Senior Resources Development Agency, Pueblo, Inc.

LEP Educational Packet
LIMITED ENGLISH PROFICIENCY PLAN

May 2013

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for Senior Resource Development Agency (SRDA) has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person shall “on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conduct and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for Senior Resource Development Agency (SRDA) has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

II. POLICY

It is the policy of Senior Resource Development Agency (SRDA) to ensure that our programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus do not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. SRDA will, to the maximum extent feasible in its official deliberations and communications, community outreach and related notifications, provide appropriate alternative non-English formats for persons with LEP to access information and services provided.

III. LIMITED ENGLISH PROFIENCY NEEDS OF AREA
The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have with LEP persons in providing transit services. Each of these elements is addressed below.

**Factor 1. Number and Percentage of LEP Persons in Our Area**

1. **Permanent Population**

   **TABLE 1 - Individuals Speaking English "Not Well" or "Not at All"**

<table>
<thead>
<tr>
<th>Data Category</th>
<th>Pueblo County</th>
<th>Pueblo</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total #</td>
<td>%</td>
</tr>
<tr>
<td>Total Population (5 years old &amp; older)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>147,482</td>
<td>100%</td>
</tr>
<tr>
<td>Population Speaking English &quot;Not Well&quot; or &quot;Not at All&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2,563</td>
<td>2%</td>
</tr>
<tr>
<td>Population Speaking English &quot;Not Well&quot; or &quot;Not at All&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spanish</td>
<td>2,240</td>
<td>87%</td>
</tr>
<tr>
<td>Other Indo-European</td>
<td>109</td>
<td>4%</td>
</tr>
<tr>
<td>Asian and Pacific Islander</td>
<td>199</td>
<td>8%</td>
</tr>
<tr>
<td>Other</td>
<td>15</td>
<td>1%</td>
</tr>
<tr>
<td>Total</td>
<td>2,563</td>
<td>100%</td>
</tr>
</tbody>
</table>

Source: U.S. Census American Community Survey 2007-2011 estimates, population 5 years old and older, speaking another language at home, who speak English "Not well" or "Not at All."

According to the table, Pueblo and Pueblo County reflects a small percent of population of Speaking English “Not Well or “Not at All”, 2% in Pueblo County and 2% in Pueblo with a total population of 5 years and older of 147,482 for Pueblo County, with 87% Spanish speaking individuals, 4% other Indo-European, 8% Asian and Pacific islanders and 1% listed as Other for Pueblo County. City of Pueblo’s total population of 5 years old and older of 99,275 with 86% Spanish speaking individuals 5% other Indo-European, 7% Asian and Pacific islanders and 1% listed as other for City of Pueblo.

2. **Visitor Population**

   SRDA will work closely with Pueblo Chamber of Commerce and Pueblo County Government to obtain data regarding visitor information, which is track by zip codes at Pueblo events such as annual Chile Festival. This information is gathered and sent to Pueblo County GIS department.
3. **Summary**

A LEP population for Pueblo and Pueblo County according to the data, only 2% of the population speaking English “Not well or Not at All”. for Pueblo County, with 87% Spanish speaking individuals, 4% other Indo-European, 8% Asian and Pacific islanders and 1% listed as other for Pueblo County. City of Pueblo’s total population of 5 years old and older of 99,275 with 86% Spanish speaking individuals 5% other Indo-European, 7% Asian and Pacific islanders and 1% listed as other for City of Pueblo.

**Factor 2 & 3 Nature, Frequency and Importance of LEP Contact**

1. **Nature of Contact**

SRDA Transportation provides the following transit services:

- Specialized Demand response
- Curb- to- Curb Transportation Service for seniors with or without disabilities within the city of Pueblo and all of Pueblo County.

Contact with LEP individuals can vary from day-to-day. SRDA works closely with the public, the day-to-day contact is made from the beginning at application and can continues from telephone calls, dispatcher, driver, and possibly between the client and driver at time of pick up with family members or clients. SRDA has 12 vans in operation and all vans will have Spanish/English notice regarding how to file a compliant with contact information listed.

2. **Frequency of Contact**

The frequency of contact such as identifying or targeting potential LEP population in our service area will need to be addressed; we plan on conducting surveys, evaluations for our clients to determine frequency of contact with LEP populations.

3. **Importance of Contact**

SRDA rates the importance of contact with LEP person very high, we have Title VI notice on all our vans and have our material in Spanish when requested it can be done. Several of our driver’s speak Spanish.

Attached will be a copy of the English Notice regarding Title VI.

**Factor 4. Resources Available for LEP Outreach**

SRDA will utilize resources as follows:

- Current Spanish speaking employees, drivers, dispatchers
- Technology such as English/Spanish translation application
Identify other County agencies who serve LEP persons
d. Spanish material forms such as complaint forms, public notices and brochures

IV. LANGUAGE ASSISTANCE PLAN

Identifying LEP Persons Who Need Language Assistance

When it come to identifying potential future needs of our transit program will be focus on the following:

- Review Census category information
- Review needs with our drivers/dispatchers
- Review survey information

Utilizing agencies with access to Geographic Information System (GIS) mapping software can produce maps showing where the LEP population is concentrated. These maps can also display an agency’s routes and facilities over the map highlighting concentrations of LEP persons. Chamber of Pueblo collect zip codes of visitors, we will work with the Chamber to access their data base.

Identify Language Assistance Measures

We will identify Language Assistance Measures by the following:

- Utilizing our current Spanish Speaking employees as drivers, dispatchers, and customers service
- Spanish versions of material and notices
- Research
- Technology
- Partnering with Pueblo County LEP ready agencies

Training

SRDA’s training will consist of the following:

- Staff and driver/dispatcher training regarding procedures to follow, chain of command, and complaints
- Implementing technology to assist with translation as needed
- Better understanding of the LEP Handbook
Outreach

SRDA will conduct outreach efforts if a route changes by compiling flyers, posting in vans, conducting meetings, and by telephone contacts.

Monitoring and Updating Plan
We will monitor and update our plan every 3 years, as needed or recommended by staff, clients LEP handbook.

Disseminating Our LEP Plan
We will disseminate our plan on our web site and provide copies when requested.
Questions to Gather LEP Data:

1. What geographical area do the LEP users come from on your routes?

________________________________________________________________________
________________________________________________________________________

2. How many LEP users board your services on a daily basis?

________________________________________________________________________
________________________________________________________________________

3. How many times a day do the LEP users board your service? For example: once in the morning, once in the evening for a total of twice a day the LEP users board the services vs. all day due to deliveries to the hospital.

________________________________________________________________________
________________________________________________________________________

4. On average, how often do you assist customers with Limited English Proficiency?

_____ times per:  □ Day          □ Week          □ Month          □ Year

5. Check all languages that you encounter:

□ Spanish          □ German      □ Russian          □ Asian        □ Unknown      □ Other

6. Have you ever received requests for translation or interpretation assistance?

□ Yes                        □ No

If YES, please check any that apply.

□ In-person         □ Co-worker         □ Quick Guide
□ Telephone         □ Dispatcher         □ Other

7. Have you ever received comments or feedback concerning the need to translate route schedules?

□ Yes                           □ No

8. Do your LEP users board your services for:

Work  □ Yes      □ No  Day Care □ Yes      □ No

Health □ Yes      □ No  Senior Services □ Yes      □ No

Grocery Store □ Yes      □ No

Entertainment/Learning □ Yes      □ No

Other: ___________________________________________________________
In accordance with provisions of the Americans with Disabilities Act and the Civil Rights Act of 1964, SRDA Programs do not discriminate on the basis of disability, race, color, national origin, or gender.

Any person who believes he/she or any specific class of persons is subjected to discrimination prohibited by Title VI may by him/herself or by a representative file a written complaint with SRDA’s Human Resource Office: and/or the Federal transit Administration. All complaints will be promptly investigated.

To request additional information of the SRDA Programs nondiscrimination obligation contact:

Jamie Duran
Human Resource Director
(719) 553-3419
jamie@srda.org
SRDA
230 N. Union Avenue
Pueblo, Colorado 81003

Information in languages other than English will be provided as needed and will be consistent with DOT LEP Guidance.