

# Limited English Proficiency Plan

*Come SIT with Us!*

October  
2023

Southern Iowa Trolley



Southern Iowa Trolley serves the counties of Adams, Adair, Clarke, Decatur, Ringgold, Taylor, and Union Counties in Southwest Iowa.

[www.southerniowatrolley.org](http://www.southerniowatrolley.org) | 215 E. Montgomery St., Creston, IA 50801 | 1-866-782-6571

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## INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the Southern Iowa Trolley responsibilities 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, 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.

### Plan Summary

Southern Iowa Trolley 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.

To prepare this plan, the system used the four-factor LEP analysis which considers the following factors:

- 1. Demography Factor:** The number or proportion of LEP persons in the service area who may be served by the Southern Iowa Trolley
- 2. Frequency of Contact Factor:** The frequency with which LEP persons come in contact with the Southern Iowa Trolley services.
- 3. Importance Factor:** The nature and importance of services provided by the Southern Iowa Trolley to the LEP population.
- 4. Resources Factor:** The interpretation services available to the Southern Iowa Trolley and overall cost to provide LEP assistance.

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

### Four Factor Analysis

- 1. Demography Factor:** The number or proportion of LEP persons in the service area who may be served or are likely to require Southern Iowa Trolley services.

Southern Iowa Trolley serves Adams, Adair, Clarke, Decatur, Ringgold, Taylor, and Union Counties. Southern



Iowa Trolley used the United Census Bureau data to assess ability to speak English for each county. According to the Census.gov data, an estimated 219 households (0.43% of Southern Iowa Trolley's total population) reported they speak English less than very well and are therefore considered LEP. Table 1 illustrates that Spanish is the most common other language used in the seven counties Southern Iowa Trolley serves. Brochures are printed in Spanish and available to the general public and persons with disabilities.

**Table 1: Limited English Speaking Households in the Southern Iowa Trolley Region**

COUNTY	RANK (Percent)	Total Population	Total Households	Total Limited English Speaking Households	Spanish	Other Indo-European Languages	Asian and Pacific Islands Languages	Other Languages
ADAIR	0.03%	7439	3217	1	63	58	22	0
ADAMS	0.00%	3697	1627	0	34	10	0	0
CLARKE	2.33%	9736	3950	92	267	18	2	0
DECATUR	0.89%	7718	3242	29	91	93	9	3
RINGGOLD	0.27%	4739	1843	5	25	17	5	1
TAYLOR	2.57%	5932	2567	66	132	4	0	0
UNION	0.50%	12193	5199	26	45	78	66	10
TOTALS	1.01%	51454	21645	219	657	278	104	14

*Source: <https://data.census.gov>*

**2. Frequency of Contact Factor:** The frequency with which LEP persons come in contact with the Southern Iowa Trolley services.

The Southern Iowa Trolley staff reviewed the frequency with which Board members, office staff, and drivers have, or could have, contact with LEP persons. The following conclusions were reached through phone inquiries, office visits and verbally surveying drivers:

- On average, each transit driver came into contact with 0-2 LEP persons per year. These interactions always resulted in the driver being able to get the passenger to his/her destination without major issues using local maps. When a communication barrier arises that cannot be resolved on the bus, the driver is to direct the LEP person to dispatch for additional assistance.
- To date, the Southern Iowa Trolley has had no requests for interpreters and no requests for translated program documents. The board members, office staff and drivers have had very little contact with LEP persons.

Southern Iowa Trolley has the How to Ride brochure available in Spanish and Braille and has the ability to convert the brochure to Audio upon the request. There has been no such request to-date.

Based upon the above assessment, Southern Iowa Trolley has concluded that we have limited contact with LEP persons to the average of zero-two encounters per year. Which to-date, all encounters have been resolved by the drivers themselves, or dispatch.

**3. Importance Factor:** The nature and importance of services provided by the Southern Iowa Trolley to the LEP population.

Transportation is vital to any person accessing services throughout our 7-county region, especially if they are transit dependent. While we have a number of Spanish speaking households in Clarke, Taylor, and Union Counties, the majority of households speak English.

**Table 2: Means of Transportation in Southern Iowa Trolley Region - Percentages**

COUNTY	Car, Truck, or Van	Car, Truck or Van Carpooled	Public Transportation (excluding taxicab)	Walked	Other means	Worked at home
ADAMS	81.3	8.8	0.1	3.3	1.4	5.2
ADAIR	77.6	10.0	0.4	4.0	0.5	7.4
CLARKE	82.2	9.6	0.5	2.1	1.2	4.4
DECATUR	73.1	11.1	0.1	7.0	0.7	8.2
RINGGOLD	74.0	7.4	0.3	7.4	1.0	9.8
TAYLOR	78.1	13.9	0.8	2.5	0.5	4.2
UNION	78.1	9.5	0.6	7.3	0.6	3.9

Source: State Data Center of Iowa <https://www.iowadatatcenter.org/county-quick-facts>

**4. Resources Factor:** The resources available to the Southern Iowa Trolley and overall costs to provide LEP assistance.

Based on the low overall LEP population in the Southern Iowa Trolley region and the infrequent contact with LEP persons on the transit system, Southern Iowa Trolley reviews annually, available resources that could be used for providing LEP assistance which include:

- Which of its documents would be most valuable to be translated if the need should arise;
- Local citizens that would be willing to provide voluntary Spanish translation if needed in person within a reasonable period;
- Translation services, if needed that could provided through a telephone/internet interpreter, for which the Southern Iowa Trolley would pay a fee.

Southern Iowa Trolley assessed which documents would be the most valuable to be translated if and when the populations warrant visual materials and determined the brochures translated in Spanish was the most valuable and currently have brochures printed in Spanish available. S.I.T. website and documents may also be translated via Google Translate so customers can view or hear the information in their language of choice.

Southern Iowa Trolley utilizes local outreach by participating in various meetings held monthly by groups such as Family Ties, Ringgold County Interagency, and with both regional planning agencies which include Southern Iowa Council of Governments (SICOG) and Chariton Valley Transportation Planning Affiliation (CVTPA). Southern Iowa Trolley currently has an employee fluent in Spanish available to translate when the need arises.

Southern Iowa Trolley assessed available resources which could be used for providing LEP assistance and has readily available to use the services by Language Link at <https://language.link/> for interpreter or translation



services. Current cost of a professional interpreter and/or translation service over the phone via Language Link is \$.57 per minute for all languages and Video-Remote Interpretation (VRI) charges are \$1.99 per minute for ASL, \$.89 per minute all other languages. Additional services such as Transcription, Localization, 3<sup>rd</sup> party international calls are also available in needed and are offered under a separate agreement or quote.

Southern Iowa Trolley office staff and drivers also have available, I Speak Cards and instructions, for those that may need interpretation services. <https://www.lep.gov/sites/lep/files/resources/ISpeakCards2004.pdf>

After analyzing the four analysis factors, Southern Iowa Trolley will continue to evaluate, monitor, and provide outreach to all LEP individuals to provide meaningful access to our services and programs. The LEP Plan will be reviewed and updated as necessary. Updates will include the following:

- Annual number of documented LEP person contacts encountered.
- Annual use of interpreted language services.
- How the needs of LEP persons have been addressed.
- Determination if the need for services has changed.
- Determination if interpretive services have been effective and sufficient to meet the needs.
- Determine if Southern Iowa Trolley has fully complied with the goals of the LEP Plan.
- Determine if complaints have been received concerning Southern Iowa Trolley's failure to meet the needs of LEP individuals.

**5. Safe Harbor Provision:** Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

In the Southern Iowa Trolley region, the LEP language groups constitute < 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided to meet the safe harbor

standard. Even though the population is less than 5%, Southern Iowa Trolley has brochures available in Spanish, and Title VI Notices have been translated in Spanish since it is the 2<sup>nd</sup> highest language used in the

SIT area, other than English. Other vital documents such as the LEP Plan and public notices of changes to transit service or fares would also be published in Spanish as needed. Southern Iowa Trolley staff will utilize websites and services such as Google Translate and Language Link, <https://language.link>, for translation, interpretation, or audio video services, and multi-lingual staff, including a Spanish speaking driver at SIT, staff from The Village in Osceola and Crestridge Estates, for personnel that have volunteered to translate in Spanish if required. Southern Iowa Trolley will also proceed as needed with oral interpretation options through iSpeak for compliance with LEP regulations.

**Dissemination of the Southern Iowa Trolley Limited English Proficiency Plan**

Copies of the LEP Plan will be provided on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request, or utilize Google Translate to view in the language of their choice. Any questions or comments regarding this plan should be directed to the Transit Director.

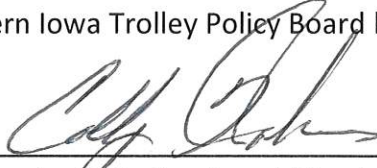
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**Goal**

The goal of English proficiency accommodations by Southern Iowa Trolley is to find a balance that ensures meaningful access for LEP persons to critical information and services while not imposing undue burdens on the organization.

**APPROVAL**

Southern Iowa Trolley Policy Board hereby approved and adopted, this 26<sup>th</sup> day of October 2021.

  
\_\_\_\_\_  
Southern Iowa Trolley Board Member

October 26, 2023  
Date

  
\_\_\_\_\_  
Southern Iowa Trolley Transit Director

October 26, 2023  
Date