

Limited English Proficiency (LEP) Plan

Improving Access to Services for Persons with
Limited English Proficiency

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1. Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of the Livermore Amador Valley Transit Authority (LAVTA) 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, 42 U.S.C. 2000d, et se, and its implementing regulations, 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 understands 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, including the LAVTA which receives federal assistance through the U.S. Department of Transportation (U.S. DOT).

2. Plan Summary

LAVTA 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 transit authority. 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.

3. LEP Four Factor Analysis

In order to prepare this plan, LAVTA undertook the 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 a LAVTA program, activity or service.
2. The frequency with which LEP persons come in contact with LAVTA programs, activities or services.
3. The nature and importance of programs, activities or services provided by LAVTA to the LEP population.
4. The resources available to LAVTA and overall cost to provide LEP assistance.

A summary of the results from the four-factor analysis are in the following section.

3.1 The number or proportion of LEP persons in the service area who may be served or are likely to encounter a LAVTA program, activity or service

The Census Bureau has defined two classifications of how well people speak English. The classifications are 1.) people that speak English “very well” and 2.) people that speak English “less than very well.”

Within the LAVTA service area, 12% of the population speaks English less than very well. On a percentage basis, Dublin and Pleasanton have an equal distribution of less than proficient English speakers while Livermore has slightly less. Table 1 shows the distribution of English proficiency within the population, aged 5 years or older.

**Table 1:
English Language Spoken at Home within the LAVTA Service Area -
Persons 5 years of Age and Older**

English Speaking Proficiency Classification	LAVTA Service Area							
	Dublin		Pleasanton		Livermore		Total Service Area	
	Estimated Population	Percent of Population	Estimated Population	Percent of Population	Estimated Population	Percent of Population	Estimated Population	Percent of Population
Speaks English very well	26,863	67%	46,131	71%	58,931	79%	131,925	73%
Speaks English less than very well	5,153	13%	8,767	13%	6,997	9%	20,917	12%
Total	39,821	100%	65,433	100%	75,066	100%	180,320	100%

Source: 2006-2010 American Community Survey 5-Year Estimates

Population data in Table 2 shows the languages spoken at home for all persons, aged five years old and older, within the LAVTA service area. Of the total population, 20,917 people (11.60%) speak a language other than English. The three most prevalent languages spoken at home are Spanish with 7,376 people (4.09%), Chinese with 6,425 people (3.56%), and Korean with 1,766 people (0.98%).

The people speaking a language other than English at home (11.6%) may also constitute the group who do not speak English very well (12%). For planning purposes, LAVTA considers the Spanish, Chinese, and Korean speaking people within its service area as LEP persons.

**Table 2:
Language Spoken at Home for the Population within the LAVTA Service Area -
Persons 5 Years of Age and Older**

Language Spoken at Home	LAVTA Service Area							
	Dublin		Pleasanton		Livermore		Total Service Area	
	Estimated Population	Percent of Population	Estimated Population	Percent of Population	Estimated Population	Percent of Population	Estimated Population	Percent of Population
English	26,863	67.46%	46,131	70.50%	58,931	78.51%	131,925	73.16%
Spanish or Spanish Creole	971	2.44%	2,065	3.16%	4,340	5.78%	7,376	4.09%
French (incl. Patois, Cajun)	55	0.14%	32	0.05%	37	0.05%	124	0.07%
French Creole	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Italian	12	0.03%	19	0.03%	66	0.09%	97	0.05%
Portuguese or Portuguese Creole	30	0.08%	34	0.05%	77	0.10%	141	0.08%
German	0	0.00%	71	0.11%	17	0.02%	88	0.05%
Yiddish	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other West Germanic languages	0	0.00%	16	0.02%	0	0.00%	16	0.01%
Scandinavian languages	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Greek	46	0.12%	0	0.00%	19	0.03%	65	0.04%
Russian	58	0.15%	110	0.17%	162	0.22%	330	0.18%
Polish	0	0.00%	64	0.10%	0	0.00%	64	0.04%
Serbo-Croatian	45	0.11%	0	0.00%	0	0.00%	45	0.02%
Other Slavic languages	11	0.03%	0	0.00%	0	0.00%	11	0.01%
Armenian	0	0.00%	0	0.00%	26	0.03%	26	0.01%
Persian	404	1.01%	270	0.41%	134	0.18%	808	0.45%
Gujarati	42	0.11%	41	0.06%	0	0.00%	83	0.05%
Hindi	74	0.19%	152	0.23%	68	0.09%	294	0.16%
Urdu	42	0.11%	16	0.02%	0	0.00%	58	0.03%
Other Indic languages	75	0.19%	133	0.20%	73	0.10%	281	0.16%
Other Indo-European languages	7	0.02%	26	0.04%	0	0.00%	33	0.02%
Chinese	1,720	4.32%	3,762	5.75%	943	1.26%	6,425	3.56%
Japanese	124	0.31%	112	0.17%	53	0.07%	289	0.16%
Korean	625	1.57%	1,010	1.54%	131	0.17%	1,766	0.98%
Mon-Khmer, Cambodian	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hmong	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Thai	14	0.04%	57	0.09%	0	0.00%	71	0.04%
Laotian	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Vietnamese	223	0.56%	125	0.19%	248	0.33%	596	0.33%
Other Asian languages	201	0.50%	422	0.64%	27	0.04%	650	0.36%
Tagalog	265	0.67%	151	0.23%	419	0.56%	835	0.46%
Other Pacific Island languages	63	0.16%	43	0.07%	64	0.09%	170	0.09%
Navajo	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other Native North American languages	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hungarian	0	0.00%	11	0.02%	26	0.03%	37	0.02%
Arabic	46	0.12%	25	0.04%	37	0.05%	108	0.06%
Hebrew	0	0.00%	0	0.00%	0	0.00%	0	0.00%
African languages	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other and unspecified languages	0	0.00%	0	0.00%	30	0.04%	30	0.02%

Source: 2006-2010 American Community Survey 5-Year Estimates

3.2 The frequency with which LEP persons come in contact with LAVTA programs, activities or services

LAVTA assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
Bus	Frequently
Drivers	Frequently
Transit Center information line	Occasionally – Often
Transit Guide	Often – frequently
Dispatchers (after-hours customer service)	Occasionally
DAR reservationists	Occasionally
Interior car cards	Frequently
On-street signage	Frequently
Website	Occasionally
Interior fare car cards	Frequently
SECONDARY TOUCH POINTS	
Receptionist	Occasionally
Ticket vendors	Occasionally – often
Road Supervisors	Occasionally
Print media	Occasionally
Broadcast media	Occasionally
Public relations media	Occasionally
Transit fairs	Occasionally

3.3 The nature and importance of programs, activities or services provided by LAVTA to the LEP population

The largest concentrations of LEP individuals in the LAVTA service area are people who speak Spanish, Chinese, and Korean. Services provided by LAVTA that are most likely to encounter LEP individuals are the fixed route system which serves the general public and the demand-response (Dial-A-Ride) system which serves primarily senior and disabled persons. It is also likely that LAVTA will encounter LEP individuals at the Livermore Transit Center where discount tickets are sold and community outreach events.

3.4 The resources available to LAVTA and overall cost to provide LEP assistance

LAVTA assessed the available resources that could be used to provide LEP assistance including determining the costs of professional interpreters and translation and taking an inventory of available organizations with whom resources could be shared. LAVTA used this information to determine which of its documents and materials would be the most valuable to be available in multiple languages.

4. LEP Plan

Based on the four-factor analysis, LAVTA developed its LEP Plan into five areas as follows:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP persons
5. Monitoring and updating the LEP Plan

4.1 Identifying LEP individuals who need language assistance

How LAVTA may identify an LEP person who needs language assistance

- Examine customer service records 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;
- When LAVTA sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to informally gauge each attendee's ability to speak and understand English;
- Have Census Bureau *Language Identification Flashcards* available at LAVTA events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events;
- Have *Language Identification Flashcards* on all transit vehicles to assist coach 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 the transit system manager for follow-up. Dispatchers and schedulers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone, recording passengers request for language assistance in customer service database.

4.2 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 LAVTA staff responds to LEP persons, whether in person, by telephone or in writing).

How LAVTA will assist an LEP person who needs language assistance

- LAVTA Hispanic Outreach Program will continue to provide vital information to LEP groups on LAVTA programs and services;
- LAVTA will work with local senior centers to provide vital information to LEP groups on LAVTA programs and services;
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on LAVTA programs and services;
- Provide a statement in notices and publications that interpreter services are available for public hearings and Board of Director meetings, with seven day advance notice;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers;
- Survey coach operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year;
- Provide *Language Identification Flashcards* at the Transit Center, onboard the LAVTA fleet, in Road Supervisor vehicles and at transit systems administrative offices;
- Post the LAVTA Title VI Policy and LEP Plan on the agency website, www.wheelsbus.com;
- Provide group travel training to LEP persons with the assistance of Spanish speaking staff;
- Encourage the skill to speak multiple languages in the recruitment of customer service representative and bus drivers;
- Host an online translation service on the LAVTA website, which includes the Spanish, Chinese, and Korean languages.

4.3 Staff Training

How LAVTA will train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Develop curriculum and a corresponding PowerPoint to educate LAVTA staff on the Title VI LEP requirements for providing meaningful access to services for LEP persons;

- Provide staff with a description of language assistance services offered by LAVTA;
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP;
- Instruct staff on the use of FTA *Language Identification Flashcards*.

4.4 Providing Notice to LEP Persons

How LAVTA will provide Notice to LEP Persons, both oral and written communications

Oral communications:

- Offer general information, such as operation hours of the Transit Center/ Administrative Offices, fares, Lost and Found, etc., on the LAVTA customer service line in English and Spanish;
- Provide a statement affirming that LAVTA will make reasonable accommodations to provide an interpreter at public hearings and meetings with advance notice.
- Implement the use of an automated greeting in both Spanish and English, directing callers to select which language they prefer;
- Use the services of a professional translation provider to ensure that vital documents are accurate (vital documents are defined as those documents without which a person would be unable to access services).

Written communications:

- Information about LAVTA's non-discrimination policies and information on the local/federal complaint process are provided in Spanish, Chinese, and Korean;
- The introduction section of the Wheels Bus Book which contains information on fares, accessibility, locations where discount tickets and passes are sold and general riding information is included in all Bus Books in Spanish and available upon request in Chinese and Korean;
- The www.lavta.org website can be viewed in Spanish, Chinese and Korean;
- Onboard "take one" flyers containing information about route changes, rider alerts, fare increases and public hearings are provided in Spanish, Chinese, and Korean;
- Temporary signs at bus stops and transit centers informing customers of any detours or route changes include Spanish;
- Interior bus cards displaying cash fare, cost of monthly discount passes and special promotions/campaigns include Spanish;

- Interior bus stickers and posters at Transit Center that display safety or system policy information are provided in Spanish;
- Onboard surveys are provided in Spanish.

4.5 Monitoring and Updating the LEP plan

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demo-graphics and types of services.

How LAVTA will examine and update its' LEP Plan

LAVTA will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the LAVTA service area. The following details the methodology that will be used:

- Record and report how on the number of LEP persons were encountered annually through LAVTA's Hispanic Education and Outreach Program and working with local Senior Centers;
- Determine how the needs of LEP persons have been addressed;
- Determine the current LEP population in the service area and whether the need for translation services has changed;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed;
- Determine whether the LAVTA and its Contractor have fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals;
- Obtain input from customers and the general community via LAVTA's Market Segmentation Study which is conducted every 3 years.

Dissemination of the LAVTA LEP Plan

The LAVTA LEP Plan will be disseminated to customers and the community as follows:

- A link to the LAVTA LEP Plan and the Title VI Plan will be included on the LAVTA website, *www.lavta.org*.

- LAVTA's LEP Plan will also be shared with human service organizations in its service area.
- Any person or agency with internet access will be able to access and download the plan from the LAVTA 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 LAVTA will provide, if feasible.

5. Contact Information

Questions or comments regarding the LEP Plan may be submitted to the LAVTA Executive Director as follows:

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