

**TRANSPORTATION & MOTOR BUSES FOR PUBLIC USE AUTHORITY
DOING BUSINESS AS . . .**



**LIMITED ENGLISH
PROFICIENCY (LEP) PLAN**

**IMPROVING ACCESS TO PERSONS WITH
LIMITED ENGLISH PROFICIENCY**

2015

LANGUAGE IMPLEMENTATION PLAN

Background

Pursuant to Federal Transit Administration (FTA) Circular C 4702.1A (May 13, 2007), which provides recipients and sub-recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation’s (DOT’s) Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT’s *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons* (70 FR 74087, December 14, 2005) – AMTRAN has developed the following implementation plan.

Meaningful Access to LEP Persons

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Recipients and sub-recipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance.

INTRODUCTION

Limited English Proficiency (LEP) is defined by the US Department of Transportation (DOT) as “individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.” Altoona Metro Transit (AMTRAN) has developed this LEP Plan to ensure LEP persons have meaningful access to AMTRAN’s programs, services and activities.

AMTRAN’s LEP Plan was developed utilizing the Federal Transit Administration Office of Civil Rights, April 13, 2007 handbook for Public Transportation Providers entitled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons.”

AMTRAN is committed to ensuring that no person is excluded from participation in or denied the benefit of its services on the basis of race, color or national origin. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964: *National Origin Discrimination Against Persons with Limited English Proficiency* and Executive Order 13166: *Improving Access to Service for Persons with Limited English Proficiency (LEP)*.

SERVICE OVERVIEW

On May 27, 1958, the city of Altoona and Logan Township voted to create the first public transportation authority in the Commonwealth of Pennsylvania, Transportation & Motor Buses for Public Use Authority. This new authority took over the public bus operation from Logan Valley on November 1, 1959. From 1958 through 1977, the authority was generally known as the Altoona & Logan Valley Bus Authority.

In 1977 the Bus Authority adopted the business name of AMTRAN (for Altoona Metro Transit). AMTRAN celebrated its 50th Anniversary in August of 2008

Today, AMTRAN is Blair County's only public transportation authority providing fixed-route service to Altoona, Hollidaysburg, Allegheny Township and Logan Township.

PLAN SUMMARY

AMTRAN has developed this Limited English Proficiency Plan to help identify steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by AMTRAN.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available and information for future plan updates.

Additionally, AMTRAN has taken steps to further develop the plan in order to:

- Provide enhanced training to staff members,
- Enhance accessibility of information to potential LEP individuals, and
- Increase dialogue between local Human Service organizations.

AMTRAN uses the recommendations set forth in the DOT’s LEP guidance handbook which explains the four-factor framework for determining an appropriate mix of language assistance and how to prepare a language assistance implementation plan that is consistent with the DOT LEP Guidance. AMTRAN understands that the information in this handbook is advisory and does not establish new requirements for FTA recipients or sub recipients.

AMTRAN’s review and implementation of the four-factor analysis includes:

- **Factor 1:** The number and proportion of LEP persons eligible in AMTRAN’s service area who may be served or who are likely to encounter AMTRAN programs, activities and services.
- **Factor 2:** The frequency with which LEP persons come in contact with AMTRAN’s programs, activities or services.
- **Factor 3:** The nature and importance of programs, activities or services provided by AMTRAN to the LEP population.
- **Factor 4:** The resources available and overall cost to provide LEP assistance.

SUMMARY OF FOUR-FACTOR ANALYSIS

Factor 1: The number and proportion of LEP persons eligible in AMTRAN’s service area who may be served or who are likely to encounter AMTRAN programs, activities and services.

For the LEP plan update, AMTRAN reviewed demographic data for the State of Pennsylvania, the Central Pennsylvania region, and the County of Blair for comparative analysis. However, a more in-depth analysis of the cities of Altoona and Hollidaysburg were utilized due to those being within AMTRAN’s service area.

AMTRAN analyzed census data from the U.S. Census Bureau Data 2010; 2006-2010 American Community Survey 5-Year Estimates. Additionally, AMTRAN reviewed the 2009-2013 American Community Survey 5-year Estimates and determined that the estimated changes were too nominal to warrant revision of the data. However, AMTRAN will continue to review demographic data annually for any significant population changes that would merit changes to plan direction.

Based on the US Census Bureau, 2006-2010 American Community Survey Data, 0.3% or less of AMTRAN’s service area population speak English less than “very well” and fall well below the state average as illustrated by the following table:

	Total Population	Speaks English Less than “very well”	Percent
State of Pennsylvania	11,885,430	193,689	1.6%
Blair County	119,746	270	.2%
City of Altoona	43,635	134	.3%
Hollidaysburg Borough	5,540	0	0%

Table # B06007

PLACE OF BIRTH BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH IN THE UNITED STATES
Universe: Population 5 years and over in the United States
2006-2010 American Community Survey 5-Year Estimates

Determining the concentration of a specific language other than English was derived by using data from the US Census Bureau Fact Finder, S1601, Language Spoken at Home, 2006-2010 American Community Survey 5-Year Estimates. Indo-European languages had the highest percentage for grouped languages and Spanish had the highest percentage for an individual language in AMTRAN’s primary service area.

	Total Population	Indo-European	Spanish	Asian/Pacific Island	Other
State of Pennsylvania	11,885,430 100%	426,186 3.6%	490,488 4.1%	199,840 1.7%	58,677 .5%
Blair County	119,746 100%	1,977 1.7%	824 .7%	417 .3%	60 .1%
City of Altoona	43,635 100%	594 1.4%	335 .8%	203 .5%	28 .1%
Borough of Hollidaysburg	5,540 100%	54 1%	61 1.1%	0 0%	0 0%

Determining the concentration of a specific language other than English was derived by using data from the LEP, Special Tabulation of Census 2000 Data on Limited English Proficient Adults, U.S. Department of Labor, Employment, & Training Administration. The following Table shows English versus non-English along with the top languages other than English in Central Pennsylvania:

Table 1. Ability to Speak English by Language Spoken at Home

Universe: Total population

Geography: Pennsylvania Central Pennsylvania

42175 LWIA#

Language Spoken at Home	Speak English "very well"		Speak English "well"		Speak English "not well"		Speak English "not at all"		Total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total population	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)	596,315	100.0
Speak language other than English	21,625	64.1	8,520	25.2	3,290	9.7	330	1.0	33,765	5.7
Arabic	265	50.5	175	33.3	65	12.4	20	3.8	525	0.1
Chinese	805	42.6	875	46.3	175	9.3	35	1.9	1,890	0.3
French (incl. Patois, Cajun)	1,405	68.2	335	16.3	315	15.3	4	0.2	2,059	0.4
German	2,245	67.5	765	23.0	310	9.3	4	0.1	3,324	0.6
Italian	1,090	72.7	245	16.3	155	10.3	10	0.7	1,500	0.3
Korean	460	44.5	340	32.9	230	22.2	4	0.4	1,034	0.2
Other Slavic languages	510	82.4	70	11.3	35	5.7	4	0.7	619	0.1
Other West Germanic languages	4,110	53.6	3,055	39.8	465	6.1	40	0.5	7,670	1.3
Russian	355	43.3	230	28.1	180	22.0	55	6.7	820	0.1
Spanish or Spanish Creole	6,245	71.6	1,365	15.6	970	11.1	145	1.7	8,725	1.5
Vietnamese	155	43.7	105	29.6	85	23.9	10	2.8	355	0.1

The following table illustrates a concentration of the top 7 specific languages other than English within our coverage area. The table was derived by using data from the LEP, Special Tabulation of Census 2000 Data on Limited English Proficient Adults, U.S. Department of Labor, Employment, & Training Administration. Using the Census data for Central Pennsylvania - specific figures for Blair County, Altoona and Hollidaysburg were prorated for the respective areas. This breakdown will allow us to target specific languages when determining the frequency with which LEP persons come in contact with AMTRAN’s programs, activities and/or services.

Geographic Area	Total Population	Percent of Total	Language						
			Spanish	French	German	Italian	Chinese	Korean	Russian
Central Pennsylvania	596,315	100%	8725	2073	3324	1500	1890	1034	820
Blair County	119,746	20.08%	1752	416	667	301	380	208	165
Altoona	43,635	7.32%	638	152	243	110	138	76	60
Hollidaysburg	5,540	0.93%	81	19	31	14	18	10	8

Factor 2: The frequency with which LEP persons come in contact with AMTRAN’s programs, activities or services.

In October of 2014 AMTRAN conducted a survey to assess the frequency with which LEP persons come in contact with AMTRAN programs, activities or services. The following chart summarizes the results:

AMTRAN LEP Exposure Compilation

	Exposure				Outcome		
	Rarely	Occasionally	Frequently		Don't Know	Unsuccessful	Successful
Spanish	9	11	1	Spanish	6	1	13
French	8	1	0	French	5	0	3
German	8	2	0	German	5	1	2
Italian	7	3	0	Italian	6	0	4
Chinese	10	6	2	Chinese	5	1	11
Korean	7	4	2	Korean	5	0	7
Russian	8	0	0	Russian	5	0	2
Other	6	3	1	Other	5	1	3
Unknown	7	2	0	Unknown	5	0	3
Total	70	32	6	Total	47	4	48
%	22.22%	10.16%	1.90%	%	14.92%	1.27%	15.24%

The table illustrates the amount of encounters all levels of staff have experienced in the past year. As you can see, over 10% of staff has experienced an encounter with an identified LEP individual during the course of providing service. This statistic demonstrates the importance of the LEP plan, the plan’s continued development, and staff training initiatives. Furthermore, over 15% of encounters were deemed to be successfully assisted utilizing established procedures.

Based on the survey, AMTRAN will initiate a program utilizing Language Identification Materials to further ascertain and track the specific encounters and language(s) of the LEP population. This initiative will enable AMTRAN to review and continue to develop programs to address the needs of the LEP population.

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

The transportation services provided by AMTRAN are high-need services that provide access for passengers to work, medical appointments, and shopping opportunities. Based on a 2014 Fixed-Route Rider Survey conducted by AMTRAN in coordination with PennDOT (see Appendix E), passengers indicated that their primary purpose for utilizing AMTRAN services were as follows:

- School – 32.9%
- Work – 23.2%
- Shopping – 19.0%
- Medical – 8.3%
- Social – 16.6%

Moreover, that same survey showed that over 80% of respondents (non-students) earned a total household income of \$23,000 or less, which further emphasizes the importance of AMTRAN's programs and services to the community.

AMTRAN has identified Access to our Fixed Routes as potentially critical to the LEP individual in benefitting from our service due to the locations and destinations that the system provides access to (i.e. job centers, grocery stores, medical facilities, and shopping, social, and recreational facilities). AMTRAN will continue to examine routes/schedules, fare and payment information, system rules, ride guides, public service announcements, and complaint and commendation forms with the intent on developing/revising instruments that could be used to increase the LEP individual's access to our Fixed Route service.

AMTRAN continues to utilize **Certified Languages International**, (4800 Southwest Macadam Avenue, Ste. 400, Portland, OR 97239) for its Interpretive Services and Document Translation. This agreement allows us to provide interpretation services to assist LEP individuals obtain vital information about our system, which increases the independence of the individual and their trust within our service.

Additionally, Language Interpreter Identification Cards (I speak cards) are stored in each revenue vehicle and are utilized to provide information to the LEP individual and a guide of how to process the encounter for the Vehicle Operator. Efforts are made to coordinate and channel LEP Individuals in need of translation services to Certified Languages. In addition, language interpretive services posters/signs are posted on the buses and placed on our website directing LEP individuals to call our office if language services are needed.

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

AMTRAN is committed to ensuring LEP persons have meaningful access to AMTRAN's programs, services and activities, and will devote the necessary resources to accomplish the designated goals. AMTRAN will continue to monitor LEP populations and will provide language services on an as need basis.

Based on current data, AMTRAN will continue to focus on LEP persons whose primary language is Spanish; however, resources will be utilized for all seven (7) languages referenced above.

As previously stated, AMTRAN will continue to utilize Certified Languages International to provide professional interpreter/ translation services. Further

development of the LEP plan provides a mechanism for AMTRAN to monitor LEP persons in its service area, define LEP needs and implement LEP assistance.

AMTRAN's LEP PLAN

AMTRAN has thoroughly reviewed the established LEP Plan, and is preparing to further develop the plan to provide more education to staff, human service organizations, and businesses that may service a high population of LEP individuals.

To ensure proper and effective communication, AMTRAN has reviewed all documentation, procedures, and processes concerning the LEP Plan. Therefore, after careful review, AMTRAN has committed to the following initiatives in order to further develop the LEP Plan and assist individuals in accessing and effectively utilizing our vital community service.

1. Plan notification methods:
 - a. Revise Title VI Notification, Complaint Procedures, and Complaint Form to account for staff changes,
 - b. Developed a dedicated link on company website for Title VI information, enabling easier access to vital information,
 - c. Distributing Title VI information and LEP Plan to local Human Service organizations to assist in providing notifications directly to population in need (see section entitled Dissemination of AMTRAN's LEP Plan),
 - d. Post information at Transit Centers and AMTRAN office locations,
 - e. Utilize Notification posters in the interior of transit vehicles,
 - f. Revised "I Speak" cards have been distributed to all transit vehicles – include the seven (7) most spoken foreign languages (as determined through census data) and contact information for AMTRAN HelpLine. LEP individual will be asked to identify preferred language and then to contact AMTRAN HelpLine for further assistance,
 - g. Revised "I Speak" cards for Dispatch – revised cards detail LEP procedures; as well as, contain contact information and process for contacting Certified Languages International

2. Language Assistance Measures
 - a. Develop schedule of Information Sessions that target Human Service organizations in order to provide information about our system and services, including the LEP Plan
 - i. Human Service organizations will be provided a survey to obtain information regarding contact with LEP individuals (if any) prior to session; therefore, AMTRAN can tailor message to particular individual or group if necessary,
 - ii. Language assistance tools will be provided to Human Service organizations for more direct distribution to LEP individuals as appropriate,
 - iii. Information Session to be scheduled once per quarter (goal 4/year)

- b. Obtain translation of vital documents for distribution as needed that include:
 - i. Title VI Notification
 - ii. Complaint Procedures
 - iii. Complaint Form
 - iv. Description of Services
- c. Utilize local businesses to distribute LEP materials and information regarding AMTRAN services in preferred languages
 - i. Restaurants
 - ii. Altoona Public Library
 - iii. Human Service organizations
 - iv. Altoona Post Office
 - v. Blair County Courthouse
 - vi. Transit Centers
- d. Work with Blair County Metropolitan Planning Organization for public outreach on all transit initiatives,
- e. Survey operators, dispatchers, maintenance, administrators and customer service staff annually on their experience and contact with LEP persons during the previous year,
- f. Review routes and service materials for increasing symbolic signs (pictographs)

3. Staff Training

- a. Revised LEP procedures, process, roles, and responsibilities (see Appendix E),
- b. Enhanced training - on November 6, 2014 AMTRAN staff conducted LEP training for AMTRAN’s front line employees (see Appendix F). The training consisted of a review of revised process and procedures, a video entitled: “Communicating with LEP Customers: What front line transit employees need to know” produced by Homeland Security University Programs, and a role play training scenario. During the role play, employees boarded a bus to observe the LEP encounter which consisted of passenger and driver interaction on the bus and the driver’s radio call to report it to the dispatch office. Convening in the training room, a call was made to Certified Languages International by the Dispatch office to provide the necessary LEP interpretation. Employees benefitted by witnessing the entire process from beginning to end realizing how important their role is in identifying and then referring the encounter to the proper staff. Mrs. Randazzo, a local restaurateur fluent in English and Italian, provided much needed feedback to the process and played an integral role in illustrating the services to the employees,
- c. Incorporate new training materials referenced above into new employee orientation plan

4. Monitoring and updating the LEP plan
 - a. Developed LEP encounter tracking tool to document LEP encounters and provide analytical information that can be used to better service LEP individuals,
 - i. Review on quarterly basis
 - b. Revised LEP procedures, process, roles, and responsibilities based on LEP encounter survey data,
 - c. Implemented Information Sessions to target local Human Service organizations in an effort to more effectively provide information regarding our system, services, and programs to LEP individuals,
 - i. Developed outline of “talking points” for Information Sessions (see section entitled Dissemination of AMTRAN’s LEP Plan)
 - d. Annually review demographics
 - e. Annually review plan

5. Monitoring and updating the LEP plan – review demographics, enter determination
 - a. Annually review demographics
 - i. Change and/or concentration in LEP population
 - b. Annually review and update plan
 - i. Evaluate plan – based upon LEP encounters survey
 1. Determine if needs of LEP have been addressed;
 - Determine if needs of LEP services have changed;
 - Determine financial resources;
 - Determine whether complaints have been received relative to the needs of LEP individuals.
 - c. Monitor changes – developed tracking tool
 - d. Update plan

DISSEMINATION OF AMTRAN’S LEP PLAN

AMTRAN’s LEP Plan, Title VI Policy and complaint form will be included on the website at amtran.org.

Additionally, this LEP Plan will also be shared with human service organizations in its service area. These organizations, listed below, will be targeted for Information Sessions, which are designed to provide information about AMTRAN’s system, services, and programs in an effort to more effectively and efficiently distribute vital information to end users and LEP individuals.

Center for Independent Living
Blair/Clearfield Association for the Blind
The Arc of Blair County
Blair Senior Services, Inc.
Blair County Chapter, NAACP
Blair County Community Action Agency

Fair Housing Administrator
Skills of Central PA
Family Services Incorporated

Any person or agency with internet access will be able to access and download the plan from AMTRAN's 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. Finally, a Statement of Notification will be posted at the following AMTRAN locations:

AMTRAN's Administrative Offices
AMTRAN's Operation and Maintenance facility
Downtown Altoona Transit Center
Hawthorn Shelter at Penn State Altoona
Logan Valley Mall Shelter

Questions or comments regarding the LEP Plan may be submitted to AMTRAN's Executive Director:

Eric Wolf, AMTRAN's General Manager
AMTRAN (Altoona Metro Transit)
3301 Fifth Avenue
Altoona, PA 16602
Telephone: (814) 944-4074

APPENDIX A

Table # B06007

**PLACE OF BIRTH BY LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK
ENGLISH IN THE UNITED STATES**

**Universe: Population 5 years and over in the United States
2006-2010 American Community Survey 5-Year Estimates**

APPENDIX B

**US Census Bureau Fact Finder
S1601 - Language Spoken at Home,
2006-2010 American Community Survey 5-Year Estimates
2009-2013 American Community Survey 5-Year Estimates**

APPENDIX C

The LEP,
Special Tabulation of Census 2000 Data
On Limited English Proficient Adults,
U.S. Department of Labor,
Employment & Training Administration

Table 1. Ability to Speak English by Language Spoken at Home
Central Pennsylvania - 42175 - LWIA#

APPENDIX D

List of Local Human Service Organizations

APPENDIX E

Statement on construction projects undertaken
Title VI Investigations
Notice to Public and Complaint Procedures
Title VI Complaint Form
I Speak Card
Dispatch Procedures
Need an Interpreter poster (to be placed on buses)
PennDOT 2014 Fixed Route Rider Survey

APPENDIX F

Title VI Training Presentation