



**CITY OF GREELEY TRANSIT SERVICES DIVISION  
GREELEY-EVANS TRANSIT  
LIMITED ENGLISH PROFICIENCY (LEP) ACCESS PLAN**

September 9, 2010

**Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of the City of Greeley, Colorado, dba Greeley-Evans Transit (GET) 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 4702.1A dated May 13, 2007, 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 of Greeley is the owner and operator of Greeley-Evans Transit (GET) and 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 GET. 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, GET undertook 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 GET program, activity or service.
2. The frequency with which LEP persons come in contact with GET programs, activities or services.
3. The nature and importance of programs, activities or services provided by GET to the LEP population.
4. The resources available to GET and overall cost to provide LEP assistance.

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

#### **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 GET program, activity or service.**

GET staff reviewed the U.S. Census 2006-2008 American Community Survey 3-Year Estimates and determined that 18,313 persons in the cities of Greeley and Evans [16.7 % of the population] speak a language other than English. In Greeley & Evans, 8,059 persons [7.3%] have limited English proficiency; that is, they speak English less than “very well”.

In the cities of Greeley & Evans, of those persons with limited English proficiency, 16,304 speak Spanish, 1,227 speak other Indo-European languages, 634 speak Asian and Pacific Islander languages, and 148 speak other languages.

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

GET 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. To date, the most frequent contact between LEP persons is with bus drivers. Translated documents have included postings on the buses relating to fares and transit rules written in Spanish.

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

The largest geographic concentration of LEP individuals in the GET service area is Spanish. Services provided by GET that are most likely to encounter LEP individuals are the fixed route system which serves the general public, the Paratransit & demand-response system which serves primarily senior and people with disabilities, and the GET reservations and transit information service.

##### **4. The resources available to GET and overall costs to provide LEP assistance.**

GET assessed 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 GET 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, GET developed its LEP Plan as outlined in the following section.

## Limited English Proficiency (LEP) Plan Outline

### How GET and staff may identify an 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 participants as they arrive to GET 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 available at GET meetings. This will assist GET in identifying language assistance needs for future events and meetings.
4. 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 to give to GET's management for follow-up.
5. Vehicle operators and other front-line staff, like dispatchers, Paratransit/demand-response reservationists, and receptionists, will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

### Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which GET staff responds to LEP persons, whether in person, by telephone or in writing:

- The GET Rider Guide is published in Spanish which provides vital information on GET programs and services;
- Distribute the book "Basic Spanish for Transit Employees" (published by Colorado Mountain College, CDOT & RFTA);
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on GET programs and services;
- Provide a bilingual interpreter at community events and public hearings;
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Provide *Language Identification Flashcards* at the Transit Center, onboard the GET fleet, in Road Supervisor vehicles and at transit systems administrative offices;
- Post the GET Title VI Policy and LEP Plan on the agency website, [www.GreeleyEvansTransit.com](http://www.GreeleyEvansTransit.com);

- Provide group travel training to LEP persons with the assistance of bilingual staff;
- Include language “Spanish a plus” in bus driver & reservationist recruitment advertisements;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will provide access to the Language Line translation assistance service.

### **Staff Training**

The following training will be provided to GET staff:

1. Information on the GET 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. Use of Language Line service
6. 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, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. All public notices regarding transit services (public meetings, fare and/or service changes, Disadvantaged Business Enterprise goal, etc.) will be published in the local Spanish language newspaper. Interpreters will be made available as needed.

### **Monitoring and Updating the LEP Plan**

GET will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the GET 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 need;
- Determine whether GET’s financial resources are sufficient to fund language assistance resources needed;
- Determine whether GET has fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning GET’s failure to meet the needs of LEP individuals.

**Dissemination of the GET LEP Plan**

A link to the GET LEP Plan and the Title VI Procedures is included on the GET website at [www.GreeleyEvansTransit.com](http://www.GreeleyEvansTransit.com).

Any person or agency with internet access will be able to access and download the plan from the GET 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 which GET will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the City of Greeley Title VI Administrator or Transit Services Division Manager:

City of Greeley, Colorado

Greeley-Evans Transit

1200 A Street

Greeley, Colorado 80631

Phone: 970-350-9751

Fax: 970-350-9285

Email: [Joel.Hemesath@GreeleyGov.com](mailto:Joel.Hemesath@GreeleyGov.com) (Title VI Administrator)

Email: [Brad.Patterson@GreeleyGov.com](mailto:Brad.Patterson@GreeleyGov.com) (Transit Services Division Manager)