

Cache Valley Transit District

Limited English Proficiency Plan (LEP Plan)

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of the Cache Valley Transit District (the District), as a recipient of federal financial assistance for the operation of its public transit system, as it relates 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 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that “no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activities receiving federal financial assistance.”

This plan was developed to guide the District in its administration and management of Title VI-related activities.

Plan Summary

The District is the owner/operator of a public transit system and has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the District. As defined by 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 District undertook the U.S. Department of Transportation’s 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 or are likely to be served by the District,
2. The frequency with which LEP persons come into contact with the District services,
3. The nature and importance of District services to the LEP population, and
4. The resources available to District employees and overall costs to provide LEP assistance.

A summary of the results of the analysis follows.

Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to be served by the District.

The District employees reviewed the 2007-2011 U.S. Census American Community Survey 5-Year Estimates and determined that 13,971 persons in Cache County (14.1%) speak a language other than English. Of those persons, 4,527 or 4.6% speak English less than “very well”. Of those persons with limited English proficiency, 3,318 speak Spanish. Those speaking a language other than English or Spanish consisted of 4,588 persons; however, only 1,209, or 1.2% of the population, indicated that they speak English less than “very well.” The District recognized the impact of the state-sponsored university (Utah State University) on the limited English demographics.

2. The frequency with which LEP person come into contact with the District services.

The District assessed the frequency with which employees, including drivers, have or could have contact with LEP persons. This included authorizing a survey of riders to determine the primary language used by the rider, as well as inquiry of the employees. The primary language encountered, other than English, was Spanish. The most requested document was the bus schedule. There were also inquiries about the amount of the fare; however, we operate a fare-free system which is explained on the bus schedule.

3. The nature and importance of District services to the LEP population.

The largest concentration of LEP individuals in the District service area is Spanish. The District operates fixed-route and paratransit service and could encounter LEP individuals at any time the buses are in service.

4. The resources available to District employees and overall costs to provide LEP assistance.

The District has assessed its available resources that could be used for providing LEP assistance including determining how much professional interpreter and translations services would cost on an as-needed basis, which documents should be translated, and evaluating which organizations could partner with the District for outreach and translation efforts. Employee training that may be needed was also considered.

LEP Plan

Based on the four-factor analysis, the District developed the following LEP Plan.

Task 1 - Identifying LEP Individuals Who Need Language Assistance

- A. Have the Census Bureau’s “I speak cards” at public meetings and at our Transit Center. While this will not help during the first occurrence it can establish a need and allow staff to prepare for future meetings.
- B. Bus drivers and other front-line employees will be interviewed on their experience concerning any contacts with LEP persons.

Task 2 - Language Assistance Measures

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which District employees may respond to LEP persons, whether in person, by telephone or in writing.

The District has established a partnership with the English Language Center, an organization specializing in teaching English as a second language, to provide assistance with LEP persons. This organization can provide service to the Spanish speaking population as well as numerous other languages. District employees are instructed to direct LEP persons to this service. As an additional service, the District has several employees who are able to provide basic communication with individuals speaking Spanish.

The District posts all passenger alerts and notifications in both English and Spanish. The District is currently in the process of identifying other documents to be provided in Spanish based on requests. The District will work with the English Language Center to translate documents when in-house translation services are considered inadequate.

Task 3 - Training Employees

The following training will be provided to District employees:

- A. Information on the District's Title VI complaint procedures and LEP Plan.
- B. Description of interpretive services offered to the public and how to contact the English Language Center.
- C. Documentation of interpretive services requests, including how to use the Census Bureau's "I speak cards."
- D. How to handle a potential Title VI/LEP complaint.

Task 4 - Providing Notice to LEP Persons

All passenger alerts or notices will be posted in both English and Spanish in all the buses and at the Transit Center and Administrative offices. In addition, Title VI notices will be posted in both English and Spanish.

The District will continue to work with the English Language Center to provide information of services available to LEP individuals. In addition, the District will conduct regular outreach presentations to the local schools and the university.

Task 5 - Monitoring and Updating the LEP Plan

The LEP Plan will be reviewed and updated when new data from the U.S. Census is available or when it is clear that higher concentrations of LEP individuals are present in Cache County. The District will evaluate the following factors when determining if the plan should be updated:

- A. The number of documented LEP persons encountered annually.

- B. How the needs of the LEP persons encountered have been addressed.
- C. Determination of the current LEP population in the service area.
- D. Determination if the need for translation services has changed.
- E. Determination if the coordination of language services with the English Language Center has been effective and sufficient to meet the needs.
- F. Determine if complaints have been received concerning the District's ability to meet the needs of LEP persons.
- G. Evaluation of compliance with the goals of the LEP Plan.

Dissemination of the District's LEP Plan

A link to the District's LEP Plan is included on the District's website at www.cvtdbus.org. Persons wishing to leave comments have the opportunity to do so at the previously mentioned website.

Any person or agency with internet access will be able to access and download the plan from the website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in alternate languages which will be provided, if feasible.

Question or comments regarding the LEP Plan may be submitted to the District at the following:

Cache Valley Transit District
Attn: Title VI Administrator
754 West 600 North
Logan, Utah 84321

Phone: 435-713-6963
Fax: 435-713-6991
Email: croberts@cvtdbus.org