

# **Language Assistance Plan for Northeast Contemporary Services, Inc. (NCSI) – Transportation Service**

**Effective: June 27, 2016**

## **Purpose**

The purpose of this Language Assistance Plan (hereinafter “plan”) is to meet Federal Transit Administration’s (FTA’s) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a subrecipient of FTA funds, NCSI is pledged to take reasonable steps to provide meaningful access to its Transportation Service for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons.

The completion of this plan for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT’s FTA Office of Civil Rights’ publication “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers,” dated April 13, 2007, was used in the preparation of this plan.

The plan for Northeast Contemporary Services, Inc. contains:

- A. A needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods for monitoring, evaluating and updating the plan

## **A. LEP Needs Assessment – the Four-Factor Analysis**

Factor 1. The number or proportion of LEP persons in our service area who may be served or are likely to encounter NCSI’s Transportation Service.

NCSI assessed the following information about LEP persons to determine the number or proportion of LEP persons who might use or want to use our Transportation Service:

- 2010 US Census data
- 2014 American Community Survey data
- Minnesota State Demographic Center’s website
- MnDOT’s MnMap
- Minnesota Compass
- *Public Transit and Human Services Transportation Coordination Action Plan – Twin Cities Metropolitan Area*

NCSI's current Transportation Service is specifically for people participating in our Day Training & Habilitation (DT&H) and Supported Employment services. Those people are adults ages 21 and older, living in Ramsey County, who have intellectual and developmental disabilities.

(Of the "civilian noninstitutionalized population") 5% of persons aged 18-64, and 8% of persons aged 65 and older, living in Ramsey County have cognitive disabilities.

9.7% of all persons (with and without cognitive disabilities) aged 5 and older, living in Ramsey County, who speak a language other than English, speak English "less than very well."

Based on the above statistics, the total number of LEP persons who live in Ramsey County, who are aged 21 and older, and who also have cognitive disabilities, is very small.

Factor 2. The frequency with which LEP persons come in contact with our Transportation Service.

NCSI currently has three LEP persons who participate in our DT&H and Supported Employment services and who utilize our Transportation Service. These three individuals' first language is Karen.

NCSI's Transportation Service also currently serves two people who speak Hmong, however they are both proficient in English.

The interdisciplinary team members of the LEP persons who utilize our Transportation Service assist NCSI staff with oral interpretation and written translation in the Karen language when needed.

The conclusion drawn from examining this information about LEP persons seeking NCSI's Transportation Service is that there isn't a high need for NCSI to provide language assistance.

Factor 3. The nature and importance of NCSI's Transportation Service to the LEP population.

While NCSI considers our Transportation Service to be important and essential for the people participating in NCSI's DT&H and Supported Employment services, and the three LEP persons currently participating at NCSI utilize our Transportation Service to travel to and from our service site, based on Factor 1 our Transportation Service isn't critical to our eligible population as a whole.

Factor 4. The resources available to our Transportation Service and the overall cost to provide language assistance.

Our current budget for *marketing* to LEP persons in their language about NCSI's Transportation Service is \$0. Our current budget for *communicating* with LEP persons in their language about NCSI's Transportation Service is limited to on-request oral interpretation services.

As noted in the Factor 2 section, the interdisciplinary team members of the LEP persons who utilize our Transportation Service assist NCSI staff with oral interpretation and written translation when needed.

## **B. Language Assistance Measures**

Based on the four-factor analysis in Part A above, NCSI currently has the appropriate mix of LEP services. These language assistance measures are:

- Arranging for the availability of oral interpretation either via phone or in person.
- Communication with LEP persons' interdisciplinary teams about our Transportation Service.

In addition, NCSI currently employs a staff member who is orally proficient in Hmong.

Based on the fact that our current LEP persons served speak Karen, moving forward NCSI will be reaching out to the Karen Organization of Minnesota to explore how we might partner in the future in order to continue to provide meaningful access to LEP persons who are eligible for our Transportation Service.

## **C. Staff Training**

To ensure effective implementation of this plan, NCSI will schedule training at orientations for new staff and for all relevant employees on an annual basis to review:

- NCSI – Transportation Service's Language Assistance Plan
- demographic data about local LEP population
- how to handle verbal requests for NCSI's Transportation Service in a foreign language
- responsibility to notify Executive Director about any LEP persons' unmet needs
- information about NCSI's Title VI Notice to the Public, Title VI Complaint Procedures, and Title VI Complaint Form.

## **D. Notice to LEP Persons about Available Language Assistance**

NCSI plans to notify LEP persons in their own language about the language assistance available to them without cost by working with the members of their interdisciplinary teams during the intake process.

## **E. Annual Monitoring, Evaluating and Updating Plan**

NCSI will review this plan during its annual review with its Mn/DOT transit project manager by:

- assessing its effectiveness (e.g., comparing numbers of LEP persons served by year, number of requests for language assistance received during the year),
- assessing the sufficiency of staff training and budget for language assistance,
- reviewing current sources for assistance to ensure continuing availability, and
- reviewing any complaints from LEP persons or about their needs that were received during the past year.

This plan will be reviewed by NCSI annually. Revisions of this plan will be approved by the Board of Directors and dated.

## **F. Dissemination of Plan**

This Language Assistance Plan is available on our website at <http://www.northeastcontemporaryservices.org>.

This plan is also available at no cost in English upon request by telephone, fax, and mail or in person.

If requested to be provided in another language and it is feasible to have it orally interpreted, information will be provided at no cost to the requester.

## **G. Contact Information**

Questions or comments about this plan may be submitted to:

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