



Shasta Regional Transportation Agency (SRTA)

Limited English Proficiency (LEP) Plan

Developed June, 2014

Title VI Coordinator

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INTRODUCTION

This Limited English Proficiency (LEP) Plan was developed during the process of preparing SRTA's Title VI Program to ensure that SRTA services are accessible to limited English proficient individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

SRTA's Title VI Program was prepared in the spring of 2014 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

PLAN SUMMARY

SRTA 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. As defined by 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.

In order to prepare this plan, SRTA 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 by SRTA.
2. The frequency with which LEP persons come in contact with SRTA services.
3. The nature and importance of services provided by SRTA to the LEP population.
4. The interpretation services available to SRTA and the overall cost to provide LEP assistance.

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

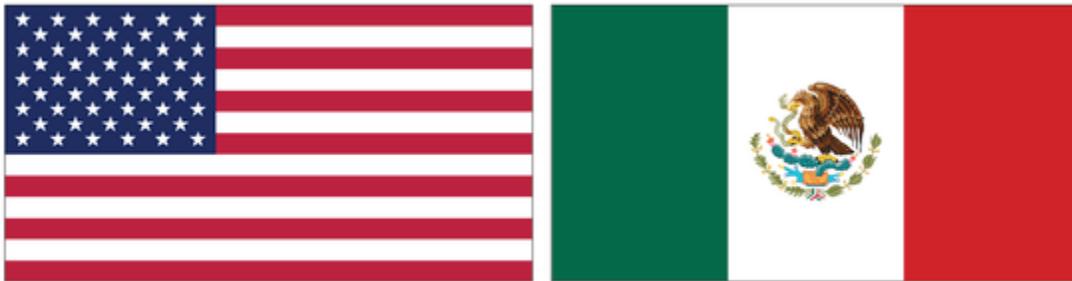
MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

In order to ensure meaningful access to programs and services, SRTA has used the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis, based on the four factors below, reveals how the agency can improve communication with LEP individuals.

FACTOR 1

The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

SRTA staff reviewed the American Community Survey Five-Year Estimate for language spoken at home and determined that 13,686 persons in the Shasta region (8.2% of the population) speak a language other than English. Of those 13,686 persons, 4,729 persons, or 34.6%, have limited English proficiency; that is, they speak English “not well” or “not at all.” This is 2.8 % of the overall population in the service area.



Spanish is the only language group that meets the threshold specified by the Department of Transportation’s Safe Harbor Provision of over 5% or 1,000 individuals (whichever is less). There are 2,335 LEP Spanish speakers in the Shasta region (see Table 1). As a result, SRTA has translated the following vital documents into Spanish and made them available to the public (at SRTA’s office and online):

- SRTA’s Title VI Notice to the Public
- SRTA’s Title VI Complaint Form
- SRTA’s Procedures for filling out the complaint form

The next largest LEP populations in the Shasta region are, respectively, Russian and Chinese. While SRTA will not immediately translate vital documents into Russian or Chinese, as the number of LEP individuals is below the Safe Harbor Provision for each of these groups, it will continue to monitor the proportions of LEP individuals and corresponding languages as detailed in the Monitoring Section.

Table 3 - Shasta Region LEP Populations

	Shasta County, California	Shasta County Service Area
	Population Estimate	Percentage
<i>Total Population</i>	<i>167,325</i>	<i>100.0%</i>
English Only	153,639	91.8%
Speak Other Than English	13686	8.2%
Speak English less than "very well"	4,729	2.8%
Spanish or Spanish Creole:	2,335	1.4%
German:	122	0.1%
Russian:	384	0.2%
Chinese:	343	0.2%
Korean:	234	0.1%
Hmong:	102	0.1%
Vietnamese:	136	0.1%
Other Asian languages:	186	0.1%
Tagalog:	218	0.1%
All other languages	669	0.4%

FACTOR 2

The frequency with which LEP persons come in contact with SRTA services.

SRTA staff reviewed the frequency with which the SRTA Board of Directors and office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries, emails, or office visits. To date, SRTA has had no requests for interpreters and no requests for translated program documents. In their SRTA capacity, the board of directors and office staff have had very little contact with LEP persons.

Now that SRTA has identified Spanish speakers as an LEP population, staff can greet people at public meetings to determine if there are individuals who may benefit from one-on-one assistance later, or if Spanish translation and interpretation services may be needed at future meetings.

FACTOR 3

The nature and importance of services provided by SRTA to the LEP population.

SRTA performs transportation planning for the region. Transit service questions (from LEP persons and otherwise) are generally directed to the Redding Area Bus Authority.

There is no large geographic concentration of any type of LEP individuals in the Shasta region. The overwhelming majority of the population in Shasta, 91.8%, speaks only English. The SRTA Board of Directors and office staff are most likely to encounter LEP individuals through office visits, phone conversations, email correspondence, and attendance at board of directors' meetings.

FACTOR 4

The resources available to SRTA, and overall costs to provide LEP assistance.

The SRTA assessed its available resources that could be used for providing LEP assistance, including:

- Determining the cost of a professional interpreter and translation service on an as-needed basis
- Determining which documents would be the most valuable to be translated if the need should arise
- Taking an inventory of available organizations that the SRTA could partner with for outreach and translation efforts
- Assessing the amount of staff training that might be needed.

Based on the four-factor analysis, SRTA developed measures for language assistance, training staff, and for monitoring and disseminating its LEP Plan as outlined in the following sections.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a (LEP) person and may be entitled to language assistance with respect to SRTA services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How SRTA staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- SRTA staff will be provided with "I Speak" cards, at public meetings, to identify language interpretation needed if the occasion arises.
- When public notices are provided, they are published in advance of SRTA meetings (for details on public review periods, please consult the Public Participation Plan in Attachment B). The public notices delineate how prior arrangements can be made for a

translator (LEP) or interpreter (sign language for hearing impaired individuals) to attend the meeting.

- Staff may greet participants as they arrive at meetings. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be possible at the meeting, one-on-one assistance could be provided later and it will help identify the need for future meetings.

LANGUAGE ASSISTANCE MEASURES

There are numerous language assistance measures available to LEP persons, including both oral and written language services. The SRTA will ensure that vital documents, such as a Title VI complaint form, procedures for the form, and the notice of a person's rights under Title VI are translated into Spanish. Other vital documents may be translated as need arises.

SRTA will strive to develop the following language assistance measures:

- Develop a list of language assistance products and methods and how SRTA can access these.
- Develop staff procedures for customer service regarding:
 - How to respond to LEP callers
 - How to respond to correspondence from LEPs
 - How to respond to LEPs in person
 - How to document LEP needs
 - How to respond to civil rights complaints
- Develop a process for determining:
 - If a particular document needs to be translated
 - The language(s) into which the document(s) should be translated

STAFF TRAINING

The following training will be provided to SRTA staff:

- Information on the SRTA's Title VI procedures and LEP responsibilities
- Description of language assistance services offered to the public
- Use of "I Speak" cards
- Documentation of language assistance requests
- Use of professional interpreter services (over the phone interpretation provider)
- How to handle a potential Title VI/LEP complaint

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

MONITORING



A thorough review of the LEP Plan will be undertaken every three years concurrent with updating and submitting the SRTA Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in SRTA's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the LEP Plan:

1. SRTA will regularly assess the effectiveness of how SRTA communicates with LEP individuals by:
 - Including questions about language assistance and information needs on any community surveys
 - Conversations with key contacts that work with LEPs
 - Ad-hoc outreach with LEP groups
 - Determining whether the need for translation services has changed
 - Determining whether SRTA's financial resources are sufficient to fund language assistance resources needed
 - Determining whether SRTA fully complies with the goals of this LEP Plan
2. SRTA will track its language assistance efforts, including:
 - Reporting front-line staff's interactions with LEP
 - Documenting the number of LEP persons encountered annually
 - Documenting how the needs of LEP persons have been addressed
 - Determining whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals
 - Maintaining a Title VI complaint log, including LEP to determine issues and basis of complaints

DISSEMINATION OF SRTA'S LEP PLAN

Any person or agency with internet access will be able to access and download the SRTA's LEP Plan. Notice of the public's Title VI rights (in English and Spanish) will be placed in the SRTA office reception, as well as in SRTA's meeting room.

Alternatively, any person or agency may request a copy of the plan via telephone, mail, or email and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which the SRTA will provide, if feasible. SRTA will also distribute copies of its Title VI Plan (LEP Plan included) to members of the Social Services Transportation Advisory Council (see Attachment A).

Questions or comments regarding the LEP Plan may be submitted to the SRTA's Title VI Program Administrator:

Shasta Regional Transportation Agency

Attn: Title VI Program Administrator

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Redding, CA 96001

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