



City Policy #11.8

**LIMITED ENGLISH
PROFICIENCY
PROCEDURES MANUAL**

FOR

CITY OF NEW CASTLE

2019

TITLE VI DOCUMENTATION LIMITED ENGLISH PROFICIENCY (LEP) PLAN

As Part of the FY 2019 Title VI Update

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for the City of New Castle Transportation System (NCTransit) has been developed in accordance with 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 and titled, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..."

As a recipient of funds from the Federal Transit Administration (FTA), this Limited English Proficiency (LEP) Plan for NCTransit has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of persons 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. The City of New Castle is the only geographic area that NCTransit serves.

II. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the following:

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

Each of these elements is addressed below.

A. Four-Factor Analysis

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

U.S. Census Data

The U.S. Census provides information to assist in estimating the number of limited English speakers in the permanent population. Table 1 presents information for the City of New Castle on *New Castle Total Language*, based on the year 2011 Census Data. Per review of 2011 Census Data by City of New Castle Coordinator, it was determined that 552 persons (0.019% of Total Population 5yrs&5yrs+) in New Castle speak a language other than English. Of those 552 persons, 202 speak English less than “very well”. In New Castle, of those persons that speak English less than “very well”, 190 speak Spanish, 12 speak French.

TABLE 1

		New Castle	
		%	#
	Total Population	100.00%	28338
	Pop. Speaking Only English	98.05%	27786
Spanish or Spanish Creole:	Speak English less than "very well"	1.93%	190
French (incl. Patois, Cajun):	Speak English less than "very well"	0.02%	12

SOURCE: US CENSUS- B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION
5 YEARS AND OVER: FROM 2011 CENSUS.

Data Analysis from review of the 2011 U.S. Census report indicate there are low numbers and percentages of LEP persons within the City of New Castle (NCTransit service area). The largest group of LEP who spoke English less than “very well” was Spanish speaking and they make up only 1.93 % of the total population that are 5 years old and older.

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

NCTransit surveyed office staff, dispatchers and bus drivers to determine the frequency with which they have or could have contact with LEP persons. This includes documenting phone inquiries, visits to NCTransit headquarters, surveying NCTransit vehicle operators, the management team, dispatchers, and those who access the NCTransit web site. The office staff and dispatchers have not had any calls from LEP persons requesting an interpreter or any other information to date. The survey of NCTransit drivers indicated that they have had contact with an average of 1400 riders a week (280 a day). No riders were reported to speak english "less than very well".

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

There is no large geographic concentration of any type of LEP individuals in the NCTransit service area. The overwhelming majority of the population, 98.05%, speaks only English. As a result, there are few social, service, or professional organizations within the NCTransit service area that focus on outreach to LEP persons. Services provided by NCTransit that are most likely to encounter LEP persons are the fixed bus route NCTransit system which serves the general public and the on demand response. All of the above services could be of particular importance to the LEP population.

4. The resources available to NCTransit and overall cost to provide LEP assistance.

NCTransit reviewed its available resources that could be used for providing LEP assistance, 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 could be partnered with for outreach and translation efforts. Since Spanish speaking LEP persons are, by far the largest group that speak English less than "very well" in New Castle, most of NCTransit resources and assistance are directed toward them. The City of New Castle Community Development has access to an interpreter that speaks Spanish that NCTransit can utilize if the need arises.

III. 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 the NCTransit programs and activities. 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. NCTransit will determine when interpretation and/or translation are needed and are reasonable. How the NCTransit staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- NCTransit' staff should become familiar with *Language Line Services* at <http://www.language.com>. Also, a Translation Service at <http://www.languagemarketplace.com/13-indianapolis-translation-services.html>.
- When NCTransit sponsors an event, have a staff person 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.
- Have "*I Speak*" *Language Identification Cards* available at NCTransit events near the registration table. Individuals self-identifying themselves as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have "*I Speak*" *Language Identification Cards* available at the customer service desk and easily accessible to lead drivers, supervisors, dispatchers and schedulers as needed.
- Post notice of LEP Plan and the availability of "*I Speak*" *Language Identification Cards* on the City of New Castle web site.
- Vehicle operators and other front-line staff, like lead drivers, supervisors, dispatchers and schedulers will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

A. Language Assistance Measures - Although there is a very low percentage of LEP individuals in the City of New Castle, that is, persons who speak English less than "very well", NCTransit will strive to offer the following measures:

1. NCTransit Title VI Policy and the NCTransit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. There are a few resources available to NCTransit to accommodate LEP persons.
 - i. Language assistance services available on websites.
 - ii. The New Castle High School foreign language department
3. If a client asks for language assistance and NCTransit determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, NCTransit will provide the language assistance in the LEP client's preferred language. NCTransit has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
4. NCTransit will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
5. There are online translation services available online however there is a fee involved for the service.

6. When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance at one or more of the available resources identified under Section 3.A.2.

IV. STAFF TRAINING

The following training will be provided to NCTransit staff:

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

Information will be distributed to all NCTransit staff and posted on the City of New Castle website, www.cityofnewcastle.net

V. TRANSLATION OF DOCUMENTS

- Due to the very small local LEP population, NCTransit does not have a formal outreach procedure in place, as of 2019. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, NCTransit 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.

VI. FORMAL INTERPRETERS

- When necessary to provide meaningful access for LEP clients, NCTransit will provide qualified interpreters, including any bilingual staff of the City of New Castle, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- NCTransit may require a formal interpreter to certify to the following:
 - a.** The interpreter understood the matter communicated and rendered a competent interpretation.
 - b.** The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
 - c.** Bilingual City employees, when available, can provide limited assistance to NCTransit staff and LEP clients as part of their regular job duties.

VII. INFORMAL INTERPRETERS

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. City staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the City. If possible, NCTransit/City should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after NCTransit has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
- If an LEP client wants to use his or her own informal interpreter, NCTransit reserves the right to also have a formal interpreter present.

VIII. OUTSIDE RESOURCES

- Outside resources may include community volunteers
- Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

IX. MONITORING

Monitoring and Updating the LEP Plan- NCTransit will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed when it is clear that higher concentrations of LEP individuals are present in the NCTransit 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 transit system's financial resources are sufficient to fund language assistance resources needed.
- Determine whether NCTransit 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.

X. DISSEMINATION OF THE NCTransit LEP PLAN

- A link to the NCTransit LEP Plan and the Title VI Plan will be included on the City of New Castle website
- Any person or agency with Internet access will be able to access and download the plan from the City of New Castle 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 NCTransit will provide, if feasible.

- Questions or comments regarding the LEP Plan may be submitted to NCTransit, 227 North Main Street, New Castle, IN 47362



DOCUMENT TRANSLATION REQUEST FORM

USE OF FORM: This form should be used to request translation of City of New Castle documents / records. Translation time will vary depending on the length of the document you are requesting. The City of New Castle will accommodate reasonable requests for translation and translation of our vital documents.

TRANSMITTAL: Please complete this form and deliver it by mail or e-mail to:

Christy Asberry, ADA/Title VI Coordinator
227 North Main Street
New Castle, Indiana 47362
Email: newcastlecoordinator@gmail.com

Date:	Name of person requesting translation:	E-mail address:	Phone number:
County:	Street Address:	City / State:	Zip Code:
What language are you requesting translation into: (Please include specific dialect / region if applicable.)			
Please Identify the Documents you are requesting New Castle to translate: <i>Please use the back of this form if additional information is required.</i>			
CITY USE ONLY:	Date Request Received:	Received by:	
Pages / Cost:	Date Provided:	Received for record by Title VI Coordinator: (sign)	

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|--|------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p> | 1. Arabic |
| <input type="checkbox"/> <p>Խոսողո՞ւմ ե՞սք նշո՞ւմ կատարե՞ք այս քանակուսու՞մ, եթե խոսո՞ւմ կա՞մ կարո՞ւմ ե՞ք հայերեն:</p> | 2. Armenian |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p> | 3. Bengali |
| <input type="checkbox"/> <p>ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p> | 4. Cambodian |
| <input type="checkbox"/> <p>Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p> | 5. Chamorro |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p> | 6. Simplified Chinese |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p> | 7. Traditional Chinese |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p> | 8. Croatian |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p> | 9. Czech |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p> | 10. Dutch |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p> | 11. English |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنيد.</p> | 12. Farsi |

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérta vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish