

Language Assistance Plan for Tri-County Action Program, Inc. Tri-CAP Transit Connection

Effective
March 20, 2014

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 Tri-CAP Transit Connection 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 about LEP persons to determine the number or proportion of LEP persons who might use or want to use our transit services:

- 2010 US Census data/American Community Survey data indicating that our top four languages are African, Spanish, German and Vietnamese
- 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

According to data provided by Mn/DOT from the 2010 American Community Survey 2007-2011 Five-Year estimate:

- 1) The total number of LEP persons in our service area is 4,587.
- 2) The total eligible population in our service area is 206,185.
- 3) The proportion of LEP persons to the total eligible service population is 2.22%

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

Our transportation staff have daily contact with LEP customers. We transport Spanish speaking children to pre-school and school throughout the program year in the Rockville, Cold Spring, Melrose and Sauk Centre areas. Spanish speaking passengers use our services in the Melrose area for medical and shopping needs. We transport Somalian passengers daily to work during the cold weather months from St. Cloud to Cold Spring. In addition to these regular trips, we routinely have telephone inquiries about other transportation needs. We were part of the planning to provide transportation services for a Hispanic Health Fair in Melrose, which was unfortunately cancelled due to weather. We will be part of this event when it is scheduled for 2015.

The conclusions drawn from examining this information about LEP persons seeking transit services are that we have strengthened our ability to reach out to our LEP populations by working with community partners. There is more work to be done in this area so we will continue to nurture these relationships going forward.

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

Tri-CAP considers transportation to be an important and essential service for many people living in our service area. Many LEP persons rely on our transit service to travel to work, school, medical and shopping needs.

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 up to \$1000. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc.

B. Language Assistance Measures

There are several language assistance measures that are available to Tri-CAP Transit Connection. These include:

- Translation of key documents into Spanish and Somalian.
- Arranging for availability of oral interpreters
- Communication with LEP persons' groups about transit services
- Posting notices in appropriate languages informing LEP persons of available services
- Language line phone interpreters
- Hiring of bi-lingual staff when possible
- Website translation into other languages

No person will be denied access to Tri-CAP's programs or program information because he/she does not speak or read English or with limited English skills. Tri-CAP will provide language assistance services as needed for customers with LEP to provide meaningful access to programs and services and ensure effective communication between customers and Tri-CAP staff. Customers will be provided with language assistance services at no cost to them and in a timely manner during business hours.

Tri-CAP will use "I Speak" cards as a means of identifying the primary language of LEP customers. In addition, Spanish and Somalian phrase charts will be in the buses to help communicate fare information.

Tri-CAP will ensure that interpreters are competent to provide interpreter services. The interpreter must be proficient in both English and the target language and be able to convey information in both languages accurately.

If an interpreter is needed for an uncommon language, or is not available on a timely basis, Tri-CAP staff will notify the Program Director to make appropriate arrangements.

Tri-CAP staff must assist a customer with limited English proficiency who does not read his/her primary language to the same extent as we would assist an English speaking customer who does not read English.

When programs require access to services within short time frames, Tri-CAP will take whatever steps necessary to ensure all customers, including customers with LEP, have access to services within the appropriate time frames.

Non-English speaking customers will be notified about available language assistance by the use of posters, website information and other means as appropriate.

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:

- Sending information to local organizations that work with LEP persons
- Website translation
- Information tables at local events, grocery stores, pharmacies, and churches

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 Tri-CAP Board of Directors and dated.

F. Dissemination of Plan

This Language Assistance Plan is available on our website at

<http://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, 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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