



BUTTE COUNTY ASSOCIATION OF GOVERNMENTS  
BUTTE REGIONAL TRANSIT, B-LINE

326 Huss Drive, Suite 150  
Chico, CA 95928  
Tel: 530-809-4616 Fax: 530-879-2444

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the Butte County Association of Governments (BCAG) and Butte Regional Transit (BRT) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Federal Executive Order 13166, titled ***Improving Access to Services for Persons with Limited English Proficiency***, states that differing treatment based on a person's inability to speak, read, write or understand English is a type of national origin discrimination. The Executive Order directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all BCAG departments receiving federal grant funds.

Plan Summary

BCAG is the owner and operator for Butte Regional Transit (BRT) and has developed this LEP plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by BRT. 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.

This LEP plan 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 through various public outreach efforts.

### BCAG and BRT (the B-Line) Language Assistance Plan

In order to prepare this plan, BCAG/BRT used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a BRT program, activity or service.
2. The frequency with which LEP persons come in contact with BRT programs, activities or services.
3. The nature and importance of programs, activities or services provided by BRT to the LEP population.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. For example, interpretation services available to BRT and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

#### Four-Factor Analysis

1. The number or proportion of LEP persons in the Butte County who may be served or are likely to require BRT services.

BRT staff reviewed the 2014 American Community Survey (5-year estimates) and determined that 13.3% of the population 5 years and over in Butte County speak a language other than English. In Butte County, 5.5% (~11,517 persons) of the population 5 years and over speak English less than “very well”

In Butte County, of those ~11,517 persons 5 years and over who speak English less than very well, 58% speak Spanish or Spanish Creole, 32% speak Asian and Pacific Island languages, and 9% speak other Indo-European languages.

2. The frequency with which LEP persons come in contact with BRT programs, activities or services.

BRT assessed the frequency with which the board members, office staff, customer service representatives and bus drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries, complaints and surveying vehicle operators for requests for interpreters and translated documents. To date, the most frequent contact between LEP persons is with bus drivers. Translated documents have included postings on the buses relating to fares and transit rules written in Spanish. The Title VI Notice is on all of BRT buses and are posted in English, Spanish and Hmong.

BRT will continue to assess the frequency with which staff and drivers have or could have, contact with LEP persons. These include the following points of contact and their frequency:

#### Main Points of Contact with LEP persons

- Buses
- Drivers
- Chico Transit Center
- Travel Training Guides – Mains'l
- Dispatchers
- Customer Service Representatives
- Paratransit and Dial-a-Ride Reservationists
- Jurisdictions selling bus tickets
- [www.blinetransit.com](http://www.blinetransit.com) and [www.bcaq.org](http://www.bcaq.org)

3. The nature and importance of programs, activities or services provided by BRT to the LEP population.

The largest geographic concentration of LEP individuals in the BRT service area is Spanish. Two concentrated areas have been identified in Butte County. The City of Oroville has 6.2% of adult speakers who speak English less than very well. The City of Gridley has 12.1% of adult speakers who speak English less than very well. Services provided by BRT that are most likely to encounter LEP individuals are the fixed route system which serves the general public and the demand-response (Dial-A-Ride) system which serves primarily senior and disabled persons.

It is also likely that BRT will encounter LEP individuals at the downtown Chico Transit Center which serves as the regional hub for transit riders and buses. A customer service representative is available to answer general questions relating to transit, bus tickets and schedules. Discount tickets are sold at the transit center, community outreach events and posters are displayed and Title VI public notices are posted.

4. The resources available to BRT and overall costs to provide LEP assistance.

BCAG/BRT assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that BRT could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four-factor analysis, BRT developed its LEP Plan as outlined in the following section.

## Limited English Proficiency (LEP) Plan Outline

### Language Assistance Measures

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to BRT services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

There are also various ways in which BRT staff responds to LEP persons, whether in person, by telephone or in writing.

- Provide bilingual staffing to provide Spanish-speaking interpretation at its Administrative offices and Customer Service;
- BRT Hispanic Education and Outreach Programs will continue to provide vital information to LEP groups on BRT programs and services;
- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on BRT programs and services;
- Provide a bilingual Community Outreach Coordinator at community events, public hearings and Board of Director meetings;
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven-day advance notice. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.
- Survey bus drivers and other front-line staff, like customer service representatives, dispatchers, dial-a-ride schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year;
- Provide *Language Identification Flashcards* at the Transit Center, onboard the BRT fleet, in Road Supervisor vehicles and at transit systems administrative offices;
- Post the BRT Title VI Policy and LEP Plan on the agency website, [www.blinetransit.com](http://www.blinetransit.com) and [www.bcaq.org](http://www.bcaq.org);

- Provide group travel training to LEP persons with the assistance of bilingual staff;
- Include language “Spanish a plus” on bus driver recruitment flyers and onboard recruitment posters;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from Disability Action Center, a professional translation service or qualified community volunteers.

How BRT and staff may identify an LEP person who needs language assistance:

1. Conduct examination of customer service center records for language assistance requests or assistance provided in person or over the phone.
2. BRT eligibility coordinators and dispatchers will be instructed to record and report on passenger requests for language assistance.
3. Schedule public meetings in neighborhoods where LEP residents are concentrated, and advertise the availability of translation assistance at least two weeks in advance.
4. Have a staff person greet participants as they arrive to BRT sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English.
5. Census Bureau Language Identification Flashcards; strive to make available at BRT meetings. This will assist BRT in identifying language assistance needs for future events and meetings.
6. Census Bureau Language Identification Flashcards; strive to make available 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 BRT’s management for follow-up.
7. Conduct an annual survey of vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and customer service representatives on their experience concerning any contacts with LEP persons during the previous year.

## Staff Training

BRT will continue to train staff on the following:

1. Information on the BRT Title VI Policy and Procedures and LEP responsibilities
2. Provide new BRT staff and Contractors the staff training handout that explains what Title VI is about, the complaint process, the Language Assistance Plan, what to do if an LEP person is encountered, and services offered to LEP persons.
3. Use of Language Identification Flashcards (used to identify language preference)
4. Documentation of language assistance requests
5. BCAG/BRT coordinates with the Disability Action Center to provide language interpretation services for Spanish and Hmong.
6. How to handle a potential Title VI/LEP complaint

***All contractors or subcontractors performing work for BRT will be required to follow the Title VI/LEP guidelines.***

## Outreach Techniques and Translation of Documents

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

BCAG/BRT will be providing Google Translate on both the BRT and BCAG websites to make vital documents available and accessible to LEP persons of many languages.

## Monitoring and Updating the LEP Plan

BRT will update the LEP as required. At minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the BRT service area. 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 the current LEP population 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 BRT's financial resources are sufficient to fund language assistance resources needed
- Determine whether BRT has fully complied with the goals of this LEP Plan

- Determine whether complaints have been received concerning BRT's failure to meet the needs of LEP individuals
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints

### Dissemination of the BRT LEP Plan

A link to the BRT LEP Plan and the Title VI Procedures is included on the BRT and BCAG websites at [www.BLinetransit.com](http://www.BLinetransit.com) and [www.bcag.org](http://www.bcag.org).

Any person or agency with internet access will be able to access and download the plan from the BRT 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 BRT will provide, if feasible.

State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at 530-879-2468.

Post signs at conspicuous and accessible locations notifying LEP persons of the LEP Plan and how to access language services.

Questions or comments regarding the LEP Plan may be submitted to the Butte County Association of Governments, Title VI Administrator or Transit Manager:

Butte County Association of Governments  
Butte Regional Transit  
326 Huss Drive, Suite 150  
Chico, CA 95928

Phone: 530-809-4616  
Fax: 530-879-2444  
Email: [cmassae@bcag.org](mailto:cmassae@bcag.org)  
(Cheryl Massae, Title VI Administrator)  
Email: [mrosson@bcag.org](mailto:mrosson@bcag.org)  
(Michael Rosson, Transit Manager)