



Provide Meaningful Access to Limited English Proficiency (LEP) Persons

Introduction:

The vision of Lane Transit District (LTD) is in all that we do, we are committed to creating a more connected, sustainable, and equitable community. LTD believes its services should be accessible to all potential users. It is with this belief that LTD has prepared this program to meet the requirements set forth in Title VI of the Civil Rights Act of 1964 concerning access to services for people with limited English language proficiency (LEP). As a recipient of federal financial assistance, LTD must adhere to the LEP standards set forth. Under Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency, LTD is federally mandated to examine the services it provides and to develop and implement a system by which LEP persons can have meaningful access to the benefits, services, information, and other important portions of its programs and activities. LEP includes persons who are unable to communicate effectively in English because their primary language is not English and they have not developed fluency in the English language.

This plan has been developed utilizing the U.S. Department of Transportation's (DOT) LEP Guidance Handbook. The DOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes the following criteria:

1. The number or proportion of LEP persons eligible to be served, or likely to be encountered by a LTD program, activity, or service.
2. The frequency with which LEP persons come in contact with LTD programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by LTD to the LEP population.
4. The resources available to LTD and overall cost to provide LEP assistance.

Lane Transit District's plan outlines the identification process for LEP communities, the ways in which assistance can be provided, staff training that may be required, and how to notify LEP persons that assistance is available regarding LTD activities.

Four Factor Analysis:

FACTOR 1: THE NUMBER OR PROPORTION OF LEP ELIGIBLE PEOPLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED BY AN LTD PROGRAM, ACTIVITY, OR SERVICE.

LTD Experience with LEP Persons

LTD staff interaction with customers of Limited English Proficiency varies depending on the department/function of the employee. LTD interacts with the public at large in a

multitude of ways including but not limited to transit service, fare media sales outlets, administrative duties, and public meetings and events. LTD personnel who come in direct contact with customers were asked how often they served a LEP customer. According to this survey, the most frequent contact occurs while customers are in transit.

Census Data

Data from the U.S. Census Bureau describe the English language proficiency of people based on the language they speak at home. Residents of Lane County were asked if they spoke a language other than English and to indicate their ability to speak English as either “very well” or less than “very well.”

Table A compares trends over time and geography of the percent of the population five years and older that were reported to speak English less than “very well.” The most recent data are from the American Community Survey (ACS) 2012-2016 5-year, 2015-2019 5-year, and 2018-2022 5-year estimates.

Table A. Population that speaks English less than “very well” (5 years or older).

Percent of Population 5 years or older	ACS	ACS	ACS
<i>Speak English less than very well</i>	2012-2016	2015-2019	2018-2022
United States	8.7%	8.4%	8.2%
Oregon	6.1%	5.6%	5.3%
Lane Co.	2.9%	2.5%	2.3%
Eugene Urbanized Area	3.6%	3.0%	2.7%

Source: American Community Survey

This table shows, for example, that nationally 8.2 percent of the population in 2018-2022 reported an ability to speak English less than “very well;” the percentage in Oregon is 5.3 percent.

Within Lane County, 2.3 percent of the population reported less than “very well” English speaking ability. Within the boundaries of the Eugene Urbanized area (approximately the boundaries of the Central Lane Metropolitan Planning Organization, which includes the cities of Eugene, Springfield, and Coburg, and which comprises a large part of the Lane Transit District), a comparable 2.7 percent of respondents reported the same level of English proficiency.

People who speak English as a second language come from a variety of lingual backgrounds. The 2018-2022 ACS shows that Spanish, with 16,838 people (4.60 percent), is the only language within the LTD service area that exceeds the Safe Harbor threshold of 1,000 people or 5 percent of the total population. Other prevalent languages include Chinese with 2,102 people (0.57 percent), German with 2,176 people (0.59 percent), French, Haitian, or Cajun with 2,145 people (0.59 percent), and Korean with 1,064 people (0.29 percent). Table B shows the languages as a percent of the population in Lane County.

Table B. Language Spoken at Home (5 years and older). C16001

Language	Estimate	Percent of Population	Speak English Less than "very well"	Percent LEP
Total:	366,441			
Speak Only English	334,906	91.39%		
Spanish	16,838	4.60%	5,296	1.45%
French, Haitian, or Cajun	2,145	0.59%	796	0.22%
German or Other West Germanic Languages	2,176	0.59%	126	0.03%
Russian, Polish, or Other Slavic Languages	1,043	0.28%	188	0.05%
Other Indo-European Languages	2,939	0.80%	1025	0.28%
Korean	1,064	0.29%	371	0.10%
Chinese (Incl. Mandarin, Cantonese)	2,102	0.57%	922	0.25%
Vietnamese	488	0.13%	189	0.05%
Tagalog (Incl. Filipino)	1,001	0.27%	163	0.04%
Other Asian and Pacific Island Languages	699	0.19%	132	0.04%
Arabic	386	0.11%	59	0.02%
Other and Unspecified Languages	654	0.18%	550	0.15%
Source: American Community Survey 2018-2022 Table C16001				

Table C summarizes the trends in the percent of the population (five years and older) within the Eugene Urbanized Area that speaks Spanish and other languages in the home. This table shows a decreasing proportion of the population who speaks Spanish and speak English less than very well in the home since 2012. Other languages also are decreasing in frequency who speak English less than well. The data suggest that Spanish speakers speak English “very well” at comparable rates with those who speak Other Languages. For the 2018-2022 period, of the 5.67 percent of Spanish speakers report speaking English “very well” at 4.11 percent compared to 4.40 percent of the population who speak other languages report speaking English “very well” at 3.27 percent. Overall, the percent of non-English speakers who speak English less than “very well” has started to increase marginally.

Table C. Language ability over time within the Eugene Urbanized area (5 years and older).

	ACS	ACS	ACS
Eugene Urbanized Area	2012-2016	2015-2019	2018-2022
Population 5 or older	242,238	251,070	264,506
Speak only English	89.60%	90.00%	89.91%
Speak Spanish	5.90%	5.60%	5.67%
<i>Speak English Very Well</i>	3.90%	3.90%	4.11%
<i>Speak English Less Than "Very Well"</i>	2.00%	1.60%	1.56%
Speak Other Languages	4.40%	3.00%	4.40%
<i>Speak English Very Well</i>	3.50%	1.30%	3.27%
<i>Speak English Less Than "Very Well"</i>	1.80%	1.20%	1.13%

FACTOR 2: THE FREQUENCY WITH WHICH LEP PERSONS COME IN CONTACT WITH LTD PROGRAMS, ACTIVITIES OR SERVICES.

ACS 2018-2022 data sets for workers aged 16 years and older provide data for travel to work in Lane County. Within ACS data, the mode of transportation by language proficiency was surveyed; Table D below displays the results. The data indicate that LEP by itself is not a deciding factor in the decision to use transit: those who speak English very well have a higher use of transit (9.62 percent) than those who speak English less than very well (2.18 percent).

Those who speak languages other than English at home, no matter with what their proficiency, chose transit less than those in the English-only speaking population (9.62 percent). The data also shows an increase in Work at home (12.37 percent).

Table D. LEP populations by mode used as means of transportation to work within the Lane County (workers 16 years and over).

Mode	ALL	English	Other language proficiency	
			Very well	Less than Very Well
SOV	67.88%	91.96%	5.68%	2.36%
HOV	9.26%	84.78%	9.56%	5.65%
Transit	2.07%	88.19%	9.62%	2.18%
Walk	4.22%	85.18%	12.26%	2.56%
Bike, Motorcycle, etc.	4.19%	87.42%	10.56%	2.01%
Work at home	12.37%	92.38%	6.34%	1.28%

Source: ACS 2018-2022 Table B08113

ACS 2018-2022 data sets for workers aged 16 years and older provide data for travel to work in Eugene Urbanized Area. Table E shows that LEP by itself is not a deciding factor in the decision to use transit: those who speak English very well have a higher use of transit (8.62 percent) than those who speak English less than very well (0.00 percent).

Those who speak languages other than English at home, no matter with what their proficiency, chose transit less than those in the English-only speaking population (9.62 percent). The data also shows an increase in Work at home (14.87 percent).

In addition, in August 2014, LTD conducted a sample survey of LTD bus operators and administrative personnel to find out how frequently they come into contact with an LEP customer and which languages other than English they encounter most. Eighty-two (82) of 85 employees surveyed indicated that they assist LEP customers at least once per week. Seventy-five (75) of 85 indicated that, other than English, Spanish was the language most encountered.

LTD primarily serves Spanish speaking customers with Limited English Proficiency. LTD staff encounter persons who cannot speak any English frequently to rarely depending on the department/function. LTD personnel who come in direct contact with customers were asked how often they served a LEP customer. The survey showed that:

- LTD Administrative personnel serve LEP customers once a week on average.
- Most LTD Administrative personnel assist LEP customers at the Customer Service Center or over the phone.
- LEP Customer assistance is primarily in regards to fare questions, how to ride, or trip planning.

Table E. Mode use by LEP populations traveling to work within Eugene Urbanized Area (workers 16 years and older).

Mode	ALL	English	Other language proficiency	
			Very well	Less than Very Well
SOV	65.68%	90.17%	7.30%	2.53%
HOV	8.55%	87.43%	8.26%	4.31%
Transit	1.38%	91.38%	8.62%	0.00%
Walk	5.10%	86.79%	9.01%	4.20%
Bike, Motorcycle, etc.	4.41%	96.04%	3.41%	0.55%
Work at home	14.87%	93.07%	5.74%	1.19%

Source: ACS 2018-2022 Table B08113

FACTOR 3: THE NATURE AND IMPORTANCE OF PROGRAMS, ACTIVITIES OR SERVICES PROVIDED BY LTD TO THE LEP POPULATION.

LTD provides a wide array of transportation service from the regular fixed-route system to carpool opportunities. Making these services accessible to LEP persons provides choices when it comes to transportation. It is likely that LTD will interact with LEP customers frequently throughout the system through various services and programs. Translating information to a language that is comprehensible will allow LEP customers to take advantage of the services LTD provides.

LTD provides a paratransit RideSource system, which serves customers who are unable to utilize typical fixed-route service. These customers are frequently elderly or disabled citizens, of which some may be LEP customers. This service is vital for customers who are not able to use traditional service.

Tables A through E indicate that minorities in general tend to utilize transit at a higher rate than other modes in traveling to their work places. LTD thus provides an important service to this population.

FACTOR 4: THE RESOURCES AVAILABLE TO LTD AND OVERALL COST TO PROVIDE LEP ASSISTANCE.

LTD is committed to assuring that resources are used to reduce the barriers that limit access to its information and service by LEP persons. LTD will continue to expend a reasonable portion of budgetary dollars to meet its customers' language assistance needs.

LTD assessed its available resources that could be used to provide language assistance and opportunities for improvement. This included identifying bilingual staff, reviewing existing contract for professional translation services, determining which documents should be translated, bilingual staff at the Customer Service Center, and recruitment for bilingual/bicultural employees. LTD will continue to concentrate on the Spanish speaking population as it has the highest rate of home use other than English. However, the results above indicate that LTD must continue to be open to the need to provide language assistance to non-Spanish speakers as the need may arise.

Printed Materials

LTD maintains a list of "Vital Documents." These documents are considered mission critical and will be translated and made available as part of the annual process of updating. Documents not included on this list will be translated upon request. LTD is moving toward translating all materials not just mission critical.

1. *Rider's Guide* route and schedule book
2. Station information outlining routes, schedules, and other specific rider information.
3. Riding rules posters and Title VI notice to beneficiaries.
4. Summaries of key project documents, such as the environmental assessment for the West Eugene EmX project.
5. Paid advertising related to public hearings on service and fares.
6. Annual route review materials posted at stops and stations.
7. Consent and Complaint forms.

8. Written notices of rights.
9. Mission critical signage system wide-all signage that has a potential impact on the ability of customers to utilize LTD's service.

Additional documents and services are available on the LTD website. The website can be translated using Google Translate services by selecting a language from the available drop-down list menu. This service is available on every page of the LTD website.

LTD chooses to translate mission critical signage system-wide and is moving toward translating all material. All signage that has a potential impact on the ability of customers to utilize LTD's service are translated into Spanish. Mission critical signage includes but is not limited to Bus Stop Information posts that contain route schedule information at high usage stations, service changes and disruptions, and LTD contact information.

LTD's FY 2023 - 2024 budget increased from \$3,500 to \$10,000 for voice and printed translation services, we are translating all materials not just mission critical. We are also translating k-12 materials in Chinese and Japanese as well.

Google Translate

LTD recommends www.spanishdict.com, www.translate.google.com, and www.spanishcentral.com/translate/audio to provide translation services to Bus Operators and employees who may require assistance in person or over the phone. All LTD customer service representatives, Dispatch, and secretarial staff have access to this service.

Title VI Notice

Title VI information and documentation is available at www.ltd.org and upon request. Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with LTD. Any such complaint must be in writing and filed with LTD within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact LTD by any of the methods provided below. Title VI Complaint Forms and instructions for their completion are available on the LTD website, LTD Title VI Policy Statement page.

Public Outreach

LTD conducts public outreach programs within the community concerning proposed service changes. At this time, LTD provides opportunities for language translation, as well as distribution of service change documents in Spanish language translations both on the LTD website and at outreach events. When events with community members that may require translation occur, LTD hires and provides translation services at no additional cost to community members. LTD includes materials in Spanish at all public outreach efforts dealing with service and has bilingual staff available at workshops/forums.

LTD customer research routinely includes opportunities for community input from all citizens. LTD conducts an annual route review that includes on-board surveys and opportunities for customer input on certain routes and service changes.

Employee Resources

LTD has developed instructional opportunities for all employees. Each new class of drivers receives Spanish instructional training in a lecture, video, and situation-based classroom. Basic Transit Spanish classes are open to all LTD employees during new driver training. This occurs approximately four times per year. The class is guided using *Basic Spanish for Transit Employees*, developed by Regional Transit District, Roaring Fork Transportation Authority, and Colorado Mountain College. The class focuses on transit scenarios including trip planning, system use, and fare questions and is taught by LTD employees who have proven Spanish fluency.

All new LTD bus operators are given an Operator Manual during training. This Manual contains an LEP section that highlights operating procedures for assisting LEP customers. This includes explanation of Google translate and other resources available to drivers from LTD.

After analyzing the four factors, LTD developed the following plan for providing language assistance to LEP persons.

LTD Language Assistance Plan

Goals and Objectives

1. Comply with federal regulations¹ to “Improve Access to Services for Persons with Limited English Proficiency” by providing meaningful access to the benefits, services, information, and other important portions of Lane Transit District’s programs and activities for individuals with Limited English Proficiency.
 - a. Translate “vital documents” into Spanish and, if necessary, replace text with pictograms or universal icons.
 - b. Notify Spanish speaking population of the availability of free translation and interpretation, upon request, for non-vital but important documents.
 - c. Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies.
2. Develop programs and materials to educate both community leaders who serve Spanish speaking LEP populations, and LEP community members about LTD’s services and programs.
 - a. Contact LEP partners to determine culturally appropriate travel-training materials and contact methods for members of their specific communities.
 - b. Using input from community leaders, develop and provide customer orientation to familiarize transit coordinators at Community centers and LEP customers with all LTD services and programs.
 - c. Design new pictograms with community input to replace text in signage where possible.

¹ Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency

3. Educate LTD staff regarding LEP programs and policies.
 - a. Work with the Operator Training Department to improve operator training programs related to transporting and communicating with LEP customers.
 - b. Develop standards to certify LTD staff as qualified interpreters and translators.
 - c. Write policy stating *approved individuals whose competency has been established must perform all interpretation and written translation.*

General Strategy

- This program will utilize existing networks² within the Spanish speaking community to contact, engage, and educate community leaders serving Spanish speaking LEP populations and LEP community members about LTD's services and programs.
- Utilize LTD's internal task force to ensure LTD's LEP program and services appropriately meet the needs of Spanish speaking LEP populations and LTD's frontline personnel.
- Create a "one stop shop" within LTD to handle all communications for the Spanish speaking LEP community.

Primary Target Audience

New immigrants whose primary language is Spanish and who read at least some Spanish. Members of this group vary in age, education, and income; however, they tend to live in urban or suburban settings, have access to LTD services, have low incomes, and be transit dependent. Ridership patterns include men and women commuting to work and school, men and women taking children to school and medical appointments, youth riding to school and jobs, and elders going to medical appointments and social activities.

Secondary Target Audience

Recent immigrants from rural areas of Mexico, Central America, and South America. This group is noteworthy because they comprise much of the recent Latino population growth.

Stakeholders

- Internal: LTD management, LEP Task force, LTD staff needing to communicate with the Spanish speaking LEP community regarding legal, service, and ridership issues
- External: Spanish speaking LEP communities; Community-based organizations (CBOs) serving Spanish speaking LEP populations; Lane Community College; state, county, and city governments serving Spanish speaking LEP populations; and Hispanic business groups.

Program Elements

1. Outreach – External stakeholders
 - a. CBOs serving Spanish speaking LEP populations
 - b. Urban Spanish speaking LEP communities:
 - c. Rural Spanish speaking LEP communities
 - d. Hispanic business associations

² Community based organizations (CBOs), churches, social clubs, business organizations and State, County and city social service agencies.

- e. State, county, and city governments
 - f. A bilingual LTD staff person at public hearings, open houses, and other service outreach activities
2. Outreach – Internal stakeholders
 - a. Employee training
 - b. Service and scheduling
 - c. Board and Leadership Council
 - d. Capital projects
 3. Media – Paid and earned
 - a. Include Spanish when promoting LTD services
 4. Training – LTD Employees and Contracted Personnel (Public Safety, Transit hosts etc.)
 - a. Employee training (initial focus on front-line staff: operators, Customer Service, reception)
 - b. Provide staff with a description of language assistance service offered by LTD.
 - c. Offer basic, functional Spanish classes for employees
 - d. Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint.
 5. Translation Service
 - a. Contract for written translation services
 - b. Contract for oral translation services
 - c. Contract for web translation service or link to translation services
 6. Recruit and hire bilingual/bicultural
 - a. Attend job fairs targeting the Latino/Hispanic population
 - b. Place job announcements encouraging bilingual individuals to apply in local newspapers, on LTD's website, through e-mail notifications, and any other medium used to attract potential employees

Monitoring and Updating the LEP Plan

This plan is designed to be flexible. As such, it is important to consider if new documents, services, and technologies need to be made available for LEP persons from monitoring changes in demographics and types of services. LTD will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated every three years using five-year American Community Survey estimates or when it is clear that higher concentrations of LEP individuals are present in the LTD service area.

Dissemination of the Limited English Proficiency Plan

LTD will post the LEP Plan on its website at www.ltd.org. Copies of the Plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this Plan should be directed to:

Marketing Director
Lane Transit District
PO Box 7070
Eugene, OR 97401
LTD@ltd.org
Phone: 541-687-5555
Fax: 541-682-6111