

Golden Crescent Regional Planning Commission
Improving Access for People with
Limited English Proficiency (LEP) *revised 3/2020*

Four Factor Analysis

The Golden Crescent Regional Planning Commission (GCRPC) has conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from FTA.

Analysis Using Four Factor Framework

GCRPC has conducted the following analysis using the four factors identified in the DOT LEP Guidance:

❖ **Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.**

Task 1. Step 1: Examine prior experiences with LEP Individuals.

GCRPC's Small-Urban and Rural Transportation Programs serve a diverse region covering Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, Matagorda and Victoria counties. Minority populations make up about 69 percent of the population in the city of Victoria. Hispanics make up the largest minority with 45 percent of the total minority population. Black and Asian persons account for 7.2 and 0.2 percent of the population, respectively. There is also a small number of American Indian/Alaska Native which represents 1.1 percent of the population. We also have 15.6 percent of the population who identified themselves as some other race. (U.S. Census 2010)

In the Region as a whole the Minority population makes up about 48.1 percent of the population, and Hispanics make up the largest minority with 38.9 percent of the total minority population. Black persons account for 6.8 percent of the population 2.4 percent of the population are made up of other races. (U.S. Census 2010)

GCRPC's Transit Operation staff report daily interactions with LEP persons, particularly persons speaking Spanish as their primary language. The information needed relate to use of transit services including requesting route and schedule information, fare information, transfers, etc.

Task 1. Step 2: Become familiar with data from the U.S. Census.

Table 1.1 describes the languages spoken in the Small-Urban area of the City of Victoria:

Language Spoken At Home Population 5 years and over	2010 Estimate	Percent
English only	40,599	71.3%
Language other than English	16,348	28.7%

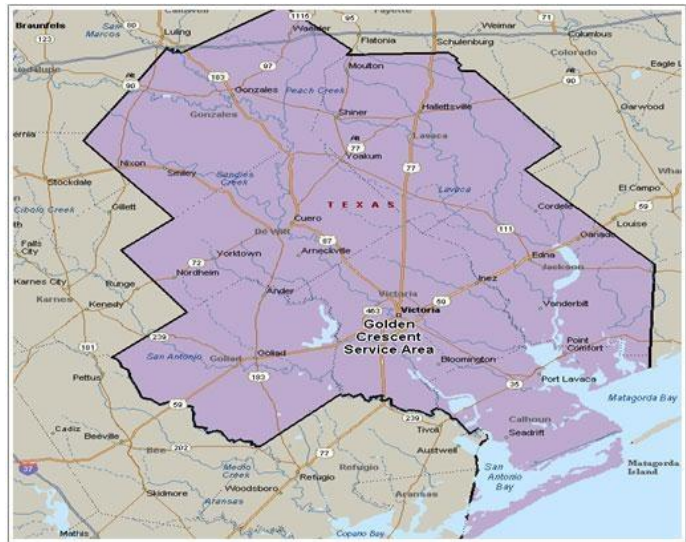
Speak English less than “very well”	5,181	9.1%
Spanish	15,238	26.8%
Speak English less than “very well”	4,735	8.3%
Other Indo-European languages	660	1.2%
Speak English less than “very well”	185	0.3%
Asian and Pacific Islander languages	323	0.6%
Speak English less than “very well”	157	0.3%
Other languages	129	0.2%
Speak English less than “very well”	84	0.1%

Source: 2010 U.S. Census Bureau

The most significant non-English language populations speak Spanish, with 8.3% speaking not “very well”.

Task 1. Step 2.A: Identify the geographic boundaries of the area that your agency serves.

GCRPC’s service area is defined by the city limits of Victoria for the Small-Urban Transit Program, and for the Rural Transit Program it serves the rural communities of Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, Matagorda, and Victoria counties.



Task 1. Step 2B: Obtain Census data on the LEP population in your service area.

Appendices A.1 contain census data on English proficiency in the Small-Urban City of Victoria, and the Rural Communities in the Golden Crescent Region, listing population by language of origin and the numbers of those speaking English “very well”, “well”, “not well”, and “not at all”.

Task 1. Step 2C: Analyze the data you have collected.

Non-proficiency is determined by adding those who speak English in any category other than well.

- A total of 8,539 persons are identified with limited English proficiency. Of these 4,941 are foreign born.
- Among the Spanish speaking population 8,026 persons are not proficient with English. Of these 4,555 are foreign born.

- For Asian or Pacific Island languages 385 persons are not English proficient. Of these 375 are foreign born.
- The remaining 140 speak either Indo-European or other languages. Of these 11 are foreign born.

Of the total small-urban population 2,136, 3.8% are persons with limited English proficiency. The largest group, 3.7% speak Spanish, 0.1% of persons speak an Asian or Pacific Island language, most speak Asian.

Of the total rural population 206,350, 4.1% are persons with limited English proficiency. The largest group, 3.9% speak Spanish, and the next largest language group speak Asian or Pacific Island language representing 0.2%.

Task 1. Step 2D: Identify any concentrations of LEP persons within your service area.

Appendix A.2 compares language proficiency between the City of Victoria and the Rural Communities it services. The chart below summarizes the numbers of LEP persons by language category in each area.

Language	City of Victoria	Calhoun County	DeWitt County	Goliad County	Gonzales County	Jackson County	Lavaca County	Matagorda County	Victoria County <i>(includes City)</i>
Spanish	2,054	665	559	181	1,311	499	231	2,036	2,544
Indo-European	42	0	19	4	0	23	31	0	46
Asian/Pacific Islander	40	144	12	0	0	0	0	189	40
Other	0	0	0	0	0	0	0	5	0
Total LEP Person	2,136	809	590	185	1,311	522	262	2,230	2,630

The majority of LEP persons live in Victoria County with the largest concentration speaking Spanish. A map representing English Proficiency in the Region is shown in Appendix A.3.

Task 1. Step 3: Consult state and local sources of data.

The Texas Education Agencies 2017 Performance Report for Victoria Independent School District notes that of the 14,315 students enrolled in 2017 that 5.8% are English Language Learners which represent about 830 students. Of the Students enrolled 6.9% are African American, 65.1% are Hispanic, 25.3% are White, and the remaining students are American Indian, Asian, Pacific Islander, or indicated they were of Two or More Races.

Task 1. Step 4: Community organizations that serve LEP persons.

GCRPC has current associations with the Adult Learning Center of the Victoria College, Golden Crescent Workforce Center, and Region III Education Center all of which provide services for persons speaking limited English.

Task 1. Step 4A: Identify community organizations.

LEP persons are served by many organizations in the community see Appendix A.4.

Task 1. Step 4B: Contact relevant community organizations.

The following organizations are the most involved in serving LEP persons, and comprise the list of agencies GCRPC coordinates with.

DARS Division for Blind Services
4102 N Navarro St, Suite #D2
Victoria, Texas 77901
361-580-5700
361-580-5737 fax

Henry Guajardo
Executive Director
Golden Crescent Workforce Development Board
120 S. Main Place, Suite 501
Victoria, Texas 77901
Henry.Guajardo@twc.state.tx.us

Jennifer Yancey
Victoria College
2200 E. Red River St. (Student Services Bldg. Room 113)
Victoria, Texas 77901
361-582-2519
jennifer.yancey@victoriacollege.edu

Robert Vargas
Devereux - Victoria
Office: 361-574-7204
Fax: 361-575-6520
rvargas@devereux.org

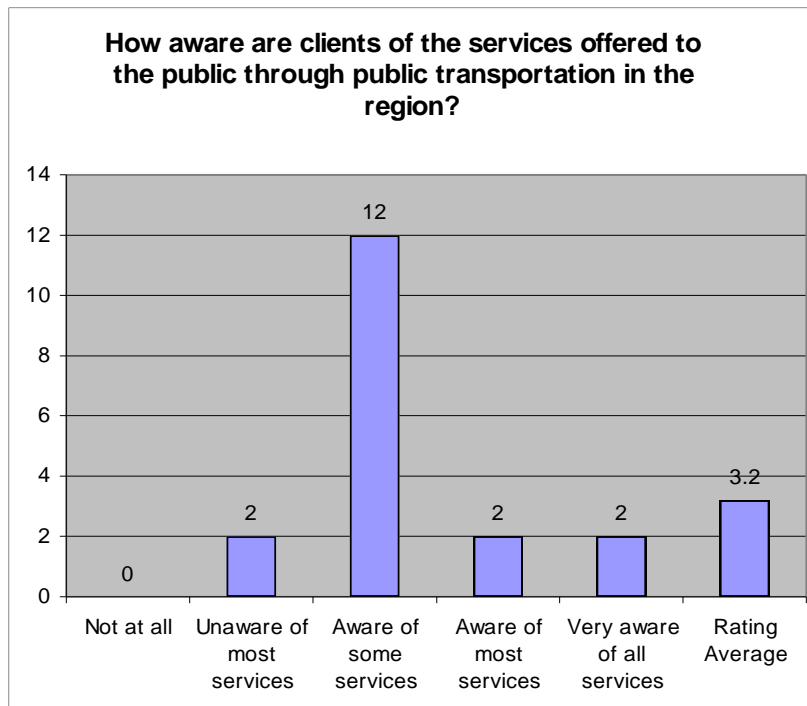
Melissa Garcia
Gulf Bend Center
6502 Nursery Drive, Suite 100
Victoria, Texas 77904
361-582-2309
361-575-0627 fax
Melissa5223@gulfbend.org

Brett Jones
Mid-Coast Family Services
120 S. Main, Suite 175
Victoria, Texas 77901

361-575-7842
 bjones@midcoastfamily.org

Task 1: Step 4C: Obtain information.

Based on a survey conducted through GCRPC’s Regional Coordination Plan. Community Organizations that serve LEP individuals were asked to judge their perceptions on the awareness of services by their clients and by themselves. They were also asked about the availability of public transportation information in their offices or at their agency.



❖ Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services.

Task 2. Step 1: Review the relevant programs, activities, and services you provide.

As identified in Task 1, LEP individuals inquire about, use, and are affected by the services that GCRPC provides on a daily basis. Operational services for our small-urban program in the city of Victoria include fixed route service, ADA paratransit service, medical transportation demand response services, and job access fixed route service. Demand Response services are provided for our rural communities in Calhoun, DeWitt, Goliad, Gonzales, Jackson, Lavaca, Matagorda, and Victoria County. LEP individuals also come into contact with GCRPC by calling our transit operation offices in various locations throughout the area, GCRPC administrative offices, as well as using our web sites.

Task 2. Step 2: Review information obtained from community organizations.

The General finding from the most recently updated Regional Coordination Plan which received information from community organizations.

In the Golden Crescent Region, we are fortunate that there are no glaring gaps in transportation services – the populations that have the greatest demand and need for affordable public transportation have access to such services. But, there is always room for improved services – especially in the area of off-hour services and reverse commute services to rural employment. Increased awareness by the general public and increased and better coordination and cooperation among regional transportation agencies and HHS agencies, workforce agencies, and other service agencies will also benefit the region.

One of the Barriers and Constraints identified was the Lack of information on how to access transit services by potential riders in the region or those involved with particular agencies. The following are potential solutions and suggestions for improvement:

- *Create communication forums between providers and the public and agencies that could benefit from public transportation services.*
- *Encourage providers to reach out to those that may be in greatest need of services. Reverse the idea that users need to seek out services, and have service providers seek out users.*
- *Encourage more sharing of information between business and transportation providers.*
- *Investigate ways to distribute information and schedules to a wider audience.*
- *Establish single points of contact in business and agencies concerning transportation.*
- *Develop a regional marketing campaign for transit services and resources.*
- *Seek out more involvement from the general public in regional coordination efforts.*

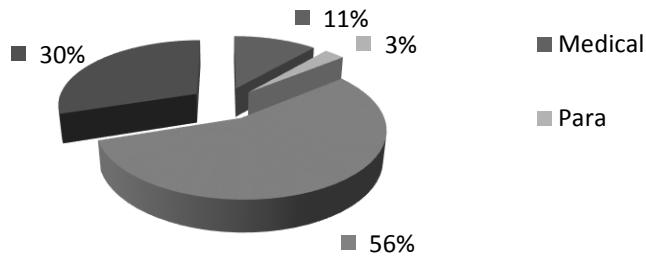
Task 2. Step 3: Consult directly with customer-facing staff.

GCRPC reviewed the frequency with which staff have, or could have contact with LEP persons. This includes surveying staff, documenting phone calls and office visits for a certain period. To date, the GCRPC has had no requests for interpreters. LEP persons were assisted by using attendants as translators as well as the GCRPC brochures and notices translated into the Spanish language and bilingual Spanish speaking GCRPC staff. Transit operational staff has been identified as most likely to come into contact with LEP persons; however, are able to assist those persons using various resources.

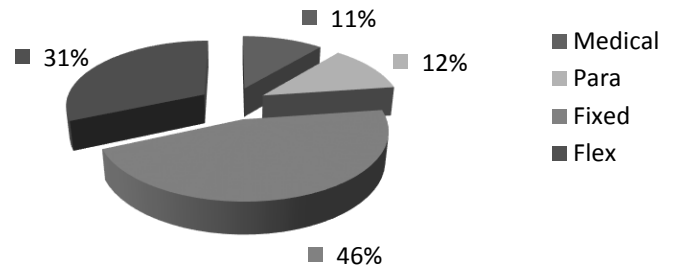
Task 2. Step 4: Consult directly with LEP persons.

GCRPC conducted a two-day on-board survey to determine what services are frequently used and 56% use our Fixed Route Service, and 30% use the Flex Route service. The results will assist GCRPC focus limited resources to outreach and public information on these services. In comparing a previous LEP survey conducted in 2013, we had a 10% increase use on our Fixed Route Service and a decrease in our Paratransit Service. The decrease is partly based on a new Program called Choose My Ride that was implemented in 2014 that targets Individuals 65+ and Persons with Disabilities. It is a voucher program that provides this target group choice in the delivery of their transportation services.

Program/Service Use City of Victoria 2019



Program/Service Use City of Victoria 2013



❖ Factor 3: The importance to LEP persons of your program, activities, and services.

Task 3. Step 1: Identify your agency's most critical services.

Using public transportation is important to LEP persons as indicated from survey results and stakeholder meetings. GCRPC's most critical services are:

- Rural Demand Response Services
- Fixed Route Service
- Flex Service

Task 3. Step 2: Review input from community organizations and LEP persons.

If limited English is a barrier to using these services then the consequences for the individual are serious, including limited access to obtain health care, education, or employment. Critical information from GCRPC which can affect access includes:

- Route and schedule information
- Fare and payment information
- System rules
- Information on how to ride
- Public service announcements
- Safety and security announcements
- Complaint procedures
- Communication related to transit planning
- Information about paratransit services

❖ Factor 4: The resources available to the recipient and costs.

Task 4. Step 1: Inventory language assistance measures currently being provided, along with associated costs.

GCRPC has provided the following language assistance measures to date:

- Language Line Translation Services through AT&T
- Translation services from Bilingual (Spanish speaking) Operations staff.
- Ride Guide, riding rules, route, scheduling, and fare payment information printed in Spanish.
- Ride Guide, and rules in Spanish on GCRPC website.

Cost of these measures has been less than \$5,000 annually.

Task 4. Step 2: Determine what, if any additional services are needed to provide meaningful access.

Due to the small size of our agency and limited resources, GCRPC should focus its language measures on extending access for persons speaking Spanish. The following should be translated into Spanish:

- Translation of safety and security related announcements.
- Region Wide Service Brochure

Task 4. Step 3: Analyze our budget.

Like most public agencies, GCRPC's has funding and staff constraints. GCRPC will continue to devote its available resources to continuing providing as outline in Step 1 above, and also budgeting additional resources to provide additional translation of safety and security related announcements, and a region-wide service brochure outlining all the services available in the region.

Task 4. Step 4: Consider cost effective practices for providing language services.

GCRPC can collaborate with many of the community organizations identified in Task 1 to provide cost effective practices. GCRPC could partner with these agencies to provide:

- Translation assistance for LEP persons;
- Assistance with translation of printed and online information;
- Distribution of information;
- Educational and outreach opportunities to help improve access for LEP persons; and
- Utilize translation resources provided by other local, regional, or state government agencies.

**Improving Access for People with Limited English Proficiency (LEP)
for all Public Transportation Services provided
through the Golden Crescent Regional Planning Commission**

IMPLEMENTATION PLAN

1. Identifying LEP individuals who need language assistance.

Research and field work completed in the four factor analysis indicates that of the GCRPC regions total population of 206,350 people, the largest Minority population 38.9% is represented by the Hispanic/Latino Population, and of that population only 1.7% are Limited English Proficient and do not speak English well.

GCRPC conducted a two-day on-board survey to identify the needs of those we serve and the results are indicated in the following tables:

City of Victoria

Table 1. Primary Language Spoken

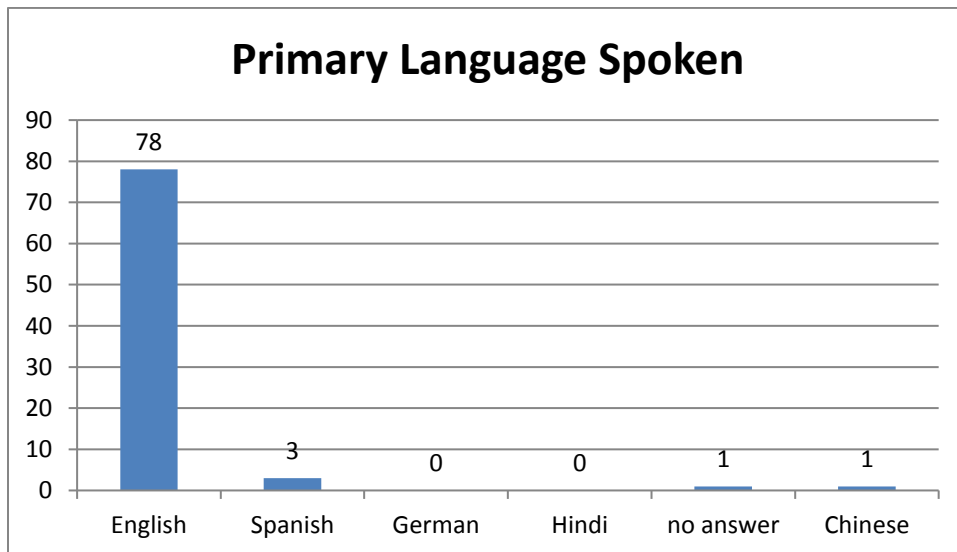


Table 2. Public Information Requested in Alternative Format

Yes	2%
No	98%

Table 3. Alternative Format Language Requested

Spanish	2%
---------	----

Table 4. Race/Ethnic Designation

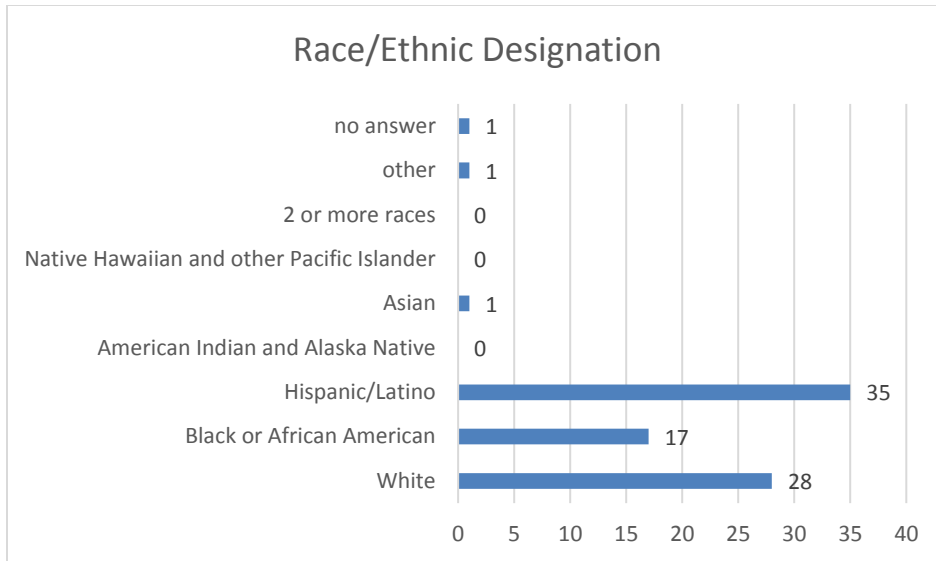


Table 5. Survey Responders by Zip Code Area

- 66% Live Centrally in the City of Victoria**
- 17% Live North West or North East of Victoria**
- 6% Live in the Lower South East of Victoria**
- 11% Live outside the City Limits**

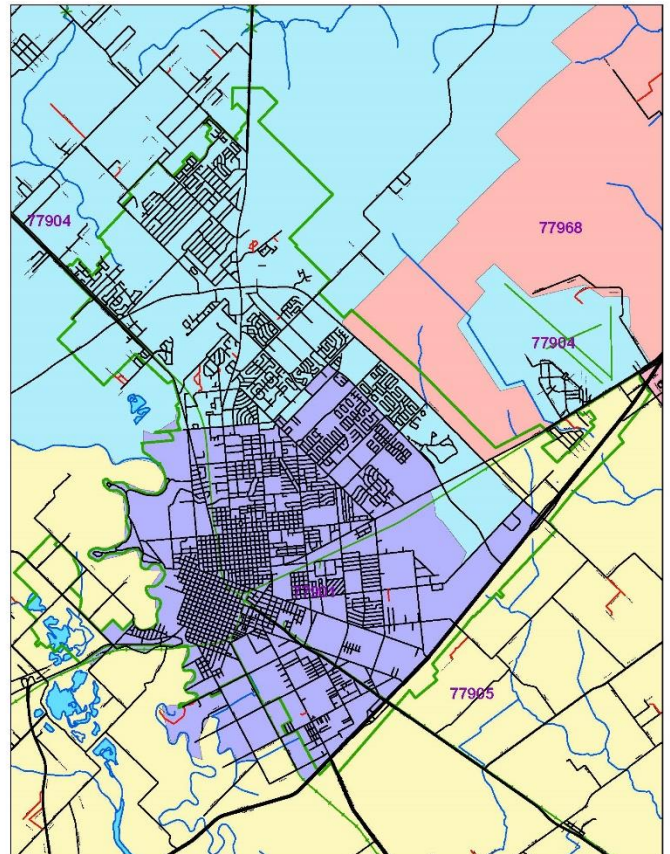
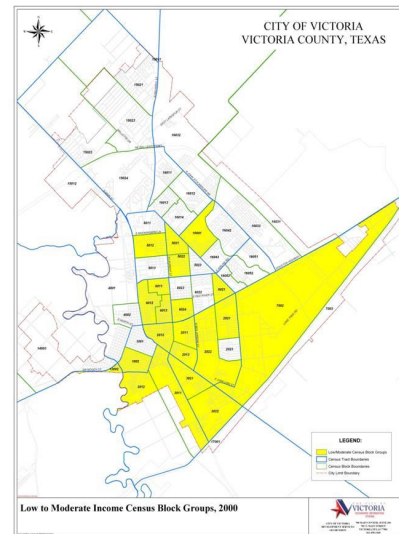
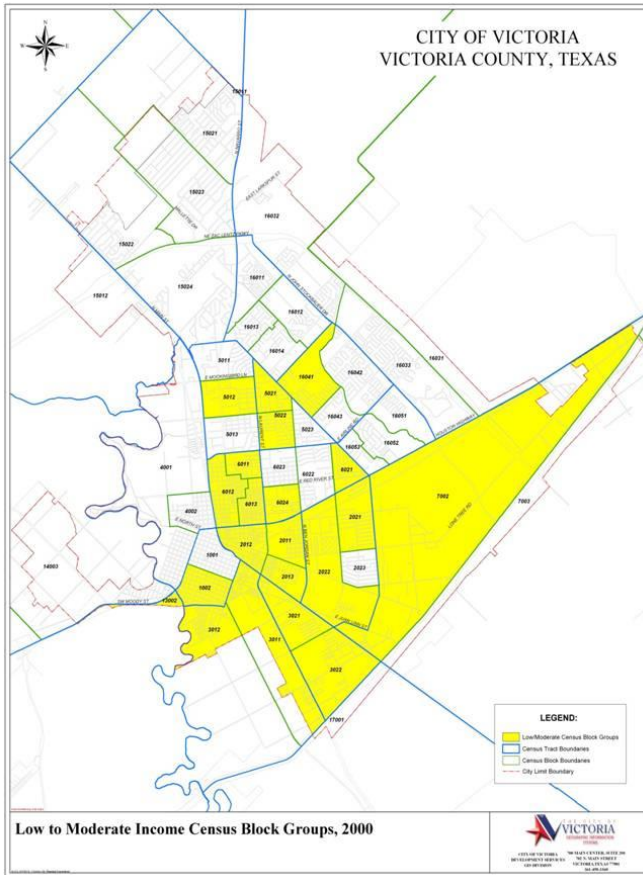


Table 6. Low to Moderate Income Census Blocks for the City of Victoria, Texas



Golden Crescent Region

Table 1. Primary Language Spoken

English	57%
Spanish	43%
German	0
Hindi	0

Table 2. Public Information Requested in Alternative Format

Yes	7%
No	93%

Table 3. Alternative Format Language Requested

Spanish	7%
---------	----

2. Language assistance measures

The following resources will be used to provide language assistance:

Written language: Bilingual (Spanish) versions of the following information are available:

- Paratransit Application and Ride Guide
- Fixed Route Map and Transit Service Guide
- Rural Transit Services Brochure
- Basic information about services in Spanish on website: gcrpc.org

Oral language:

- Language Line Translation Services through AT&T
- Bilingual (Spanish) staff available to interpret information on an “as needed” basis
- Victoria Transit operations has a voice mail system that has information about the services we provide in Spanish

Community Outreach

- Use of Revista Newspaper to advertise (Spanish Newspaper)
- Use of Magic 95 Spanish Radio Station to Advertise as funds are available.
- Spanish Translator would be made available at public meetings if requested.

3. Training staff

GCRPC’s employees and staff are likely to come into contact with LEP persons. These include bus operators, dispatchers, supervisors, administrative, and management. Training is offered during new hire orientation as well as annual refresher trainings.

Training on GCRPC’s responsibilities to serve LEP persons is implemented by the following means:

- Orientation and initial training for new bus operators, and ongoing training, will include information on serving LEP persons.
- Dispatchers, supervisors, administrative, and management staff will take part in training on serving LEP persons.

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

4. Providing notice to LEP persons

GCRPC incorporates a variety of methods to communicate with transit user and the public. These include printed schedule information, signs inside of vehicle and our operations centers, web sites, customer service phone line, news releases, advertising, community meetings, and participation in local events. GCRPC will use these methods to notify LEP persons of the availability of language assistance, and when applicable, and to notify customers of the availability of translated documents.

5. Monitoring and Updating the LEP Plan

GCRPC will monitor and update the LEP Plan by taking into account changes throughout its service area by:

- Periodically reviewing Census Information/other demographic information available Locally, or on the state, or national level relating to LEP persons;
- Input from Stakeholders that service LEP persons;
- Outreach efforts that may include, public meetings and community events;
- Coordinate with Regional Coordination efforts in the region;
- Surveys conducted periodically to access the needs of LEP persons;
- Update the LEP plan as necessary due to changes in the services we provide to ensure access of and benefit for LEP persons; and
- Availability of new resources.

Based on the information obtained through these monitoring procedures, GCRPC may make changes to the type of written and oral language assistance or other measures needed. The changes may result in additional measures or the elimination of measures which are not effective.

DISSEMINATION OF THE GCRPC LEP PLAN

GCRPC's Title VI Policy and LEP Plan are made available on the company's website at www.gcrpc.org. Any person or agency may request a copy of the LEP plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request a copy of the plan in alternative languages which will be provided.

Questions concerning the LEP Plan may be submitted to the Golden Crescent Regional Planning Commission at:

Golden Crescent Regional Planning Commission
1908 N. Laurent, Suite 600
Victoria, Texas 77901
Phone: (361) 578-1587
Fax: (361) 578-8865
www.gcrpc.org