

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

CITY OF PASO ROBLES

Adopted 8-5-2014

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address San Luis Obispo Regional Transit Authority's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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

Plan Summary

The City has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided by City. As defined in 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 how to notify LEP persons that assistance is available.

In order to prepare this plan, City utilized the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City transit program's activity or service.
2. The frequency with which LEP persons come into contact with City Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by City to the LEP population.
4. The resources available to City staff and overall costs of providing LEP assistance.

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

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Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City Transit program, activity or service.*

CITY staff reviewed the 2008-2012 America Community Survey Report and determined that 6,987 persons in the City of Paso Robles in San Luis Obispo County (25% of the population) speak a language other than English. Of this number, 3,281 persons (12.2%) have Limited English Proficiency; that is, they speak English “not well” or “not at all.”

In the City of Paso Robles, of those persons with limited English proficiency, 3,040 speak Spanish, 119 speak an Asian or Pacific Island language, and 12 speak other Indo-European languages.

2. *The frequency with which LEP persons come in contact with CITY programs, activities or services.*

City assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. The most frequent contact between LEP persons are with dispatchers, consisting of approximately 1/5 of total call volume. Documents related to fares, service changes and rider rules are posted on the transit vehicles in both English and Spanish. All schedules and rider information guides are also written in both Spanish and English.

3. *The nature and importance of programs, activities or services provided by CITY to the LEP population.*

The largest proportion of LEP individuals in the CITY service area speaks Spanish. The City of Paso Robles has 12.2% of speakers who speak English less than “very well”. Of these, 96% are Spanish speakers, or 11.8%. Other LEP persons constitute the remaining .4% of the total City population. Services provided by City that are most likely to encounter LEP individuals are the fixed route system which serves the general public, though also on the demand-response (Dial-A-Ride, or DAR) system which serves the general public as well, though primarily seniors and persons with disabilities.

4. *The resources available to CITY and overall cost to provide LEP assistance.*

The City assesses its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that City could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four-factor analysis, City developed its LEP Plan as outlined in the following section.

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Limited English Proficiency (LEP) Plan Outline

How City staff may identify a LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet and engage participants as they arrive at City-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards, or comparable materials, available at City meetings to assist City staff in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language Identification Flashcards, or comparable materials on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers, if such individuals are encountered; vehicle operators will be instructed to try to obtain contact information to give to City's management for follow-up.
5. Vehicle operators and other front-line staff, like dispatchers, DAR schedulers, and service development planners, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year in order to identify needs beyond

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, both oral and written. There are also various ways in which City staff responds to LEP persons, whether in person, by telephone or in writing, as described below.

- The City conducts Outreach Programs in both English and Spanish, which will continue to provide vital information to the predominant LEP group (Spanish speakers) on City programs and services. Efforts to identify other LEP groups in needs of assistance will continue.
- The City collaborates with local human service organizations that provide services to LEP individuals by producing and distributing bilingual materials, such as mailed city announcements and postings on city websites, as part of the effort to seek opportunities to provide information on City programs and services.
- The City provides a bilingual staff member at community events, including public hearings affecting city policies and services and City Council meetings, when LEP persons are present. Inclusion of information on language services will be included in notices and publications for these meetings, with 48 hours advance notice per the Brown Act. Provide bilingual staff in departments that frequently interface with the public.

- Survey bus drivers and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year.

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- Provide Language Identification Flashcards, or comparable materials, onboard transit vehicles operated in the City, and at transit systems administrative offices.
- Post the CITY Title VI Policy and LEP Plan on the City website, www.prcity.com.
- Provide group travel training to LEP persons with the assistance of bilingual staff.
- Encourage recruitment of bilingual staff through distributed recruitment materials.
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service, other staff members, or qualified community volunteers. A list of volunteers would need to be developed.

Staff Training

The following training will be provided to City staff in connection with transit activities:

1. Information on the City Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests
5. How to handle a potential Title VI/LEP complaint

Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

Monitoring and Updating the LEP Plan

The City will update the LEP as required by the U.S. DOT. At minimum, the plan will be reviewed and updated every three years. The most current U.S. Census is available will be used. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient

- to meet the needs of the LEP public.
- Determine whether City's financial resources are sufficient to fund needed language assistance Resources as identified.

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- Determine whether City has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning City failure to meet the needs of LEP individuals.

Dissemination of the CITY LEP Plan

A link to the CITY LEP Plan and the Title VI Procedures shall is included on the CITY website at www.prcity.com. This link includes access to an updated complaint form, both in English and Spanish. Any person or agency with internet access will be able to access and download the plan from the City website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation to additional languages other than English and Spanish, which City will provide, as feasible.

Questions or comments regarding the LEP Plan may be submitted to the City of Paso Robles, Title VI Coordinator:

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