

Limited English Proficiency Plan

DCTA's Limited English Proficiency Plan addresses the agency's responsibilities, as a recipient of federal financial assistance to meet the needs of individuals with limited English language skills. Executive Order 13166, titled Improving Access to Service for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. This order applies to all state and local agencies which receive federal funds, including DCTA which receives federal assistance through the U.S. Department of Transportation, which includes the Federal Transit Administration, the Federal Railroad Administration and the Federal Highway Administration.

DCTA has developed this Limited English Proficiency Plan as part of its Title VI program to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided by the transit authority. 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.

In order to ensure meaningful access to programs and activities, DCTA uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate and the appropriate methods to engage those with limited English proficiency. This analysis helps DCTA determine if it communicates effectively with LEP persons and informs language access planning and the development of passenger information.

The Four Factor Analysis is a local assessment outlined by the U.S. DOT that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by DCTA;
2. The frequency with which LEP persons come into contact with DCTA services and programs;
3. The nature and importance of DCTA's services and programs in people's lives; and
4. The resources available to DCTA for LEP outreach, as well as the costs associated with that outreach.

For the purposes of this plan, statistically significant LEP groups are defined as persons with the same first language, comprising 2% or more of the DCTA service area, who have limited English proficiency. Additionally, in accordance with the Safe Harbor provisions, DCTA provides written translation of vital documents for each eligible LEP groups that constitutes 5% or 1,000 persons, whichever is less, of the total population served or likely to be encountered or affected. Based on the four-factor analysis outlined more thoroughly below, DCTA has identified Spanish speaking as an eligible population group throughout the service area and Burmese speaking individuals in the Lewisville, TX service area.

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

The first step in determining the appropriate components of the language assistance program is understanding the proportion of LEP persons who may encounter DCTA's services, their literacy skills in English and their native language, the location of their communities and neighborhoods, and if any are underserved as a result of a language barrier.

DCTA's authority is largely defined by the boundaries of Denton County, while its services are focused within the cities of Denton, Lewisville and Highland Village within the Denton/Lewisville Urbanized Area. Limited campus shuttle service is provided in Flower Mound and Corinth. The A-train has a terminus station in Carrollton that connects with Dallas Area Rapid Transit. Texas has a growing Hispanic community and Denton County and DCTA's service area mirror this trend.

- Review of U.S. Census Data: A review of 2007-2011 American Community Survey data identified a statistically significant representation of Spanish speaking individuals who spoke English less than very well or were linguistically isolated. The table below contains the census data on English proficiency in the DCTA service area. The largest group of persons with limited English proficiency speak Spanish. The cities of Denton and Lewisville have the largest population of individuals with limited English proficiency.

Table 1: LEP Percentages within DCTA Service Area

Geography	Speak Spanish, Speak English Less than Well Very	Speak Other Indo-European, Speak English Less than Well Very	Speak Asian and Pacific Islander, Speak English Less than Well Very	Speak Other Languages, Speak English Less than Well Very
	Denton County	5.9%	0.7%	1.8%
Corinth	1.8%	0.5%	0.8%	<0.0%
Denton	7.3%	0.3%	1.1%	0.1%
Flower Mound	1.1%	0.3%	1.5%	0.1%
Highland	1.5%	0.7%	0.1%	0.0%
Lewisville	13.3%	1.1%	2.6%	0.1%

Source: U.S. Census Bureau. 2007-2011 American Community Survey 5-Year Estimates, Table B16004.

Note: Census geographies are commensurate with Census 2010.

- Review of DCTA Survey Data: DCTA conducts a bi-annual survey of its customers to measure system performance, gather input on service initiatives and priorities, and understand customer demographics. In survey data from 2011 and 2013, English and Spanish were the predominant languages spoken by DCTA customers. 3% of customers in 2011 and 5% of customers in 2013 indicated that Spanish was the primary language spoken in the home.

- Examination of prior experiences: Discussions with DCTA transit operators, customer service representatives and the call center confirmed frequent and consistent encounters with Spanish speaking individuals who have little or no English proficiency. In most cases, the information requested relates to routes, schedules, connections with other transit systems, key destinations (retail, medical, social services, and employers) and fare information.

Discussions with our partner cities, local school districts and stakeholders revealed that their data and experience indicated a need to provide Spanish speaking individuals with information in their native language. Knowing that fact, DCTA has worked with the Hispanic Chamber of Commerce, local school districts, Texas Workforce Commission and social service agencies to ensure the needs of these individuals, especially those with limited English proficiency, are met.

Discussions with Catholic Charities in Lewisville did indicate another demographic in addition to Spanish speaking individuals that meets the Safe Harbor thresholds. Over 3,500 Chinn refugees have relocated to Lewisville with the assistance of Catholic Charities. While representing a small portion of the Lewisville population, a majority of these individuals do not own a car and a likely to need public transportation. DCTA works closely with Catholic Charities on transit training and travel assistance. While Catholic Charities has provided translation services in the past, DCTA took over translation responsibilities of the vital documents in 2014. Vital documents for these purposes include Lewisville Connect Route Guides, the A-train Schedule, Title VI Notice and the Title VI Compliant Form and Procedures.

- Review of regional demographic information: A review of regional demographic trends provided by the North Central Texas Council of Governments also confirmed the migration of Spanish speaking individuals in the area. This group is the fastest growing demographic in Denton County and in the North Texas region.

The analysis conducted in Factor 1 clearly indicates the need for language services in Spanish throughout the service area and in Burmese in Lewisville. Additional understanding of where in the service area populations of limited English proficiency reside is also helpful.

Factor 2: The Frequency with Which LEP Individuals Come Into Contact with DCTA Programs, Activities and Services

There are a large number of places where DCTA passengers and members of the LEP population can come into contact with DCTA services. An important part of the development of DCTA's Language Access Plan is the assessment of major points of contact.

Discussions with DCTA transit operators, customer service representatives and the agency call center indicate frequent interactions with Spanish speaking only individuals. These individuals are frequent users of DCTA's fixed-route and demand response services. While interactions with other individuals that are linguistically isolated but do not speak Spanish is limited, rare occurrences are experienced. African, Asian and Middle Eastern dialects are the next most predominant occurrences.

DCTA hosts regular discussions and opportunities for engagement at DCTA facilities and other public venues during service changes or to gather feedback on service provision. During these interactions with passengers and community members, DCTA staff regularly observes that a significant portion of those waiting on buses were Hispanic and spoke little or no English. Spanish speaking staff is made available to collect feedback from those individuals.

Based on Factor 2 and the discussions described, no other language or population group was consistently identified as an eligible participation group.

Factor 3: The Importance to LEP Persons of DCTA Programs, Activities and Services

Access to the services provided by DCTA, both fixed route and demand response are critical to the lives of many in the area. Many depend on DCTA's fixed route services for access to jobs, education and essential social services. Because of the essential nature of services provided by DCTA, DCTA needs to make every effort to ensure that language is not a barrier for access to the system.

Because of the diverse nature of DCTA's service area, the lack of personal transportation by the Chinn population in Lewisville and the growing Hispanic population throughout North Texas, all of DCTA's services are critically important. This need is confirmed by observation and surveys conducted on-board and at DCTA transit facilities and in consultation with community service organizations. For example, our relationship with Catholic Charities has allowed us to better understand the travel needs of the Chinn population and know that their travel needs are localized to Lewisville.

DCTA has determined that these services are often the primary means of transportation of populations with limited English proficiency. Critical information that can affect access includes route and schedule information; fare and payment information; demand response information and application; complaint and commendation forms, system code of conduct and emergency information, and automated announcements.

Based on Factor 3 analysis, Spanish speaking individuals were the only LEP population identified.

Factor 4: The Resources Available to DCTA and the Costs

DCTA assessed its resources that are used for providing LEP assistance, including cost of translation and printing of additional materials and identifying materials and information that need to be made immediately available in other languages. Consideration was also given to the amount of staff and vehicle operator training that is needed.

Due to the small size of our agency and limited resources, DCTA has collaborated with community organizations and social service agencies to provide assistance. These agencies include Lewisville Independent School District, Denton Independent School District, Carrollton/Farmers Branch Independent School District, Lake Dallas Independent School District, The University of North Texas, Texas Woman's University, North Central Texas College, the Denton Hispanic Chamber of Commerce, the Salvation

Army, the City of Denton, the City of Lewisville, the City of Highland Village, Immaculate Conception Catholic Church, Catholic Charities, Serve Denton, REACH of Denton, Southeast Denton Neighborhood Association, Christian Community Action and Our Daily Bread.

These organizations help with the dissemination of printed information, translation of relevant information, travel training and the identification and joint participation in educational and outreach opportunities to help improve access for LEP persons.

Annually, DCTA reviews its translation expenditures and budgets accordingly for the next fiscal year. Approximately, \$2,000 is spent each year on outside translation services with additional work provided by bilingual staff. DCTA includes translated sections within existing printed materials to minimize printing costs.

LEP Program and Activities

Following the Four Factor Analysis, DCTA concluded that in addition to providing extensive outreach materials in Spanish and vital documents in Burmese, there is a need for additional services to assist other LEP populations within the region.

As a result, DCTA's LEP Program 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. Methods of determination of need and assistance include:

- Examination of 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.
- Have a welcome table at any DCTA sponsored event so that a staff person greets participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist DCTA in identifying language assistance needs for future events. Follow-up participation opportunities will be offered to those individuals either via phone call with an interpreter or through written communication in their native language.
- Have Language 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 contact information to give to the transit system manager for follow-up.
- Actively recruit bilingual employees.
- Dispatchers and schedulers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
- Language Identification Flashcards will be available at the Downtown Denton Transit Center and at the main office reception desk. It will be especially important for the customer service representatives to have these cards available

since the station serves both the local transit system and the regional rail network.

- Creation of a webpage providing information on DCTA's language assistance services (in process).

Language Assistance Measures

Spanish and Burmese speaking individuals with limited English proficiency have been identified as statistically significant populations requiring the access to vital information in their native languages. DCTA will provide the following measures to ensure access to these individuals and other individuals with limited English proficiency:

- Language Identification Flashcards are available at all times in DCTA vehicles, at the Downtown Denton Transit Center, and at transit system administrative offices where tickets are sold or information is distributed.
- The DCTA Title VI Policy, Complaint Form and Limited English Proficiency Plan is posted on the agency website, www.dcta.net.
- DCTA posts a translated version of the beneficiaries notice along with the English version on all DCTA vehicles.
- DCTA provides translations of printed materials including service schedules, maps or other necessary information to assist in effectively utilizing DCTA services or opportunities to comment on DCTA programs and services
- DCTA provides reasonable means for an individual to request public information, comment on DCTA programs or services during the public participation process, or file a complaint to DCTA regarding services or programs.
- DCTA makes every effort to hire bilingual operations staff, customer service representative and operators.
- When an interpreter is needed, in person or on the telephone, staff attempts to determine what language is required and to access language assistance services through local colleges and universities, social service agencies or through www.languageline.com.
- When staff prepares a document or schedules a meeting for which the target population is expected to include LEP individuals, the documents, meeting notices, flyers and agendas are printed in an alternative language based on the known LEP population. Historically, DCTA has provided public meeting materials in Spanish for meetings held in Denton and Lewisville.

Staff Training

The following training is provided to DCTA staff, DCTA operations contractors and DCTA Board of Directors:

- Information on DCTA Title VI Policy and LEP responsibilities;
- Description of language assistance services offered to the public;
- Description of agencies and resources that can assist DCTA in providing service to special populations including those with limited English proficiency;
- Use of Language Identification Flashcards;

- Documentation of language assistance requests;
- Use of language line services; and,
- How to handle a potential Title VI/LEP complaint.

Monitoring and Updating the Plan

The Marketing and Communications Department in conjunction with Planning and Operations staff will monitor the effectiveness of this plan. Monitoring includes annual reviews of census data in coordination with NCTCOG for changing patterns of LEP populations, ongoing collaboration with regional partners and community groups, and post event assessments. Additionally, staff will continue to pursue new media opportunities to offer affordable and effective travel information in multiple languages.

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 appropriate documents for translation;
- Determination of the current LEP and Safe Harbor populations 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 transit system's financial resources are sufficient to fund the language assistance resources needed;
- Determine whether DCTA has fully complied with the goals of this LEP Plan; and,
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of DCTA's LEP Plan

A link to DCTA's plan is included on the DCTA website, www.dcta.net, under the Resources section.

Any person or agency with internet access will be able to access and download the plan from the DCTA website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which DCTA will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to DCTA's President or Chief Operating Officer.

Overview of Planning, Advisory and Policy Makers

In addition to the Board of Directors, DCTA has five committees, one of which, the Citizen Advisory Committee (CAC), consists of non-elected members of the general public.

The duties of the Board and each committee are summarized below.

Board of Directors

DCTA is governed by a 14-member board appointed by respective entities (municipalities or county commissioner's court). Large cities, small cities and at-large members serve two-year terms. There is currently one vacancy on the board. No positions are directly appointed by DCTA. Texas Transportation Code 460 [Section 460.202] outlines eligibility for participation on the board. To be eligible for appointment, a person must: (i) have professional experience in the field of transportation, business, government, engineering or law; and (ii) reside: (A) within the territory of the Authority; or (B) outside the territory of the authority in a municipality that is located partly in the territory of the Authority.

Board Committees

In accordance with the bylaws, the Chairman of the Board appoints members of the board to various committees. DCTA has four active committees Executive, Finance, Program Services and Legislative Committees. These committees do not have authority to act on the behalf of the agency. The committees report its discussions or recommendations, subsequent to its meeting, to the next Board of Directors meeting. While the Executive Committee meets monthly, all other committees meet as needed.

Citizens Advisory Team

The Citizens Advisory Team provides a forum to exchange information between DCTA staff, its passengers and the community members on transit related issues. While the Citizens Advisory Team is not authorized to make decisions, this team of local citizen volunteers has the ability to influence decisions, interact more closely with DCTA Board and staff and more intimately participate in the process. Participation is on a volunteer basis, and citizens are required to reside the local service area. The current team consists of DCTA transit system users and non-transit users as well as interested citizens seeking ways to improve the public transportation options available in Denton County. These residents represent a broad range of interests, such as public transportation; community enhancement; environmental issues; economic development; and issues concerning seniors and the disabled.

DCTA efforts for minority participation

DCTA recognizes the importance of diverse participation on its planning, advisory and policy making bodies. While DCTA does not directly appoint members to its Board of Directors, DCTA will continue to encourage the appointing entities to consider diversity in their selection process. DCTA will continue to actively solicit participation on its Citizen's Advisory Committee and will increase its efforts to engage minority, low-income and LEP populations. Additionally, DCTA occasionally forms ad-hoc stakeholder work-groups to assist with project planning efforts. DCTA ensures that the work groups adequately reflect the diverse community. For example, when DCTA was developing an enhancement project in a neighborhood that was primarily African American, DCTA formed an advisory group that helped develop the plans for the improvements. The advisory group included three African American residents from the neighborhood, three

members from the City of Denton, a representative from the Historical Commission and two members from DCTA.

Table 2: Racial Breakdown of Planning, Advisory and Policy Makers

Body	Caucasian	Latino	African American	Asian American	Native American
Board of Directors	13	0	0	0	0
Citizens Advisory Team	13*	1	0	0	0

Subrecipient Compliance

DCTA does not have any subrecipients.