

LIMITED ENGLISH PROFICIENCY PLAN

Gunnison Valley Transportation Authority (Gunnison Valley RTA)

September 10, 2010

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for the Gunnison Valley RTA 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 conducted 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 the Gunnison Valley RTA 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. LIMITED ENGLISH PROFICIENCY 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.

Number and Percentage of LEP Persons in Our Area

Permanent Population

U.S. Census Data

The U.S. Census provides information to assist in estimating the number of limited English speakers in the permanent population. While the 2010 Census will provide up-to-date data, that information is not yet available. For small urban areas and rural counties, the best data available is from the U.S. Census 2000. Table 1 presents information for Gunnison County on *Language Spoken at Home by Ability to Speak English*, based on the year 2000 Census.

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

Data Category	Gunnison County	
	#	%
Total Population (5 years old & older)	13,306	100%
<i>Population Speaking English "Not Well" or "Not at All"</i>	215	1.6%
<i>Population Speaking English "Not Well" or "Not at All"</i>		
Spanish	151	70%
Other Indo-European	64	30%
Asian and Pacific Islander	0	0%
Other	0	0%
Total	215	100%

Source: U.S. Census 2000, population 5 years old and older, speaking another language in the home, who speak English "Not Well" or "Not at All."

As the table shows, there were very low numbers and percentages of persons in the permanent population of Gunnison County, in the year 2000, who had difficulty speaking English; 215 individuals, less than 2% of all persons age 5 and over. Most of those with difficulty were Spanish speakers in the valley who might use the RTA service to get to work but there were also some speakers of other Indo-European languages.

School District, Gunnison County Multicultural Center, and Other Local Data

U.S. Census data indicates a very low need to respond to individuals in our service area who have difficulty with English. Those who do have difficulty are primarily Spanish speakers but there is also a significant percentage of individuals speaking other Indo-European languages. Therefore, for this LEP Plan, additional local contacts were not made to clarify the need among the permanent population of our service area. However, we are committed to monitoring LEP needs among the permanent population over time.

Visitors

During the March, 2009 survey of our riders, it was noted that only 8% of our riders are not residents of Gunnison County. However, due to the fact that some of our riders are visitors to Crested Butte Mountain Resort there is a potential need for special services for LEP individuals from our visitor population. As a year round resort community, the Crested Butte/Mt. Crested Butte area, as well as Gunnison County as a whole, attracts individuals from all over the world. We are therefore sensitive to LEP needs among visitors to our area.

Summary

Given the resort nature of the Gunnison Valley RTA service area, the fact that many of the Spanish speakers work at the resort, and the large number of visitors we have, including those who potentially have Limited English Proficiency needs, we are committed to addressing those needs.

Nature, Frequency and Importance of LEP Contact

The nature and importance of LEP contact is high for public transit services in general, and in our service area, we are sensitive to those needs. We have daily contact with non-English speakers who are commuting to work. Therefore, strategies to address this need have been developed and will continually be reviewed, and improved where needed.

III. CURRENT LEP EFFORTS

Due to the resort nature of our service area, the potential numbers and percentages of LEP persons are significant. As a public transit provider we are committed to addressing the on-going need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts. We ask our provider (Mountain Express at the time of the adoption of this plan) to follow their own LEP practices and to make our schedules available in Spanish when requested to do so. We adopted an LEP Policy in May, 2010 and adopted this plan in September, 2010.

IV. PLANS FOR THE FUTURE LEP EFFORTS

Given the current and potential future need to respond to individuals with Limited English proficiency our LEP Plan includes the elements identified below.

Identifying LEP Persons Who Need Language Assistance

In order to identify potential future LEP needs with respect to our transit service we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with our contracted provider and their drivers;
- Make periodic contacts with the Gunnison County Multicultural Center, and other community agencies that may know of LEP persons or groups.

Language Assistance Measures

As the need arises, we will consider the following to respond to LEP needs:

- Asking our provider to obtain copies of “I Speak Cards” to have on hand if needed;
- Develop Spanish versions of marketing materials, public notices, and related information, as appropriate;
- Asking our provider to consider hiring Spanish-speaking drivers;
- Ask our provider to obtain copies of CDOT’s “Basic Spanish for Transit Employees” and distribute to drivers and customer service staff, as appropriate;
- Become familiar with Language Line Services at <http://www.language.com>;
- Use CDOT’s new translation service when it becomes available to translate more documents into Spanish;
- Identify other community resources such as agencies serving LEP persons which may have resources to share.

Staff Training

Similarly, as the need arises, we will consider requiring our provider to address the following staff training topics:

- Federal LEP requirements, your LEP Plan and Title VI;
- Documenting language assistance requests;
- Use of any of the language assistance measures as described above.

Outreach Efforts

Similarly, as the need arises, we will consider the following staff training topics:

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

Monitoring and Updating Plan

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing our LEP Plan with our provider and make adjustments, as needed
- Pay particular attention to demographic changes in our area and to any LEP-related complaints we receive.

Disseminating Our LEP Plan

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests;
- Post our plan on our website;
- This plan was adopted by the Board of Directors of the Gunnison Valley Transportation Authority at their September 10, 2010 regular meeting.

APPENDIX A

U.S. CENSUS DATA SOURCES

The U.S. Census provides two good sources for estimating the number of limited English speakers by various geographic areas (counties, urban areas, places, etc.). The year 2000 Census has the most complete data in terms of areas covered. Updates are also provided for cities over 60,000 population (2008 updates) and for cities over 20,000 population (2006 to 2008 updates). Beginning October 2010 data will be updated annually for all geographic areas.

Year 2000 Census Data

Data from the 2000 Census is available for a variety of geographic areas (counties, urban areas, places, etc.). To access 2000 census data go to the U.S. Census web site at <<http://www.census.gov>> and follow these steps:

Select "American FactFinder"(on left)
Select "Data sets" and choose "Decennial Census".
Select "Census 2000 Summary File 3 (SF3) Sample Data" and choose "Detailed Tables".

Click on the geography drop down box and choose "County" (or "Urban Area," "Place" or some other geographic area listed). If you're looking for data by county, select the state of your choice and the county of your choice and then enter "Add" and "Next" or "Show Result". Click on "by keyword" and type in "Language" and then choose "Search." Wait for the data to be retrieved, then click on the desired table and then "Add" and "Show Results."

Two tables appear to be most useful, Table P19 and Table P20:

Table P19 is titled "Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." It identifies, by age group and language group, the number of individuals who speak English "very well," "well," "not well" and "not at all" in the geographic area you have selected.

Table P20 is titled "Household Language by Linguistic Isolation" and shows the numbers of households which are "linguistically Isolated" by language group for your area you selected. Households that are "linguistically isolated" are those in which all household members age 14 and over have some difficulty with English.

Census Updates

For 2008 estimates (available for cities over 60,000 population) and for 2006-2008 estimates (available for cities over 20,000 population), go to www.census.gov.

Then, after going to American FactFinder, select “American Community Survey” as the data set. Then work your way through the choices in the same manner as for the year 2000 data set.

For additional information, contact either: 1) the U.S Census, Information Resources and Dissemination Branch, Data Integration Division, U.S. Census Bureau, 301-763-2422 or toll free 1-866-758-1060 (on ask a question on-line and you will get a response in a day or two), or 2) the Colorado Demographers Office, Colorado Department of Local Affairs, 303 866-2156