



*Westmoreland Transit*

**LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

**JUNE 2008**

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## **Introduction**

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), the Westmoreland County Transit Authority (WCTA) shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

## **Plan Summary**

The WCTA has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to WCTA services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the WCTA's extent of obligation to provide LEP services, the WCTA conducted a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the WCTA service area who may be served or likely to encounter a WCTA program, activity, or service; 2) the frequency with which LEP individuals come in contact with WCTA services; 3) the nature and importance of the program, activity or service provided by the WCTA to the LEP population; and 4) the resources available to the WCTA and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## **Four Factor Analysis**

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

The WCTA examined the US Census report from 2010 and the Census tracts in the WCTA service area determined that approximately 4%, or 8,976 people within WCTA's service area age 5 and older spoke a language other than English. Of the 8,976 people reporting they speak other languages than English, 2,065 or 23% of respondents speak English "less than very well." Languages other than Spanish, Italian, German, Polish and Chinese comprised the largest non-English speaking language groups (46%), followed by Spanish (24%), Italian (13%), German (10%), Chinese (5%), and Polish (5%). Of those groups, the following percentages speak English "less than very well": Other languages (23%), Spanish (30%), Italian (14%), German (12%), Chinese (44%), and Polish (18%).

### **2. The frequency with which LEP individuals come in contact with a WCTA program, activity, or service.**

The WCTA assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying drivers and customer service personnel. In 1999, the WCTA implemented a language line service for LEP individuals. Since the implementation of this service, the WCTA has had no requests for interpreters and zero requests for translated WCTA documents. WCTA staff and drivers have had very little to no contact with LEP individuals. Currently, the WCTA's website can be translated, by the click of a button, to over 10 languages. The WCTA has not had any requests for document translation.

### **3. The nature and importance of the program, activity, or service provided by the WCTA to LEP community.**

There is no large geographic concentration of any one type of LEP individuals in the WCTA service area. The overwhelming majority of the population, 96% of residents speak only English. Therefore, for the most part, LEP individuals do not use WCTA's services. However, on occasion, international students from nearby Seton Hill University do use WCTA's fixed-route system. While none of these students have ever required language assistance, and do speak English very well, the WCTA's services are moderately important to these individuals in order to provide access to shopping and leisure activities outside of the service area of the Seton Hill University's privately run shuttle service. It should be noted that use of the WCTA's service by these students is minimal.

### **4. The resources available to the WCTA and overall costs.**

The WCTA assessed its available resources that could be used for providing LEP assistance. This included identifying costs associated with subscription to the Language Line service, the costs of additional translation services such as a professional interpreter on an as needed basis, which documents would be the most valuable to be translated if and when the populations supports, taking an inventory of available organizations that the WCTA could partner with for outreach and translation efforts, and what level of staff training is needed. After analyzing the four factors, the WCTA developed the plan outlined in the following section for assisting persons of limited English proficiency.

# LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

## How to Identify a LEP Person Who Needs Language Assistance

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When the WCTA sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the WCTA Transit Center; and
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

## Language Assistance Measures

The WCTA has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the WCTA service area:

- Census Bureau's "I Speak Cards" are to be located in the Transit Center waiting area at all times.
- During the WCTA's website redesign in 2016, the website is now easily converted to over 10 languages.
- When an interpreter is needed, in person or on the telephone, staff will utilize the Language Line Service.

## WCTA Staff Training

All WCTA staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the WCTA staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the WCTA offers;
- Use of LEP "I Speak Cards";
- How to use the Language Line interpretation and translation services;

- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

### **Outreach Techniques**

The WCTA does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that the WCTA will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”.
- Key print materials will be translated and made available at the WCTA Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the WCTA will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?;
- Were their needs met?;
- What is the current LEP population in WCTA service area?;
- Has there been a change in the types of languages where translation services are needed?;
- Is there still a need for continued language assistance for previously identified WCTA programs? Are there other programs that should be included?;
- Have the WCTA’s available resources, such as technology, staff, and financial costs changed?;
- Has the WCTA fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

As part of the monitoring and update plan, the WCTA will track the activity of usage of its services by LEP persons and requests for assistance from Customer Service and Operator staff, and record information from passenger surveys which will identify the language spoken by passengers and their need for assistance. The WCTA will also maintain communication with municipalities in its service area at a

minimum on an annual basis to identify LEP individuals who may have moved into a part of WCTA's service area and may require assistance. These municipalities will also be instructed to contact the WCTA with any requests that they may receive for language assistance.

**Dissemination of the WCTA Limited English Proficiency Plan**

The WCTA includes the LEP plan on the WCTA website ([www.westmorelandtransit.com](http://www.westmorelandtransit.com)) together with its Title VI Policy and Complaint Procedures. The WCTA's Notice of Rights under Title VI to the public is available in the WCTA Transit Center and on all vehicles.

Any person, including social service, non-profit, and law enforcement agencies, along with other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the WCTA Title VI Coordinator.

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