

**2014 - 2017
Cedar Rapids Transit
Limited English Proficiency (LEP) Plan**



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Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Cedar Rapids' responsibilities as a recipient of federal financial assistance for the operation of its public transit system, 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 which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. 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, including the City of Cedar Rapids, doing business as Cedar Rapids Transit, which receives federal assistance through the Federal Transit Administration (FTA) and Iowa Department of Transportation (IDOT).

Cedar Rapids Transit is committed to ensuring that no person is excluded from access to its transit services on the basis of race, color, or national origin. This plan was developed to guide CRT in its administration and management of LEP related activities.

Plan Summary

Cedar Rapids Transit (CRT), the public transit service provided by the City of Cedar Rapids, 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 transit agency. 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, CRT undertook the FTA's four-factor LEP analysis which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to be served by CRT.
2. The frequency with which LEP persons come in contact with CRT's services.
3. The nature and importance of CRT's services to the LEP population.
4. The resources available to CRT and overall cost to provide LEP assistance.

Four-Factor Analysis

1. Assessing the Number and Proportion of LEP Persons Likely to be Served by Cedar Rapids Transit.

US Census Data of the Service Area

CRT provides transit service within the Cedar Rapids metropolitan area, with service to the cities of Cedar Rapids, Marion and Hiawatha. The metropolitan planning services are provided by the Corridor MPO. US Census data from the 2008-2012 American Community Survey (ACS) 5-year estimates were used to determine the LEP population concentrations in the Cedar Rapids metropolitan planning area.

The ACS tracks information for persons speaking another language to determine how well such populations speak English. For the purpose of this analysis, the population speaking another language and speaking English less than very well is considered to be an LEP population.

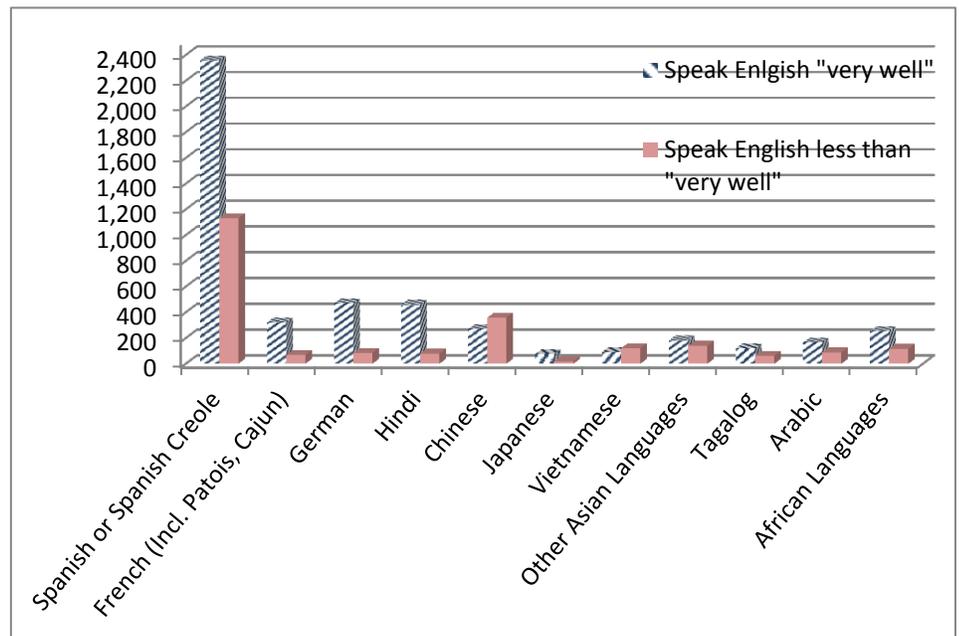


Figure 1:
Most Spoken Languages (Other Than English) in the Corridor MPO

Figure 1 summarizes the most commonly spoken language (other than English) in the Cedar Rapids metropolitan planning area and how well these people speaking other languages speak English. As the table shows, Spanish is the most commonly spoken language other than English.

Figure 2 further breaks down the LEP population by various member jurisdictions in the Corridor MPO planning area. With the exception of the small towns of Swisher and Shueyville, which are not in the CRT service area, the LEP population is a very low percentage of the overall population among the jurisdictions. CRT provides service to Cedar Rapids, Marion and Hiawatha which have a combined LEP population of 2,842 persons or only 1.9% of the population.

Figure 2: LEP Population in the Corridor MPO

	Cedar Rapids	Marion	Hiawatha	Robins	Fairfax	Shueyville	Swisher	Palo	Bertram	Walford	Ely	All Linn County
Total Population	118,424	32,417	6,470	2,744	1,674	432	793	726	448	1,495	1,481	197,787
Speaking English Only	111,603	30,997	6,111	2,609	1,632	416	788	722	432	1,467	1,441	188,226
Speaking Another Language and Speak English Less Than "Very Well" - LEP	2,300	401	141	66	12	12	4	3	7	3	4	3,270
Limited English Proficiency (LEP) %	1.9%	1.2%	2.2%	2.4%	.7%	2.8%	.5%	.4%	1.6%	.2%	.3%	1.7%

Source: 2008-2012 American Community Survey, US Census Bureau

Figure 3 shows the LEP population in the Corridor MPO area by census tracts. Most of the LEP population is concentrated in central Cedar Rapids and Marion and shows a diverse spread of LEP population throughout the metro area.

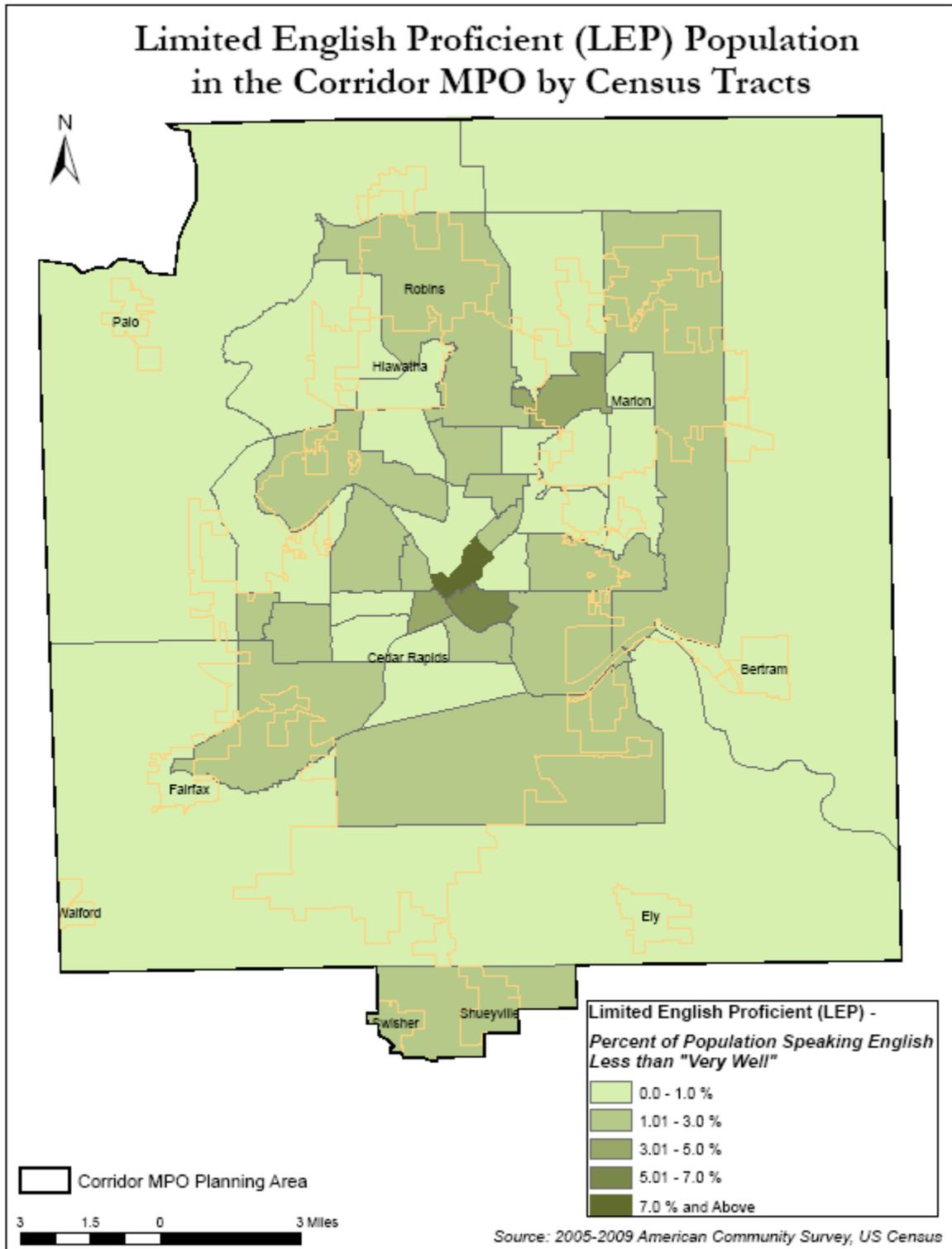


Figure 3: LEP Population Distribution by Census Tracts

Contacts with Community Organizations that serve LEP Persons

Steps were taken to identify any concentrations of LEP persons in the Cedar Rapids metropolitan area through contacts with community organizations that serve LEP persons. CRT contacted the communications liaison with the City of Cedar Rapids, Kirkwood Community College, Coe College, metro area community school districts (Cedar Rapids, College Community, Linn-Mar, and Marion), the United Way of East Central Iowa, and the metro area Human Services and Transportation Advisory Group (HSTAG) to request information on any specific LEP or minority groups that they are aware of.

City of Cedar Rapids – No known diversity groups are organized through the City of Cedar Rapids at this time to access the LEP population. In discussions with the City's Communications Liaison, no instances of language barriers have occurred in the past year with any city departments. When instances do occur, individuals generally speak Spanish and they generally bring an English speaking adult with them to discuss their issues with city staff. The City of Cedar Rapids does not track LEP instances due to the low number of occurrences.

Local Colleges and School Districts – Contacts with Kirkwood Community College, Coe College, and Mt. Mercy University revealed that while international students attend those institutions, the students speak English well enough to function sufficiently within the community. Contacts with the metro area community school districts (Cedar Rapids, College Community, Linn-Mar, and Marion) showed that none of the schools has sufficient LEP students to warrant any programs to provide LEP assistance in the classroom.

Human Services and Transportation Advisory Group (HSTAG) (50+ members) - CRT has reached out to local human service agencies that work with individuals that may be limited English proficient through the metro area Human Services and Transportation Advisory Group, which consists of over 50 members. This organization is coordinated by the United Way of East Central Iowa and consists of organizations representing transportation providers, school systems, youth organizations, health organizations, community organizations, state and city government departments, religious organizations and legal aid entities. The HSTAG meets at least quarterly and plays an active role in the Corridor MPO's Passenger Transportation Plan. The LEP analysis in the Passenger Transportation Plan concluded that limited English proficiency is not an issue at this time. CRT will continue to coordinate LEP outreach through the HSTAG committee.

<i>HSTAG Members</i>	<i>HSTAG Members</i>
Abbe Center for Mental Health	Goodwill Industries
Aging Services, Inc.	Hawkeye Area Community Action Program
Alzheimer's Association	H.D. Youth Center
American Cancer Society	Healthy Linn Care Network
Area Ambulance	Horizons, A Family Service Alliance
Area Substance Abuse Council - Heart of Iowa	Iowa Department of Transportation
Area Substance Abuse Council - Novus Center	Iowa Workforce Development
Big Brothers Big Sisters	Jane Boyd
Boys and Girls Club	Jones County Jets
Benton County Coalition	Kirkwood - Skills to Employment
Benton County Transit	Linn County Community Services
Benton County Volunteer Transportation	Linn County General Assistance
Catherine McAuley Center	Linn County LIFTS
Cedar Rapids Transit	Linn Marr School District
Cedar Rapids Community Schools	Mercy Medical Center
Cedar Rapids Recreation Department	Neighborhood Transportation Systems
Churches United	Options of Linn County
Community Health Free Clinic	RSVP of Linn and Jones County
Conner Center for Independent Living	Southeast Linn Community Center
Corridor MPO	The Arc of East Central Iowa
Cross Roads Mission	The Heritage Area Agency on Aging
Coralville Transit	United Way of East Central Iowa
Discovery Living	Volunteer Services of Cedar County
East Central Iowa Council of Governments	Willis Dady Shelter
Empower Iowa	Witwer Senior Center
Foundation 2	YMCA
Four Oaks	Young Parents Network

Human Services and Transportation Advisory Group (HSTAG) Members

2. Assessing the Frequency with which LEP Individuals Come into Contact with Cedar Rapids Transit

CRT held internal discussions with its operations personnel to help examine prior experiences with LEP persons. The following conclusions were reached:

- The bus drivers have occasional contact with LEP persons, but not to the point where they cannot get passengers to their destinations. When a communication barrier arises on the bus that cannot be resolved, the driver contacts the information booth or a supervisor for assistance because the supervisors have more time to communicate with the individual and understand their issue. Drivers are instructed to utilize the route map to communicate where the

passenger wants to go. The supervisors estimate that incidents of this nature occur a few times per year.

- The information clerks have more intermittent contact with LEP persons via face to face contact at the transfer station information booth, but again, not to the point where they cannot get passengers to their destinations. Staff is instructed to use a route map and point to where the individual is currently at and ask them to point where they want to go.
- The information clerks estimate a call every other month is made by non-English speaking individuals where staff could not understand or communicate with them during their conversation. Efforts are made to express to those individuals to come in to discuss their situation so that they can point to a map or call back with a translator.
- No LEP persons have contacted the administrative office personnel.
- No requests have been received at the CRT e-mail inbox.
- No requests have been received by attendees at public meetings held by CRT.
- Although the contact with LEP persons is infrequent at best, Spanish is the most common language encountered. With that in mind, CRT has begun to print more of the bus signage in both English and Spanish.

CRT has the bus schedule converted to Braille upon the request of sight-impaired passengers approximately once or twice a year. A more frequent accommodation is for large-text schedules, so those are now printed on an on-going basis and made available upon request.

In 2004, CRT, in partnership with the United Way of East Central Iowa, printed transit schedules in five foreign languages (Spanish, French, Bosnian, Arabic and Vietnamese) to assist LEP individuals. The foreign language schedules have been discontinued due to lack of demand for this service. CRT has not received any requests for foreign language schedules since that program was discontinued.

Most individuals that CRT struggles to communicate with are those with disabilities but not from lack of a language barrier. Generally, these individuals require additional time to understand policies or just need more information about changes occurring to CRT's bus routes.

Based upon the above assessment, CRT has concluded that we have occasional contact with LEP persons to the average of one or two encounters per month, which are often able to be resolved at this time.

3. Assessing the Nature and Importance of the Service to LEP Persons

Providing updated communication regarding CRT's fixed-route service is important to LEP persons if the lack of information results in limited access to the bus service. If limited English is a barrier to using the bus system, then the consequences could be serious, including limited access to health care, education or employment.

CRT's critical services include route and schedule information, detour information, fare and payment information, passenger information (system rules), information on how to ride, public service announcements, safety and security announcements, passenger comment cards, and transit planning information.

4. Assessing the resources available and the cost to provide LEP assistance.

Based on the low overall LEP population in the Cedar Rapids metropolitan area and the infrequent contact with LEP persons on the transit system, CRT has not dedicated any resources specifically to provide LEP assistance since the foreign language schedules were printed in 2004. As a small urban transit system with limited resources, it has not been practical to fund underutilized projects. However, low-cost measures may be available to provide LEP assistance that could be absorbed in the current operating budget.

The following steps should be considered to translate public information into Spanish:

- ◆ **Signage** – CRT should continue to provide translations on signage inside of transit facilities, shelters and vehicles.
- ◆ **Website** - CRT should ensure that information posted on its website will be compatible to allow Google Translate on its pages so that customers can view the information in their language of choice. Not only would customers be allowed to translate their information but they could print a hard copy within their own preferred language. Efforts should be made to provide information in convertible formats, such as html, to allow all documents to be accessible to everyone regardless of nationality or disability. Therefore all written materials on the website (schedules, timetables, detours, alerts, what's new information, ADA applications, Title VI complaint process etc.) would be available in alternative languages through Google translate.
- ◆ **Text/Email Notifications** - CRT has begun to communicate important updates, such as detours or service interruptions, to the public via a text and email notification service. Anyone can sign-up to receive these notifications; however the postings are still in English. Efforts should be made to see if translation services are available for this method of communication.
- ◆ **Schedules** – CRT provides its printed schedule in English format as well as on the website. With today's technology, computers have opened up a new world for the visually impaired as text can be read verbally through programs for the visually impaired.
- ◆ **Translation Service** – CRT does not have any readily available language translation services at this time. However, the Iowa DOT has recently contracted with "thebigword" for telephone interpreter services to help fulfill their LEP obligations under Title VI. The Iowa DOT's contract is available to subrecipients, such as CRT, to assist in providing meaningful access to LEP persons. This service

provides telephone interpreting service for over 250 languages and is available 24/7/365. There are no start-up or maintenance fees and the cost is \$0.85 per minute on a pay as you go basis. This service would provide an immediate benefit for verbal communication with LEP persons.

Limited English Proficiency (LEP) Plan

Although the need for LEP assistance is very low in the CRT service area, the following measures can be provided at a relatively low cost to provide better access to an LEP person.

Identifying LEP Persons and Language Assistance Measures

Free LEP Assistance Notice

To inform passengers that LEP Assistance is available to them free of charge a notice will be placed on CRT's website, added to the bus schedule, and posted at the Information Booth.

Language Identification Cards

CRT will determine the language of LEP individuals requesting information with use of language identification cards, commonly known as "[I speak cards](#)". CRT will document the LEP individuals served each year and determine their preferred national language if communication in English is a barrier to receiving CRT services.

Survey LEP Persons: Surveys will be developed for LEP persons to complete through CRT's website. CRT will communicate this survey to its human service agencies it works with through the coordinated passenger transportation plan process to receive input from those LEP persons accessing services throughout the Cedar Rapids community.

Survey CRT Staff: CRT staff will be surveyed for their alternative language skills to determine language resources available within CRT.

Website Translation – CRT has worked with the City of Cedar Rapids Information Technology Department to implement Google Translate on CRT's website. This is now available to anyone to click a drop down button to change the language on the site to the preferred language. CRT will provide website information in a translatable format.

Staff Training

The following training will be provided, at least yearly, to CRT staff:

1. CRT's Title VI Program, LEP Plan and discrimination complaint procedures will be discussed with all CRT operations employees.
2. LEP awareness training will be included for new employees on how to communicate with the LEP population as well as procedures if difficulties with communication arise.

3. LEP instances on the bus and in the office (email, phone, and letter) and requests for interpretive services through public meetings will be documented on an annual basis.

Outreach Techniques

- ◆ Documents and Public Meeting Notices –
When documents are prepared or public meetings are scheduled for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers will be published on CRT’s website in which Google Translate would have translated the materials into the preferred language of choice. CRT will add to public meeting announcements that interpretive services are available upon request if the request is provided at least 48 hours prior to the meeting.
- ◆ Public Service Announcements on the Local Public Access Television Channel –
CRT will examine the possibility of airing public service announcements on the local public access channel that would inform LEP individuals of how to access CRT’s services.
- ◆ Human Services and Transportation Advisory Group (HSTAG) -
CRT will continue to coordinate LEP outreach through the HSTAG committee.

Monitoring and Updating the LEP Plan

The LEP Plan will be reviewed and updated each year through the coordinated human services-transit provider plan (Corridor MPO’s Passenger Transportation Plan Update) as required by the Iowa Department of Transportation. Updates will include the following:

- ◆ Annual number of documented LEP person contacts encountered.
- ◆ Annual use of interpretive language services.
- ◆ How the needs of LEP persons have been addressed.
- ◆ Determination if the need for services has changed.
- ◆ Determination if interpretative services have been effective and sufficient to meet the needs.
- ◆ Determine if CRT has fully complied with the goals of the LEP plan.
- ◆ Determine if complaints have been received concerning CRT’s failure to meet the needs of LEP individuals.

Subrecipient Monitoring

Both subrecipients (LIFTS and NTS) are executive members of the HSTAG Committee and active in all discussions and decisions regarding LEP and Title VI that occur at each quarterly meeting. In addition, at the LIFTS quarterly meeting and NTS annual meeting with CRT, LEP and Title VI issues and/or complaints are discussed and noted on the meeting agenda.

Requirement to Report Minority Representation on Planning and Advisory Bodies

CRT does not have a non-elected planning or advisory board, so this requirement is not applicable.

Dissemination of CRT's LEP Plan

CRT's LEP Plan and Title VI Program will be available on CRT's website. The LEP plan will also be available through the annual Passenger Transportation Plan (PTP) update effort as required by the Iowa Department of Transportation. As a result, the LEP will be dispersed to all transportation providers and human service agencies participating in the PTP process. Any person or agency may request a copy of the LEP Plan. LEP individuals may request copies of the Plan in alternative languages which will be provided. The LEP plan will be available on CRT's website which can be translated via Google Translate.