

Limited English Proficiency Plan



StarTran
Public Works & Utilities

City of Lincoln
2016

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I. BACKGROUND

A. Federal – Limited English Proficiency

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121, August 16, 2000 directs each Federal agency to examine the services it provides and develops and implements a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and dating the plan. Individuals, who have limited ability to read, write, speak or understand English are Limited English Proficient or "LEP". Among limited English speakers, Spanish is the language most frequently spoken, followed by Chinese (Cantonese or Mandarin), Vietnamese, and Korean.

Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and linguistically isolated populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

B. StarTran Service Overview

StarTran provides fixed route bus service and ADA paratransit service throughout the City of Lincoln, and operates as a division of the City Public Works and Utilities Department. StarTran operates 19 Weekday routes and 13 Saturday routes.

There is a seven-member StarTran Advisory Board that provides guidance to the Mayor and Council concerning transit issues and operations. The StarTran Advisory Board is responsible for reviewing and acting upon matters related to the operation of the system, including the following specific areas: Transit-related studies and plans, route studies and evaluations, performance indicators, rates, fares, and schedules.

The City of Lincoln is located in southeast Nebraska in Lancaster County. Lincoln's population makes up 90% of the population in Lancaster County. Lincoln is both the capitol of Nebraska and the government center for Lancaster County and is also the second largest metropolitan area in the state, second only to Omaha. Lincoln has an estimated population of 265,811 (2014 ACS 5 Year Estimate) and is home to the University of Nebraska-Lincoln. StarTran provides transit services within city limits only.

II. STARTRAN'S EFFORTS TO SERVE LEP PERSONS

StarTran, City of Lincoln, supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons.

StarTran has worked with community organizations that serve LEP populations to promote StarTran services and educate LEP persons on how to use StarTran services. These organizations are:

Catholic Social Services	Lincoln Area Agency on Aging	El Centro de las Americas	Community Action Partnership
Center For People In Need	Fresh Start Home	City "F" Street Recreation Center	Good Neighbor Center
State of Nebraska Workforce Development	Clyde Malone Community Center	CenterPointe	Carol Youkum Family Resource Center
Cedars	Indian Center, Inc.	Lincoln Public Schools	HUB

Other efforts include:

- StarTran provides translated information via our website that includes translation software called, "Google Translate", that provides translation for over 30 languages. A StarTran Rider Guide is available in 4 different languages (Arabic, Russian, Spanish, Vietnamese) available on the StarTran website and upon request. This Ride Guide is utilized when StarTran gives presentations to LEP groups promoting StarTran services.
- For language translation via telephone StarTran has a vendor who provides language translation services.
- A common bus terms in Spanish guide is also available for StarTran bus drivers.
- StarTran has given guided bus tours for LEP groups and interpreters were available for assistance. These tours were coordinated with Lincoln Public Schools and Southeast Community College as part of their English Language Learner (ELL) program.

III. IDENTIFICATION OF LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

***DOT Guidance:** "There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis."*

An assessment of the number or proportion of LEP individuals eligible to be served or encountered by StarTran and the frequency of encounters with StarTran is an important first step, to determine whether or not a Language Assessment Plan should be developed to meet the specific need.

The assessment involves four steps:

1. Identify the proportion of LEP Persons in StarTran's Service Area
2. Determine the Frequency of Contact by LEP Persons with StarTran Services
3. Determine the Nature and Importance of Transit
4. Assess the Current Resources Available and the Costs to Provide Language Assistance Services.

1. Number and Proportion of LEP Persons in the StarTran Service Area

The data for the table below was taken from the 2010-2014 American Community Survey from the U.S. Census. Based on the ACS survey the two highest language groups, in Lincoln, other than English are Spanish and Asian & Pacific Island (API) languages. Spanish represents 4.4% and Vietnamese represents 3.6% of all languages spoken at home.

This table also shows ability to speak English, "very well" and "less than very well". The table reveals:

- Of the 247,244 persons, 88.1% speak only English at home.
- Of the total persons, who speak English "less than very well" is 5.1% of the population.
- The highest language groups that speak a language other than English are Spanish (4.4%) and Asian & Pacific Island languages (3.6%).

Languages Spoken at Home: 2010-14 American Community Survey

Subject	Lincoln city, Nebraska					
	Total		Percent of specified language speakers			
	Estimate	Margin of Error	Speak English "very well"		Speak English less than "very well"	
			Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	247,244	+/-220	94.9%	+/-0.4	5.1%	+/-0.4
Speak only English	88.1%	+/-0.6	(X)	(X)	(X)	(X)
Speak a language other than English	11.9%	+/-0.6	57.1%	+/-2.3	42.9%	+/-2.3
Spanish or Spanish Creole	4.4%	+/-0.3	63.6%	+/-4.2	36.4%	+/-4.2
Other Indo-European languages	2.7%	+/-0.3	66.8%	+/-4.0	33.2%	+/-4.0
Asian and Pacific Island languages	3.6%	+/-0.2	42.3%	+/-3.9	57.7%	+/-3.9
Other languages	1.2%	+/-0.3	55.9%	+/-7.5	44.1%	+/-7.5
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish or Spanish Creole	10,806	+/-760	63.6%	+/-4.2	36.4%	+/-4.2
5-17 years	2,286	+/-392	85.5%	+/-6.0	14.5%	+/-6.0
18-64 years	8,047	+/-557	57.5%	+/-4.5	42.5%	+/-4.5
65 years and over	473	+/-109	60.3%	+/-12.4	39.7%	+/-12.4
Other Indo-European languages	6,618	+/-848	66.8%	+/-4.0	33.2%	+/-4.0
5-17 years	1,186	+/-344	80.7%	+/-8.8	19.3%	+/-8.8
18-64 years	4,651	+/-571	65.7%	+/-4.5	34.3%	+/-4.5
65 years and over	781	+/-186	52.2%	+/-11.3	47.8%	+/-11.3
Asian and Pacific Island languages	8,899	+/-544	42.3%	+/-3.9	57.7%	+/-3.9
5-17 years	1,791	+/-227	68.8%	+/-9.6	31.2%	+/-9.6
18-64 years	6,581	+/-393	37.9%	+/-4.3	62.1%	+/-4.3
65 years and over	527	+/-91	8.2%	+/-6.5	91.8%	+/-6.5
Other languages	3,040	+/-865	55.9%	+/-7.5	44.1%	+/-7.5
5-17 years	1,238	+/-499	57.3%	+/-11.6	42.7%	+/-11.6

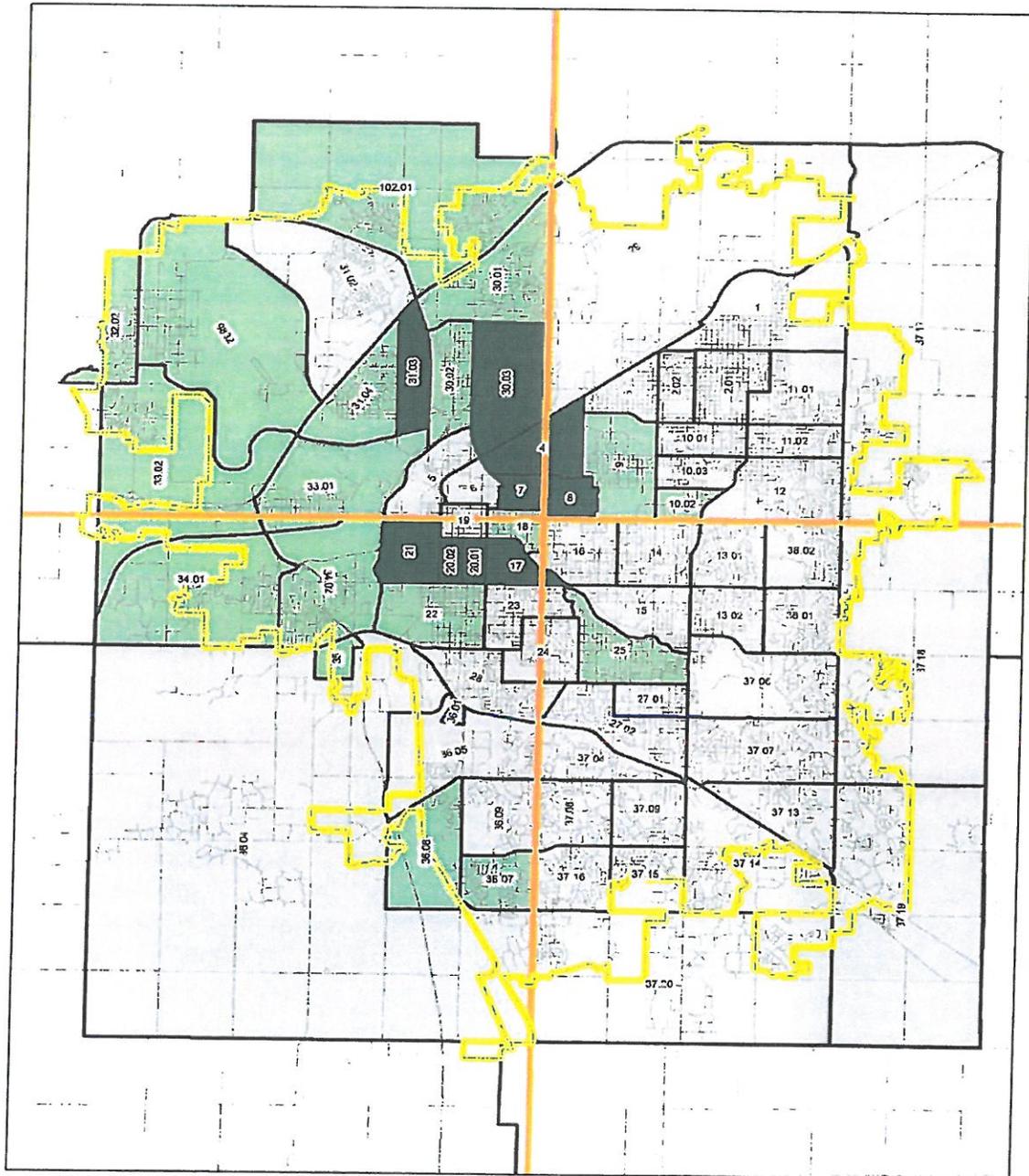
Lincoln city, Nebraska						
Subject	Total		Percent of specified language speakers			
	Estimate	Margin of Error	Speak English "very well"		Speak English less than "very well"	
			Estimate	Margin of Error	Estimate	Margin of Error
18-64 years	1,692	+/-429	54.3%	+/-10.6	45.7%	+/-10.6
65 years and over	110	+/-69	64.5%	+/-32.1	35.5%	+/-32.1
CITIZENS 18 YEARS AND OVER						
All citizens 18 years and over	194,789	+/-783	97.7%	+/-0.2	2.3%	+/-0.2
Speak only English	93.2%	+/-0.4	(X)	(X)	(X)	(X)
Speak a language other than English	6.8%	+/-0.4	66.7%	+/-2.5	33.3%	+/-2.5
Spanish or Spanish Creole	2.7%	+/-0.3	80.3%	+/-3.8	19.7%	+/-3.8
Other languages	4.1%	+/-0.4	57.9%	+/-3.7	42.1%	+/-3.7
PERCENT IMPUTED						
Language status	2.9%	(X)	(X)	(X)	(X)	(X)
Language status (speak a language other than English)	3.3%	(X)	(X)	(X)	(X)	(X)
Ability to speak English	4.8%	(X)	(X)	(X)		

Concentrations of LEP persons within StarTran service area

StarTran used data from the 2011-14 American Community Survey to identify census tracts where there are concentrations of LEP persons within StarTran service area. Such information is displayed in a mapping format which assists our agency identify if our LEP population is concentrated around specific transit routes.

Exhibit A on the next page shows by census tract, languages spoken at home other than English. On this map the dark green census tracts that include: 4, 7, 8, 17, 20.01, 20.02, 21, 30.03, 31.03 are the highest census tracts where a language other than English is spoken at home.

Exhibit A



LANGUAGE SPOKEN AT HOME
Percent who Speaks a Language other than English



Provided below is a listing of the census tracts in dark green where and the bus route(s) that serve that tract:

Tract	StarTran Bus Route(s)
4	41, 49
7	41, 42
8	42, 44, 54
17	40, 43, 50
20.01	50, 53
20.02	50, 53
21	46
30.03	41, 47
31.03	52

Community Organizations That Serve LEP Persons

StarTran's marketing initiatives have yielded organizations which serve populations with limited English proficiency. The organizations that StarTran provided marketing services to typically have an interpreter on staff to communicate information to the organizations' clients. Those organizations are listed on page 4.

In order to ascertain information that is not included in the Census data StarTran contacted community organizations that work with LEP populations to obtain information on specific languages spoken by the LEP populations and what services are most frequently sought by the LEP population. Two community organizations, Catholic Social Services and Lutheran Family Services provide the majority of services for incoming or new Americans to the Lincoln Community. Lincoln Literacy Council also provided input. These organizations revealed:

- The languages spoken by the people they serve are Arabic, Eritrean, Karen, Burmese, Spanish, Vietnamese, Russian, Swahili, Nuer and Somalian
- The Hispanic/Latino population and populations from Middle East has increased in the past five years.
- The English speaking ability of these language groups is less than very well.
- LEP persons have expressed the complexity of using the bus system.
- Issues or challenges of these population groups include understanding the bus maps and schedules. Figuring out how to use the bus for the first time such as how transfers work, where to get on a bus, and bus drivers not courteous to persons needs.

Other Community Sources of LEP Persons

NATF (New Americans Task Force) is a network of public and private organizations and community members, dedicated to supporting New Americans in Lincoln. According to the NATF both of Lincoln's current refugee resettlement agencies, Catholic Social

Services and Lutheran Family Services anticipate continuing to bring in around 200 new refugees a year. Today, Lincoln Public Schools teaches English to over 3000 students from 50 different countries speaking 48 different languages. Lincoln also houses the second largest Karen community in the US.

2. Frequency of Contact by LEP Persons with StarTran Services

DOT Guidance: "Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily."

StarTran does not collect data from its passengers on their level of English proficiency. For future surveys StarTran will have such surveys translated in other languages to capture specific data. For purposes of this assessment, the following data sources were used to estimate the frequency of encounters by LEP persons with StarTran employees and other sources. These sources are:

- Contact with transit vehicle operators – information obtained through informal interviews with StarTran drivers reveals little contact with LEP persons, mostly Spanish speaking persons. Anecdotal evidence of the communication between drivers and LEP persons is based on the LEP person writing their bus question and giving it to the driver whereby the driver writes back the appropriate response. Frequency of contact varies between once a week to once a month.
- Calls to the StarTran customer service telephone line – telephone call staff receive about 1-2 calls from LEP persons per month. Most of these calls with LEP persons are handled by a younger household member calling into the StarTran office for the LEP person. Most of these calls are Spanish speaking individuals with a few who speak Vietnamese.
- Visits to StarTran office – StarTran averages 20 daily patron walk-ins to the office. Approximately 3-4 of these daily walk-ins are by LEP individuals. In most cases these LEP individuals are accompanied by a friend/family member who can speak English.
- Access to StarTran's website – StarTran's website receives an average of 370 daily visits or "hits". Currently, there is no way to record / monitor how many were for the review and / or downloading of any documents or how many utilized the Google Translate software feature.
- Attendance at community meetings or public hearings – to date StarTran has not received requests for LEP language assistance at public meetings or special events. StarTran will provide interpreter services if requested.

- Contact with StarTran's ADA complementary paratransit system:
 - Interviews with StarTran's paratransit supervisor indicated that in the past year there have been two LEP persons who are eligible for complementary paratransit services. Both of these persons are Spanish speaking. The supervisor indicated that when making reservations an English speaking person would make the reservation.

3. Nature and Importance of Transit

DOT Guidance: "The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed (emphasis added). The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual..."

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons. According to the 2000 Census, nationally, more than eleven percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers.

Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. However, public transit use among recent immigrants decreases with length of residence in the United States. Recent immigrants might elect to continue using public transit for at least a portion of their trips if their experience with public transit is positive. For transit agencies seeking to increase their "choice riders," it may be easier to retain riders who have past, positive impressions of the system than to attract those persons who have never or rarely used transit. Catering to LEP persons may help to increase and retain ridership among StarTran's immigrant communities.

LEP individuals are neither denied nor experiences delayed access to StarTran services. StarTran route information is available at approximately 40 locations throughout the community including libraries, schools, banks, grocery stores, employment agencies, and social service agencies. StarTran will continue to interact with the LEP community to ensure the LEP population's experience with StarTran services is positive.

StarTran has reviewed any programs or areas that would have serious consequences to individuals if language barriers prevent a person from benefiting from the activity. The result of this identification is there are no programs or areas that would have such serious consequences for LEP persons.

4. Access the Current Resources Available Resources and Costs of Providing Language Assistance Services

DOT Guidance: "A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. (emphasis added). Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns."

Based on a review of the demographic and community input data StarTran staff encounters with LEP individuals is minimal and infrequent. As a result, StarTran will conduct the following activities:

- Continue its outreach efforts to those organizations that serve LEP persons. Such outreach is an effort to educate and inform LEP persons on how to utilize StarTran services. This effort will allow these community organizations that serve LEP to directly provide information to their clients thereby making the use of public transportation easier.
- StarTran has translated vital documents such as the Title VI notice and Title VI complaint form into Spanish, Vietnamese and Arabic.
- Telephone language translation services are available for StarTran staff.

Costs for conducting the above activities include staff time and approximately \$2,500/year for document translation and telephone translation services.

IV. LANGUAGE ASSISTANCE PLAN

DOT Guidance: "An effective LEP plan would likely include information about the ways in which language assistance will be provided."

To determine what additional language assistance measures could reduce the barriers LEP individuals face in riding public transit, StarTran identified existing methods as outlined previously in Section III, "Identification of LEP Individuals in StarTran Service Area Who Need Language Assistance". As a result of this four factor process StarTran will conduct the following measures to ensure meaningful access to LEP persons:

1. Continue agreement with local translation vendor that provides translation services for telephone, in person and documents in several languages.
2. Continue to provide StarTran's Rider Guide, which is translated in 5 languages, to patrons and update as needed.
3. Continue to provide a common bus terminology guide for StarTran bus drivers and StarTran staff when encountering Spanish speaking persons.

4. Provide on-going training to community organizations that serve LEP persons on how to utilize the bus system as staffing changes occur and LEP population needs change.
5. Translation of vital documents such as Title VI notice and Title VI complaint form in Spanish, Vietnamese and Arabic.
6. For requests of document translation in other languages StarTran will immediately send document to local translation vendor for translation.
7. Posting information in all StarTran vehicles that informs the public about language assistance services. This poster is translated in 5 languages.

V. STAFF TRAINING

DOT Guidance: *"Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained."*

StarTran staff are educated on the procedures and services available for LEP persons. If frequency with LEP groups increases StarTran will add language assistance into current training meetings. Employee training is conducted twice a year. Various topics are presented based on need. In April 2014 StarTran employees were trained in cultural awareness that includes a focus on effective interaction with LEP populations.

StarTran is aware and will utilize, if needed, the many language assistance resources available from the Federal Transit Administration Office of Civil Rights.

VI. PROVIDING NOTICE TO LEP PERSONS

DOT Guidance: *"Once an agency has decided, based on the four factors, that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge (emphasis added). Recipients should provide this notice in languages LEP persons would understand."*

The Title VI notice to the public includes a statement that language assistance measures are available and are free of charge. This notice is posted on the City of Lincoln website and at StarTran's office area, where patrons come to obtain fare devices and other information. This notice is translated in Spanish, Vietnamese and Arabic.

VII. MONITORING AND UPDATING STARTRAN'S LANGUAGE ASSISTANCE PLAN

DOT Guidance: *"Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees."*

StarTran will monitor the strengths and weaknesses of language assistance measures on a minimum of an annual basis and will make modifications as appropriate. The following actions will be employed when modifying language assistance measures:

1. Coordinate with the City Urban Development Department to obtain updated data on LEP population by use of US Census and ACS
2. Continued interaction with LEP populations and provide on-going training that serve LEP persons as staffing changes occur and LEP population needs change.
3. Measure StarTran's frequency of contact by LEP individuals as reported by:
 - Customer Service telephone line
 - Contact with bus operators
 - Office visits
 - Attendees of public / community meetings