

# LANGUAGE ASSISTANCE PLAN

## For

### PHASE, Inc. (DBA Industries, Inc.)

Effective: August 29, 2016, Rev. 2017.09.29, 2018.10.01, 2019.09.30, 2020.09.30

#### **Purpose**

The purpose of this Language Assistance Plan (hereinafter "plan") is to meet Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a sub-recipient of FTA funds, this transit system is pledged to take reasonable steps to provide meaningful access to its transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT's FTA Office of Civil Rights' publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers," dated April 13, 2007, was used in the preparation of this plan.

The plan for PHASE contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating the plan

#### **A. LEP Needs Assessment – the Four-Factor Analysis**

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

We assessed the following information (as checked) about LEP persons to determine the number or proportion of LEP persons who might use or want to use our transit services:

- 2013-2017 US Census Bureau American Community Survey 5-Year Estimates Report, 2017 MN State Demographic Center Report and, U.S. Census Bureau's 2018 population estimates report.
- Survey results:

REGIONAL DEMOGRAPHICS *									
Total Population	%	White	%	Black or African American	%	American Indian or Alaska Native	%	Asian	%
84107	100%	79178	94.1%	913	1.1%	1012	1.2%	761	0.9%
		Native Hawaiian or Other Pacific Islander	%	Two or more races	%	Identify as Hispanic or Latino**	%	With any Disability	%
		29	0.0%	1854	2.2%	1825	2.2%	13055	15.5%
<small>* Data derived from U.S. Census Bureau's 2018 &amp; 2019 American Community Survey-5-Year Estimates Reports. Data uses percentages reported to estimate population numbers.  **Hispanic and Latino may identify as any race, so are also included in applicable race statistics.</small>									

- Reports from drivers, dispatchers and others about contact with LEP persons
- Internal organization statistics
  - 1) The total number of LEP persons in our service area is estimated at less than 4,000 people.
  - 2) The total eligible population in our service area is more than 38,190 people.
  - 3) The proportion of LEP persons to the total eligible service population is less than 5%.

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

The primary contact with Limited English Proficiency individuals is with the disabled population, however the communication needs have been addressed in the intake and the rider/driver assigned to assist with the route has been trained on communication techniques with that individual.

The conclusions drawn from examining this information about LEP persons seeking transit services are PHASE makes every effort to be proactive in providing Limited English Proficiency assistance as needed.

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

Our transit system considers transit to be an important and essential service for many people living in our service area. Many LEP persons use our transit service to travel to work, community integration events, shopping, personal services, homes, etc.

Factor 4. The resources available to our transit system and the overall cost to provide language assistance.

Our current budget for marketing to or communicating with LEP persons in their language about transit services that are available to them is as needed. This may include funding for staff training,

translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc. We first attempt to use free translation services such as Google Translator and Services for the Blind.

## **B. Language Assistance Measures**

There are several language assistance measures that are available to PHASE's Transit System. These include:

- Translation of key documents in the following language(s): Most languages available upon request
- Arranging for availability of oral translators
- Communication with LEP persons' groups about transit services
- Posting notices in appropriate languages informing LEP persons of available services

## **C. Staff Training**

To ensure effective implementation of this plan, the transit system will schedule training at orientations for new staff and for all relevant employees on an annual to review:

- the transit system's Language Assistance Plan (as part of the larger Title VI Plan)
- demographic data about local LEP population
- printed LEP persons' materials
- how to handle verbal requests for transit service in a foreign language
- responsibility to notify transportation manager about any LEP persons' unmet needs.

## **D. Notice to LEP Persons about Available Language Assistance**

Our transit system plans to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- signs on buses and in the PHASE's buildings
- organization brochures
- sending information to local organizations that work with LEP persons
- website notices

## **E. Annual Monitoring, Evaluating and Updating Plan**

The transit system will review this plan during its annual review with its MN/DOT transit project manager by:

- assessing its effectiveness (e.g., comparing numbers of LEP persons served by year, number of requests for language assistance received during the year),
- assessing the sufficiency of staff training and budget for language assistance,
- reviewing current sources for assistance to ensure continuing availability, and
- reviewing any complaints from LEP persons or about their needs that were received during the past year.

This plan will be reviewed by our transit system annually. Revisions of this plan will be approved by the Transit Manager and dated.

## **F. Dissemination of Plan**

This plan is available by going to [www.pinehab.org](http://www.pinehab.org)

This plan is also available at no cost in English upon request by telephone, fax, and mail or in person.

If requested to be provided in another language and it is feasible to have it translated, information will be provided at no cost to the requester.

## **G. Contact Information**

Questions or comments about this plan may be submitted to:

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Title: Transportation Manager  
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