

Language Assistance Plan

Go COMO Limited English Proficiency Plan

Policy

Go COMO strives to ensure that all segments of the population, including LEP persons, are provided with meaningful access to its programs, services and planning. It is the policy of Go COMO to provide meaningful access to persons who, as a result of national origin, are limited in English proficiency.

Title VI Responsibilities

This Limited English Proficiency Plan has been prepared to address Go COMO's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

LEP Persons

LEP persons are those whose proficiency in speaking, reading, writing, or understanding English, as a result of national origin, is such that it would deny or limit their meaningful access to programs and services provided by Go COMO if language assistance were not provided. Go COMO assists LEP individuals, as outlined in this plan, in accessing its programs and services and Go COMO is committed to continuing to improve this access.

Analysis

Part of Go COMO's policy of providing meaningful access to LEP persons is understanding the current conditions surrounding this issue. It is necessary to understand the LEP population in Go COMO's service area, to determine the frequency with which LEP persons use its programs and services, to evaluate the importance of the various programs and services, and to consider the resources available.

Number And Proportion of LEP persons eligible to be served by Go COMO

Go COMO surveyed the LEP population of residents within the Columbia city limits, including some adjacent portions outside of the city limits. [See **Appendix C** for LEP Population Chart by Census Tract and see **Appendix D** for Map of Census Tracts]. A significant majority of people in the Go COMO service area are proficient in the English language. Based on the 2010 Census data, approximately 3.8% of the population five years of age and older speak English “less than very well.” See the table below for the populations by numbers and percentage.

	Totals
SERVICE AREA	
Population (5 Years and Over)	125,878
LIMITED ENGLISH PROFICIENCY	
LEP %	3.8%
LEP #	4,721
SPANISH	
Spanish % (5 Years and Over)	2.20%
Spanish #	2,733
Spanish LEP%	0.80%
Spanish LEP#	1,047
OTHER INDO-EUROPEAN (OIE)	
OIE % (5 Years and Over)	2.60%
OIE #	3,221
OIE LEP %	0.50%
OIE LEP #	680
ASIAN & PACIFIC	
Asian & Pacific % (5 Years and Over)	3.40%
Asian & Pacific #	4,228
Asian & Pacific LEP %	1.90%
Asian & Pacific LEP #	2,333
ALL OTHER	
All Other % (5 Years and Over)	1.50%
All Other #	1,871
All Other LEP %	0.50%
All Other LEP #	649

Frequency with which LEP persons come into contact with Go COMO

The Go COMO staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, Go COMO has had no requests for an interpreter, either in person or by phone.

Although there have been no requests for interpreters, in surveying City staff, the frequency with which driver and non-drivers come into contact with passengers who do not speak English, or have trouble understanding English when it is spoken to them, is higher. See the table below for the results of the staff survey. [See **Appendix E** for Staff Survey Sample Form].

Staff Surveyed	21 Employees (14 Drivers, 7 Non-Drivers)
Responses to Frequency of Contact with Passengers who do not speak English or have trouble understanding English when it is spoken to them	5 - Daily 6 - Weekly 6 – Monthly 4 – Less than Monthly
Responses to Languages Spoken (in no particular order)	Spanish, Chinese, Bosnian, Korean, American Sign Language, East Asian Language, Swedish, Vietnamese, Serbian, Croatian, Slovenian, African Language, Pilipino (Tagalog), Middle Eastern, Persian
Responses to Translator Requests	Two (2) Go COMO employees identified as willing to serve as Translators and one (1) employee identified as maybe: <i>Adnan Halivovic</i> : Bosnian, Serbian, Croatian, Slovenian <i>Cesar Guevara</i> : Pilipino (Tagalog) <i>Shannon Hemenway</i> : Spanish, French [maybe]

Nature and importance of the program, activity

Public transportation is vital to many people’s lives. According to the Department of Transportation’s Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (LEP) Persons, “Providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment.” **2010 Census data for the area indicates that only 3.8% of the population identify as LEP. While this number is small, it is still important to provide exceptional service to all customers. However, the vast majority of foreign language speakers are in Columbia for the University of Missouri. In order to attend they must pass certain thresholds for English proficiency. This is likely the reason for the low number of LEP individuals in the community. At this time, signage is translated into Spanish and Mandarin.**

Resources available to Go COMO for LEP outreach

Resources that have been, or may be useful in Go COMO’s LEP efforts include:

- University of Missouri – International Center
- Centro Latino,
- Refugee and Immigration Services

Proposed Actions

Go COMO strives to ensure that all segments of the population, including LEP persons, are provided with meaningful access to its programs, services and planning. Go COMO has adopted this LEP plan to ensure that this goal is achieved in a manner that is both effective and efficient. Consistent with the analysis of the LEP population, Go COMO's limited financial resources, and its policy, Go COMO offers the following:

Language Assistive Services

Signage describing our language services is displayed on all buses and at the Wabash Station (See attached PDF). Translation for these signs was provided at no cost by the International Center at the University of Missouri.

- All buses contain a language card for Bus Drivers to use to help identify the language spoken by a customer. Drivers are instructed to refer the Customer to a dispatcher who can access the Language Line or a member of staff who speaks the language, if necessary. To date, this has not been necessary. A list of staff who speak various languages and instructions for accessing the Language Line are kept in the LEP log book at the Dispatch Desk.
- Annually Transit works with the University of Missouri International Center to provide information on public transportation to their students. Typically, at the beginning of each school year, we provide a short trip from the International Center on the MU campus to our main Customer Service office at the Wabash Station. During the trip a staff member will discuss the basics of the service and answer questions. At the station maps and materials are provided and additional staff are on hand to answer further questions.
- Go COMO is continually looking for new ways to improve on the current processes and outreach.

Notice to LEP persons about language assistive services

- Language Services information is displayed in all Go COMO vehicles and at the main transfer center in the Wabash Station (See attached PDF of the sign).
- With the major revision of the Fixed Route system, all websites, maps, signs and printed material will be updated to include new branding and information. A complete evaluation of LEP and Title VI information will be included in this process.

Updating LEP Plan

- Go COMO monitors LEP population and all LEP requests. The Transportation Superintendent, in collaboration with the Title VI Coordinator for the City, may evaluate the LEP plan and update the information. Furthermore, this plan is available to the public and Go COMO will accept public comment on the plan at any time. This plan will be formally evaluated every three (3) years. During a formal evaluation, Go COMO will receive public feedback from riders, external organizations, the public in general and staff. It will consider the feedback with its advisory bodies and its governing body before updating the plan.

Staff Training

- All Go COMO staff are trained on LEP procedures in orientation. Refresher training for all staff is administered once each year at all employee meetings.
- Determining that LEP materials are on board each bus is part of the daily pre-trip of vehicles for drivers.