

Region 10 Limited English Proficiency Plan

Introduction:

This Limited English Proficiency Plan has been prepared to address the Region 10 (Corridor Rides) public transit agency responsibilities as a potential recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills accessing the services offered by the Region 10. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which states 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 that receive federal transit funds, including Region 10.

Region 10 has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services. 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.

Four Factor Analysis:

In order to prepare this plan, Region 10 completed the four factor LEP analysis, provided by the U.S. DOT for formulating LEP Plans that considers the following factors:

1. Portion of LEP people: The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Region 10 service.
2. Frequency of contact: The frequency with which LEP persons come in contact with Region 10 programs, activities or services.
3. Nature and importance of service provided: The nature and importance of programs, activities or services provided by Region 10 to the LEP population.
4. Resources available and cost: The resources available to Region 10 and overall cost to provide LEP assistance.

Four Factor Analysis for Region 10:

1. Portion of LEP people

Region 10 staff reviewed 2013-2017 5-year estimates from the American Community Survey and determined the following information in Table 1 about the LEP population in the Region. Information about the languages spoken, other than English, are provided in Table 2.

Table 1: LEP Population in Region 10 Service Area

	Benton County	Iowa County	Johnson County	Jones County	Linn County	Washington County
Total Population	24140	15263	135540	19418	204039	20596
Speak English Only	23947	14593	120443	19172	194856	18451
Limited English Proficiency*	160	139	7404	80	3525	497
LEP%	0.66%	0.91%	5.46%	0.41%	1.73%	2.41%

*Speaking another language and speak English less than "very well"

Source: U.S. Census Bureau, American Community Survey 5-Year estimates (2013-2017)

Table 2: Language Spoken in Region 10 Service Area as Percentage of Total Population

	Benton County	Iowa County	Johnson County	Jones County	Linn County	Washington County
Spanish	1.2%	2.3%	4.0%	1.3%	1.8%	4.0%
Other Indo-European	1.0%	1.8%	3.3%	0.3%	1.0%	0.4%
Asian and Pacific Island	0.0%	0.1%	4.5%	0.0%	1.3%	0.5%
Other	0.0%	0.0%	1.5%	0.3%	0.6%	0.1%

Source: U.S. Census Bureau, American Community Survey 5-Year estimates (2013-2017)

Based on the data from the U.S. Census the percentage of LEP in the region is relatively small. Johnson County has a higher LEP percentage and it likely associated with the metropolitan area of Iowa City and the University of Iowa which attracts a sizable foreign population for academic reasons. The metropolitan area of Johnson County is technically not a part of Region 10 but is served by the Metropolitan Planning Organization of Johnson County, which has a detailed LEP analysis and plan specifically for the metropolitan area.

The other area in Region 10 with relatively high LEP is Washington County, and as shown in Table 2 Spanish is the primary language other than English.

2. Frequency of contact

Region 10 staff and Region 10 public transit subcontractors regularly monitor and track interactions with LEP persons. Region 10 staff has had no direct interaction with LEP persons dating back to 2010. The most frequent contact is related to information requests to the transit subcontractors, especially those in Johnson County. The subcontractor in Johnson County (SEATS) also provides para-transit service for Iowa City and Coralville Transit and receives more LEP contacts related to those services. The LEP contacts specifically for the rural portions of Johnson County are low. The transit subcontractors in other counties have received very few LEP contacts. Mobility Coordinators employed by Linn and Johnson County receive nominal contacts for their services from LEP persons, but are able to accommodate with various resources.

3. Nature and importance of service provided

The majority of the Region 10 population speaks English as a first language or as a second language and "very well." The infrequent contacts for information or service to the transit subcontractors by LEP persons has been able to be accommodated. Typically LEP persons requesting information or service are able to be assisted within a similar time-frame as the general public.

4. Resources available and cost

Region 10 assessed available resources that could be used for providing LEP assistance, including translation service, and which of the Region 10 documents would be the most valuable to be translated if the need should arise, as well as taking an inventory of available organizations that the Region could partner with for outreach and translation efforts. Johnson and Linn County have a variety of translation services related to public transit documents through their partnerships with the metropolitan planning

organizations and fixed route public transit providers in their area that are available to Region 10 transit subcontractors. The amount of staff training that would be needed was also considered.

Conclusion from Four Factor Analysis

Based on the Four Factor Analysis, Region 10 developed its LEP Plan as outlined in the following section. Note that the DOT provides a Safe Harbor Provision (see Chap. III-9(c) of FTA C 4702.1B) for recipients regarding translation of written materials for LEP populations, if it is deemed necessary by the recipient based on the Four Factor Analysis.

Limited English Proficiency Plan Outline

The Region will develop several options to be available to assist LEP individuals to utilize services. These options include:

- Utilize CTS Language Link to translate and interpret information requests by LEP persons as well as requests to utilize public transit service by transit subcontractors.
- Provide translation services on request and document these requests for future reference.
- Continue to partner and share resources related to LEP materials with metropolitan planning organizations and fixed route public transit providers in the region, including resources via the mobility coordinators in Linn and Johnson County.
- Continue to monitor LEP persons and reevaluate LEP Plan as population changes.
- Continue to survey staff and transit subcontractors about contacts with LEP Populations and document any phone interactions with these individuals.

Language Assistance

Region 10 will ensure that the following measures are in place:

- The Region 10 Title VI Policy and Limited English Proficiency Plan will be posted on the agency website, www.ecicog.org and www.corridorrides.com
- When an interpreter is needed, in person or on the telephone, staff and transit subcontractors will utilize CTS language link.
- When documents are needed in a different language, translation services will be sought to timely and accurately interpret translate documents, as well as outreach efforts to partner organizations for assistance.
- Sharing of documents and resources made available for LEP persons by metropolitan planning organizations, public fixed route providers and mobility coordinators in Linn and Johnson County.

Staff Training

The following training has been provided to Region 10 staff and will be made available to transit subcontractors:

- Information on Region 10's Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public, including CTS Language Link.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.
- Document Translation services, including online translation for websites.

Outreach Techniques

When and if the need arises for LEP outreach, the Region 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.
- Bus schedules, maps, and other transit publications will be made available online in an alternative language when and if a specific and concentrated LEP population is identified.
- Staff will seek to increase communication with LEP persons by participating in transportation committees and groups that assist potential LEP populations, including the two mobility coordinators in the region.

Monitoring and Updating the LEP Plan

Region 10 will update the LEP as required by U.S. DOT or other federal funding sources. 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 Region 10 and the transit subcontractors have fully complied with this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of the LEP Plan

The LEP Plan will be made available as a part of the Title VI Plan on the ECICOG and CorridorRides website. Copies of the LEP Plan will be provided, upon request, to any person(s) requesting the document via phone, in-person, by mail or email, and will always be available for review at the ECICOG office. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to the Title VI Coordinator.

Questions or comments regarding the LEP Plan may be submitted to Region 10 as follows:

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