

**Language Assistance Plan
for
Central Community Transit Joint Powers Board**

**Effective:
March 21, 2014**

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 Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

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 Central Community Transit 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 (as checked) about LEP persons to determine the number or proportion of LEP persons who might use or want to use our transit services:

- 2010 US Census data/American Community Survey data

- Survey results: Describe: Results show that African, Spanish, and Vietnamese are languages that are spoken in Kandiyohi and Renville County.
- Local school district data
- Locally Coordinated Human Services Plan
- Other Human Services data
- Area/Metropolitan Planning Organizations/Regional Development Commission data
- Information from local organizations (religious, legal, social service, etc.) about LEP persons in our service area
- Reports from drivers, dispatchers and others about contact with LEP persons

According to data provided by Mn/DOT from the 2010 American Community Survey 2007-2011 Five-Year estimate:

- 1) The total number of LEP persons in our service area is 1316.
- 2) The total eligible population in our service area is 39130.
- 3) The proportion of LEP persons to the total eligible service population is 3.36%.

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

The Central Community Transit has frequent requests from passengers who are Limited English Proficient (LEP). LEP persons are making some type of contact with a CCT employee hourly within its system. People request to go to places in Kandiyohi County such as Jennie-O Turkey Store, Willmar Poultry Company, Adult Basic Education, Cashwise and Cub Foods, Affiliated Community Medical Centers, Family Practice Medical Centers, Rice Hospital and Dental Clinic, the Kandiyohi County Family and Social Service Agency, and Heartland Community Action Council, Kandiyohi County Public Health, Work force Center, Goodwill, and the Downtown Somali Resource Center. People who need to travel to and from these destinations speak Spanish or Somali and other languages. Overall, people are making an attempt to speak English when arranging and using transit, however, it is still difficult for them to communicate accurately their information such as where they are and where they need to go to. Drivers and dispatchers find it extremely difficult to understand the passengers request for transportation and then to communicate the transit system information. Resources that the Central Community Transit personnel have found helpful are the Adult Basic Education program and Kandiyohi County Family Services. These agencies work directly with various populations and have direct connections with individuals who can assist with linking the services and needs of LEP persons.

The conclusions drawn from examining this information about LEP persons seeking transit services are: Contact made with LEP individuals have been very positive and CCT learns about the cultures and transportation needs from leaders and elders of these groups and has continued to adjust its services to meet those needs.

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. The LEP population in Kandiyohi and Renville County is made up primarily of citizens who are residents of the county, and migrant and refugee populations that are often seeking employment and education. Many families live in poverty and need medical attention. Transit provides a means to access services, as many are not licensed to drive or have a vehicle.

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 \$2,000. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc.

In addition to this budget and other resources CCT may be able to utilize on a very limited basis, resources from the Kandiyohi County Family Services Department, Willmar Adult Basic Education, and Heartland Community Action.

B. Language Assistance Measures

There are several language assistance measures that are available to Central Community Transit. These include:

- Translation of key documents in the following language(s): Spanish and Somali
- Communication with LEP persons' groups about transit services
- Posting notices in appropriate languages informing LEP persons of available services

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
- updates from city, county, and other area resources about LEP persons.

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:

- signs on buses or at bus stops
- brochures
- posters
- sending information to local organizations that work with LEP persons
- telephone messages

- local ads (newspaper , radio, TV)
- website notices
- information tables at local events, grocery stores, pharmacies, and churches

E. Annual Monitoring, Evaluating and Updating Plan

The transit system will review this plan during its annual review with its Mn/DOT 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 for assistance to ensure continuing availability, and
- reviewing any complaints from LEP persons or about their needs that were received during the past year.

This plan will be made a part of the Central Community Transit Operations Policies and will be reviewed by our transit system annually. Revisions of this plan will be approved or adopted by the CCT Joint Powers Board and dated accordingly.

F. Dissemination of Plan

This Language Assistance Plan is available on our website at www.cctbus.org/LanguageAssistancePlan

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:

Tiffany Collins
CCT Transit Director
P.O. Box 186, Willmar, MN 56201
320-214-7433
Fax 320-214-7754
tcollins@cctbus.org