Limited English Proficiency Analysis – Regional Planning Affiliation 1 (RPA 1)

The purpose of this Limited English Proficiency (LEP) analysis is to outline how the Regional Transit Agency (RTA) in RPA 1 identifies persons who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. 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. The following analysis gives a detailed view of the LEP population in the region and ways to assist that population.

This LEP analysis will utilize the framework of the U.S. DOT's four-factor LEP analysis, which considers the following elements:

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

The number or proportion of LEP persons in the region who may be served or are likely to encounter a public transportation program, activity, or service:

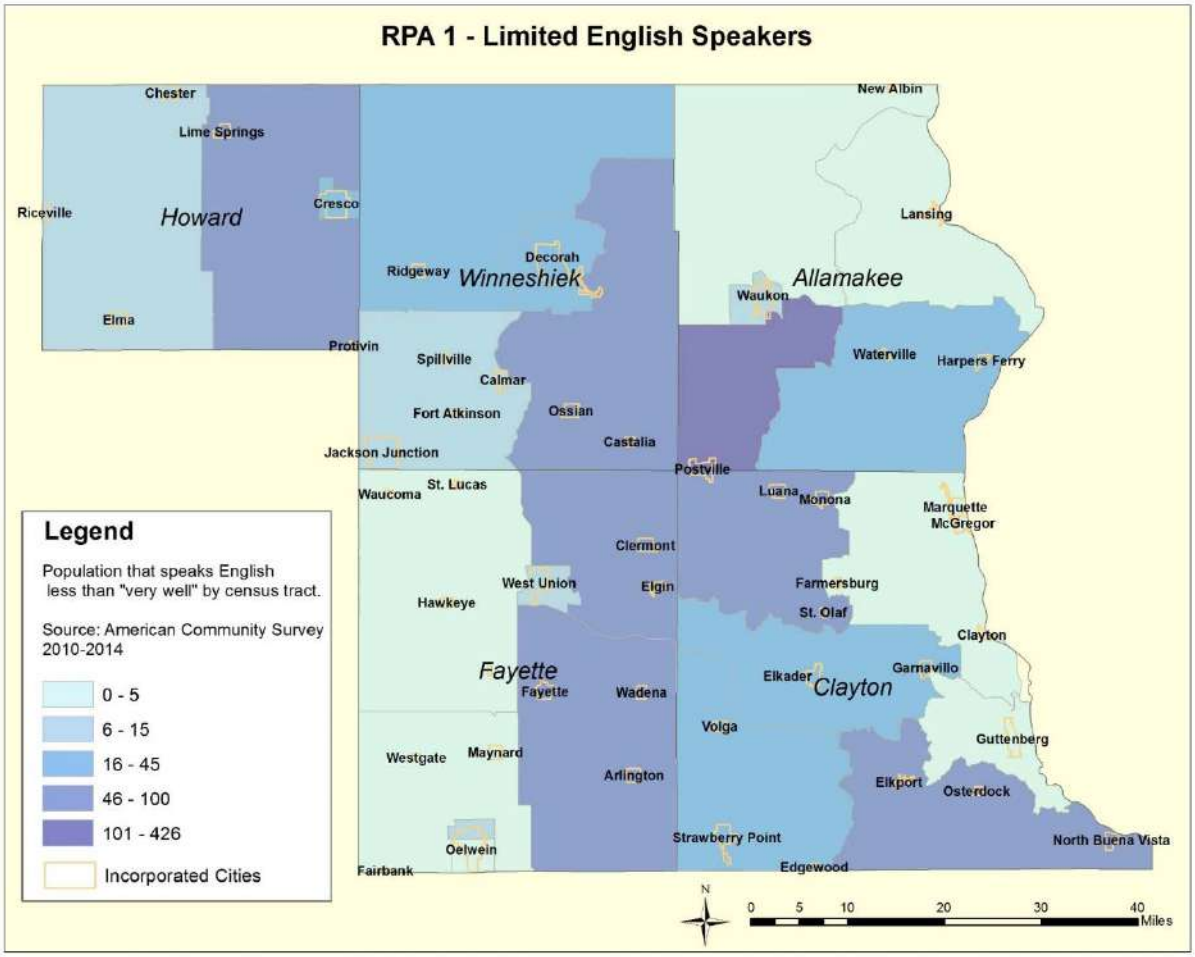
The 2010-2014 American Community Survey estimates were utilized to determine what percentage of the area's population could be considered LEP. For the purposes of this analysis, persons five (5) years and over that speak a language other than English at home, and that speak English "less than very well," were considered to be LEP. The following table shows the number of people for each county meeting this definition.

RPA 1 – Non-English Speaking Population

County:	Total County Population (5 Yrs. And Over)	Speak English "Less Than Very Well" (No. of Individuals)	Speak English "Less Than Very Well" (% of Population)
Winneshiek	19,984	122	0.61%
Allamakee	13,291	459	3.45%
Howard	8,873	134	1.51%
Clayton	16,850	223	1.32%
Fayette	19,430	175	0.9%
Total RPA 1 Population	78,428		
Total RPA 1 - LEP Population		1,113	
Total RPA 1 - LEP Population (%)			1.42%

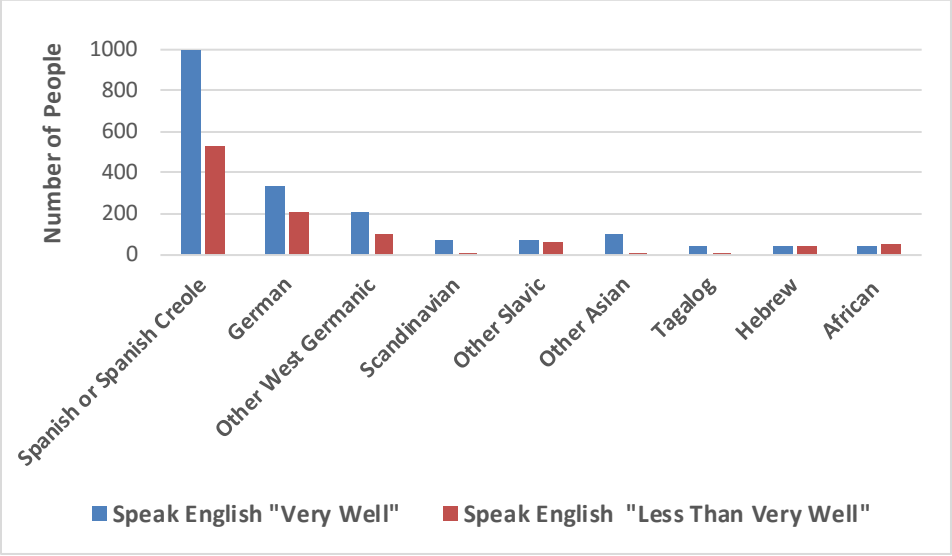
Source: U.S. Census Bureau, 2010-2014 American Community Survey

The map below shows the number of individuals who speak another language and speak English less than "very well" by census tract.



The chart below shows languages other than English spoken in the region by at least 50 people, as well as the number of people for each language that speak English "very well", and less than "very well."

RPA 1 – Languages Most Spoken Other Than English



Source: U.S. Census Bureau, 2010-2014 American Community Survey

As shown on the table, map, and chart, the number of LEP persons in the region is very low. Spanish, German, and other West Germanic languages are the most likely languages to be spoken by LEP persons in the region. The map on the previous page shows areas in the region where there are concentrations of LEP persons. Areas around the community of Postville, Iowa in Allamakee County have the highest portion of non-English speakers. Spanish is the predominant language among those individuals.

The frequency with which LEP persons come in contact with public transportation programs, activities, or services:

Northeast Iowa Community Action Corporation (NEICAC) – Transit is responsible for transit administration, operations and coordinating the region's transit services. NEICAC-Transit has seen limited demand for transit services from LEP individuals in the past, with use by such individuals limited to only a few times per year according to NEICAC staff. Further, NEICAC – Transit has received few requests for interpreters or translated documents in the service area. Upper Explorerland Regional Planning Commission (UERPC) provides transportation planning and technical assistance for RPA 1. UERPC has found transportation related inquiries from LEP individuals to be limited as well.

The nature and importance of programs, activities, or services provided by public transportation providers to the LEP population:

There is no large geographic concentration of LEP individuals in the UERPC region. The majority of the population over 5 years of age (77,315 of 78,428 people, or 99%) speak only English, or speak another language but speak English "very well". As a result, there is a lack of transit activities within the RPA 1 service area that focus on outreach to LEP individuals. However, the RTA has identified methods for accommodating LEP transit users should the need arise. EARL Public Transit is the public transit provider for the region and accommodates LEP persons in the following ways:

1. Provides service to all citizens in the region.
2. Offers regularly scheduled in-town service, regularly scheduled county trips, contracted service, and special request (cab) service.
3. Provides service in both urban and rural areas.
4. Provides service during the work week and on the weekend.
5. Provides flexible pick-up/ drop-off locations.
6. Provides transit brochures in both English and Spanish.
7. Has staff fluent in Spanish able to assist with interpretation as needed.
8. Provides the option of a dial-in interpretation service.

In addition, UERPC subscribes to Language Services Associates, a dial-in language assistance service. The service was used three times over the course of a year, from 2015-2016.

The resources available to public transportation providers and overall costs to provide LEP assistance:

As described above, the current resources available for NEICAC – Transit with regards to providing LEP assistance include having staff available to interpret for Spanish speaking transit users (the predominant non-English language spoken in the region), providing the option of a dial-in interpretation service to accommodate a greater variety of non-English language speakers, and providing transit documents in Spanish.

In addition, resources available to the RPA 1 transit agency in the future to assist in better accommodating and engaging LEP persons include:

1. Take an inventory of available organizations that the transit agency could partner with for outreach and translation efforts.

2. Consider opportunities for staff and vehicle operating training with regards to responding to the needs of LEP persons.

3. Establish methods for identifying LEP persons who need language assistance, such as:

    a. Review meeting and phone inquiry records to determine whether language assistance has been requested and may be needed at future transit agency events.
    b. Drivers and dispatchers may be surveyed annually on their experience concerning any contact with LEP persons during the previous year.

4. As necessary, develop additional outreach procedures, such as:

    a. Provide additional website documents in Spanish. Address the translation of transit publications into other languages as required.
    b. When notice of a public hearing is posted agendas will include a statement that assistance is available for LEP persons.

5. Continue to monitor and update efforts to accommodate LEP persons as required or needed. The following elements will help the RTA determine if its LEP efforts are adequate, or if additional steps may need to be taken:

    a. The number of documented LEP person contacts encountered annually.
    b. How the needs of LEP persons have been addressed.
    c. Monitor the LEP population in the service area.
    d. Determine whether the need for translation services has changed.
    e. Determine whether local language assistance programs have been effective and sufficient to meet the need.
    f. Determine whether the transit system's financial resources are sufficient to fund language assistance resources needed.
    g. Determine whether the RTA has made progress in completing their LEP goals.
    h. Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.