

Antelope Valley Transit Authority Limited English Proficiency (LEP) Plan

Updated: May 2017

Introduction

The Limited English Proficiency (LEP) Plan has been prepared to address the Antelope Valley Transit Authority's (AVTA) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. AVTA will take reasonable steps to ensure that all persons have meaningful access to its programs, service and information, at no additional cost.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicate 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 discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including AVTA.

AVTA's goal is to take responsible steps to ensure meaningful access to benefits, services and information for LEP persons in the service area and eliminate, as much as possible, language barriers. All residents in this service area should be able to understand and utilize the transit services provided.

Plan Summary

AVTA has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by AVTA. 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, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons that assistance is available.

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

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with AVTA programs, activities or services.
3. The nature and importance of services provided by AVTA to the LEP population.
4. The resources available to AVTA and overall cost to provide LEP assistance.

A summary of the results of AVTA’s four factor analysis is in the following section.

Four-Factor Analysis

1. The number and proportion of LEP persons served or encountered in the eligible service population.

AVTA’s service area covers the Antelope Valley and a small portion of the Santa Clarita Valley. The Antelope Valley consists of the cities of Palmdale and Lancaster with some various unincorporated areas of Los Angeles County. For planning purposes, AVTA reviewed the 2011-2015 American Community Survey 5-year estimates “Languages Spoken at Home” (B16001) by Census Tract for the AVTA service area.

The AVTA service area has a total population of 353,673 over five years of age. In this population, 68.8% speak only English. Of the 31.2% that speak a language other than English, approximately 50,664 residents, or 14.33%, indicated that they speak English “less than very well”. Of the 50,664 residents that would be considered LEP, (speak English “less than very well”) 45,902 or 91% are Spanish speakers.

Other languages spoken within the AVTA service area include: **Indo-European** (Persian and Armenian), **Asian and Pacific Island** (Tagalog, Chinese, Cambodian, Korean, and Vietnamese) and all **other languages** (Arabic). The table below illustrates the number of LEP residents by language.

AVTA Population with Limited English Proficiency		
Language	LEP Speakers	LEP Percent of Total Population
Spanish	45,903	12.98%
Tagalog	1,407	0.40%
Vietnamese	620	0.18%
Korean	617	0.17%
Arabic	552	0.16%
Chinese	525	0.15%
Armenian	357	0.10%
Persian	350	0.10%
Mon-Khmer/Cambodian	333	0.09%
Total	50,664	14.33%

Source: 2015 ACS 5-year estimates

Based on the demographics outlined above, the primary focus of AVTA efforts is on the Spanish speaking segment of the LEP population.

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

AVTA serves LEP persons daily via our fixed route and dial-a-ride services. The majority of our LEP persons are Spanish speakers. To date, the most frequent contact between LEP persons and our transit staff is with bus operators. In order to have more Spanish assistance on board our buses, all coach operator recruiting flyers and website postings have included that, “Spanish is desired”. The second highest is our customer service representatives, which 90% speak Spanish fluently and have the ability to translate. The local language resources at AVTA had been sufficient to meet the needs of LEP persons. At this time we do not track which calls or in person visits are from LEP individuals. However our call center phone system allows patron to request to speak with a Spanish speaking individual.

- LEP Attachment 1, provides the full 2010-2015 American Community Survey “Languages Spoken at Home” (S16001) by the Census Tract level of the service area.
- LEP Attachment 2, Illustrates the service area and route map with Spanish language densities.

3. The nature and importance of services provided by AVTA to the LEP population.

AVTA provides important transit services to the public through its fixed route and Dial-a-Ride services. AVTA is the only major public transportation provider in the Antelope Valley and provides Commuter bus service between the Antelope Valley and the Los Angeles basin (Century City, San Fernando and the Downtown Los Angeles). AVTA also provides service to Santa Clarita with the Route 790, dubbed the North County TRANSporter. AVTA provides residents, including LEP persons, transportation services for the purpose of commuting to work, shopping, recreational needs, personal errands, school and other services the public accesses frequently.

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

Providing translation services to allow LEP populations to participate in the development of AVTA’s core planning and investment policies is a routine practice for the Authority. AVTA’s customer service call center, which processes customer comments by phone, mail, email, and in-person, currently benefits from having four of six staff members who speak, read, and write Spanish. Two of the three IntelliRide call takers (who hand the Dial-A-Ride call center) also speak Spanish.

Documents translated into Spanish include rider alerts posted on our buses and at bus stops; fare and/or service change information; and current fare and pass information. AVTA currently provides a Spanish translator at all community events and has developed Spanish language marketing campaigns promoting the benefits of public transportation via Spanish newspapers, television and radio ads. AVTA’s website also provides a one-button/click solution to for translation to Spanish. In addition, AVTA has developed 15 English and Spanish travel training

videos as part of its mobility management program.

Based on the four-factor analysis, AVTA developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

How AVTA and staff may identify an LEP 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 a bilingual staff person greet participants as they arrive to an AVTA sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Consistently monitor the number of people that access the transit website in Spanish. And continue to update the site wherever needed.
4. If a vehicle operator encounters a customer in need of assistance in a language other than English, vehicle operators are instructed to try to obtain their contact information and give this information to their manager for follow-up.
5. Automated phone tree is available in English and in Spanish. Callers are given the opportunity to speak directly to a Spanish speaking staff person.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which AVTA staff responds to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on programs and services.
- Provide a bilingual staff member at all community events and public hearings.
- Continue to survey bus operators, dispatchers and customer service staff, on their experience concerning any contacts with LEP persons during the previous year;
- Continue to post the AVTA Title VI notice and LEP Plan on the agency website, www.avta.com;
- Continue travel training to LEP persons with the assistance of bilingual staff;
- Include language "Spanish a plus" on bus operator and customer service staff recruitment flyers and onboard recruitment posters;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service within the given time notice.

Staff Training

The following training is provided to all AVTA staff:

1. Information on the AVTA's Title VI procedures and LEP responsibilities
2. Documentation of language assistance requests
3. How to handle a potential Title VI/LEP complaint

All contractors or subcontractors performing work AVTA will be required to follow the Title VI and LEP guidelines.

Outreach Techniques

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 also be printed in the alternative language based on the known LEP population (Spanish). Interpreters will also be available as needed.

Monitoring and Updating the LEP Plan

AVTA will update the LEP plan as required by the U.S. DOT. At minimum, the plan will be reviewed and updated every three years or when it is clear that higher concentrations of LEP individuals are present in the AVTA 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 AVTA's financial resources are sufficient to fund language assistance resources needed
- Determine whether AVTA has fully complied with the goals of this LEP plan
- Determine whether complaints have been received concerning AVTA's failure to meet the needs of LEP individuals

Dissemination of the Antelope Valley Transit Authority LEP Plan

A link to the AVTA LEP Plan and the Title VI Notice is included on the AVTA website at www.avta.com. Any person or agency with internet access will be able to access and download the plan. Alternatively, any person or agency may request a copy of the plan via telephone, fax, and mail or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which AVTA will provide.



Questions or comments regarding the LEP Plan may be submitted to:

Title VI Officer
42210 6th Street West Lancaster, CA. 93534
Phone: (661) 729-2224
Fax: (661) 726-2615
Email: titlevi@avta.com

AVTA Demographics Study

Limited English Proficiency Table

Language Spoken at Home and Ability to Speak English	
Language	Total
Spanish or Spanish Creole	95421
Speak English "very well"	49518
Speak English less than "very well"	45903
Asian	8673
Speak English "very well"	4788
Speak English less than "very well"	3885
Indo-European Languages	4263
Speak English "very well"	2679
Speak English less than "very well"	1584
All Other Languages	1882
Speak English "very well"	1233
Speak English less than "very well"	649

Source: 2015 ACS 5-year estimates

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Mon-Khmer/Cambodian	333	0.09%
Total	50,664	14.33%

Source: 2015 ACS 5-year estimates

Language Spoken at Home	Total	Language Spoken at Home	Total
Spanish or Spanish Creole:	95421	Other Slavic languages:	75
Speak English "very well"	49518	Speak English "very well"	65
Speak English less than "very well"	45903	Speak English less than "very well"	10
French:	518	Armenian:	722
Speak English "very well"	371	Speak English "very well"	365
Speak English less than "very well"	147	Speak English less than "very well"	357
French Creole:	29	Persian:	544
Speak English "very well"	22	Speak English "very well"	194
Speak English less than "very well"	7	Speak English less than "very well"	350
Italian:	172	Gujarati:	0
Speak English "very well"	138	Speak English "very well"	0
Speak English less than "very well"	34	Speak English less than "very well"	0
Portuguese or Portuguese Creole:	92	Hindi:	75
Speak English "very well"	76	Speak English "very well"	45
Speak English less than "very well"	16	Speak English less than "very well"	30
German:	482	Urdu:	48
Speak English "very well"	389	Speak English "very well"	38
Speak English less than "very well"	93	Speak English less than "very well"	10
Yiddish:	4	Other Indic languages:	471
Speak English "very well"	4	Speak English "very well"	199
Speak English less than "very well"	0	Speak English less than "very well"	272
Other West Germanic languages:	139	Other Indo-European languages:	372
Speak English "very well"	102	Speak English "very well"	325
Speak English less than "very well"	37	Speak English less than "very well"	47
Scandinavian languages:	84	Chinese:	928
Speak English "very well"	72	Speak English "very well"	403
Speak English less than "very well"	12	Speak English less than "very well"	525
Greek:	93	Japanese:	305
Speak English "very well"	46	Speak English "very well"	176
Speak English less than "very well"	47	Speak English less than "very well"	129
Russian:	223	Korean:	956
Speak English "very well"	152	Speak English "very well"	339
Speak English less than "very well"	71	Speak English less than "very well"	617
Polish:	89	Mon-Khmer, Cambodian:	556
Speak English "very well"	58	Speak English "very well"	223
Speak English less than "very well"	31	Speak English less than "very well"	333
Serbo-Croatian:	31	Hmong:	0
Speak English "very well"	18	Speak English "very well"	0
Speak English less than "very well"	13	Speak English less than "very well"	0

Source: 2015 ACS 5-year estimates Table B16001

Language Spoken at Home	Total	Language Spoken at Home	Total
Thai:	195	Other Native North American languages:	17
Speak English "very well"	150	Speak English "very well"	17
Speak English less than "very well"	45	Speak English less than "very well"	0
Laotian:	53	Hungarian:	17
Speak English "very well"	26	Speak English "very well"	9
Speak English less than "very well"	27	Speak English less than "very well"	8
Vietnamese:	945	Arabic:	1104
Speak English "very well"	325	Speak English "very well"	552
Speak English less than "very well"	620	Speak English less than "very well"	552
Other Asian languages:	283	Hebrew:	20
Speak English "very well"	185	Speak English "very well"	10
Speak English less than "very well"	98	Speak English less than "very well"	10
Tagalog:	4109	African languages:	262
Speak English "very well"	2702	Speak English "very well"	226
Speak English less than "very well"	1407	Speak English less than "very well"	36
Other Pacific Island languages:	343	Other and unspecified languages:	445
Speak English "very well"	259	Speak English "very well"	402
Speak English less than "very well"	84	Speak English less than "very well"	43
Navajo:	17		
Speak English "very well"	17		
Speak English less than "very well"	0		

Source: 2015 ACS 5-year estimates Table 16001



