



LIMITED ENGLISH PROFICIENCY PLAN

ADOPTED: _____

LIMITED ENGLISH PROFICIENCY PLAN

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I. INTRODUCTION AND POLICY STATEMENT

A. *PURPOSE OF THIS LEP PLAN*

The Pyramid Lake Paiute Tribal Transit (PLPTT) is a recipient and subrecipient of federal financial assistance and grants from Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As such, PLPTT must comply with Executive Order 13166- Limited English Proficiency (LEP).

This LEP Plan is designed to assist PLPTT management and staff to understand their roles and responsibilities with respect to overcoming barriers for LEP individuals. This LEP Plan will provide guidance to staff on translation, interpretation, and outreach services for LEP individuals seeking access to PLPTT programs and services. This LEP Plan supplements PLPTT's Title VI Program Plan and the Public Participation Plan.

PLPTT developed this LEP Plan by using the Federal Transit Administration (FTA), Office of Civil Rights "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons" handbook and performing the Four-Factor analysis therein.

B. *POLICY STATEMENT*

PLPTT, under Title VI of the Civil Rights Act of 1964, ensures that no person shall, on the basis 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 it administers.

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency. It is the policy of PLPTT to provide timely, reasonable, effective and meaningful access for LEP persons to all its programs and activities. All staff shall provide free language assistance services to LEP individuals with whom they encounter or whenever an LEP person requests language assistance services. All staff shall ensure the public is treated with dignity and respect, identify the language needs of PLPTT customers, and utilize available bilingual resources to assist customers, when needed.

PLPTT will ensure the provisions of this LEP Plan will apply and be incorporated into agreements with subgrantees and contractors as subrecipients of federal financial assistance.

II. SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS

PLPTT is a federally recognized Indian Tribe entity that delivers transportation projects in the Pyramid Lake Indian Reservation and local surrounding area, including transit services and capital improvement projects. This section sets forth the Four-Factor analysis used to determine the appropriate, reasonable, resource effective and meaningful access for LEP persons. In determining "reasonable," there are four factors to be considered.

Factor 1 -The Number and Proportion of LEP Persons Served or Encountered in the PLPTT Service Area

PLPTT provides year-round transportation on the Pyramid Lake Indian Reservation and local surrounding area, located in northern Nevada in the counties of Washoe and Lyon. The service area population is approximately 336,314.

PLPTT used the 2011-2015 American Community Survey Five-Year Estimates to seek information on persons who speak languages other than English at home and who speak English less than very well.

Statistical Language Breakdown Source: Census 2011-2015

NIXON AREA

Total Population: 374

	Number who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	0	-
Other Pacific Island	9	100.0%

WADSWORTH AREA

Total Population: 834

	Number who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	8	40.0%
Other Pacific Island	0	-

SUTCLIFFE AREA

Total Population: 253

	Number who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	6	46.2%
Other Pacific Island	0	-

FERNLEY AREA

Total Population: 19,368

	Number who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	678	38.1%
Other Pacific Island	86	40.2%

SPARKS AREA

Total Population: 90,264

	Number who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	6,566	36.6%
Other Pacific Island	1,318	41.5%

RENO AREA**Total Population: 225,221**

	%WhoNumber who Speak English Less Than Very Well	% Who Speak English Less Than Very Well
Spanish	16,428	40.0%
Other Pacific Island	3,819	38.0%

A review of the above tables shows Spanish as the highest percentage of the total population who speak English less than very well in both service areas, with Other Pacific Island as the second highest.

Factor 2-The Frequency with Which LEP Individuals Come into Contact with PLPTT Services

PLPTT serves LEP persons daily via the fixed route bus and demand response services. The Pyramid Lake Indian Reservation receives visitors to the area who enjoy the winter, spring, fall and summer recreational activities. Visitors include international multi-lingual guests. PLPTT recognizes that the international visitors may be LEP and access PLPTT transit services during their temporary stay in the area.

Factor 3- Nature and Importance of the Services Provided

PLPTT's transit services provide an important means of transportation for much of the public, including the LEP population in the Pyramid Lake Indian Reservation and surrounding area. Along with fixed route, commuter, and demand response service, there are specialized transportation services available to larger nearby cities, such as Reno/Sparks individuals with access to regional programs and services not available locally.

Factor 4-Resources Available to PLPTT to Ensure Meaningful Access to Services by LEP Individuals

PLPTT continues to assess available resources in order to provide efficient, effective and meaningful LEP services. PLPTT has a transit manager and specialist/dispatcher who are able to provide translation services when needed. PLPTT has translated the transit service brochures and notices into Spanish. When possible, PLPTT will:

- Consider utilizing language software technology
- Share language assistance materials and services among and between other transit agencies and advocacy groups
- Share information through community groups who serve LEP persons
- Use telephonic and video conferencing interpretation services
- Pool resources among local agencies and standardize documents to reduce translation needs
- Use qualified translators and interpreters to ensure accuracy of translated documents
- Request and use qualified community volunteers in a formalized manner

Procedures will be in place to provide language assistance to LEP individuals as part of the standard business practices. The standard business practices to LEP individuals will include:

- Continued translation of vital bus service documents and notices in Spanish
- Appoint Spanish translators at public participation events, and if necessary, Tagalog translators
- Advise the public that PLPTT provides free LEP services to its programs and activities

III. LEP PLAN

The LEP Plan reflects the overall goal of improving and maintaining language access for PLPTT customers as transit riders and project recipients. The intent is to achieve a balance that ensures meaningful access to programs and services while avoiding undue burdens on PLPTT resources. It is important to inform LEP individuals that services are available in Spanish and they are free of charge. PLPTT will continue to use existing resources to meet the requirements of Executive Order 13166. The most widely used LEP services will be translating oral and written communications.

A. Identifying LEP Individuals Needing Language Assistance

PLPTT may examine customer service records to look for previous language assistance and to determine if language assistance might be needed at future events.

Have language identification cards available for individuals to identify the language they speak.

B. Language Assistance Measures

Language assistance will be provided to LEP individuals through the translation of vital documents, as well as through oral language interpretation when necessary and possible. LEP individuals are not obligated to provide their own interpreter, although many do so.

Interpreters will be provided at public meetings when necessary.

In-coming calls by Spanish speaking individuals will be transferred or conferenced with PLPTT Spanish speaking staff.

Vital notices will be published in local Spanish newspapers, as needed.

C. Training Staff

Staff will be trained on the following:

- PLPTT Title VI policy and LEP responsibilities
- Documentation of language assistance requests
- How to handle a potential Title VI/LEP complaint

IV. MONITORING AND UPDATING THE LEP PLAN

PLPTT's Title VI Coordinator shall monitor implementation of the LEP Plan, making revisions to the plan, as may be required periodically. In monitoring compliance, an assessment will be made whether the plan allows LEP individuals to overcome language barriers and participate in a meaningful way in the program activities and services.

Monitoring shall consider information from the following sources and criteria, as well as other factors as may be appropriate:

- Changes in demographics, including new language groups, types of services and other activities.
- Frequency of encounters with LEP persons.
- Whether existing LEP language services are adequate.
- Availability of new resources, including technology.

Full review of the LEP Plan will occur with each triennial Title VI program submission.

V. DEFINITIONS

- **Bilingual** - The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.
- **Interpretation** - Interpretation - The act of listening to spoken words in one language (the source) and orally translating into another language (the target).
- **Limited English Proficient Person** - Any individual who does not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." Such person or persons may be entitled to language assistance at no cost to themselves with respect to a particular type or service, benefit, or encounter.
- **Linguistically Isolated** - This term is described in the census as the percentage of person in the households in which no one over the age of 14 speaks English well, and is used as a direct measure of those persons with a severe language barrier, as a distinct from those of foreign origin who speak English well. Those who are linguistically isolated may also be unable to benefit from transportation services and the services of other DOT recipients and, therefore, should receive attention from recipients as a high priority.
- **Primary Language** - The Language in which an individual is most effectively able to communicate.
- **Qualified Interpreter** - Qualified interpreter means an interpreter who is able to interpret effectively, accurately, and impartially, either for individuals with disabilities or for individuals with limited English skills. The interpreter should be able to interpret both receptively and expressively, using any necessary specialized vocabulary.
- **Substantial number of non-or limited-English speaking people** - Members of a group who either do not speak English, or who are unable to effectively communicate in English because it is not their native language, and who comprise five percent or more of the people service by any local office or facility of a State agency.
- **Translation** - The replacement of written text from one language into an equivalent written text in another language. It is noted that some LEP persons cannot read in their own language and back-up oral interpretation services may be needed for written documents.
- **Vital Documents** - Documents that convey information that critically affects the ability of the recipient/customer to make decisions about his or her participation in the program. Examples of vital documents include but are not limited to: applications, public notices, consent forms, letters containing important information regarding participation in a program, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, notices advising of the availability of language assistance, and outreach and community education materials, and notices advising LEP person of the availability of free language services.