

## LANGUAGE ASSISTANCE PLAN

### Plan Summary

FACT has developed this Language Assistance Plan (LAP) to help identify steps to provide language assistance for LEP persons seeking meaningful access to FACT’s services. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. The LAP details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the LAP, FACT undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in FACT service area who may be served or likely to encounter a FACT program, activity, or service; 2) the frequency with which LEP individuals come in contact with any FACT services; 3) the nature and importance of the program, activity or service provided by FACT to the LEP population; and 4) the resources available to FACT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

### Four Factor Analysis

**1. The number or proportion of LEP persons eligible in the FACT service area who may be served or likely to encounter a FACT program, activity, or service.**

The US Census Bureau, table C16001 provides information for FACT ‘s service area (Fayette County) for thirteen (13) language groups for population’s 5-years and over by language spoken at home and speak English less than very well. This survey shows that 0.3 percent of the County’s total population or 313 people who speak Spanish at home, speak English less that very well. The Spanish language group had the highest number (313) and percentage (0.3) of people that speak English less than very well in Fayette County. All other language groups had 64 people or less.

Label	Fayette County Estimate	Percent of Total Population
Total:	121,995	
Speak only English	118,466	97.1%
Spanish:	1,318	1.1%
<b>Speak English less than "very well"</b>	<b>313</b>	<b>0.3%</b>
French, Haitian, or Cajun:	358	0.3%
Speak English less than "very well"	64	0.1%
German or other West Germanic languages:	362	0.3%
Speak English less than "very well"	48	0.0%
Russian, Polish, or other Slavic languages:	243	0.2%
Speak English less than "very well"	21	0.0%

Other Indo-European languages:	554	0.5%
Speak English less than "very well"	53	0.0%
Korean:	35	0.0%
Speak English less than "very well"	21	0.0%
Chinese (incl. Mandarin, Cantonese):	102	0.1%
Speak English less than "very well"	28	0.0%
Vietnamese:	0	0.0%
Speak English less than "very well"	0	0.0%
Tagalog (incl. Filipino):	97	0.1%
Speak English less than "very well"	27	0.0%
Other Asian and Pacific Island languages:	140	0.1%
Speak English less than "very well"	60	0.0%
Arabic:	191	0.2%
Speak English less than "very well"	23	0.0%
Other and unspecified languages:	129	0.1%
Speak English less than "very well"	14	0.0%
<i>Source: US Census American Community Survey 5-Year Estimate, 2022, C16001</i>		

Consistent with the safe harbor provision, FACT will continue to review LEP service area demographics to determine if there is a need to translate vital documents into languages spoken by LEP populations that represent five percent or 1,000 individuals, whichever is less, of FACT's overall service population. Vital documents may include documents such as written notices of rights, consent and complaint forms, schedules and intake and application forms.

At this time, FACT's LEP populations are less than the number and percentages identified in the safe harbor provisions. However, since the Spanish language group had the highest number (313) and percentage (0.3) of people that speak English less than very well, FACT translates key documents in Spanish.

FACT continues to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed. These services are free to the consumer.

**2. The frequency with which LEP individuals come in contact with a FACT program, activity, or service.**

FACT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. Since June 2011, FACT has had no requests for interpreters and zero requests for translated FACT documents. The staff and drivers have little to no barriers communicating to with LEP individuals.

**3. The nature and importance of the program, activity, or service provided by FACT to LEP community.**

FACT is important to the public including the LEP population to get to work, medical appointments, school and recreational activities. There is no large geographic concentration of

any one type of LEP individuals in FACT’s service area. The overwhelming majority of the population, 97% speaks only English. At this time, there is a lack of social, service, professional and leadership organizations within the FACT’s service area that focuses on outreach or membership of LEP individuals.

**4. The resources available to the FACT and overall costs.**

FACT assessed its available resources that could be used for providing LEP assistance. FACT has limited resources; however, the organization is committed to ensuring LEP persons have meaningful access to FACT’s programs, services and activities. FACT will continue to monitor LEP populations and provide language services on an as-needed basis. The table below summarizes the costs.

<b>Cost of Language Services</b>	
Document Translation	\$0.20 to \$0.28 per word
Telephone Interpretation/Over the Phone Interpretation	\$1.30 to \$1.70 per minute
Video Interpretation/Video Remote Interpretation	\$150 to \$160 per hour
On-site Interpretation	\$175 to \$200 per hour, plus travel time
<i>Source: Keylingo (<a href="https://keylingo.com">https://keylingo.com</a>)</i>	

**LIMITED ENGLISH PROFICIENCY PLAN OUTLINE**

**How to Identify an LEP Person who Needs Language Assistance**

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When FACT sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gage the attendee’s ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau’s “I Speak Cards” at the workshop or conference sign-in sheet table. Also, have the cards available at FACT’s Transit Center Customer Service Area; and
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience of having any direct or indirect contact with LEP individuals.

**Language Assistance Measures**

FACT has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least “well,” and the lack of resources available in the FACT service area:

- Census Bureau’s “I Speak Cards” are to be located at the Customer Service window in the Transit Center at all times.
- FACT’s website is designed with Free Language translation.

- FACT provides free language interpretation services.
- Translate key documents into Spanish.
- Bilingual staff
- When an interpreter is needed, in person or on the telephone, staff shall use the telephone interpreter service – Language Line Services at <http://www.languageline.com>. On the Language Line home page, staff will select the Need an Interpreter Now link and follow the directions to receive and access code.
- Additionally, FACT will continue to monitor its service area population and customer interactions for the need to increase its language assistant measures.

If we engage the services of a company, FACT will:

- Ensure that our internal and external translators demonstrate their ability to accurately translate English and the other language in which they are fluent.
- Ensure that outside resources are versed in our industry terminology so they can better serve the community.
- Instruct the interpreter or translator that they should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translating.
- Request that the interpreter or translator attest that they will not have a conflict of interest on the issues for which they would be providing interpretation services.

### **FACT Staff Training**

All FACT staff have been provided with the LEP Plan and procedures. This information is also be part of staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services the FACT offers;
- Use of Language Identification “I Speak Cards”;
- How to use the Language Line (<http://www.languageline.com>) interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

### **Outreach Techniques**

FACT does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. FACT will determine the level of outreach needed to ensure that LEP populations are able to access FACT’s services. The following are a few options that the FACT will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in the alternative language, based on known LEP population in the area.
- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible” This means “A Spanish translator will be available”.

- Key print materials, including but limited to schedules and maps, will be translated and made available at the FACT Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, FACT will follow the Title VI Program update schedule for the LEP Plan. If there is a change or concentration of LEP populations, FACT will update the Plan. The updates will include:

- Review of demographics, customer service calls and employee encounters with LEP persons;
- Conduct internal survey to determine frequency of encountering LEP persons;
- Identify if LEP persons' needs were met.
- Determine if there has been a change in the types of languages where translation services are needed.
- Determine if needs of LEP have been addressed.
- Has FACT's available resources, such as technology, staff, and financial costs changed?
- Is there still a need for continued language assistance for previously identified FACT programs? Are there other programs that should be included?
- Has the FACT fulfilled the goals of the LEP Plan?; and
- Were any complaints received?
- Monitor changes.
- Update Plan.

### **Dissemination of the FACT Limited English Proficiency Plan**

FACT disseminates and posts the LEP Plan to employees. In addition, the LEP Plan is posted on FACT's 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.

Questions or comments regarding the LEP Plan may be submitted to FACT's Executive Director:

Rudy P. Dutko, Executive Director  
Office of Human and Community Services  
Fayette Area Coordinated Transportation  
825 Airport Road  
Lemont Furnace, PA 15456  
(724) 628-7433 – Phone