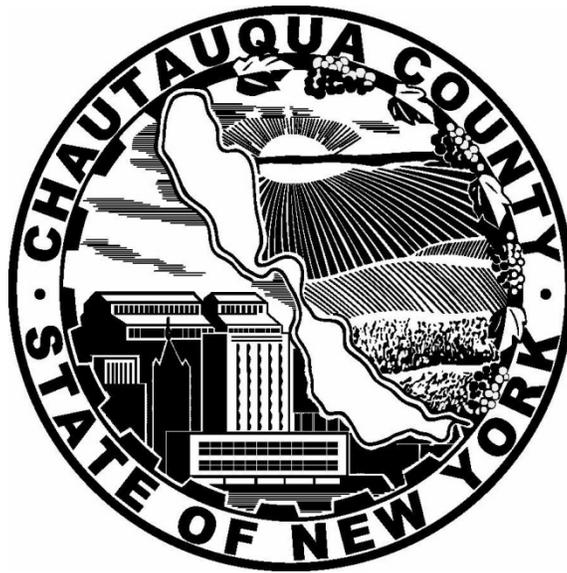


**Limited English Proficiency Plan
Chautauqua Area Regional
Transit System – CARTS**



Joe Porpiglia

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Chautauqua County Human Resources

cchrs.co.chautauqua.ny.us

716-753-4237

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I. INTRODUCTION

The limited English Proficiency (LEP) Plan has been prepared to address the Chautauqua Area Regional Transit System (CARTS) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. This plan is 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 states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access for Persons with Limited English Proficiency*, states that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination which is covered under Title VI. This order directs each agency to publish guidance for its respective recipients clarifying their obligations to ensure that such discrimination does not take place. This order applies to all state and local agencies that receive federal funds and extends to its sub recipients.

II. PLAN SUMMARY

CARTS developed the LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided by CARTS. As defined by 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 notification to LEP persons regarding the availability of assistance.

In order to prepare this plan, CARTS used the Federal Highway Administration (FHWA) Four Factor LEP analysis:

1. The number or proportions of LEP persons in the service area who may be served or are likely to require services provided by CARTS.
2. The frequency with which LEP persons come in contact with the CARTS.
3. The nature and importance of services by the CARTS; and
4. The interpretation services available to the CARTS and overall cost to provide LEP assistance.

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

III. MEANINGFUL ACCESS FOUR-FACTOR ANALYSIS

1. The number of proportion of LEP persons in the service area who may be served or are likely to require CARTS.

CARTS staff reviewed the Analysis of US Census Bureau 2007-2011 American Community Survey to estimate the LEP population in the CARTS service area of Chautauqua County.

Examination of US Census Bureau 2007-2011 American Community Survey by geographic place determined that 7.2% of residents in Chautauqua County are non-English speaking. See Table 1

Table 1: Languages spoken in the homes of Chautauqua County residents 2007-2011:

LANGUAGE SPOKEN AT HOME	NUMBER	PERCENTAGE
Population 5 years and over	127,542	100%
English Only	118,330	92.8%
Language other than English	9,212	7.2%
Speak English less than "very well"	3,069	2.4%
Spanish	5,271	4.1%
Speak English less than "very well"	1,922	1.5%
Other Indo-European languages	3,234	2.5%
Speak English less than "very well"	730	0.60%
Asian and Pacific Islander languages	571	0.40%
Speak English less than "very well"	326	0.30%
Other languages	136	0.10%

2. The frequency with which LEP persons come in contact with CARTS.

CARTS will review customer calls semiannually to determine the ratio of LEP calls and to make sure that we are reaching out to all individuals.

3. The nature and importance of services provided by CARTS.

Access to public transportation is critical for many to fully participate in society, CARTS provides a range of important transportation options to the community through its fixed-route, rural off route, and paratransit services. Riders use CARTS for their multiple travel needs within the community, including work, school, job interviews, grocery stores and retail shops, medical offices, and community service agencies.

4. The interpretation services available to CARTS and overall cost to provide LEP assistance.

CARTS annual operating budget allocated funds for a position for a Spanish Speaking Operations Assistant. This allows for translation services to effectively communicate with LEP persons in the community. As funding allows, CARTS intends to continue such efforts into the foreseeable future, including printing LEP brochures and flyers.

CARTS partners with Chautauqua Adult Day Care Latino Outreach Program. Staff is available for translation of written materials and interpretation for appointments and referrals.

IV. IMPLEMENTATION

CARTS has developed an implementation plan to address the needs of the LEP populations they serve. CARTS implementation plan includes the following five elements:

1. Identifying LEP individuals who need language assistance
2. Provide Language assistance measures
3. Training staff
4. Providing notice to LEP persons; and
5. Monitoring and updating the Plan

Element 1: Identifying LEP Individuals who need language assistance

1. **CENSUS DATA:** US Census Bureau 2007-2011 American Community Survey indicates that Spanish Speaking LEP persons are the primary group requiring language assistance in CARTS service area.
2. **Customer Satisfaction Survey:** Chautauqua County Mobility Manager conducts an annual survey which provides detailed information about passenger's needs and gaps in service, and any language barriers that are presented.
3. **Tracking Calls:** CARTS will continue to monitor and quantify the volume and trends of calls that come in for language assistance.

Element 2: Providing Language Assistance Measures:

1. **Translation Services:** CARTS has access to a Spanish speaking interpreter who will assist riders with bus schedule information Monday thru Friday from 8:00 am - 4:30 pm.
2. **Schedules and route maps in Spanish:** Many route schedules are printed in both English and Spanish. Bilingual route literature is also available.
3. **"Non-English Resources" section of CARTS website:** CARTS has dedicated a section of its website that discusses specific services available to non-English speaking persons and provides links to critical translated documents for download.
4. **Critical documents in Spanish:** Applications in Spanish for reduced fares for seniors,

youth, and persons with disabilities are available on the CARTS website and upon written, telephone or in-person requests. An overview of CARTS Title VI Program and Title VI complaint form are available in Spanish at the following link.

<http://www.co.chautauqua.ny.us/335/Chautauqua-Area-Regional-Transit-System>

- 5. Assisting LEP Persons on-board CARTS Buses:** If an LEP passengers needs assistance while on-board a CARTS bus, then CARTS shall select from the following options:
1. The bus operator should radio into the office to speak with the Spanish speaking Operations Assistant.
 2. The bus operator may inquire if another passenger can serve as an interpreter.
 3. The driver could also direct the LEP person to any translated schedule and route information that has been placed aboard the vehicle or to CARTS Spanish speaking Operations Assistant.
 4. More difficult or emergency situations may necessitate contacting Transportation Supervisor or Dispatch for additional help.

Element 3: Training of Staff

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public will be trained on CARTS' LEP plan for providing language assistance.

Recommended training efforts include the following:

- a. Executive staff should be familiarized with the LEP plan to reinforce its importance and ensure its implementation by CARTS
- b. The CARTS administration will train dispatchers, supervisors and operators on best practices and procedures for assisting LEP passengers needing help. LEP passenger's assistance measures will be incorporated into orientation training for new staff and refresher training for current staff.

Element 4: Providing Notice to LEP Persons

CARTS current and planned measures to inform LEP persons of the availability of language assistance avenues includes but, not limited, to the following:

Direct engagement with LEP populations and community organizations:

Through working with various community organizations CARTS will seek to identify and engage LEP population in the community and inform them of available public transportation services and related language assistance mediums, conducting "Travel Training" clinics in partnership with community organizations will continue to be a great tool in educating LEP persons how to use CARTS services. Direct engagement with LEP persons will also help CARTS learn what additional agency information may need translation.

Element 5: Monitoring and Updating the LEP Plan

CARTS will routinely review and update its LEP Plan as necessary. Anticipated updates will include the incorporation of new Census data, LEP ridership trends identified through the annual "Customer Satisfaction Survey", and public comments about the LEP Plan. Each update should examine the following:

1. The number of documented LEP contacts encountered annually;
2. How the needs of LEP persons have been addressed;
3. Determination of the current LEP population in the service area;
4. Determination as to whether the need for translation services has changed;
5. Determination of the effectiveness of language assistant efforts ;
6. Determination of the adequacy of the CARTS financial resources to fund language assistance resources;
7. Determination of CARTS full compliance with the goals of the LEP Plan.; and
8. Determination of CARTS processing of LEP complaints.

V. DISSEMINATION OF CHAUTAUQUA AREA REGIONAL TRANSIT SYSTEM LEP PLAN

1. CARTS posts its LEP plan on its website at the following link:
<http://www.co.chautauqua.ny.us/335/Chautauqua-Area-Regional-Transit-System->
Any person or agency with Internet access will be able to access and download the plan from the CARTS website.
2. Signs will be posted in CARTS public area informing LEP persons of the LEP Plan and how to access language services.
3. CARTS shall notify LEP persons of the availability, upon request, of documents in other languages. These notifications shall be placed on agendas and public notices and in the language the LEP persons understand.
4. CARTS shall prepare and post press releases in non-English languages, as necessary.
5. CARTS will distribute copies of press release to advocacy groups and other organizations serving LEP populations.
6. CARTS staff will receive annual training.