

# LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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## Community Action Agency of Columbiana County, Inc. Community Action Rural Transit System

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Community Action Agency of Columbiana County, Inc. (CAA) 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 4702.1B, which state that no person shall be subjected to discrimination on the basis of 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 discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### Plan Summary

CAA is the grantee for Community Action Rural Transit System (CARTS) and 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 CARTS. 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, CARTS undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CARTS program, activity or service.
2. The frequency with which LEP persons come in contact with CARTS programs, activities or services.
3. The nature and importance of programs, activities or services provided by CARTS to the LEP population.
4. The resources available to CARTS and overall costs to provide LEP assistance.

A summary of the results of the CARTS four-factor analysis is in the following section.

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## Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CARTS program, activity or service.

LANGUAGE SPOKEN AT HOME		
Population 5 years and over	102,300	102,300
English only	100,003	97.8%
Language other than English	2,297	2.2%
Speak English less than "very well"	848	0.8%
Spanish	1,274	1.2%
Speak English less than "very well"	513	0.5%
Other Indo-European languages	661	0.6%
Speak English less than "very well"	175	0.2%
Asian and Pacific Islander languages	264	0.3%
Speak English less than "very well"	160	0.2%
Other languages	98	0.1%
Speak English less than "very well"	0	0.0%

At this time, no group represents a significant percentage of the county's population.

EDUCATIONAL ATTAINMENT		
Population 25 years and over	76,104	76,104
Less than 9th grade	2,470	3.2%
9th to 12th grade, no diploma	8,403	11.0%
High school graduate (includes equivalency)	35,831	47.1%
Some college, no degree	13,260	17.4%
Associate's degree	6,214	8.2%
Bachelor's degree	6,724	8.8%
Graduate or professional degree	3,202	4.2%
Percent high school graduate or higher	(X)	85.7%
Percent bachelor's degree or higher	(X)	13.0%

CARTS reviewed the 2010 U.S. Census Report and determined that 2,297 persons in Columbiana County [2.2 % of the population] speak a language other than English. In Columbiana County, 1696 persons [1.5%] have limited English proficiency; that is, they speak English "not well" or "not at all."

In Columbiana County, of those persons with limited English proficiency, 1,274 speak Spanish, 264 speak Asian and Pacific Island languages, 661 speak other Indo-European languages and 98 speak other languages.

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

CARTS assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. To date, CARTS has not had any record of clients that have LEP. However, translation services for Community Action Agency are provided by Organization Civica y Cultural Hispana Americana, Inc. (OCCHA). OCCHA is a non-profit organization located in Youngstown, Ohio which serves Hispanics and the community at large. Because of the small size of the LEP population, LEP involvement currently is infrequent and unpredictable.

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

The largest geographic concentration of LEP individuals in the CARTS service area are Spanish speaking. Services provided by CARTS that are most likely to encounter LEP individuals are the demand-response system which serves primarily senior and disabled persons. It is also possible that CARTS will encounter LEP individuals at the CARTS office where trips are scheduled and passes are sold. There is also a possibility that CARTS will encounter LEP individuals at local social service agencies where posters are displayed relating to transit events.

4. The resources available to CARTS and overall costs to provide LEP assistance.

CARTS assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that CARTS could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four-factor analysis, CARTS developed its LEP Plan as outlined in the following section.

### Limited English Proficiency (LEP) Plan Outline

#### **How CARTS 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, over the phone, to determine whether language assistance might be needed in the future.
2. Have a vehicle operators greet clients as they board the bus. By informally engaging participants in conversation it is possible to gauge passengers ability to speak and understand English.
3. Front-line staff, like dispatchers, office managers, and transportation supervisors, will utilize language identification cards when first encountering an LEP individual. These cards, developed

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by the US Census Bureau, have been translated into 38 different languages. This form is available in our office and can also be accessed at [www.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf)

### **Language Assistance Measures**

CARTS has language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which CARTS staff are able to respond to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on CARTS programs and services;
- Survey bus drivers and other front-line staff, like dispatchers, office managers, and transportation supervisors, annually on their experience concerning any contacts with LEP persons during the previous year;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service.

### **Staff Training**

The following training will be provided to CARTS staff:

1. Information on the CARTS Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

### **Outreach Techniques**

When staff prepares a document, for which the target audience is expected to include LEP individuals, the documents will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

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

CARTS will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the newest U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the CARTS service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- 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

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- Determine whether CARTS financial resources are sufficient to fund language assistance resources needed
- Determine whether CARTS has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning CARTS failure to meet the needs of LEP individuals

### **Dissemination of the CARTS LEP Plan**

A link to the CARTS LEP Plan and the Title VI Procedures is included on the CARTS website at [www.cartsonline.org](http://www.cartsonline.org).

Any person or agency with internet access will be able to access and download the plan from the CARTS website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which CARTS will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Community Action Agency of Columbiana County, Inc., Transportation Director or Mobility Manager:

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