

# Washita Valley Transit

## Limited English Proficiency Plan

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Board Chair

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Date

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## **Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address Washita Valley Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive Order 13166, "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 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 all Washita Valley Transit departments receiving federal grant funds.

Washita Valley Transit has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided. As defined 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.

To determine if the Washita Valley Transit is required to file an LEP Plan, first fill out the LEP Four Factor Analysis form.

### **LEP Four Factor Analysis**

In order to prepare this plan, Washita Valley Transit used the 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 require Washita Valley Transit's services.**

The Washita Valley Transit staff reviewed the current U.S. census report and determined that in the Washita Valley Transit service area 52,431 persons (3.4%) of populations speaks a language other than English. Of those 52,431 persons 629 (1.2%) have limited English proficiency; that is, they speak English "not well" or "not at all", this is 1.2% of the overall population in the service area. In Washita Valley Transit's service area, of those persons with limited English proficiency, 1,508 speak Spanish, 390 speak Indo-European, and 118 speak Asian or other Pacific Islander Languages.

2. **The frequency with which LEP persons come in contact with Washita Valley Transit's services.**

Washita Valley Transit's staff reviewed the frequency with which the board/council, office staff and bus drivers have or could have, contact with LEP persons. This includes documenting phone inquiries of office visits. To date, Washita Valley Transit has received zero requests for translated programs and documents.

3. **The nature and importance of services provided by Washita Valley Transit to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the service area for the Washita Valley Transit. The overwhelming majority of the population, 96.6%, speak only English. As a result, there are few social, service, professional and leadership organizations within Washita Valley Transit's service area that focus on outreach to LEP individuals. Washita Valley Transit's Board/council, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

4. **The resources available to Washita Valley Transit and the overall costs to provide LEP assistance.**

Washita Valley Transit reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. Washita Valley Transit has contacted local citizens that would be willing to provide voluntary language(s) translation if needed, within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the Washita Valley Transit would pay a fee.

Based on the Four Factor Analysis, our research shows that in the Washita Valley Transit service area, we **do not** meet the minimum requirement of 5% or 1,000 individuals whichever is less. Therefore, a LEP Plan is not required. Listed below are the resources used to obtain this information.

Resources:

Census Data

<http://www.census.gov>



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<http://www.quickfacts.census.gov/efd/index.html> (Quick Facts for States/Counties/Cities)

#### **American Fact Finder**

<http://www.factfinder2.census.gov>

Washita Valley Transit agrees to the following requirements, the Translation of Documents and Monitoring and Updating the LEP Plan, as mentioned below:

#### **Translation of Documents**

Washita Valley Transit weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, Washita Valley Transit does not have a formal outreach procedure in place, as of 2017. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, Washita Valley Transit will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

#### **Monitoring and Updating the LEP Plan**

Washita Valley Transit will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the next U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Washita Valley Transit's service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to 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 Washita Valley Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Washita Valley Transit fully complies 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.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

### **Staff Training**

The following training will be provided to all Washita Valley Transit staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of languages assistance services offered to the public.
- Use of "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

All contractors or subcontractors performing work for Washita Valley Transit will be required to follow the Title VI / LEP guidelines.

### **Dissemination of the Washita Valley Transit LEP Plan**

Washita Valley Transit will notify LEP persons of the LEP Plan and how to access language services, by posting signs at conspicuous and accessible locations which may include but not limited to the following:

- Washita Valley Transit Web Site
- Post Office
- County DHS Office
- 5310 Transportation Office
- Senior Center(s)
- Doctor's Offices
- Other

State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request at the Washita Valley Transit office.