



Anaheim Resort Transportation service of Anaheim
Transportation Network

Limited English Proficiency Plan



*ATN Board of Directors Original Approval – 02-27-2013
3-25-2015*



INTRODUCTION

This Limited English Proficiency (LEP) Implementation Plan has been prepared to address the Anaheim Transportation Network's (ATN) responsibilities as a recipient of federal financial assistance as it relates 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 states no person in the United States shall be subjected to discrimination on basis of race, color, or national origin.

There are two pieces of legislation that provide the foundation for the development of an LEP Plan; Title VI of the Civil Rights Act of 1964 and the Executive Order 13166. In some circumstances, failure to ensure LEP persons can effectively participate in federally assisted programs may constitute discrimination based on race, color or national origin under Title VI. In order to comply with Title VI, ATN will take reasonable actions for competent language assistance.

Executive Order 13166 clarified requirements for an LEP person under Title VI. Executive Order 13166 requires ATN to examine the services it provides and to develop and implement a system by which an LEP person can have meaningful access those services. 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.

As a sub-recipient of the Orange County Transportation Authority (OCTA), the Anaheim Transportation Network (ATN) has the ability to adopt OCTA's Limited English Proficiency (LEP) Plan. The purpose of this is to allow sub-recipients with limited resources to use data collected and analyzed by the primary recipient. However, a separate Implementation Plan must be prepared to address LEP needs within the sub-recipients service area. ATN's LEP Implementation Plan was adopted by the ATN Board of Directors on February 27, 2013. ATN Board of Directors approved LEP Implementation Plan update on May 27, 2015.

ATN'S LEP IMPLEMENTATION PLAN

United States Department of Justice (DOJ) developed a Four Factor Analysis to establish a Safe Harbor threshold of 1,000 speakers, or five percent of the population whichever is less. Nineteen languages in United States meet this criteria. In Orange County, Spanish and Vietnamese, at 26.5 percent at 5.8 percent respectively, are the two languages that meet this criteria. Based on the 2010 Census (and 2013 Census update), the ATN determined that the Anaheim's Spanish speaking population (meet the DOJ Safe Harbor threshold).

The heaviest concentration of Spanish-speaking population in Orange County is in the vicinity of the cities of Santa Ana and Anaheim. Because the City of Anaheim has a high concentration of Spanish-speakers, it is assumed that that the percent of LEP population that speaks English less than "very well" or "not at all" in the City of Anaheim exceeds the five percent threshold.



Based on the four factor analysis conducted by OCTA, ATN developed an implementation plan to ensure meaningful access to information for the LEP residents of the City of Anaheim. Current programs, activities, and services that are being offered by ATN as of April 2013 include:

LANGUAGE ASSISTANCE MEASURES

- Title VI Notification placards in English and Spanish are installed on-board all Anaheim Resort Transportation (ART) buses.
- Interior bus posters displaying general safety information in English and Spanish, along with pictographs
- Major Service and Fare Changes Notices are provided in English and Spanish and are distributed on-board all ART buses, and published in local newspapers
- Many coach operators are bilingual; however, if they are not bilingual, they are instructed to request assistance by contacting dispatch in order to respond to LEP individuals
- LEP callers are directed to bilingual staff. Currently, ATN has several regular hourly employees who speak languages other than English, including Spanish
- ART website has a “translate” feature allowing viewing of ART website information and materials in all language available through Google Translate
- Should language assistance requests be made, ATN has access to interpretation services provided by the Anaheim Orange County Visitor and Convention Bureau (AOCVCB)
- ART Route maps/timetables are universal by showing street alignments and numeric timetables

VITAL DOCUMENTS

Vital Documents are defined as those documents without which a person would be unable to access services. The following are written communications that are currently written in both English and Spanish:

- Title VI Protection Notifications (on-board all buses, website)
- Major Service and Fare Change Notifications (on-board all buses, website, public newspapers)
- Interior bus posters and stickers displaying safety or system information

ATN is currently providing route, schedule and fare information in Spanish in print. ART System Map consists primarily of business and street names, and numeric timetables that cannot be translated in other languages.



STAFF TRAINING

There are four primary staff groups who come into contact with LEP individuals: Coach Operators, Customer Service Representatives, Transit Managers/Administrators and Marketing Staff.

- Coach Operators have the greatest potential to interact with LEP person, through daily interaction with passengers
- Customer Service Representatives are also likely to come into contact with LEP persons by telephone, or when assisting passengers

LEP training for both groups occurs during their initial training and orientation. This training includes understanding Title VI responsibilities, what procedures to follow when encountering an LEP person, and how to handle a potential Title VI complaint.