

# **Hill Country Transit District**

## **Limited English Proficiency (LEP) Plan**

Hill Country Transit District (HCTD) has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. 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, HCTD used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD.
2. The frequency with which LEP persons come into contact with HCTD programs, activities or services.
3. The nature and importance of the program, activity, or service provided by HCTD to the LEP population.
4. The resources available to HCTD for LEP outreach, as well as the costs associated with that outreach.

### **Meaningful Access: Four-Factor Analysis**

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD.**

HCTD provides services in nine Texas counties (covering approximately 9,000 square miles). HCTD staff reviewed the 2010 U.S. Census Report and compiled the following statistics to identify the number or proportion of LEP persons eligible to be served or likely to be encountered by HCTD:

It was determined that 59,731 persons in the combined service areas (16.4%) speak a language other than English. Of those persons, 18,567 (5.1%) speak English less than “very well”. Of those persons with limited English proficiency, 13,698 (3.77%) Spanish speaking persons speak English less than “very well”. There were 1,926 (0.53%) persons of other Indo-European languages who spoke English less than “very well, and 2,773 (0.76%) of Asian and Pacific Islanders who spoke English less than “very well”.

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

HCTD reviewed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries, surveying vehicle operators, and office visits. To date, the most frequent contact between LEP persons is with bus drivers, dispatchers, schedulers, and front office staff. HCTD is staffed with Spanish, German and Italian translators to assist LEP persons with translation in these languages.

**3. The nature and importance of the program, activity, or service provided by HCTD to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the HCTD service areas. Over 83% of the population in the service areas speaks English only. Although there is 17% of the population in the service areas that speak a language other than English, only 5.1% of this population speaks English less than “very well”. Because HCTD provides services to persons over nine counties, it is most likely that the fixed route system and the paratransit system will both encounter LEP individuals.

**4. The resources available to HCTD for LEP outreach, as well as the costs associated with that outreach.**

HCTD has assessed its available resources that could be used for providing LEP assistance, 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 could be partnered with for outreach and translation efforts. HCTD maintains access to a language line to facilitate communication with LEP persons. There is a fee to use this service, but the use of it has been very rare so the cost has been minimal. HCTD will also provide an interpreter to LEP persons if a request for language assistance is made, or it is evident that such assistance is needed.

## **Language Assistance**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a limited English proficient person and may be entitled to language assistance with respect to HCTD programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. HCTD will determine when interpretation and/or translation are needed and are reasonable.

How HCTD staff may identify an LEP person who needs language assistance:

- 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 in the future.
- Have Language Identification (“I Speak”) Flashcards available at the customer service desk and easily accessible to drivers, supervisors, dispatchers, and schedulers as needed.
- Periodically interview bus drivers, dispatchers, schedulers and other front-line staff on their experience concerning any contacts with LEP persons during the previous year.

## **Language Assistance Measures**

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which HCTD staff may respond to LEP persons, whether in person, by telephone, or in writing.

- HCTD will provide an interpreter to an LEP person if they request language assistance or it is evident that such assistance is needed.
- If an LEP person asks for language assistance and HCTD determines that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then make available interpretation services for the LEP person.
- Bilingual HCTD staff will provide language services to LEP persons upon request and if available. HCTD will take reasonable steps to ensure that staff provides interpretative services at a level of fluency, comprehension and confidentiality appropriate to the specific nature, type, and purpose of information at issue.
- An LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by HCTD. Informal interpreters may include family members, friends, legal guardians, service representatives, or advocates of the LEP person.
- HCTD will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

## **Staff Training**

The following training will be provided to HCTD staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification (“I Speak”) Flashcards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

**Any and all contractors or subcontractors performing work for HCTD will be required to follow the Title VI/LEP guidelines.**

## **Translation of Documents**

HCTD weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, HCTD does not have a formal outreach procedure in place, as of 2012. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, HCTD will consider the following options:

- 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 alternative language based on the known LEP population.
- Bus schedules, maps and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP population is identified and requests are made.

## **Monitoring**

**Monitoring and Updating the LEP Plan.** HCTD will update the LEP as required. At a minimum, the plan will be reviewed and updated when data from the upcoming U.S. Census is made available, or when it is clear that higher concentrations of LEP individuals are present in the HCTD 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.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether HCTD's financial resources are sufficient to fund language assistance resources needed.
- Determine whether HCTD fully complies with the goals of this LEP plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

## **Dissemination of the HCTD LEP Plan**

HCTD's Title VI Policy and LEP Plan are made available on the company's website at [www.takethehop.com](http://www.takethehop.com). Any person or agency may request a copy of the LEP plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request a copy of the plan in alternative languages which will be provided, if feasible.

Questions concerning the LEP Plan may be submitted to Hill Country Transit District at:

Hill Country Transit District  
4515 W. U.S. Hwy. 190  
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