

## **Kanawha Valley Regional Transportation Authority (KVRTA) Limited English Proficiency Plan**

This Limited English Proficiency (LEP) Plan has been prepared to address the Kanawha Valley Regional Transportation Authority's (KVRTA) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is 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.

KVRTA is the provider of public transportation in Kanawha County, West Virginia. KVRTA 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 KVRTA. 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,

KVRTA 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 eligible to be served or likely to be encountered in the service area;**

Most people in the KVRTA area are proficient in the English language. Based on the United States Census Bureau – 2016-2020 ACS Demographic, Housing and Language Spoken at Home Estimates data, 97.3% of the population speak only English or speak another language but speak English "well."

Only 0.63% of the populations over 5 years of age are not proficient in English. Of the 1,119 persons who speak English "less than very well"; 280 speak Spanish, 285 speak an Asian language, 268 speak an Indo/European language and 286 speak another language.

### **2. Frequency of Contact by LEP Persons with KVRTA Services**

The KVRTA staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. **To date, KVRTA has had no requests over the past three years for an interpreter or translation of information.** KVRTA averages over 150 phone calls per days requesting schedule or other information.

### **3. The nature and importance of programs, activities or services provided by KVRTA to the LEP**

There is no large geographic concentration of any type of LEP individuals in the KVRTA service area. The overwhelming majority of the service area population, 97.3%, speaks English, or speaks another language, but speaks English “well.” KVRTA staff only encounter during the past six years with an LEP individual was through a phone conversation concerning a public timetable which we were able to utilize another individual to translate the information and resolve the request.

### **4. The resources available to KVRTA and overall cost to provide LEP assistance**

KVRTA reviewed its available resources that could be used for providing LEP assistance and determined that if required KVRTA can/and will pay for any and all translation services. Train front line managers in the Authority’s Title VI Procedures and LEP responsibilities.

Based on the four-factor analysis, KVRTA developed its Language Assistance Plan (LAP) as outlined in the following section.

#### **KVRTA Limited English Proficiency Plan Outline**

How KVRTA staff may identify a 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 KVRTA sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available to KVRTA front line managers and vehicle dispatchers. This will assist KVRTA in identifying language assistance needs for future events, meetings and to assist vehicle operators in identifying specific language assistance needs of passengers.

#### **Language Assistance Measures**

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

- Post the KVRTA Title VI Policy and LEP Plan on the agency website, [www.Rideonkrt.com](http://www.Rideonkrt.com)
- To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

- Survey bus operators, front-office staff, dispatchers, annually and Operations Supervisors related to their experience and contact with LEP persons during the previous year.

### **Staff Training**

The following training will be provided to KVRTA staff:

1. Information on KVRTA 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, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Flyers shall be put in buses and transit stations in our service areas. Announcements will be posted on KVRTA's website and in the local newspaper.

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

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

- Determine the current LEP population in the service area.
- How the needs of LEP persons have been addressed.
- Determine 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 KVRTA's financial resources are enough to fund language assistance resources as needed.
- Determine whether KVRTA has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning KVRTA's failure to meet the needs of LEP individuals.

