



LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the Butte County Association of Governments (BCAG) and Butte Regional Transit (BCAG/BRT) 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, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Federal Executive Order 13166, titled ***Improving Access to Services for Persons with Limited English Proficiency***, states that differing treatment based on a person's inability to speak, read, write or understand English is a type of national origin discrimination. The Executive Order 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, including all BCAG departments receiving federal grant funds.

Plan Summary

BCAG is the owner and operator for Butte Regional Transit (BCAG/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 BCAG/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 LEP 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 through various public outreach efforts.

BCAG and BCAG/BRT (the B-Line) Language Assistance Plan

In order to prepare this plan, BCAG/BCAG/BRT 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 encounter a BCAG/BRT program, activity or service.

2. The frequency with which LEP persons come in contact with BCAG/BRT programs, activities or services.
3. The nature and importance of programs, activities or services provided by BCAG/BRT to the LEP population.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. For example, interpretation services available to BCAG/BRT and overall cost to provide LEP assistance.

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

FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in Butte County who may be served or are likely to require BCAG/BRT services.

BCAG staff reviewed the 2016 American Community Survey (5-year estimates) and determined that 14.2% of the population 5 years and over in Butte County speak a language other than English. In Butte County, 5.4% (~11,429 persons) of the population 5 years and over speak English less than “very well”.

Table 1: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Butte County, California	Estimate	Speak English "very well"	Speak English less than "very well"
Total:	211,657	94.6%	5.4%
Speak only English	85.8%	(X)	(X)
Speak a language other than English	14.2%	62.2%	37.8%
Spanish or Spanish Creole	8.8%	64.2%	35.8%
Other Indo-European languages	1.6%	73.5%	26.5%
Asian and Pacific Island languages	3.4%	50.2%	49.8%
Other languages	0.4%	75.7%	24.3%

Source: U.S. Census Bureau, 2016 American Community Survey 5-Year Estimates (S1601)

In terms of specific languages spoken, other than those who speak only English, the largest groups are Spanish or Spanish Creole with an estimated 17,595 speakers, followed by Hmong with an estimated 3,778 speakers, and Chinese with an estimated 825 speakers.

Table 2: Language Spoken at Home for Population 5 Years & Older

Butte County, California	Estimate	% of Total
Total:	210,409	-
Speak only English	181,682	86.4%
Spanish or Spanish Creole	17,595	8.4%
French (incl. Patois, Cajun)	322	0.15%
Italian	154	0.07%
Portuguese or Portuguese Creole	214	0.10%
German	751	0.36%
Other West Germanic languages	121	0.06%
Scandinavian languages	55	0.03%
Greek	14	0.01%
Russian	108	0.05%
Polish	0	0.00%
Serbo-Croatian	52	0.02%
Other Slavic languages	88	0.04%
Armenian	103	0.05%
Persian	243	0.12%
Gujarati	132	0.06%
Hindi	174	0.08%
Urdu	28	0.01%
Other Indic languages	595	0.28%
Other Indo-European languages	212	0.10%
Chinese	825	0.39%
Japanese	144	0.07%
Korean	39	0.02%
Mon-Khmer, Cambodian	9	0.00%
Hmong	3,778	1.80%
Thai	87	0.04%
Laotian	227	0.11%
Vietnamese	379	0.18%
Other Asian languages	556	0.26%
Tagalog	743	0.35%
Other Pacific Island languages	281	0.13%
Navajo	14	0.01%
Other Native North American languages	90	0.04%
Arabic	391	0.19%
Hebrew	81	0.04%
African languages	49	0.02%
Other and unspecified languages	53	0.03%

Source: U.S. Census Bureau, 2015 American Community Survey 5-year Estimates (B16001)

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

BCAG/BRT assessed the frequency with which the board members, office staff, customer service representatives and bus drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries, complaints 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 and will now include Hmong. The Title VI Notice is on all of BCAG/BRT buses and are posted in English, Spanish and Hmong.

BCAG/BRT will continue to assess the frequency with which staff and drivers have or could have, contact with LEP persons. These include the following points of contact and their frequency:

Main Points of Contact with LEP persons

- Buses
- Drivers
- Chico Transit Center
- Travel Training Guides – Mains'l
- Dispatchers
- Customer Service Representatives
- Paratransit and Dial-a-Ride Reservationists
- Jurisdictions selling bus tickets
- www.blinetransit.com and www.bcaq.org

Bus drivers that are able to translate for passengers, have been observed by Mains'l supervisors translating while a rider is training with a bus guide to learn the fixed route. Bus stops are called out in Spanish if the bus driver observes riders who don't speak or understand English and that driver is able to announce in Spanish.

The Glenn Ride, located in Gridley provides a Spanish bus schedule.

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

The largest geographic concentrations of LEP individuals in the BRT service area speak Spanish and Hmong. Two concentrated areas of LEP individuals have been identified in Butte County. The City of Oroville has 7.9% of the population 5 years and over who speak English less than very well. The City of Gridley has 23.4% of the population 5 years and over who speak English less than very well.

Services provided by BCAG/BRT that LEP individuals use to get to work, school, church and social events include the fixed route and local dial-a-ride system serving the general public over 70 years of age or older and the complementary paratransit system for disabled persons who qualify under the Americans with Disabilities Act.

BCAG/BRT has contact with LEP individuals in its office, through local schools, through organizations serving the homeless, local community service, advocacy organizations, and at the Chico and Oroville Transit Centers.

BCAG/BRT maintains a contract with Mains'l Bus Guide services. At the request of either party, a person may be trained to ride the fixed route service instead of using paratransit. Mains'l bus guides interact with LEP individuals as assist when needed.

It is also likely that BCAG/BRT will encounter LEP individuals at the downtown Chico Transit Center which serves as the regional hub for transit riders and buses. A customer service representative is available to answer general questions relating to transit, bus tickets and schedules. The customer service representative speaks Spanish and can assist LEP Spanish speaking individuals. Discount tickets are sold at the transit center, community outreach events and posters are displayed and Title VI public notices are posted.

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

BCAG/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 and taking an inventory of available organizations with which resources could be shared. BCAG/BRT assessed which of its documents would be the most valuable to be translated, such as the bus schedules, complementary paratransit applications, Title VI notices and complaint procedures. The BCAG/BRT website is now capable of translating these documents and information via Google Translation.

The amount of staff and vehicle operating training that might be needed was also considered. BCAG/BRT will anticipate the costs associated with professional written translation of service information and vital documents into Spanish and Hmong and those associated the providing oral translation at public meetings where needed and by request.

BCAG/BRT works with Disability Action Center (DAC) for Spanish and Hmong interpretation services which would be at no cost to BCAG/BRT. A community outreach plan is also in the works to be developed between BCAG/BRT and DAC to identify opportunities to reach LEP individuals and budget for those activities. The outreach plan will include assistance of local community organizations and LEP community advocates.

LANGUAGE ASSISTANCE MEASURES

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 Limited English Proficient person and may be entitled to language assistance with respect to BCAG/BRT 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.

There are also various ways in which BCAG/BRT staff responds to LEP persons, whether in person, by telephone or in writing.

- Provide bilingual staffing to provide Spanish-speaking interpretation at its Administrative offices and Customer Service;
- BCAG/BRT Hispanic Education and Outreach Programs will continue to provide vital information to LEP groups on BCAG/BRT programs and services;
- Network with local human service organizations and senior centers that provide services to LEP individuals and seek opportunities to provide information on BCAG/BRT programs and services;
- Utilize the Hmong Cultural Center of Butte County to provide interpreter services for Hmong community members;
- 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. Additionally, a staff person may greet participants as they arrive. 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 able to be provided at the event, it will help identify the need for future events.
- Survey bus drivers and other front-line staff, like customer service representatives, dispatchers, dial-a-ride schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year;
- Provide *Language Identification Flashcards* at the Transit Center, onboard the BCAG/BRT fleet, in Road Supervisor vehicles and at transit systems administrative offices;
- Post the BCAG/BRT Title VI Policy and LEP Plan on the agency website, www.blinetransit.com and 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 or Hmong, in person or on the telephone, staff will attempt to access language assistance services from Language Line that supports over 150 languages. An interpreter is immediately available on the phone to interpret in any of those languages, a professional translation service or qualified community volunteers.

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

1. Conduct examination of customer service center records for language assistance requests or assistance provided in person or over the phone.
2. BCAG/BRT eligibility coordinators and dispatchers will be instructed to record and report on passenger requests for language assistance.
3. Schedule public meetings in neighborhoods where LEP residents are concentrated, and advertise the availability of translation assistance at least two weeks in advance.
4. Have a staff person greet participants as they arrive to BCAG/BRT sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English.
5. Census Bureau Language Identification Flashcards; strive to make available at BCAG/BRT meetings. This will assist BCAG/BRT in identifying language assistance needs for future events and meetings.
6. Census Bureau Language Identification Flashcards; strive to make available 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 BCAG/BRT’s management for follow-up.
7. Conduct an annual survey of vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and customer service representatives on their experience concerning any contacts with LEP persons during the previous year. Survey conducted in May 2016.

Staff Training – conducted in October 2018

BCAG/BRT will continue to train staff on the following:

1. Information on the BCAG/BRT Title VI Policy and Procedures and LEP responsibilities
2. Provide new BCAG/BRT staff and Contractors the staff training handout that explains what Title VI is about, the complaint process, the Language Assistance Plan, what to do if an LEP person is encountered, and services offered to LEP persons.
3. Use of Language Identification Flashcards (used to identify language preference)
4. Documentation of language assistance requests
5. BCAG/BCAG/BRT coordinates with the Disability Action Center to provide language interpretation services for Spanish and Hmong.
6. How to handle a potential Title VI/LEP complaint

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

Outreach Techniques and Translation of Documents

When staff prepares a document or schedules a public 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.

BCAG/BCAG/BRT provides Google Translation on the BCAG/BRT website to make vital documents available and accessible to LEP persons of many languages.

Bus guides help with Spanish translation services for riders who have limited to no English.

Monitoring and Updating the LEP Plan

BCAG/BRT will update the LEP every 3 years as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the BCAG/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 BCAG/BRT's financial resources are sufficient to fund language assistance resources needed
- Determine whether BCAG/BRT has fully complied with the goals of this LEP Plan

- Determine whether complaints have been received concerning BCAG/BRT's failure to meet the needs of LEP individuals
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints

Dissemination of the BCAG/BRT LEP Plan

A link to the BCAG/BRT LEP Plan and the Title VI Procedures is included on the BCAG/BRT and BCAG websites at www.BLinetransit.com and www.bcag.org.

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

State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at 530-809-4616.

Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.

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

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