

LEP Plan

2014

This plan outlines how Mountain Metropolitan Transit ensures populations with limited English proficiency may meaningfully participate in transit planning and activities.

Contents

Limited English Proficiency Plan	1
Introduction & Purpose	1
Four-Factor Analysis	2
Factor 1: Number and Percentage of LEP Persons in Area Permanent Population	2
Factor 2: Frequency and Importance of LEP Contact	3
Factor 3: Nature and Importance of Program or Activity	3
Factor 4: Resources to Reach LEP Population	3
Four Factor Analysis Summary	3
Summary of Language Assistance Efforts	3
Ongoing Efforts to Identify and Address LEP Populations	4
Monitoring and Updating Plan	4

Limited English Proficiency Plan

Introduction & Purpose

The City of Colorado Springs Transit Services Division (MMTransit) operates the local public fixed-route bus service, ADA paratransit demand-response service, and vanpool programs (collectively branded as **Mountain Metropolitan Transit**), and provides more than 10,000 trips per day in a service area that includes more than 400,000 people.

The *Mountain Metro* fixed-route bus service offers 24 bus routes with weekday service and limited Saturday and Sunday service. The routes extend north to Research Parkway, west into Manitou Springs, east to Peterson Air Force Base and south into Widefield. *Mountain Metro Mobility* is the system's complementary Americans with Disabilities Act (ADA) paratransit service, and *Mountain Metro Rides* is Transit's Congestion Mitigation and Air Quality (CMAQ) grant-funded alternative transportation program, designed to reduce congestion and pollution and encourages more people to use carpools, vanpools, bicycling and other means of commuting.

MMTransit believes that communication with all populations, particularly persons who may have limited English proficiency, is essential to the effective and equitable distribution of services. It is the policy of MMTransit to ensure that the programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus do not discriminate on the basis of national origin.

As a recipient of funds from the Federal Transit Administration (FTA) this LEP Plan has been developed to ensure compliance with the following Federal regulations and guidance:

- Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d)
- Executive Order No. 13166

The purpose of the Limited English Proficiency Plan is to meet these requirements and to further MMTransit's commitment to equity. The plan includes an assessment of the limited English proficiency needs of the area, an explanation of the steps that are currently being taken to address these needs, and the steps planned for the future to ensure meaningful access to the transit programs by persons with limited English proficiency.

Four-Factor Analysis

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 the area, and the nature, frequency, and importance of the contact with LEP persons in providing transit services. It also requires a list of resources that would be needed to provide LEP outreach. Each of these elements is addressed in this section.

Factor 1: Number and Percentage of LEP Persons in Area Permanent Population

The 2010 U.S. Census *2006 – 2010 Community Survey* provides information to assist in estimating the number of limited English speakers in the permanent population. **Table 1** presents information for the Colorado Springs Urbanized Area on language spoken at home by ability to speak and communicate in English.

TABLE 1 - Individuals Speaking English "Less than Very Well"

Language Spoken at Home	Colorado Springs Urbanized Area	
	Number	Percent
Total Population (5 years old & older)	453,272	100.0%
English Only	397,297	87.7%
Spanish	33,746	7.4%
Population Speaking English "Less than very well"	13,225	2.9%
Other Indo-European	12,532	2.8%
Population Speaking English "Less than very well"	2,538	0.6%
Asian and Pacific Islander	8,435	1.9%
Population Speaking English "Less than very well"	4,045	0.9%
Other Languages	1,262	0.3%
Population Speaking English "Less than very well"	1,049	0.2%
Total Population Speaking English "Less than very well"	20,857	4.6%

Source: U.S. Census Bureau, 2006-2010 American Community Survey

The total Colorado Springs Urbanized Area population that had difficulty speaking English (Population Speaking English "Less than very well") is estimated at 20,857 people, or less than 5%. Persons who do have difficulty with English are primarily Spanish speaking (13,225 or 2.9%), though there is also a small number of Other Indo-European and Asian and Pacific Islanders in the Colorado Springs Urbanized Area who have difficulty speaking English. The Census data represents a relatively low need among individuals within the service area.

Though the overall need for outreach is relatively small, there is some daily interaction with persons whose principal language is Spanish. The LEP Plan focuses on this population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances.

Factor 2: Frequency and Importance of LEP Contact

In addition to Census data, Mountain Metro Transit gathered internal data from the transit program to establish usage and assistance levels for current passengers. The 2013 On-Board survey confirms that 2% of MMTransit riders principally speak Spanish. Based on an average of nearly 10,000 passenger trips per day, there is the potential for approximately 100 daily contacts with people who could need language assistance. The number of actual instances of need for language assistance is between 100 and 150 times per year, and current communication efforts are meeting passengers' needs.

Factor 3: Nature and Importance of Program or Activity

Given the small population of persons having difficulty speaking English, the nature and frequency of LEP contact is relatively insignificant. However, the contact with LEP individuals is important because the LEP person's transit use may be recurring or of a critical nature and therefore this need does require a targeted response.

Factor 4: Resources to Reach LEP Population

The final component of the Four-Factor Analysis is an inventory of the resources required to conduct targeted LEP outreach. The following resources are used to carry out the LEP Plan:

- Internet services for written translation
- Coordination with other agencies that serve LEP populations
- Staff time as required to maintain LEP activities and outreach efforts
- Annual review of LEP needs
- Coordination with operations staff as needed

Four Factor Analysis Summary

Though the need for outreach is relatively small, there is some interaction with persons whose primary language is Spanish. Further, it is assumed that a number of tourism industry jobs are occupied by people whose primary language is Spanish. MMTransit has based their LEP Plan efforts on the Spanish-speaking population initially, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics.

Summary of Language Assistance Efforts

The current focus of the MMTransit language assistance efforts are directed at Spanish-speaking persons. To address this market MMTransit has initiated the following efforts:

- MMTransit considers bilingual English/Spanish when hiring customer service representatives.

- MMTransit has one (1) Spanish-speaking customer service representative on staff during normal business hours that will assist with Spanish translation and other directions when needed. The contact number for this person is 719-385-7433.
- When available, multilingual drivers assist in overcoming language barriers by translating over the radio.

Ongoing Efforts to Identify and Address LEP Populations

As part of the ongoing commitment to bridging gaps in communication with persons who have limited English proficiency, MMTransit will maintain the current LEP outreach efforts as well as the following activities:

- Update Census data as it becomes available
- Regularly review perceived LEP needs with system transit staff and drivers
- As opportunities arise, coordinate with agencies serving LEP persons which may have resources to share
- Document language assistance requests

Monitoring and Updating Plan

MMTransit will monitor the LEP efforts annually and update the Plan every three (3) years, or as needed. These efforts will include:

- Review the LEP Plan triennially; making adjustments, as needed;
- Pay particular attention to demographic changes in the area that have the potential to affect LEP strategies;
- Review any LEP-related complaints regularly and develop programs to mitigate them;
- Post the LEP Plan and subsequent changes on the City of Colorado Springs website.