

# **Mason City Transit**

**Limited English Proficiency (LEP) Plan**

**2021 – 2024**



## **Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Mason City's 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, writes, 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 Mason City, doing business as Mason City Transit, which receives federal assistance through the Federal Transit Administration (FTA) and Iowa Department of Transportation (Iowa DOT). Mason City 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 MCT in its administration and management of LEP related activities.

## **Plan Summary**

Mason City Transit (MCT), the public transit service provided by the City of Mason City, 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, MCT 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 MCT.
2. The frequency with which LEP persons come in contact with MCT's services.
3. The nature and importance of MCT's services to the LEP population.
4. The resources available to MCT and overall cost to provide LEP assistance.

## **Four-Factor Analysis**

1. *Assessing the number and proportion of LEP persons likely to be served by Mason City Transit.*

### **US Census Data of the Service Area**

MCT provides transit service within the city limits of Mason City, Iowa. According to the United States Census data for Mason City, IA for populations 5 years old and above, 4.1% of our population speaks a language other than English. The highest percentages of those who speak a different

language are Hispanic at 2.9%, followed by other Indo-European languages at 1.0% and Asian and Pacific Island languages at 0.2% respectively.

*2. Assessing the frequency with which LEP individuals come in contact with Mason City Transit.*

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

- On average, each transit driver came into contact with 1-2 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 the route map and destination flashcards. When a communication barrier arises that cannot be resolved on the bus, the driver is to direct the LEP person to his/her supervisor for additional assistance.
- MCT supervisors estimate a similar contact rate of 1-2 LEP persons per year.
- No LEP persons have contacted MCT administration to file a discrimination complaint.

As Spanish is the most common non-English language in Mason City, a percentage of transit brochures are printed in Spanish and available to the general public.

MCT has the ability to convert the bus schedule to Braille or Audio upon the request of visually-impaired or hearing-impaired passengers. There has been no such request to-date.

Most individuals that MCT struggles to communicate with are those with disabilities, but not a language barrier. Generally these individuals require additional time to understand policies or changes in our routes.

Based upon the above assessment, MCT has concluded that we have limited contact with LEP persons to the average of one or two encounters per year, per driver. Which to-date, all encounters have been able to be resolved by the drivers themselves, or transit supervisors.

*3. Assessing the nature and importance of the MCT service to LEP persons.*

Providing updated communication regarding MCT'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.

MCT'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 Mason City and the infrequent contact with LEP persons on the transit system, MCT has not dedicated any significant resources specifically to provide LEP assistance beyond responding to requests.

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

- Signage – MCT has done so and will continue to provide translations on signage inside of transit facilities, shelters, and vehicles.
- Website – all information on the MCT website is compatible with Google Translate so that customers can view the information in their language of choice. This not only allows customers to translate their information but they can print a hard copy within their own preferred language. All information on the MCT website is in convertible formats that 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.) are available in alternative languages.
- Schedules – MCT provides its printed schedule in English format as well on the website. The website is fully compatible with today's technology, computers, tablets, and smart phones have opened up a new worlds for the visually impaired, as text can be read verbally through programs for the visually impaired.
- Translation Services – MCT utilizes the services of "CTS Language Link" for translation services for LEP persons. This service offers over-the-phone interpreting for 240 languages and dialects.

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

Although the need for LEP assistance is very low in the MCT 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 MCT's website, added to the bus schedule, and included in our brochure.

#### **Language Identification Cards**

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

#### **Survey LEP Persons**

The need for a survey for LEP persons will be discussed annually with the TAG group. If a survey is warranted, MCT will communicate this survey to the human service agencies it works with through the coordinated passenger transportation plan process to receive input from those LEP persons accessing services throughout the Mason City community.

#### **Survey MCT Staff**

MCT staff will be surveyed annually for their alternative language skills to determine language resources available within MCT.

#### **Website Translation**

MCT is working with the City of Mason City's website host to implement Google Translate on main City of Mason City website. This will be available to anyone to click a drop down button to change the language on the site to the preferred language. MCT will continue to provide website information in a translatable format.

### **Staff Training**

The following training will be provided, at least annually, to MCT staff:

1. MCT's Title VI Program, LEP Plan, and Non-Discrimination complaint procedures will be discussed with all MCT 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.

### **Monitoring and Updating the LEP Plan**

The LEP Plan will be reviewed and updated each year or 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 MCT has fully complied with the goals of the LEP Plan.
- Determine if complaints have been received concerning MCT's failure to meet the needs of LEP individuals.

### **Subcontractor Monitoring**

MCT's sole subcontractor, Region 2 Transit is an executive member of the TAG Committee and active in all discussions and decisions regarding LEP and Title VI that occur at each meeting.

### **Dissemination of MCT's LEP Plan**

MCT's LEP Plan and Non-Discrimination Program are available on MCT'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 Plan 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 free of charge. The LEP Plan will be available on MCT's website which can be translated via Google Translate.