

Limited English Proficiency Plan
Northern Oklahoma Development Authority
DBA: Cherokee Strip Transit
June 2017

Adopted: June 22, 2017
Northern Oklahoma Development Authority
Governing Board

Title VI Coordinator

2901 North Van Buren, Enid, Oklahoma 73703

(580) 863 – 2279

Introduction

This Limited English Proficiency Plan has been prepared to address Northern Oklahoma Development Authority DBA: Cherokee Strip Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d, 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.

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 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 Northern Oklahoma Development Authority DBA: Cherokee Strip Transit departments receiving federal grant funds.

Plan Summary

The Northern Oklahoma Development Authority DBA: Cherokee Strip Transit has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined 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 plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff 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.

In order to prepare this plan, the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit used the four-factor LEP analysis which considers the following factors:

1. The number of proportion of LEP persons in the service area who may be served by the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit.
2. The frequency with which LEP persons come in contact with Northern Oklahoma Development Authority DBA: Cherokee Strip Transit services.
3. The nature and importance of services provided by the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit to the LEP population.
4. The interpretation services available to the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

- 1. The number of proportion of LEP persons in the service area who may be served or are likely to require Northern Oklahoma Development Authority DBA: Cherokee Strip Transit services.**

The Northern Oklahoma Development Authority DBA: Cherokee Strip Transit staff reviewed the 2000 U.S. Census Report and determined that 3299 person, or 2.1% in Northern Oklahoma Development Authority DBA: Cherokee Strip Transit service area speak English “less than very well”.

2. The frequency with which LEP persons come in contact with Northern Oklahoma Development Authority DBA: Cherokee Strip Transit services.

The Northern Oklahoma Development Authority DBA: Cherokee Strip Transit staff reviewed the frequency with which the office staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit has had no requests for interpreters and no requests for translated program documents. The office staff and drivers have had very little contact with LEP persons. Northern Oklahoma Development Authority DBA: Cherokee Strip Transit has had other service agencies schedule transportation for LEP persons; on arrival they had secured the translator to accompany their client. Often times they have had family member or friend to assist with translation.

3. The nature and importance of services provided by the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit. The overwhelming majority of speak only English. As a result, there are few social, service, professional, and leadership organizations within the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit service areas that focus on outreach to LEP individuals, that the agency is aware of.

4. The resources available to the Northern Oklahoma Development Authority DBA: Cherokee Strip Transit and overall cost to provide LEP assistance.

The Northern Oklahoma Development Authority DBA: Cherokee Strip Transit reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period.

LANGUAGE ASSISTANCE

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 Northern Oklahoma Development Authority DBA: Cherokee Strip Transit 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.

How Northern Oklahoma Development Authority DBA: Cherokee Strip Transit staff may identify an LEP person who needs language assistance:

- Northern Oklahoma Development Authority DBA: Cherokee Strip Transit staff can be provided “I Speak” cards to assist in identifying the language interpretation needed, if the occasion arises.

- When Northern Oklahoma Development Authority DBA: Cherokee Strip Transit sponsors an informational meeting or event, an advanced public notice of the event will likely be published in local newspapers, including an opportunity to request an accommodation related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). 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.

LANGUAGE ASSISTANCE MEASURES

Although there is a very low percentage of LEP individuals, that is, persons who speak English "not well" or "not at all", in Northern Oklahoma Development Authority DBA: Cherokee Strip Transit's service area, it will strive to offer the following measures:

1. Northern Oklahoma Development Authority DBA: Cherokee Strip Transit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:

- Volunteer interpreters for the Spanish language will be contacted for availability within a reasonable time period.
- Attempts will be made for language interpretation for all other languages through Google Translate or telephone interpretation services, as needed.

STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of Spanish translation cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

TRANSLATION OF DOCUMENTS

Northern Oklahoma Development Authority DBA: Cherokee Strip Transit weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, due to the very small local LEP population, Northern Oklahoma Development Authority DBA: Cherokee Strip Transit does not have a formal outreach procedure in place. Translation resources are limited in this region. However, when and if the need arises for LEP outreach, Northern Oklahoma Development Authority DBA: Cherokee Strip Transit will consider available options.

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

MONITORING

Northern Oklahoma Development Authority DBA: Cherokee Strip Transit will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the new Census is available, or when it is clear that higher concentrations of LEP individuals are present in Northern Oklahoma Development Authority DBA: Cherokee Strip Transit service area. Updates will consider 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 Northern Oklahoma Development Authority DBA: Cherokee Strip Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Review any Title VI complaints, including LEP to determine issues and basis of complaints.

DISSEMINATION OF NORTHERN OKLAHOMA DEVELOPMENT AUTHORITY DBA: CHEROKEE STRIP TRANSIT LEP PLAN

Title VI Notice to the Public is posted at each transit site and on the agency web site. A phone number is provided if information is needed in another format.