

## Language English Proficiency Plan Effective: October 1, 2011

### ***Introduction***

This Limited English Proficiency (LEP) Plan has been prepared to address the Yuma County Intergovernmental Public Transportation Authority (YCIPTA) responsibilities as a recipient of federal financial assistance as they relate 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, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### ***Plan Summary***

YCIPTA is the administrator for the Yuma County Area Transit (YCAT) for bus service 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 YCIPTA. As defined in 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.

Due to limited resources, YCIPTA has chosen to not develop a full LEP plan. However, as documented below, the YCIPTA currently implements a number of measures to ensure that limited-English speaking clients and customers have meaningful input into its services and projects. Therefore, YCIPTA staff believes that it meets the standard for providing methods for meaningful input and access for limited-English speaking customers.

In order to prepare this plan, YCIPTA undertook the U.S. Department of Transportation (U.S. DOT) 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 encounter an YCIPTA program, activity or service.
2. The frequency with which LEP persons come in contact with YCIPTA programs, activities or services.
3. The nature and importance of programs, activities or services provided by YCIPTA to the LEP population.
4. The resources available to YCIPTA and overall cost to provide LEP assistance.

A summary of the results of the YCIPTA four-factor analysis is in the following section.

## Four Factor Analysis

- **Factor 1: The Number and Proportion of LEP persons in the YMPO Service Area**

The first step towards understanding the profile of LEP persons eligible to be served or likely to be encountered by a program, activity or service is a review of the 2010 Census Data. For planning purposes, YCIPTA is considering individuals that speak English “not well” or “not at all” and only the top three language groups are included in the analysis.

**Table 1** is derived from the 2010 US Census and shows the percentage of persons that speak English, Spanish, or another language at home. The City of San Luis has the greatest concentration of LEP persons – over 94%. The second highest is the City of Somerton with 93.5%.

**Table 1: Limited English Proficiency Persons in the YCIPTA Service Area**

	CITY OF YUMA	SOMERTON	SAN LUIS	WELLTON	YUMA COUNTY	GADSDEN	DATELAND	TACNA
ENGLISH	64.70%	5.60%	3.70%	55.30%	39.20%	48.40%	31%	46.40%
SPANISH	27.40%	93.50%	94.20%	38.30%	55.70%	49.30%	69%	49.50%
OTHER LANGUAGE	7.90%	0.90%	2.10%	6.40%	5.10%	2.30%	0%	4.10%

- **Factor 2: The Frequency in which LEP Persons Encounter YCIPTA Programs**

YCIPTA has assessed the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. As discussed above, census data indicate that there is a large percentage of the general population who are Spanish-speaking persons, and people of various descents who speak English less than very well. As a fixed route and demand-response transportation provider, it is necessary to recognize these segments of the general population.

Phone inquiries and staff feedback indicate that the transit dispatchers and drivers interact the majority of their time with people with limited English speaking skills.

- **Factor 3: The Importance of Services Provided by YCIPTA Programs**

Public transportation and regional transportation planning is vital to many people’s lives. According to the Department of Transportation’s *Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (LEP) Persons*, “Providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment.” As part of the preparation of the Yuma Regional Transit Study by Arizona Department of Transportation, they administered an

on-board passenger survey to collect data on usage of and access to YCAT transit services.

Additionally, surveys and comment cards are collected on all transit buses as well online at [www.ycat.org](http://www.ycat.org).

According to the passenger survey analysis, the most common age among all the participants in the surveys was the 25 to 44 age group.

- **Factor 4: The Resources Available and Overall YMPO Cost**

YCIPTA assessed its available resources that are currently being used, and those that could be used, to provide language assistance. Notwithstanding the significant cuts in funding for public transportation service, YCIPTA provides a reasonable degree of services for limited English speaking persons upon request.

YCIPTA will continue its efforts to collaborate with other state and local agencies to provide language translation and interpretation services when practical and in consideration of available funding.

#### ***How YCIPTA May Identify an LEP Person Who Needs Language Assistance***

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to YCIPTA sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at YCIPTA meetings.
4. This will assist YCIPTA in identifying language assistance needs for future events and meetings.
5. Have Census Bureau Language Identification Flashcards on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to YCIPTA's management for follow-up.
6. Vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

#### ***Language Assistance Measures***

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which YCIPTA staff responds to LEP persons, whether in person, by telephone or in writing as defined below:

##### *Public Meetings & Workshops*

- Offer customized presentations to existing groups and organizations.
- Co-host workshops with community groups, business associations, etc.
- Sponsor a forum or summit with partner agencies, with the media, or other community organizations.

- Encourage opportunities for public input directly to YCIPTA Board Members.
- When YCIPTA staff makes community presentations to groups whom they know in advance are limited-English speakers, they will hire an interpreter to translate information from the presentation to meeting attendees.
- When customers communicate with YCIPTA staff and state a language preference, requested materials are provided in the requested language.

#### *Techniques for Public Meetings/Workshops*

- Open Houses.
- Facilitated discussions.
- Question and Answer session with YCIPTA transit staff and YCIPTA Board Members.
- Customized presentations.
- Vary the time of day for workshops (day/evening).

#### *Visualization Techniques*

- Maps.
- Charts, Illustrations, Photographs.
- Web content and interactive games.
- Electronic voting.
- PowerPoint slide shows.

#### *Polls/Surveys*

- For major planning studies, such as the Yuma Regional Transit Study, conduct statistically valid telephone polls in English as well as in Spanish.
- Electronic surveys via web.
- Intercept interviews where people congregate, such as at transit hubs.
- Printed surveys distributed at meetings, transit hubs, on-board transit vehicles etc.

#### *Printed Materials*

- User- friendly documents (including use of executive summaries.
- Outside review of written materials to ensure clear, concise language.
- Post cards.
- Maps, charts, photographs, and other visual means of displaying information.

#### *Targeted Mailings/Flyers*

- Work with community-based organizations to distribute flyers.
- Distribute "Take-one" flyers to key community organizations.
- Notices that are posted on YCIPTA transit vehicles are provided in English and Spanish, as drivers most frequently come into contact with Spanish-speaking individuals. YCIPTA provides these notices to other limited-English speaking customers upon request.

#### *Utilize local media*

- News releases.
- Opinion pieces/commentaries.
- Purchase display ads.
- Negotiate inserts into local printed media.
- Place speakers on Radio/TV talk shows.
- Public Service Announcements on radio and TV.
- Develop content for public access/cable television programming.

- Civic journalism and non-profit partnerships.

*Use of the Internet/Electronic Access to Information*

- Web site with updated content.
- Use social media to reach a larger audience.
- Electronic duplication of open house/workshop materials.
- Interactive web with surveys.
- Use the web to provide interaction among participants.
- Access to planning data (such as maps, charts, background on travel models, forecasts, census data, and research reports).
- Provide information in advance of public meeting.

*Notify Public via*

- Blast e-mails.
- Notice widely disseminated through new partnerships with community-based and interest organizations.
- Newsletters.
- Printed materials.
- Electronic access to information.
- Local media.
- Notices placed on board transit vehicles at transit hubs.

*Techniques for Involving Low Income Communities and Communities of Color*

- "Take One" flyers on transit vehicles and transit hub.
- Outreach in the community (flea markets, churches, health centers, etc.).
- Include information on meeting notices and how to request translation assistance.
- Robust use of "visualization" techniques, including maps and graphics to illustrate trends, choices being debated, etc.

*Techniques for Reporting on Impact of Public Comments*

- Direct mail and email to participants from meetings, surveys, etc., to report final outcomes.
- Newsletter articles.
- Updated and interactive web content.

*Techniques for Involving Limited-English Proficient Populations*

- Personal interviews or use of audio recording devices to obtain oral comments.
- Translated documents and web content on key initiatives.
- On-call translators for meetings.
- Translated news releases and outreach to alternative language media, such as radio, television, newspapers, and social media.
- Include information on meeting notices on how to request translation services.
- Robust use of visualization techniques, including maps and graphics to choices being debated, etc.
- Train staff to be alert to and anticipate the need of low-literacy participants in meetings, workshops, and the like.
- Information/comment tables or booths at community events and public gathering places.
- Comment cards/"take one" cards on board transit vehicles.

### ***LEP Training and Implementation by YCIPTA Staff***

- When a new hire start employment with YCIPTA or its contractor, the LEP policy adopted by the YCIPTA Board of Directors outreach to and communication with limited-English speaking persons.
- As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.
- Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the customer. In addition, some vehicle operators are bilingual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the vehicle operator contacts a dispatcher. All of YCIPTA dispatchers speak Spanish, and they are available to assist vehicle operators in translating for their customers.

### ***Dissemination of the YCIPTA LEP Plan***

A link to the YCIPTA LEP Plan and the Title VI Procedures is included on the YCIPTA website at [www.ycat.org](http://www.ycat.org). Any person or agency with internet access will be able to access and download the plan from the YCIPTA 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 translation which YCIPTA will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Yuma County Intergovernmental Public Transportation Authority Transit Director

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