

Eastern Connecticut Transportation Consortium, Inc. (ECTC) Limited English Proficiency Plan (LEP)

Access to Services by Persons with LEP

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Eastern Connecticut Transportation Consortium's 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; Federal Transit Administration Circular 47052.1A dated May 13, 2007, which states that the level and quality of transportation related services are provided without regard to 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 federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Plan Summary

Eastern Connecticut Transportation Consortium (ECTC) is the provider of transportation related services in eastern Connecticut. ECTC 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 ECTC. 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, and the ways in which assistance may be provided.

In order to prepare this plan, ECTC undertook the U.S. Department of Transportation (U.S.DOT) 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 encounter a ECTC program, activity or service.

The ECTC staff reviewed the American Community FactFinder Report 2016 Community Survey estimate and determined that there are approximately 389,111 individuals in eastern Connecticut (New London County, Windham County) [12.2% of the population] speak a language other than English. Of those 389,111 individuals 10.13% were Hispanic, 4.23% were Asian, and 3.52% were some other race

2. The frequency with which LEP persons come in contact with ECTC programs, activities or services.

The ECTC staff reviewed the frequency with which office staff, call takers and drivers have, or could have, contact with LEP persons. To date, ECTC has approximately 2 riders that request an interpreter when scheduling rides via telephone and have not had any requests in person for an interpreter.

3. The importance of programs, activities or services provided by ECTC to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for eastern Connecticut. The overwhelming majority of the population, 88%, speaks only English. 10.13% speak Spanish or Spanish Creole, ECTC staff is most likely to encounter LEP individuals through phone conversations, presentations and notifications of impacts on various transportation related services.

4. The resources available to ECTC and overall cost to provide LEP assistance.

ECTC staff reviewed its available resources that could be used for providing LEP assistance. ECTC utilizes the bi-lingual office worker to translate documents into a Spanish translation if needed. ECTC has staff that speak Spanish, French, and Creole,. Essentially other language translations would be provided through the telephone interpreter line for which ECTC would pay a fee.

Based on the four-factor analysis, ECTC developed its LEP Plan as outlined in the following section.

Limited English Proficiency LEP Plan Outline

How ECTC and staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past either at meetings or over the phone to determine whether language assistance might be needed at future events or meetings.

2. Have staff person greet participants as they arrive to ECTC sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Language Identification Flashcards available at ECTC meetings. This will assist ECTC in identifying language assistance needs for future events and meetings.

Language Assistance Measures

There are various ways in which ECTC staff responds to LEP persons, whether in person, by telephone or in writing.

- Post the ECTC Title VI Policy and LEP Plan on the agency website, www.ectcinc.com
- To the extent feasible assign bilingual drivers to vehicle runs serving groups with a high concentration of LEP riders
- To the extent feasible assign bilingual staff for community events and Board of Director meetings and on the customer service phone lines. We will survey drivers, office staff, and call takers in relation to their experience and contact with LEP persons during the previous year.

Staff Training

The following training will be provided to ECTC staff:

1. Information on ECTC Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests

Providing Notice to LEP Persons / Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents will be printed in an alternative language based on the known LEP population. Announcements will be posted on ECTC's website at www.ectcinc.com.

Monitoring and Updating the LEP Plan

ECTC will update the LEP as required by U.S.DOT. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the ECTC service area. Updates included the following:

- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed

- Determine whether local language assistance programs have been effective and sufficient to meet the needs
- Determine whether ECTC's financial resources are sufficient to fund language assistance resources as needed.
- Determine whether ECTC has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning ECTC's failure to meet the needs of LEP individuals.