

LIMITED ENGLISH PROFICIENCY PLAN

Upper Arkansas Area Council of Governments

June 29, 2010

Revised 2/11/2016

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for Upper Arkansas Area Council of Governments (UAACOG), Wet Mountain Valley Community Services Corporation, and Golden Shuttle/Fremont County Transit has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person shall “on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for Upper Arkansas Area Council of Governments (UAACOG), Wet Mountain Valley Community Services Corporation and Golden Shuttle/Fremont County Transit has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

II. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have, with LEP persons, in providing transit services. Each of these elements is addressed below.

Number and Percentage of LEP Persons in Our Area **Permanent Population**

U.S. Census Data

The U.S. Census provides information to assist in estimating the number of limited English speakers in our area. 2010 Census data was used to update and revise plan. Table 1 presents information for the UAACOG area on *Language Spoken at Home by Ability to Speak English*, taken from the U.S. Census 2010.

As the table shows, the number and percentage of LEP persons in the permanent population is quite small in Chaffee, Custer and Fremont Counties but considerably higher in Lake County. For the region as a whole only 2.1% of the population age 5 and over speaks English “Not well” or “Not at All,” according to the 2010 Census. The highest number and the highest percentage being in Lake County with 837 people, 11.5% of the population. By large majorities in all counties, 84-100%, those who have difficulty with English speak Spanish in the home. At this time Lake County does not have a local transit system. Statistics were provided for Lake County for future transit services if applicable.

School District and Other Local Data

We believe it is representative on the current situation in our region. Those who do have difficulty are primarily Spanish speakers. Therefore, for this LEP plan no additional local contacts were made to further clarify the need. However UAACOG, Wet Mountain Valley Community Services and Golden Age Center are committed to monitor LEP needs over time.

Visitors

We have significant numbers of visitors to our area, however, while some visitors may want to ride the services for which we contract, that number is likely to be very limited.

Summary

Based on the information available on the permanent population of our area, and the relative lack of visitor populations interested in the services for which we contract, there is a very small percentage of persons with Limited English Proficiency either using our services or as potential users of our services. However, we are sensitive to that potential need in the future.

TABLE 1 - Individuals Speaking English "Not Well" or "Not at All"

Data Category	Chaffee County		Custer County		Fremont County		Lake County		Total Region	
	#	%	#	%	#	%	#	%	#	%
Total Population (5 years old & older)	17,809	100%	4,255	100%	46,824	100%	7,310	100%	76,198	100%
<i>Population Speaking English "Not Well" or "Not at All"</i>	211	1.2%	1	0.0%	522	1.1%	837	11.5%	1,571	2.1%
<i>Population Speaking English "Not Well" or "Not at All"</i>										
Spanish	199	94%	1	100%	436	84%	825	99%	1,461	99%
Other Indo-European	12	6%	0	0%	70	13%	12	1%	94	1%
Asian and Pacific Islander	0	0%	0	0%	7	1%	0	0%	7	0%
Other	0	0%	0	0%	9	2%	0	0%	9	0%
Total	211	100%	1	100%	522	100%	837	100%	1,571	100%

Source: U.S. Census 2010 - population 5 years old and older, speaking another language in the home, who speak English "Not Well" or "Not at A

Nature, Frequency and Importance of LEP Contact

In general, the nature and importance of LEP contact is high for public and specialized transportation services, however, the frequency of contact with LEP individuals in our area is relatively rare.

III. CURRENT LEP EFFORTS

While the numbers and percentages of LEP persons in our service area are generally quite small, as the agency responsible for contracting for various transportation services in our region, we are sensitive to the potential need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts. **Custer, & Fremont County Transit Services will provide communications, community outreach and related notifications in a non-English format for persons with LEP to access information and available services.**

IV. PLANS FOR THE FUTURE LEP EFFORTS

Given the current and potential future need to respond to individuals with Limited English proficiency our LEP Plan includes the elements identified below.

Identifying LEP Persons Who Need Language Assistance

In order to identify potential future LEP needs with respect to our transit service we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with drivers and other first-line staff;
- Make periodic contacts with school districts and other community agencies that may know of LEP persons or groups.

Language Assistance Measures

As the need arises, we will consider the following to respond to LEP needs:

- Obtain copies of Census Bureau's "I Speak Cards" to have on hand if needed;
- Develop Spanish versions of marketing materials, customer complaint forms, public notices, and related information, as appropriate;
- Hire Spanish-speaking customer service staff and/or drivers;
- Obtain copies of CDOT's "Basic Spanish for Transit Employees" and distribute to drivers and customer service staff, as appropriate;
- Become familiar with web-based **AltaVista Babel Fish** for phrase translation into or from multiple languages;

- Become familiar with Language Line Services at <http://www.language.com>;
- Identify other community resources such as agencies serving LEP persons which may have resources to share.

Staff Training

Similarly, as the need arises, we will consider the following staff training topics:

- Federal LEP requirements, your LEP Plan and Title VI;
- Documenting language assistance requests;
- Use of any of the language assistance measures as described above.

Outreach Efforts

Similarly, as the need arises, we will consider the following staff training topics:

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

Public Participation

Public participation is a key component to the regional transportation process. UAACOG encourages public participation at LCC and CFR TPR meetings for all areas of transportation planning by providing a forum for plans and ideas. Public participation principles include providing public access to the technical and policy information used in development of plans and programs. Ensure adequate notification related to public involvement to allow for public review and comment at key decision points. Provide feedback to participants in public comments provided during the planning process. Newspaper and radio publications, email distributions and mailings are outreach techniques most used in our regions. Meetings are ADA accessible and normally held at the office of The Upper Arkansas Area Council of Governments.

Monitoring and Updating Plan

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing our LEP Plan with staff and make adjustments, as needed
- Pay particular attention to demographic changes in our area and to any LEP-related complaints we receive.

Disseminating Our LEP Plan

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests;
- Post our plan on our sub-grantees transit websites if available.

APPENDIX A

U.S. CENSUS DATA SOURCES

The U.S. Census provides two good sources for estimating the number of limited English speakers by various geographic areas (counties, urban areas, places, etc.). The year 2010 Census has the most complete data in terms of areas covered. Beginning October 2010 data will be updated annually for all geographic areas.

Year 2010 Census Data

Data from the 2010 Census is available for a variety of geographic areas (counties, urban areas, places, etc.). To access 2010 census data go to the U.S. Census web site at <http://www.census.gov> and follow these steps:

Select "American Fact Finder"(on left)
Select "Data sets" and choose "Decennial Census".
Select "Census 2010 Summary File 3 (SF3) Sample Data" and choose "Detailed Tables".

Click on the geography drop down box and choose "County" (or "Urban Area," "Place" or some other geographic area listed). If you're looking for data by county, select the state of your choice and the county of your choice and then enter "Add" and "Next" or "Show Result". Click on "by keyword" and type in "Language" and then choose "Search." Wait for the data to be retrieved, then click on the desired table and then "Add" and "Show Results."

Two tables appear to be most useful, Table P19 and Table P20:

Table P19 is titled "Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and over." It identifies, by age group and language group, the number of individuals who speak English "very well," "well," "not well" and "not at all" in the geographic area you have selected.

Table P20 is titled "Household Language by Linguistic Isolation" and shows the numbers of households which are "linguistically Isolated" by language group for your area you selected. Households that are "linguistically isolated" are those in which all household members age 14 and over have some difficulty with English.

Census Updates

For 2014 estimates (available for cities over 60,000 population) and for 2012-2014 estimates (available for cities over 20,000 population), go to www.census.gov.

Then, after going to American FactFinder, select “American Community Survey” as the data set. Then work your way through the choices in the same manner as for the year 2010 data set.

For additional information, contact either: 1) the U.S Census, Information Resources and Dissemination Branch, Data Integration Division, U.S. Census Bureau, 301-763-2422 or toll free 1-866-758-1060 (on ask a question on-line and you will get a response in a day or two), or 2) the Colorado Demographers Office, Colorado Department of Local Affairs, 303 866-2156