons in our service area is 1913.
- The total eligible population in our service area is 115,617.
- The proportion of LEP persons to the total eligible service population is 2%

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

The LEP populations that we work with speak Spanish and Somali. The Spanish speaking passengers are primarily located in the western regions of our service area while the Somali speaking passengers are located in and around the St. Cloud area. These passengers use our buses for work, school/pre-school and medical appointments. Our bus drivers have weekly contact with both languages. Many of the Spanish speaking passengers come to us through the school districts and are traveling to parenting and English classes. The Somali speaking passengers are frequently traveling to work from St. Cloud to the food processing plant in Cold Spring.

We know that our transportation services provide an important link to these groups.

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

Our transit system considers transit to be an important and essential service for many people living in our service area. Our overall passenger numbers from January 1 to June 30, 2010 indicate that we continue to outperform the previous year. From 1-1-09 to 6-30-09 we did 39,894 one way trips and from 1-1-10 to 6-30-10 we did 41,740 one way trips. We do not track LEP passengers separately, but know that during the school year and colder weather months, we have an average of 30 to 40 unduplicated LEP people riding weekly.

**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 \$4,000. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc.

We have an ongoing contract with the State of Minnesota Language Line for telephone translation. Any translated conversations are billed to us monthly through an on-line billing system. We have access to some Spanish speaking staff in our Corporate office. We will have access to copies of the Language Identification Guide "I Speak" pamphlets from the Department of Justice website for use in determining an unknown language. Buses will have translation cards with common phrases printed that include the cost of the fare and due upon boarding.

**B. Language Assistance Measures**

In the past we have printed our paper schedules in alternate languages, however now that we do not have printed schedules and only rely on the website, we are exploring options for providing our web site schedules in alternate languages. We work with the social service agencies that assist LEP to ensure that we are addressing their needs appropriately. Over the next several months, we will expand this LEP policy to encompass the entire agency making a holistic and seamless document that covers everything that we do.

Language measures currently used and planned to be used by our transit system to address the needs of LEP persons include the following:

- Translating key documents in the following language(s): Spanish, Somali.
- Arranging for availability of oral translators
- Communicating with LEP persons' groups about transit services
- Posting notices in appropriate languages informing LEP persons of available services
- Other. Describe—language line phone interpreters

In addition to non-English speaking customers, we are examining the options that can utilize for vision impaired persons that will permit them to use the Tri-CAP website.

### **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 Implementation 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.

We will address LEP at our annual mandatory staff in-service training.

### **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:

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

### **E. 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 transit manager and dated accordingly.**

## **F. Dissemination of Plan**

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

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, it shall 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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