

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

BUTTE COUNTY ASSOCIATION OF GOVERNMENTS BUTTE REGIONAL TRANSIT, B-LINE

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Butte County Association of Governments (BCAG) responsibilities 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, Federal Transit Administration Circular 4702.1A dated May 13, 2007, 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 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 which receive federal funds.

Plan Summary

BCAG is the owner and operator for Butte Regional Transit (BRT) and 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 BRT. 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.

In order to prepare this plan, BRT undertook the U.S. Department of Transportation (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 BRT program, activity or service.
2. The frequency with which LEP persons com in contact with BRT programs, activities or services.
3. The nature and importance of programs, activities or services provided by BRT to the LEP population.
4. The resources available to BRT and overall costs to provide LEP assistance.

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

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Four-Factor Analysis

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

BRT staff reviewed the 2000 U.S. Census Report and determined that 23,906 persons in Butte County [12.48 % of the population] speak a language other than English. In Butte County, 11,221 persons [5.9%] have limited English proficiency; that is, they speak English “not well” or “not at all.”

In Butte County, of those persons with limited English proficiency, 14,862 speak Spanish, 5038 speak Asian and Pacific Island languages, and 3,193 speak other Indo-European languages.

2. The frequency with which LEP persons come in contact with BRT programs, activities or services.

BRT assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. To date, the most frequent contact between LEP persons is with bus drivers. Translated documents have included postings on the buses relating to fares and transit rules written in Spanish.

3. The nature and importance of programs, activities or services provided by BRT to the LEP population.

The largest geographic concentration of LEP individuals in the BRT service area is Spanish. Two concentrated areas have been identified in Butte County. The City of Biggs has 16.9% of adult speakers who speak English less than very well. The City of Gridley has 21% of adult speakers who speak English less than very well. Services provided by BRT 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 BRT will encounter LEP individuals at the downtown Chico Transit Center where discount tickets are sold, community outreach events and posters are displayed relating to transit events.

4. The resources available to BRT and overall costs to provide LEP assistance.

BRT assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that BRT could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four-factor analysis, BRT developed its LEP Plan as outlined in the following section.

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Limited English Proficiency (LEP) Plan Outline

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

1. Examine records to see if requests 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 or meetings.
2. Have a staff person greet participants as they arrive to BRT sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at BRT meetings. This will assist BRT in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language Identification Flashcards on all transit vehicles to assist vehicle 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 BRT's management for follow-up.
5. Vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

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 BRT staff responds to LEP persons, whether in person, by telephone or in writing.

- BRT Hispanic Education and Outreach Programs will continue to provide vital information to LEP groups on BRT programs and services;
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on BRT programs and services;
- Provide a bilingual Community Outreach Coordinator at community events, public hearings and Board of Director meetings;
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Survey bus drivers 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;

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- Provide *Language Identification Flashcards* at the Transit Center, onboard the BRT fleet, in Road Supervisor vehicles and at transit systems administrative offices;
- Post the BRT Title VI Policy and LEP Plan on the agency website, www.bcag.org;
- Provide group travel training to LEP persons with the assistance of bilingual staff;
- Include language “Spanish a plus” on bus driver recruitment flyers and onboard recruitment posters;
- 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. A list of volunteers will need to be developed.

Staff Training

The following training will be provided to BRT staff:

1. Information on the BRT Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests
5. Use of languageline service
6. How to handle a potential Title VI/LEP complaint

Outreach Techniques

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. Interpreters will be available as needed.

Monitoring and Updating the LEP Plan

BRT will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the BRT 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 BRT’s financial resources are sufficient to fund language assistance resources needed

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- Determine whether BRT has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning BRT's failure to meet the needs of LEP individuals

Dissemination of the BRT LEP Plan

A link to the BRT LEP Plan and the Title VI Procedures is included on the BRT website at www.BLinetransit.com.

Any person or agency with internet access will be able to access and download the plan from the BRT 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 BRT will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Butte County Association of Governments, Title VI Administrator or Senior Planner for Transit Administration:

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