

MIDDLETOWN TRANSIT DISTRICT LIMITED ENGLISH PROFICIENCY (LEP) PLAN

This limited English Proficiency (LEP) Plan has been prepared to address Middletown Transit District's (MTD) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

MTD is the provider of public transportation in the Middlesex County Area (Cromwell, Durham, Portland, East Hampton, Middlefield). MTD has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by MTD. 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. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, MTD undertook the U.S. Department of Transportation (U.S.DOT) four-factor LEP analysis which considers the following factors:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area

Most people in the MTD area are proficient in the English language. Based on 2010 Census SF 3-Sample data, 98.2% of the population speak only English or speak another language but speak English "very well" or "well." Only 2.2% of the population is not proficient in English. Of the 792 persons who speak English "not well" or "not at all," 8.3% are from ages 5 to 17, 50.4% are ages 18 to 64 and 41.3% are 65 years or older. Three percent of the population living in minority census tracts speaks English "not at all" and 2.3% of the population living in non-minority tracts speaks English "not well" or "not at all."

2. Frequency of Contact by LEP Persons with MTD Services

The MTD staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, MTD has on average, only one or two requests per month for an interpreter. MTD averages 1,000 phone calls per month.

3. The importance of programs, activities or services provided by MTD to the LEP

There is no large geographic concentration of any type of LEP individuals in the MTD service area. The overwhelming majority of the population, 98.2%, speaks English, or speaks another language, but speaks English "very well" or "well." MTD staff is most likely to encounter LEP individuals through office visits, phone conversations and notifications from the office of impacts on services and fare increases.

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

MTD reviewed its available resources that could be used for providing LEP assistance. MTD utilizes the bi-lingual managers to translate documents into a Spanish translation if needed. Utilizing the resources of 211 InfoLine to collect information on language barriers is another option. 211 InfoLine has a very good language assistance program since they are a major resource in delivering non-emergency information services to the state's population.

Based on the four-factor analysis, MTD developed its Language Assistance Plan (LAP) as outlined in the following section.

Plan Outline

How MTD staff may identify a person who needs language assistance:

1. 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 or meetings.
2. Have staff person greet participants as they arrive to MTD sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at MTD meetings. This will assist MTD in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language and Identification Flashcards on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain information to give to MTD management for follow-up.

Language Assistance Measures

There are various ways in which MTD staff responds to LEP persons, whether in person, by telephone or in writing.

- Post the MID Title VI Policy and LEP Plan on the agency website, www.middletownareatransit.org
- To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.
- Survey bus operators, front-office staff, dispatchers, annually and Ops Supervisors related to their experience and contact with LEP persons during the previous year.

Staff Training

The following training will be provided to MID staff:

1. Information on MID Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests

Providing Notice to LEP Persons/Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Flyers shall be put in buses, the transit station and other main transfer points in our service areas. Announcements will be posted on MTD's website and in the local newspaper.

Monitoring and Updating the LEP Plan

MID will update the LEP plan as required by U.S.DOT. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the MID service area. Updates include the following:

- How the needs of LEP persons have been addressed.
- Determine the current LEP population in the service area.
- Determine as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the needs.
- Determine whether MTD's financial resources are sufficient to fund language assistance resources as needed.
- Determine whether MTD has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning MTD's failure to meet the needs of LEP individuals.