

# **LIMITED ENGLISH PROFICIENCY PLAN**

## **Gunnison Valley Transportation Authority (Gunnison Valley RTA)**

**March 11, 2016**

### **I. INTRODUCTION**

This Limited English Proficiency (LEP) Plan, for the Gunnison Valley RTA has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person shall “on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for the Gunnison Valley RTA has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

### **II. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA**

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have, with LEP persons, in providing transit services. Each of these elements is addressed below.

**Number and Percentage of LEP Persons in Our Area**

**Permanent Population**

*U.S. Census Data*

The U.S. Census provides information to assist in estimating the number of limited English speakers in the permanent population. For small urban areas and rural counties, the best data available is from the U.S. Census American Community Survey 2007-2011. Table 1 presents information for Gunnison County on *Language Spoken at Home by Ability to Speak English*, based on that Survey.

**TABLE 1 - Individuals Speaking English "Not Well" or "Not at All**

Data Category	Gunnison County	
	#	%
Total Population (5 years old & older)	14,495	100%
<i>Populaton Speaking English "Not Well" or "Not at All"</i>	409	2.8%
<i>Populaton Speaking English "Not Well" or "Not at All"</i>		
Spanish	150	37%
Other Indo-European	57	14%
Asian and Pacific Islander	202	49%
Other	0	0%
Total	409	100%

Source: U.S. Census American Community Survey 2007-2011 estimates, population 5 years old and older, speaking another language in the home, who speak English "Not Well" or "Not at All."

As the table shows, there were very low numbers and percentages of persons in the permanent population of Gunnison County, in the years 2007 - 2011, who had difficulty speaking English; 409 individuals, less than 3% of all persons age 5 and over. Most of those with difficulty were Spanish or Asian and Pacific Islander language speakers in the valley who might use the RTA service to get to work but there were also some speakers of other Indo-European languages.

U.S. Census data indicates a very low need to respond to individuals in our service area who have difficulty with English. Those who do have difficulty are primarily Spanish or

Asian and Pacific Islander language speakers but there is also a significant percentage of individuals speaking other Indo-European languages. Therefore, for this LEP Plan, additional local contacts were not made to clarify the need among the permanent population of our service area. However, we are committed to monitoring LEP needs among the permanent population over time.

### **Visitors**

During the March, 2009 survey of our riders, it was noted that only 8% of our riders are not residents of Gunnison County. However, due to the fact that some of our riders are visitors to Crested Butte Mountain Resort there is a potential need for special services for LEP individuals from our visitor population. As a year round resort community, the Crested Butte/Mt. Crested Butte area, as well as Gunnison County as a whole, attracts individuals from all over the world. We are therefore sensitive to LEP needs among visitors to our area.

### **Summary**

Given the resort nature of the Gunnison Valley RTA service area, the fact that many of the Spanish speakers work at the resort, and the large number of visitors we have, including those who potentially have Limited English Proficiency needs, we are committed to addressing those needs.

### **Nature, Frequency and Importance of LEP Contact**

The nature and importance of LEP contact is high for public transit services in general, and in our service area, we are sensitive to those needs. We have daily contact with non-English speakers who are commuting to work. Therefore, strategies to address this need have been developed and will continually be reviewed, and improved where needed.

## **III. CURRENT LEP EFFORTS**

Due to the resort nature of our service area, the potential numbers and percentages of LEP persons are significant. As a public transit provider we are committed to addressing the on-going need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts. We ask our provider (Alpine Express at the time of the adoption of this plan) to make our schedules available in Spanish when requested to do so. We adopted an LEP Policy in May, 2010, adopted an LEP Plan in September, 2010 and revised and adopted this plan in May, 2015.

## **IV. PLANS FOR THE FUTURE LEP EFFORTS**

Given the current and potential future need to respond to individuals with Limited English proficiency our LEP Plan includes the elements identified below.

## **Identifying LEP Persons Who Need Language Assistance**

In order to identify potential future LEP needs with respect to our transit service we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with our contracted provider and their drivers;
- Make periodic contacts with the Gunnison County Multicultural Center, and other community agencies that may know of LEP persons or groups.

## **Language Assistance Measures**

As the need arises, we will consider the following to respond to LEP needs:

- Asking our provider to obtain copies of “I Speak Cards” to have on hand if needed;
- Develop Spanish versions of marketing materials, public notices, and related information, as appropriate;
- Asking our provider to consider hiring Spanish-speaking drivers;
- Ask our provider to obtain copies of CDOT’s “Basic Spanish for Transit Employees” and distribute to drivers and customer service staff, as appropriate;
- Become familiar with Language Line Services at <http://www.language.com>;
- Make our schedules available in Spanish on our website;
- Identify other community resources such as agencies serving LEP persons which may have resources to share.

## **Staff Training**

Similarly, as the need arises, we will consider requiring our provider to address the following staff training topics:

- Federal LEP requirements, your LEP Plan and Title VI;
- Documenting language assistance requests;
- Use of any of the language assistance measures as described above.

## **Outreach Efforts**

Similarly, as the need arises, we will consider the following staff training topics:

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

### **Monitoring and Updating Plan**

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing our LEP Plan with our provider and make adjustments, as needed
- Pay particular attention to demographic changes in our area and to any LEP-related complaints we receive.

### **Disseminating Our LEP Plan**

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests;
- Post our plan on our website;
- This plan was adopted by the Board of Directors of the Gunnison Valley Transportation Authority at their March 11, 2016 regular meeting.