



Limited English Proficiency (LEP) Plan

Updated November 10, 2017

Table of Contents

Introduction.....	1
Policy	2
Title VI Policy.....	2
Four Factor Analysis.....	2
Analysis.....	3
Language Assistance Measures	3
Authority Staff Training	3
Providing Notice of Available Language Service to LEP Persons.....	4
Outreach Techniques	4
Monitoring and Updating the LEP Plan.....	4
LEP Contact	5

Introduction

The purpose of this Limited English Proficiency (LEP) policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance and;

Executive Order 13166

Executive Order 13166 “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964— National Origin Discrimination Against Persons with Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak write, read, or understand English may be a type of national discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies, and governments such as the Cape Fear Public Transportation Authority, private and non-profit entities and sub-recipients.

Plan Summary

The Cape Fear Public Transportation Authority (CFPTA) has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to CFPTA services and programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

Policy

Title VI Policy

As a recipient of federal funds, the Cape Fear Public Transportation Authority d/b/a Wave Transit has certified and provided assurances that it will fully comply with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d. The Authority is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, on the basis of race, color or national origin.

No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service that Wave Transit furnishes on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, and location of routes may not be determined on the basis of race, color or national origin.

Four Factor Analysis

1. The number or proportion of the LEP population that is eligible to be served or likely to encounter a CFPTA program, activity, or service.

The Cape Fear Public Transportation Authority (CFPTA) studied the US Census Bureau American Community Survey and additional demographic data for New Hanover County in order to determine the number of limited English proficiency individuals living within our service area. The current population for New Hanover County is estimated to be 202,667 people, with 5.4% of the population, or 10,716, as identifying as Hispanic or Latino. Hispanic and Latino individuals comprise the largest non-English speaking language group in New Hanover County. The language spoken most often by this group of people is Spanish. It is estimated that only 1% or 2,026 individuals age 5 and over do not speak English very well or not at all. Refer to Appendix A, Chart 2 for further detail.

2. The frequency at which an individual comes in contact with a CFPTA program or service.

The Authority assessed the frequency at which the staff has or could come into contact with LEP individuals. This included documenting phone inquiries and surveying public meetings. During the previous fiscal year, FY2017, the CFPTA received four (4) requests for a Spanish speaking interpreter by phone and no requests for translation services. One request for a hard copy, Spanish publication of the schedule was requested and fulfilled. Printed schedules are available in both English and Spanish. Printed material can be translated into additional languages upon request.

3. Importance of the program, activity or service provided by CFPTA to the LEP community.

The Cape Fear region has been identified as one of the fastest growing regions in Southeastern North Carolina with a steady growing Latino community. The Authority recognizes that public outreach to all community groups are important and will continue to provide a variety of outreach opportunities to persons with limited English proficiencies.

4. The resources available to CFPTA and overall costs

The Authority identified local resources that could be used to provide LEP assistance to customers. This included identifying staff, volunteers, and free language services, which could be used to provide translation and interpreting services. The Authority uses a language interpreting service and all staff are trained on this procedure.

Analysis

CFPTA analyzed the four factors and determined that the population of LEP persons living in the Cape Fear Region is rather small when compared to the rest of the population, which presents challenges when developing a plan for such a small population. The size of the population makes outreach activities difficult, but the Authority developed the following plan to assist individuals with Limited English Proficiency within its service region.

Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. The Authority staff can provide some Spanish interpreting services. If Spanish is not required, bilingual staff is unavailable, or formal interpretation is required, staff shall use telephone interpreting services as provided by Fluent Language Solutions. Phone numbers and access codes for the service are found near any Authority telephone.

The Authority also provides a translation link on its website to aid LEP persons with bus schedules and information about the bus system.

Authority Staff Training

All Authority staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the Authority staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI LEP responsibilities
- What language assistance services the Authority offers
- Use of “I Speak” Cards
- How to use the Fluent Language Solutions interpretation and translation services
- Documentation of language assistance requests

When anyone seeks services from the Authority, staff must inquire what language is their preference and whether they desire an interpreter if preference is other than English. The “I Speak” cards will be used to help client identify their language needs (Appendix B).

Providing Notice of Available Language Service to LEP Persons

The Authority will post a link on its website that language service is available, as well as provide a link to translate the website. The Authority will also indicate in newspaper press releases and classified ads that interpreter services are available upon request.

Outreach Techniques

If a staff member knows that they will be presenting a topic that could be of potential importance to a LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, they will have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish.

Monitoring and Updating the LEP Plan

On at least an annual basis, the Authority will conduct an evaluation of the LEP plan to determine overall effectiveness. The evaluation will consider which aspects of the program are effective and which aspects need adjustments.

The Cape Fear Public Transportation Authority’s annual review of the LEP plan will consist of the following activities:

- Assessment of the number of persons with limited English proficiency living within the Authority’s service area
- Assessment of the current language needs of clients with limited English proficiency, to determine whether they need an interpreter and/or translated materials to communicate effectively with staff.
- Determining if existing language assistance services are meeting the needs of clients with limited English proficiency
- Assessing whether staff members understand the CFPTA LEP policies and procedures, how to carry them out and whether language assistance resources and arrangements for resources are still current and accessible

LEP Contact

Any questions or comments regarding this plan should be directed to the individual listed below:

Mailing Address

Wave Transit
Attn: Title VI Coordinator
P.O. Box 12630
Wilmington, NC 28405

Contact Information

Megan Matheny
mmatheny@wavetransit.com
Phone: 910.202. 2057
Fax: 910.342.2557

Appendix A - Graphs and Charts

Chart 1

C03001. HISPANIC OR LATINO ORIGIN BY SPECIFIC ORIGIN - Universe: TOTAL POPULATION

	New Hanover County, North Carolina	
	Estimate	Margin of Error
Not Hispanic or Latino	94.6%	+/- 0%
Hispanic or Latino:	5.4%	+/- 0%
Mexican	2.3%	+/-0.9%
Puerto Rican	0.3%	+/-0.3%
Cuban	0%	+/-0.1%
Dominican (Dominican Republic)	0.6%	+/-0.6%
Central American	0.4%	+/-0.2%
South American	0.4%	+/-0.4%

Source: U.S. Census Bureau,
2015 American Community Survey Estimates

Chart 2

C16001. LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER - Universe:
POPULATION 5 YEARS AND OVER

	New Hanover County, North Carolina	
	Estimate	Margin of Error
Total (5 years and older)	29,247	+/-202
Speak English only or English very well	193,197	+/-2102
Speak a language other than English	16,050	+/-2135
Spanish	9,287	+/-1288
Other Indo-European languages	3,213	+/-1108
Other Asian or Pacific Island languages	2294	+/-1020
Other and unspecified languages	1256	+/-1046

Source: U.S. Census Bureau
2015 American Community Survey Estimates

Chart 3

B16006. LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER (HISPANIC OR LATINO) - Universe: HISPANIC OR LATINO POPULATION 5 YEARS AND OVER

	New Hanover County, North Carolina	
	Estimate	Margin of Error
Total:	10,621	*****
Speak only English	2,592	+/-1,080
Speak Spanish	8,029	+/-1080
Speak English "very well"	3,843	+/-930
Speak English "well"	1,363	+/-817
Speak English "not well"	2,389	+/-923
Speak English "not at all"	434	+/-561
Speak other language	0	+/-200

Source: U.S. Census Bureau
2015 American Community Survey Estimates

Appendix B – I Speak Cards

Kuv xav tau ib tug Hmoob
pab txbais Jus rau kuv.
I need a Hmong interpreter

or
2"llJ::{"."l"l c.13 :Jl":U Q"llJmJlJ⁶ ■
e!@ "l
I need a Lao interpreter

Turjumana afan Oromiff:1 en barbana.
**I need an Oromiffn
inter-pretet.**

Waxaan u baahnabay turjubaan
Somali ah.
I need a Somali interpreter.

Toi can thOng'4ch vien tieng Vi .
I need a Vietnamese interpreter.

ខ្ញុំត្រូវការអ្នកបកប្រែភាសាខ្មែរ
I need a Khmer interpreter.

MHe Jiy)KeH pyccJbru nepeBOJX'iKK.
I need a Russian interpreter.

Trebam pt-ęodioca srJ>sko-ht'Vatskog je:zik:i.
I need a Serbo-Croatian inteq>J-etel.

ecesito servicios de interprete
en espaiiol.
I need a Spanish interpreter.

انا احتاج مترجم عربي
I need an Arabic interpreter