

Language Assistance Plan For Tri-County Action Program, Inc.

Effective
July 30, 2018

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 sub recipient 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 as well as the National Rural Transit Assistance Program, RTAP 101 Webinar services: Title VI Requirements from July 29, 2014.

The plan for Tri-County Action Program, Inc., Tri-CAP, 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 agency services:

- 2014 DataUSA, which uses a data source of the American Community Survey (ACS) reflects that combined, the top four languages in Tri-CAP’s four county transit service area of Benton, Morrison, Sherburne and Stearns Counties in descending order are Spanish, African Languages, German, and Hmong.
- Survey results from the Agency’s 2016 Community Needs Assessment (available on Tri-CAP.org website)

- Information from local organizations (religious, legal, social service, etc.) about LEP persons in our service area.
- Reports from drivers, dispatchers and other Tri-CAP program staff about contact with LEP persons.

According to data found at DataUSA which uses the 2014 American Community Survey:

- 1) The total number of LEP persons in our service area is 17,775.
- 2) The total eligible population in our service area is 315,179.
- 3) The proportion of LEP persons to the total eligible service population is 5.6%

Tri-CAP's 2016 Community Needs Assessment Consumer Survey responses found that 5% of the respondents (23 out of 441) did not identify English as their primary language (page 7 Consumer Survey).

Results from Tri-CAP's 2016 Community Needs Assessment Provider Survey (page 28 Provider Survey), when asked "What is the biggest need you see in families you work with," one respondent wrote, "Difficulties with connecting to services or programs due to lack of language or perspective barriers." This reflects 10% or 1 of 10 provider responses.

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

Tri-CAP 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 African language speaking passengers regularly in Western Stearns County. In addition to these regular trips, we routinely have telephone inquiries about other transportation needs. In the last six months, Tri-CAP dispatchers utilized the language line 9 times for assistance in Spanish and 12 times for Somali.

The conclusion drawn from examining this information about LEP persons seeking transit services is that we have strengthened our ability to reach out to our LEP populations by working with community partners and through increased general agency and program information availability in multiple languages. There is more work to be done in this area therefore we will continue to nurture relationships, engage technology improvements, and respond to emerging needs.

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. Transportation is also a factor in equity. Many LEP persons rely on our transit service to travel to work, school, medical and shopping needs.

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

Tri-CAP utilizes marketing and communication activities to connect with LEP persons in their language. The current budget for marketing to or communicate with LEP persons in

their language about transit services that are available to them is \$1,000. Such professional services include marketing, interpretation and translation services, graphic design, brochure template creation, newspaper ads, radio ads, and website design.

B. Language Assistance Measures

There are several language assistance measures that are available and have been utilized with Tri-CAP Transportation for communication and accessibility. These include:

- ✓ Translation of key documents into Spanish and Somali
- ✓ 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
- ✓ Cultural Competency Team

No person will be denied access to Tri-CAP's programs or program information because he/she does not speak or read English or has 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.

Key Tri-CAP Transportation policies and guides have been translated and are available on the agency website or in print. General Agency brochures have been translated and are available in print.

Tri-CAP utilizes professional interpreter services ensuring that interpreters are competent to provide interpreter services. The interpreters 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 provide assistance to customers with limited English proficiency who do not read his/her primary language to the same extent as we would assist an English speaking customers who do not read English.

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

Staff utilize the Language Line to provide interpretation assistance via phone.

Tri-CAP recruits bi-lingual employees when possible by encouraging bi-lingual candidates to apply for permanent positions. We work with outreach partners who serve minority populations in advertising open positions and include bi-lingual skills as a preferred qualification for all positions that provide direct services to our customers. In addition, when working with temporary staffing agencies, preference is given to bi-lingual candidates.

Tri-CAP's website was designed using a combination of icons and words to communicate themes with words and symbols. The site was designed to optimize the use of screen magnifiers and synthetic speech functionality, increasing accessibility of the site to low vision residents. Tri-CAP's website also utilizes functionality that translates the website into any of 105 different languages instantly with the click of a button.

Because language and culture are closely intertwined, in 2017 Tri-CAP created a cross-functional Cultural Competency Ad Hoc Team whose members work to improve the agency's competency in working with diverse populations. With a goal of providing a welcoming environment and improving all-program access and utilization by LEP populations, the Tri-CAP Board of Directors approved Six Tenets of Cultural Competency as agency principles of interaction. The six tenets are:

- Provide opportunities for learning and training with the expectation of staff to professionally develop
- Promote the self-reliance of our clients honoring the individual
- Commit to respecting the differences that exist within our community
- Provide equal access to all services provided by Tri-CAP
- Seek out and welcome diverse clients and candidates for agency opportunities
- Advocate with and for the individual recognizing his/her culture

C. Staff Training

To ensure effective implementation of this plan, the Agency schedules training at annual in-service training and in assimilation plans for new employees which includes:

- The transit system's Language Assistance Plan
- Printed LEP persons' materials
- How to handle verbal requests for service in a foreign language
- Responsibility to notify about any LEP persons' unmet needs.

In addition, opportunities for Cultural Competency training are planned and made available to all Tri-CAP staff by the Cultural Competency Team. Informational events, an internal current community events calendar, and internal agency audits are engaged to increase the cultural competency of Tri-CAP staff with a goal of creating a welcoming space for diverse populations.

D. Notice to LEP Persons about Available Language Assistance

Our Agency 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 availability in multiple languages
- Information tables at local events

E. Annual Monitoring, Evaluating and Updating Plan

The transit system will review this plan during its annual review with its Minnesota Department of Transportation, MN/DOT, and transit project manager by:

- Assessing its effectiveness,
- 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.

F. Dissemination of Plan

This Language Assistance Plan is available on our website at www.tricap.org

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

If requested 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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