

Limited English Proficiency Plan
KI BOIS Community Action Foundation Inc.
KI BOIS Area Transit System
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Introduction

This *Limited English Proficiency Plan* has been prepared to address the KI BOIS AREA Transit System responsibilities as a recipient of federal financial assistance as a relate to the needs of individuals with limited English proficiency language skills. The plans has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq, and it' s implementing regulations 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 agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This applies to all state and local agencies which receive federal funds, including all KI BOIS Area Transit Systems departments receiving federal grant funds.

Plan Summary KI BOIS Area Transit Systems

The KI BOIS Area Transit Systems has developed this ***Limited English Proficiency Plan*** to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined 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, the KI BOIS Area Transit Systems used the four- factor LEP analysis which considers the following factors:

1. The number of proportion of LEP persons in the service area who may be served by the KIBOIS Area Transit Systems.
2. The frequency with which LEP persons come in contact with KI BOIS Area Transit Systems services.
3. The nature and importance of services provided by the KI BOIS Area Transit Systems to the LEP population.
4. The interpretation services available to the KI BOIS Area Transit Systems and overall cost to provide LEP assistance. A summary of results of the four-factor analysis is in the following section.

Meaningful Access: Four-Factor Analysis

1. The name or proportion of LEP persons in service area who may be served or are likely to require KI BOIS Area Transit Systems services.

The KI BOIS Area Transit Systems staff reviewed the 2010 U.S. Census Report and determined the total eligible population for the KIBOIS service area 390,799. The proportion of individuals indicating that they speak English less than "very well" in KIBOIS service area was 6,615.

KI BOIS Area Transit Systems service area is defined by 12 Counties of Oklahoma as listed below.

1. Adair County
2. Cherokee County
3. Haskell County
4. Hughes County
5. Latimer County
6. Leflore County
7. McIntosh County
8. Okfuskee County
9. Okmulgee County
10. Pittsburg County
11. Sequoyah County
12. Wagoner County

Out of the 12 Counties there were 3 Counties that meet the LEP requirement (5%+or 1000+)

Geography	Estimate	Speak English "very well"	Speak English less than "very well" by percentage	Speak English less than "very well" over 1,000 population
Cherokee County, Oklahoma	43099	97.3	2.7	1,164
Le Flore County, Oklahoma	46345	96.8	3.2	1,483
Wagoner County, Oklahoma	65396	98.2	1.8	1,177

The proportions of population speaking languages other than English are presented in the table below.

	VC04	VC05	VC06	VC07
	Speak a language other than English	Speak a language other than English	Speak a language other than English	Speak a language other than English
	Spanish or Spanish Creole	Other Indo-European languages	Asian and Pacific Island languages	Other languages
	HC01	HC01	HC01	HC01
	Total	Total	Total	Total
GEO.display-label	EST	EST	EST	EST
Geography	Estimate	Estimate	Estimate	Estimate
Le Flore	5.1	0.3	0.5	0.4
Wagoner	3.4	0.6	1.2	0
Cherokee	3.6	0.4	0.7	2.3

The most significant non-English language population is Spanish.

2. The frequency with which LEP persons come in contact with KI BOIS Area Transit Systems services.

The KI BOIS Area Transit Systems staff reviewed the frequency with which the board/council, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the KI BOIS Area Transit Systems has had no requests for Interpreters and no requests for translated program documents. The board/council, office staff and bus/van drivers have has very little contact with LEP persons.

3. The nature and importance of services provided by the KI BOIS Area Transit Systems to the LEP populations.

There is no large geographic concentration of any type of LEP individuals in the service area for the KI BOIS Area Transit Systems. The overwhelming majority of the population speak only English. However, a few services areas meet the threshold of 1000+ population. The KI BOIS Area Transit Systems goal is to improve the independence and quality of life for all individuals including economically disadvantaged persons, minority populations, limited English speaking persons and other underserved populations by providing adequate and efficient transportation to services in rural areas.

4. The Resources available to the KI BOIS Area Transit Systems and overall costs to provide LEP assistance.

The KI BOIS Area Transit Systems reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the city would pay a fee.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to KI BOIS Area Transit Systems services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the KI BOIS Area Transit Systems staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All KI BOIS Area Transit Systems staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the KI BOIS Area Transit Systems sponsors an informational meeting or events, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, as staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and

understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage in the KI BOIS Area Transit Systems of LEP individuals, that is, persons who speak English “not well” or “not at all”, it will strive to offer the following measures:

1. The KI BOIS Area Transit Systems staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Volunteer interpreters for Spanish language are available and will provide within a reasonable time period.
 - Language interpretation will be accessed for all other languages through a telephone interpretation service.

Staff Training

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEPP complaint.

All contractors or subcontractors performing work for the KI BOIS Area Transit Systems will be required to follow the Title VI/LEP guidelines.

Translation of Documents

The KI BOIS Area Transit Systems weighed the cost and benefits of translating documents for potential LED groups. Considering the expense of translating the documents, the likelihood of frequent changes in document and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, the KI BOIS Area Transit Systems does not have a formal outreach procedure in place, as of 2010. Translation resources have been identified and are limited in the region. However, when and if the need arises for LEP outreach, the KI BOIS Area Transit Systems will consider the following options:

- When staff prepares a document, or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Monitoring

Monitoring and Updating the LEP Plan - KI BOIS Area Transit System will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated from the 2010 U.S. Census if it shows concentrations of LEP individuals are present in the KI BOIS Area Transit Systems 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.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the KI BOIS Area Transit Systems financial resources are sufficient to fund language assistance resources needed.
- Determine whether the KI BOIS Area Transit Systems fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaints log, including LEP to determine issues and basis of complaints.

Dissemination of the KI BOIS Area Transit Systems LEP Plan

- Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at 800-289-7228.