

# River Parishes Transit Authority Limited English Proficiency Plan

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## Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

### Executive Order 13166

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 that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the River Parishes Transit Authority (RPTA) and governments, private and non-profit entities, and subrecipients.

## Plan Summary

The RPTA is the provider of public transportation in the River Parishes region of Southeastern Louisiana (St John the Baptist and St Charles Parishes with connecting service to St James Parish). The RPTA has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the RPTA. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

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

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

The vast majority of the RPTA service area are proficient in the English language. Based on US Census American Community Survey 2012 5-year estimates, 94% of residents of St John and St Charles Parishes speak only English. Of the 6% of residents that speak a language other than English, 67.6% speak English “very well”. Of the total population of the service area, 2% speak English less than “very well” and fewer than 200 people speak no English.

	Total	Percent Speaks Another Language	Percent Total Population
Total Population	91559		
Speaks English Only	85801		94.0%
Speaks Another Language	5758		6.0%
Speaks English "Very Well"	3890	67.6%	4.2%
Speaks English "Well"	884	15.4%	1.0%

Speaks English "Not Well"	790	13.7%	0.9%
Speaks English "Not at All"	194	3.4%	0.2%

2. **The frequency with which LEP individuals come in contact with a RPTA program, activity, or service.**  
 On average, RPTA dispatchers and operators come into contact with LEP persons one to two times per year and most are able to schedule service in English. Due to the very low proportion of LEP persons, particularly those that speak English “not well” or “not at all”, the likelihood of RPTA to come in contact with these populations is extremely low. There have never been any requests in the history of the RPTA for interpreters or translated documents.
3. **The nature and importance of the program, activity, or service provided by the RPTA to LEP community.**  
 There is no concentration of any type of LEP population in the RPTA service area. The overwhelming majority of the population, 99.2% speaks English exclusively or speaks English “very well” or “well”. RPTA staff are most likely to encounter LEP individuals through phone conversations when passengers are booking services or at public meetings. If through these conversations with riders; data analyses; or any other means it were discovered that there is a growing concentration of LEP persons in the RPTA service area, the RPTA board would consider advertising public meetings in the language in which the concentration existed, as well as translating onboard signage for fares, safety, and rider policies.
4. **The resources available to the RPTA and overall costs.**  
 Veolia Transportation, as the operations contractor, has relationships with paid translation services throughout the New Orleans Metropolitan Area but has never had to use them. The RPTA currently relies on the Louisiana Relay Service, provided by the Louisiana Public Service Commission for LEP persons with hearing impairments. This is a free service provided by the State of Louisiana. In the event that an LEP person or persons requests the translation of documents, GCR Inc., as a subcontractor under Veolia Transportation can offer document translation services through their consultant agreement. Additionally, any needs for an interpreter can be paid for through the RPTA general fund. The RPTA’s website is available in multiple languages through a free translation service provided by Google.

Based on the four-factor analysis, RPTA developed its Language Assistance Plan (LAP) as outlined in the following section. As the RPTA has no paid staff and relies on contracted services for operations and professional services, all staff are referred to as contractors below.

## Plan Outline

How RPTA contractors may identify a 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 for future events or meetings.
2. Have contractors greet participants as they arrive to RPTA 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 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 so that the General Manager may follow up.

4. Vehicle operators and dispatchers will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.

## Staff Training

The following training will be provided to Veolia Transportation Staff:

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

## Outreach Techniques

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

## Monitoring and Updating the LEP Plan

RPTA will update the LEP Plan as required by USDOT. At a minimum, the plan will be reviewed and updated if it becomes clear that higher concentrations of LEP individuals are present in the RPTA service area. 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 population
- Determine whether RPTA's financial resources are sufficient to fund language assistance resources if needed
- Determine whether RPTA has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning RPTA's failure to meet the needs of LEP individuals

## Dissemination of the RPTA LEP Plan

A link to the RPTA LEP Plan and Title IV procedures are included on the RPTA website [www.rptarolls.org](http://www.rptarolls.org).

Any person or agency with internet access is able to access and download the plan from the RPTA website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which RPTA will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the RPTA General Manager:

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