# Trailblazer Joint Powers Board Language Assistance Plan

# Effective: March 20, 2014

Revised: August 21, 2015

### Purpose

The purpose of this Language Assistance Plan (hereinafter "plan") is to meet Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a subrecipient of FTA funds, this transit system is pledged to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B <u>Title VI Requirements and Guidelines for Federal</u> <u>Transit Administration Recipients.</u>

The U.S. DOT's FTA Office of Civil Rights' publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers," dated April 13, 2007, was used in the preparation of this plan.

The plan for Trailblazer Joint Powers Board contains:

- A. A needs assessment based on the four-factor analysis.
- B. Language assistance measures.
- C. A staff training plan.
- D. Methods for notifying LEP persons about available language assistance.
- E. Methods for monitoring, evaluating, and updating the plan.

#### A. LEP Needs Assessment – the Four-Factor Analysis

Factor 1. The number or proportion of LEP persons in our service area who may be served or are likely to encounter a transit program, activity, or service.

We assessed the following information about LEP persons to determine the number or proportion of LEP persons who might use or want to use our transit services:

- 2010 U.S. Census and American Community Survey data.
- Reports from drivers, dispatchers, and others about contact with LEP persons.

According to data provided by MnDOT from the 2010 American Community Survey 2007-2011 Five-Year Estimate:

- 1) The total number of LEP persons in our service area is 3,037.
- 2) The total eligible population in our service area is 160,806.
- 3) The proportion of LEP persons to the total eligible service population is 1.89 percent.
- Factor 2. The frequency with which LEP persons come in contact with our transit programs, activities, or services.

Dispatchers and drivers report coming in contact with LEP persons requesting information or using our transit services almost daily. The most popular destinations for LEP persons are work locations, retail stores, and medical facilities. The children of many LEP persons, although fluent in English themselves, use the transit system to get to and from school.

The conclusions drawn from examining this information about LEP persons seeking transit services are:

- 1) Once persons with limited English proficiency begin using transit services, many use the transit system frequently.
- 2) Primary destinations for LEP persons are similar to those for the rest of the population.
- Factor 3. The nature and importance of programs, activities, or services provided to the LEP population.

Our transit system considers transit to be an important and essential service for many people living in our service area. Trailblazer Transit provides approximately 250,000 rides per year with our bus system, volunteer driver program, and van service. While we have not tracked ride statistics specific to the LEP population in the past, dispatchers note that there is an increase in LEP persons requesting information in the summer who live at the Seneca Foods housing complex in Glencoe. They primarily rely on Trailblazer to get them to and from shopping destinations in Hutchinson. More and more LEP persons in our service area are relying on public transit to get their children to and from school.

Factor 4. The resources available to our transit system and the overall cost to provide language assistance.

Our current budget for marketing to or communicating with LEP persons in their language about transit services that are available to them is \$0.00. While we do not have a budget specifically for marketing to or communicating with LEP persons, costs for language assistance measures come from the transit system's marketing and staff development budgets. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc.

Human service agencies in Sibley, McLeod, and Wright Counties have Spanish-speaking interpreters available for LEP persons wanting to schedule rides with the transit system. The county human service agencies are knowledgeable about the transit services that Trailblazer provides. Glencoe Regional Health Services also has Spanish-speaking interpreters available to assist LEP persons in making rides to and from its clinic and hospital. All of these measures are of no cost to the transit system.

# **B. Language Assistance Measures**

Language assistance measures currently used by the Trailblazer Joint Powers Board to address the needs of LEP persons include the following:

- Arranging for the availability of oral translators.
- Drivers carry numerical Token Sales Charts to help communicate with LEP persons who would like to purchase tokens on the bus.

In the future, we would like to expand our outreach efforts to Spanish-speaking LEP persons by:

- Translating key documents in Spanish by December 31, 2015.
- Expanding the hours that oral Spanish interpreters are available.
- Advertising in a new regional Spanish newspaper.

# C. Staff Training

To ensure effective implementation of this plan, the transit system will schedule training at orientations for new staff and for all relevant employees on an annual basis to review:

- The transit system's Language Assistance Plan.
- Demographic data about local LEP population.
- Printed LEP persons' materials.
- How to handle verbal requests for transit service in a foreign language.
- Responsibility to notify transit manager about any LEP persons' unmet needs.
- Diversity training.

# D. Notice to LEP Persons about Available Language Assistance

Our transit system plans to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Sending information to local organizations that work with LEP persons.
- Website notices.

# E. Annual Monitoring, Evaluating, and Updating Plan

The transit system will review this plan during its annual review with its MnDOT transit project manager by:

- Assessing its effectiveness (e.g., comparing numbers of LEP persons served by year, number of requests for language assistance received during the year).
- Assessing the sufficiency of staff training and budget for language assistance.
- Reviewing current sources of assistance to ensure continuing availability.
- Reviewing any complaints from LEP persons or information about their needs that were received during the past year.

This plan will be reviewed by our transit system annually. Revisions of this plan will be approved by the Trailblazer Joint Powers Board and dated.

# F. Dissemination of Plan

This Language Assistance Plan is available on our website at:

http://www.trailblazertransit.com/lap

This plan is also available at no cost in English upon request by telephone, fax, and mail or in person.

If requested to be provided in another language and it is feasible to have it translated, information will be provided at no cost to the requester.

### **G.** Contact Information

Questions or comments about this plan may be submitted to:

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