

## Limited English Proficiency (LEP) Plan Dodge City Public Transportation

The intent of Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” (65FR 50121) is to reduce language barriers and improve access to programs receiving federal funds, especially by persons who are limited in their English proficiency. As a federally funded program, the Dodge City Public Transportation Program will identify barriers to LEP individuals and implement a language assistance plan which will reduce language barriers and enhance access to our services by persons with Limited English Proficiency.

### Four Factors Analysis for Dodge City and Ford County

1. Number and Proportion of LEP individuals who can utilize the service provided by Dodge City Public Transportation.

Information obtained from the American Community Survey (ACS) 2020 shows the Limited English Proficiency (LEP) Population Groups residing in Ford County. All of the following information comes from the ACS 2020 survey. The 6,565 Spanish speakers who speak English “less than very well” represent 21% of the Ford County population and meets the criteria for providing written translations of all materials. There are an additional 349 people who speak nine different languages and English “less than very well”, but as each is a small number none of those fit the criteria requiring written translations of materials. We do, however, encounter these persons as we provide Public Transportation services, and our LEP Plan is developed with them in mind as well as the many Spanish speakers.

2. Identify the frequency in which LEP individuals come into contact with our Public Transportation Program.

Spanish speakers with limited English proficiency make up 21% of the Ford County population. Hispanics (both those who speak English very well and less than very well) made up approximately 40% of our ridership. We know from experience that many have limited English proficiency.

While no other population or language group meets the LEP threshold for mandatory translation of all materials, we do encounter many individuals with limited English proficiency. Two large beef processing plants employ about 6,000 workers and recruit internationally to fill these positions. Many new immigrants with limited English proficiency come to our community for these jobs, and many choose to ride our buses.

3. Identify the importance of our Public Transportation service to the LEP community.

As new immigrants to the United States, and new job holders in our community, many LEP individuals have neither driver’s licenses nor cars. They are very public transit dependent. As time passes, many of these individuals acquire cars or at least a network of friends with whom they can carpool. Even then they may be transit dependent because a family (2 adults plus children) might have just one car. In such cases, either one adult might need public transportation to get to work, or the other adult and children might need public transportation for shopping and medical appointments. Both data and anecdotal evidence tells us that public transportation is very important to the LEP community.

4. Identify resources available for assisting LEP individuals and the respective costs of these resources.

Resources for Spanish Speakers: Spanish is the most common language spoken by our LEP population and meets the Title VI threshold requiring that translations be available in Spanish. Therefore, we have developed a number of different resources.

- Translations: All essential documents are available in English and Spanish, including:
  - Passenger Policies and Guidelines
  - All notices posted on buses
  - Title VI Notice, Complaint Form and Complaint Procedures

Cost: For documents requiring translation, we utilize bilingual staff at City Hall. While there is a cost (staff time), the Public Transportation Program is not billed for this work.

- Bilingual Staff: Four of our part-time staff are bilingual in English and Spanish. When communication difficulties arise, drivers use cell phones to get the assistance from bilingual employees. When recruiting new drivers our job advertisement notes that "bilingual skills are strongly preferred but not required". We contract with Finney County Transit to provide Dispatch services, so they encounter each of the LEP clients when reservations are taken. FIT has two dispatchers who are bilingual and utilize various other resources for understanding LEP clients.

Cost: Bilingual staff members in Dodge City are paid up to 10% over base salary because of this important skill. There is also a cost in terms of the time these staff members spend dealing with communication difficulties encountered by staff members who do not have bilingual skills. Finney County Transit bills us (and KDOT) for all the extra time it takes to work with LEP clients due to communication difficulties. However, there is no way to know what portion of the cost is related to communication with LEP clients.

Resources for Speakers of other Languages: because there are persons in our community who speak different languages (neither English nor Spanish) we have identified a resource we can utilize to assist when working with these clients.

- Pay as You Go Personal Interpreter Service: An additional resource we can utilize for simultaneous telephone translation in any language is the Pay- as-You-Go Interpreter Service provided by Language Line ([www.language.com](http://www.language.com)). When an LEP client calls our office (or Dispatch), this service can be utilized by calling their number and asking for a specific language interpreter. The interpreter joins in a 3-way telephone conversation and provides simultaneous translation between the caller and our staff. This resource can be especially valuable with LEP clients who speak a language other than Spanish, because we have no staff members who speak languages such as Arabic, Somali, or Laotian. It is possible to have documents translated if needed.

Cost: \$3.95 per minute which KDOT has determined can be charged to the 5311 grants as an operating cost.

### Limited English Proficiency Plan

Identified LEP Individuals Spanish is the only language group which meets the threshold to require written translations of all documents.

Language Assistance Measures In order to meet the needs of all LEP populations we will take the following steps.

For LEP Spanish Speakers: We will take the following actions:

- Translate all documents into Spanish, utilizing City Hall staff when possible and hiring professional translators when necessary. This includes:
  - Passenger Policies and Guidelines



- All notices posted on buses
  - Title VI Notice, Complaint Form, and Complaint Procedures
- Use Google Translate to enable our website to be translated and presented in Spanish.
- Make every effort to recruit and hire bilingual staff who speak Spanish
- Work with Finney County Transit to assure that Dispatchers can work effectively with LEP Spanish Speakers.
- Utilize Pay-As You-Go Personal Interpreter and Translation Service ([www.languageline.com](http://www.languageline.com)) when necessary.

**For LEP Speakers of Other Languages:**

- Use Google Translate to enable LEP individuals to translate our Website information into their native language.
- Utilize Pay-As-You-Go Personal Interpreter and Translation Service ([www.languageline.com](http://www.languageline.com))
- Utilize "I Speak" cards (see attached) to help identify the language being spoken by our LEP client, recognizing that our only resource for helping them will be the Pay-as-You-Go Personal Interpreter service. Many times, they will bring another member of their language community who speaks English well and who can help interpret for us.

**Training Staff** – Identify how agency staff will be trained in utilizing language assistance measures.

- Our Administrative Staff will be trained in how to utilize the Pay-As-You-Go Interpreter service.
- We will collaborate with Finney County Transit regarding Dispatch staff communication skills with all LEP language groups.

**Providing Notice** - Identify how Dodge City Public Transportation will provide notice of the LEP plan and the Title VI procedures.

- LEP Plan will be posted on Dodge City Public Transportation website.
- LEP Plan will be provided to any person or agency requesting a copy.
- The person to contact in regard to the LEP plan is Brenda Cecil-Martinez, Public Transportation Supervisor, and can be reached at 620-225-8119 or [brendam@dodgecity.org](mailto:brendam@dodgecity.org)
- On our website we will post complaint procedures

**Monitoring and Updating LEP Plan** - Dodge City Public Transportation Program will take the following actions to monitor and update the LEP Plan:

- At a minimum, our agency will update the LEP Plan every three years as required by the Title VI update schedule.
- We will examine the LEP Plan annually as new drivers are being hired and trained in order to assure we are carrying out the plan to the fullest extent.
- If large number of LEP individuals present us with new challenges (e.g. a new language is introduced into the community), we will examine the LEP Plan to determine if any changes might be necessary, or any resources might be utilized which we had not known about previously.