**Limited English Proficiency Plan**

**SOUTHWEST TRANSPORTATION SERVICES**

**DBA: SOUTHWEST PUBLIC TRANSPORTATION (SWPT)**

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**TITLE VI COORDINATOR**

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**INTRODUCTION**

This ***Limited English Proficiency Plan (LEP)*** has been prepared to address SOUTHWEST PUBLIC TRANSPORTATION SERVICE’S responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, 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 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, including SWPT who receives federal grant funds.

**Plan Summary**

SWPT 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 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, SWPT used the 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 by SWPT.
2. The frequency with which LEP persons come in contact with SWPT services.
3. The nature and importance of services provided by SWPT to the LEP population.
4. The interpretation services available to SWPT and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

**MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS**

1. **The number or proportion of LEP persons in the service area who may be served or are likely to require SWPT services.**

SWPT staff reviewed the most current 2015 American Community Survey 5 Year Estimate and determined that 309 persons in SWPT’s service area (4% of the population) speak a language other than English. Of those 309 persons, 40 (13%) have limited English proficiency; that is, they speak English “not well” or “not at all”, this is only 0.4% of the overall population in the service area. In SWPT’S service area, of those persons with limited English proficiency, 13 speak Spanish, 11 speak German, 12 speak Tagalog, and 4 speak Other Pacific Island languages.

1. **The frequency with which LEP persons come in contact with SWPT services.**

SWPT staff reviewed the frequency with which the management board, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, SWPT has had one request for an interpreter and no requests for translated program documents. The SWPT management board, office staff and bus/van drivers have had very little contact with LEP persons.

1. **The nature and importance of services provided by SWPT to the LEP population.** There is no large geographic concentration of any type of LEP individuals in the service area for SWPT. The overwhelming majority of the population, 96%, speak only English. As a result, there are few social, service, professional and leadership organizations within the SWPT service area that focus on outreach to LEP individuals. The SWPT management board, office staff and bus/van drivers are most likely to encounter LEP individuals through rides, office visits, phone conversations, and possibly attendance at a board meeting.
2. **The resources available to SWPT, and overall costs to provide LEP assistance.**

SWPT reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise. We contacted 2 local citizens that would be willing to provide voluntary Spanish translation, if needed, within a reasonable time period. Other language translation, if needed, would be provided through a telephone interpreter line for which SWPT would pay a fee. (Language Link)

**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 SWPT services. 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.

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

* Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
* All SWPT staff will have access in each vehicle to “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises. SWPT has also entered into an agreement with Language Link to provide interpretation services. Office staff may also use Google Translate.
* All SWPT staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
* When SWPT sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

**Language Assistance Measures**

Although there is a very low percentage in the SWPT service area of LEP individuals, that is, persons who speak English “not well” or “not at all”, we will strive to offer the following measures:

**1.** SWPT staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

**2.** The following resources will be available to accommodate LEP persons:

* Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.
* Google Translate can be accessed from office computer(s) or cell phones.
* Language interpretation will be accessed for all other languages through our Language Link contract .

**STAFF TRAINING**

The following training will be provided to all staff:

* Information on the Title VI Policy and LEP responsibilities.
* Description of language assistance services offered to the public.
* Use of the “I Speak” cards, Google Translate, Language Link, Spanish interpreters, and signer for the hearing impaired.
* Documentation of language assistance requests.
* How to handle a potential Title VI/LEP complaint.

**All contractors or subcontractors performing work for SWPT will be required to follow the Title VI/LEP guidelines.**

**TRANSLATION OF DOCUMENTS**

SWPT 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.

SWPT has developed a Public Participation Plan and has outreach procedures in place, as of 2020. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, SWPT 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 an alternative language based on the known LEP population.

**MONITORING**

**Monitoring and Updating the LEP Plan -** SWPT will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the SWPT 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 the SWPT financial resources are sufficient to fund language assistance resources needed.
* Determine whether SWPT 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 SWPT LEP PLAN**

* Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
* State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request by calling 1-800-280-0204.