

# LIMITED ENGLISH PROFICIENCY PLAN

Rhode Island Public Transit Authority

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## Introduction

On August 11, 2000, President William J. Clinton signed an executive order, **Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency**, to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part:

*Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance, recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all components of a recipient's operations are covered. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

## Who is an LEP Individual?

As defined in the 2000 United States Census, it is any individual who speaks a language at home other than English as their primary language, and who speak or understand English "not well" or "not at all". Individuals who have a limited ability to read, write, speak, or understand English are considered LEP individuals. In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, RIPTA will take reasonable steps to ensure that all persons have meaningful access to its programs, services and information, at no additional cost.

The LEP Plan starts with an assessment to identify LEP individuals who need assistance. Implementation includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring of the plan.

### **Determination of Need**

In order to develop this policy, RIPTA has followed the U.S. Department of Transportation (U.S. DOT) 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 RIPTA program, activity or service.
2. The frequency with which LEP persons come in contact with RIPTA programs, activities or services.
3. The nature and importance of programs, activities or services provided by RIPTA to the LEP population.
4. The resources available to RIPTA and overall costs to provide LEP assistance.

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### **Factor 1:**

#### **The number and proportion of LEP Persons served or encountered in RIPTA's service area.**

The first step towards understanding the profile of LEP individuals in Rhode Island is a review of Census data. Table 1 shows the number and percent of persons who speak English less than "very well", by language spoken at home, and who are age five (5) and older for the state of Rhode Island (RIPTA's service area). As indicated, 79.55% of the population speaks only English, while 8.71% of the population is considered limited English proficient.

Only Spanish, at 5.02%, and Portuguese, at 1.44%, comprise more than one percent of the state population of LEP individuals. After Spanish and Portuguese, the five most frequently spoken languages in Rhode Island are French (0.26%), Italian (0.24%), Chinese (0.24%), Cambodian (0.19%), and French Creole (0.19%).

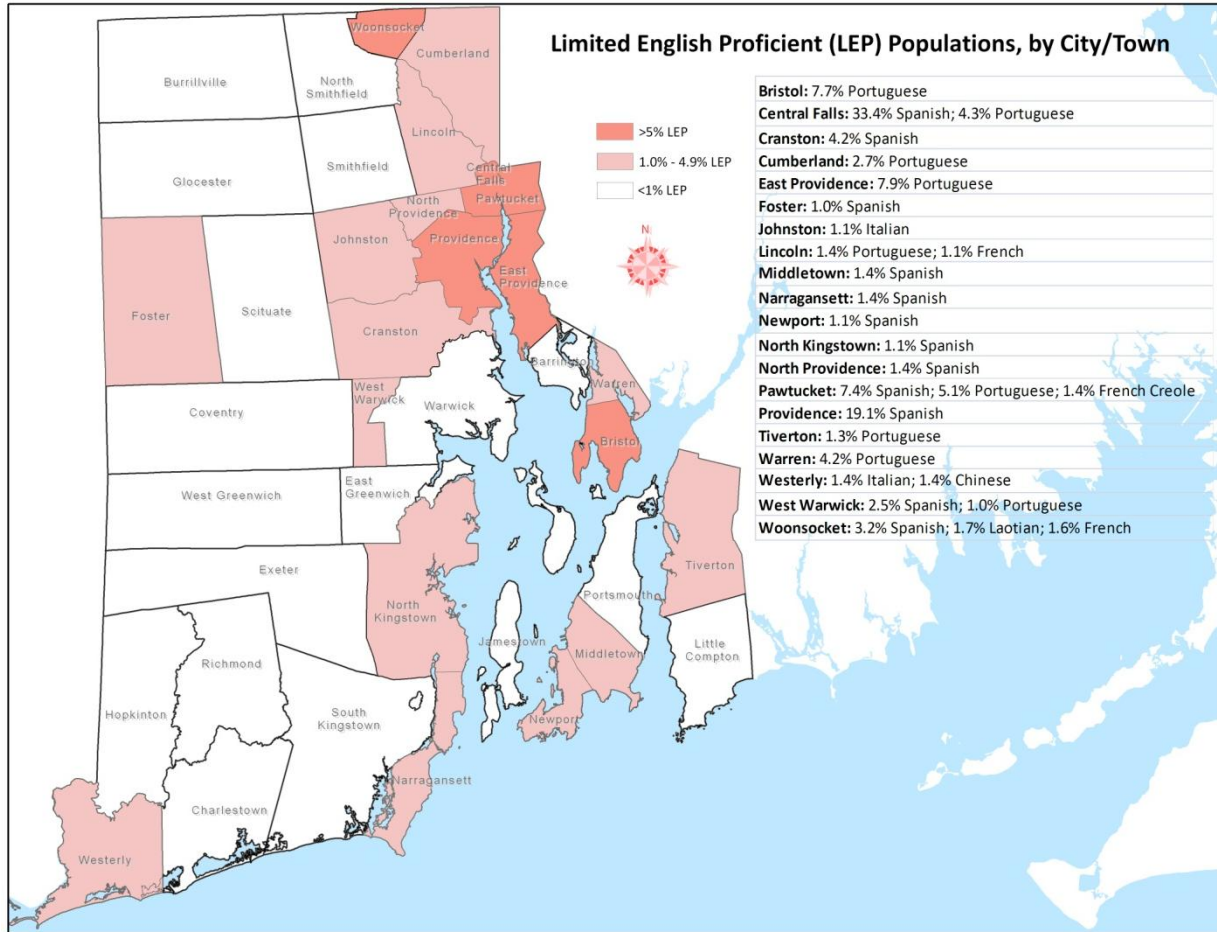
The most commonly encountered LEP persons in the RIPTA service area speak Spanish and Portuguese and providing assistance in these languages would give these population groups improved access to information and services.

<b>Table 1. LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR POPULATION 5 YEARS AND OVER</b>		
<b>Language</b>	<b>Estimate</b>	<b>% of Total Population</b>
<b>Total:</b>	996,110	
Speak only English	792,382	<b>79.55%</b>
Speak English less than "very well"	86,749	<b>8.71%</b>
<b>Spanish or Spanish Creole:</b>	99,683	10.01%
Speak English less than "very well"	49,965	<b>5.02%</b>
<b>French (incl. Patois, Cajun):</b>	14,333	1.44%
Speak English less than "very well"	2,621	<b>0.26%</b>
<b>French Creole:</b>	5,243	0.53%
Speak English less than "very well"	1,942	<b>0.19%</b>
<b>Italian:</b>	9,697	0.97%
Speak English less than "very well"	2,347	<b>0.24%</b>
<b>Portuguese or Portuguese Creole:</b>	33,923	3.41%
Speak English less than "very well"	14,305	<b>1.44%</b>
<b>German:</b>	1,921	0.19%
Speak English less than "very well"	253	<b>0.03%</b>
<b>Yiddish:</b>	65	0.01%
Speak English less than "very well"	33	<b>0.00%</b>
<b>Other West Germanic languages:</b>	273	0.03%
Speak English less than "very well"	18	<b>0.00%</b>
<b>Scandinavian languages:</b>	469	0.05%
Speak English less than "very well"	88	<b>0.01%</b>
<b>Greek:</b>	1,671	0.17%
Speak English less than "very well"	412	<b>0.04%</b>
<b>Russian:</b>	2,150	0.22%
Speak English less than "very well"	889	<b>0.09%</b>
<b>Polish:</b>	2,431	0.24%
Speak English less than "very well"	849	<b>0.09%</b>
<b>Serbo-Croatian:</b>	71	0.01%
Speak English less than "very well"	10	<b>0.00%</b>
<b>Other Slavic languages:</b>	431	0.04%
Speak English less than "very well"	209	<b>0.02%</b>
<b>Armenian:</b>	1,609	0.16%
Speak English less than "very well"	544	<b>0.05%</b>
<b>Persian:</b>	183	0.02%
Speak English less than "very well"	45	<b>0.00%</b>
<b>Gujarati:</b>	379	0.04%
Speak English less than "very well"	205	<b>0.02%</b>
<b>Hindi:</b>	818	0.08%
Speak English less than "very well"	128	<b>0.01%</b>
<b>Urdu:</b>	413	0.04%
Speak English less than "very well"	81	<b>0.01%</b>

**Table 1. (cont.) LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR POPULATION 5 YEARS AND OVER**

Language	Estimate	% of Total Population
<b>Other Indic languages:</b>	1,198	0.12%
Speak English less than "very well"	318	<b>0.03%</b>
<b>Other Indo-European languages:</b>	819	0.08%
Speak English less than "very well"	261	<b>0.03%</b>
<b>Chinese:</b>	4,474	0.45%
Speak English less than "very well"	2,387	<b>0.24%</b>
<b>Japanese:</b>	615	0.06%
Speak English less than "very well"	121	<b>0.01%</b>
<b>Korean:</b>	1,420	0.14%
Speak English less than "very well"	764	<b>0.08%</b>
<b>Mon-Khmer, Cambodian:</b>	4,302	0.43%
Speak English less than "very well"	1,923	<b>0.19%</b>
<b>Hmong:</b>	986	0.10%
Speak English less than "very well"	359	<b>0.04%</b>
<b>Thai:</b>	380	0.04%
Speak English less than "very well"	252	<b>0.03%</b>
<b>Laotian:</b>	3,131	0.31%
Speak English less than "very well"	1,624	<b>0.16%</b>
<b>Vietnamese:</b>	927	0.09%
Speak English less than "very well"	602	<b>0.06%</b>
<b>Other Asian languages:</b>	868	0.09%
Speak English less than "very well"	328	<b>0.03%</b>
<b>Tagalog:</b>	1,960	0.20%
Speak English less than "very well"	788	<b>0.08%</b>
<b>Other Pacific Island languages:</b>	310	0.03%
Speak English less than "very well"	109	<b>0.01%</b>
<b>Navajo:</b>	29	0.00%
Speak English less than "very well"	0	<b>0.00%</b>
<b>Other Native North American languages:</b>	113	0.01%
Speak English less than "very well"	36	<b>0.00%</b>
<b>Hungarian:</b>	86	0.01%
Speak English less than "very well"	27	<b>0.00%</b>
<b>Arabic:</b>	1,735	0.17%
Speak English less than "very well"	535	<b>0.05%</b>
<b>Hebrew:</b>	402	0.04%
Speak English less than "very well"	6	<b>0.00%</b>
<b>African languages:</b>	3,964	0.40%
Speak English less than "very well"	1,313	<b>0.13%</b>
<b>Other and unspecified languages:</b>	246	0.02%
Speak English less than "very well"	52	<b>0.01%</b>

Source: U.S. Census Bureau, 2005-2009 American Community Survey (Table B16001)



## Factor 2:

### Frequency of contacts of LEP individuals with RIPTA's programs, activities, and services.

In May 2011 an LEP survey was developed and distributed to all RIPTA administrative staff and transportation supervisors in order to obtain information about frequency of contact with LEP individuals. Of the total of 151 surveys sent, 54 surveys were completed, for a response rate of about 35%. Following are the highlights of the survey results:

- On average, administrative staff assists LEP customers 5.4 times per week, with a range of zero to one hundred times per week.
- Spanish was reported as being by far the most frequent language encountered by administrative staff. Portuguese, though less often, is also encountered regularly. Other languages, including Cambodian, Chinese, French, Italian, Russian, Liberian, and American

Sign Language, were reported as being encountered, but with very little frequency.

- 12% of respondents reported that they are able and qualified to translate another language. The reported languages include Spanish, Italian, and Igbo (the official language of Nigeria).
- 15 respondents reported that they have used translation assistance on the job, which were identified as:
  - Co-worker – 11
  - Volunteer – 3
  - Telephone – 1
  - Internet – 3
  - Other services mentioned included “paid interpreter at meetings”, and “service”.

A survey was also distributed to fixed route drivers and paratransit drivers. They were asked how often they assisted LEP customers, and to identify which languages they most encountered. Below are the results of the surveys:

- Fixed route drivers assist LEP customers an average of 12 times per week.
- In order of frequency, fixed route drivers encounter the following languages:
  1. Spanish
  2. Portuguese
  3. Chinese and Cambodian (the same frequency)
  4. Italian, and
  5. French.
- Paratransit drivers assist LEP customers an average of 3.2 times per week.
- In order of frequency, paratransit drivers encounter the following languages:
  1. Spanish
  2. Portuguese
  3. Cambodian
  4. Chinese
  5. French and Italian (the same frequency).
- Other languages mentioned as being encountered, with lesser frequency, include Arabic, Russian, Thai, and Tagalog.

As demonstrated by the survey results, RIPTA staff and drivers have frequent contact with LEP individuals. Survey results are consistent with data provided by the U.S. Census, with Spanish and Portuguese being the most commonly encountered languages in RIPTA’s service area. Clearly, at an

average of 12 times per week, fixed-route drivers have the most encounters with LEP individuals. This high rate of contact was expected, given that the majority of RIPTA's routes travel through areas of high LEP populations. Administrative staff that reported the highest amount of contact with LEP individuals included personnel from Human Resources, Transportation Supervisors, Customer Service, and the paratransit program director.

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### **Factor 3:**

#### **Assess the importance of RIPTA's programs, activities, and services to the LEP population.**

As stated in the U.S. Department of Transportation's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, RIPTA operates in full agreement that 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. While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons.

According to the 2000 Census, nationally, more than eleven percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. However, public transit use among recent immigrants decreases with length of residence in the United States.

RIPTA currently does not provide any emergency evacuation instructions within vehicles or shelters. RIPTA is available to the state if emergency situations arise and evacuations are necessary. In these instances, the evacuation is being coordinated by other agencies throughout the state and RIPTA is a resource to them.

RIPTA posts detours and alerts on its website, but these are typically not critical issues. The passenger may be late to work/class as a consequence if a detour is missed by LEP individuals. RIPTA also posts all detours to both Facebook and Twitter.

**RIPTA's Critical Services:**

<b>Critical Service</b>	<b>Explanation</b>
Schedule/Timetable	Map, Routes, Timetables (available via print or website). All schedules are translated into Spanish.
Detours	Temporary changes to routing or bus stops (available via website).
Fares	Cost to ride RIPTA. Fare information printed in English and Spanish on all public timetables and on the website.
Pass Sales Outlets	Locations available to purchase passes/tickets.
Ride Program (ADA) Brochure	Guide to using the Ride Program, available in English and Spanish.
ADA Application Form	How to apply for ADA Service.
Title VI Complaint	Ability to file Civil Rights complaint with RIPTA. This form will be made available on the web site in English and Spanish.

**Community Outreach.** Considering the limitations of information obtained by the U.S. Census, RIPTA reached out to the following community-based organizations that work with LEP populations:

- International Institute of Rhode Island
- Progreso Latino
- Blackstone Valley Community Action Program
- Family Resources Community Action
- Center for Hispanic Policy & Advocacy (CHisPA)
- All Saints Parish
- Hispanic American Chamber of Commerce of Rhode Island (HACCRI)
- NAACP, Providence
- Ocean State Independent Living
- Paraplegic Association of Rhode Island

RIPTA conducted outreach to these organizations in the form of a questionnaire designed to obtain information on specific languages spoken by the LEP population, population trends of LEP groups, LEP persons' awareness of the various programs and service offered by RIPTA, transit needs of LEP individuals that are not being met, and to identify of barriers to the use of transit. Following are the highlights of the questionnaire responses:

- Increasing populations that speak the following languages: Spanish, Arabic, Portuguese, French, several African languages, Russian, and Laotian.
- Decreasing populations that speak Italian and Japanese.



- Most of the organizations' LEP clients are familiar with the variety of RIPTA's fare products, but few are aware of RIPTA's Flex service, Commuter Resource RI, or Ride paratransit service.
- Some organizations mentioned specific transit needs of their LEP clients. Comments included:
  - Late night buses from job sites (North Kingstown area) to Providence
  - Evening hour transportation in Woonsocket
  - Website in variety of languages
  - Better signage in variety of languages
  - Culturally sensitive bus drivers (better trained in handling unruly passengers)
  - Discount passes for newly arrived refugees whose SSI applications are pending
- The most commonly cited barriers to the LEP population's use of transit included language, affordability, and availability. The Blackstone Valley Community Action Program made the following comment: "Cost of a bus ride and monthly bus pass have risen, just when the RI State Medicaid Program dropped its services of unlimited rides with a Medicaid card. This creates more of a barrier for an individual who is already on a fixed and limited income budget."

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## Factor 4:

### The resources available to RIPTA and the costs.

RIPTA is committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. While RIPTA currently does not track expenditures related to providing language assistance, this will be monitored ongoing as part of the language assistance plan. RIPTA will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan.

Current language assistance measures used by RIPTA:

1. Marketing Department
  - a. Two staff members of this department are capable of translating Spanish.
  - b. A private translation service, Narragansett Translations, is contracted for translating documents such as the Executive Summary of RIPTA new Strategic Plan, and various public outreach documents designed to inform the public about service changes. The cost for this service is currently \$0.25 per word.
  - c. Marketing also takes advantage of a free online translation service at [www.wordreference.com](http://www.wordreference.com).

- d. The International Institute of Rhode Island has been used in the past, and is a nearby available resource, but is not currently being used by Marketing.
  - e. RIPTA is currently in the process of developing a new web site and it will be available in Spanish. This translation work is being performed by Marketing Department staff.
2. Ride Program
- a. The Ride program has several staff that are capable of translating in Spanish and Portuguese.
  - b. Due to the sufficient number of personnel available to translate Spanish and Portuguese, and because they do not receive calls from persons speaking other languages, no translation services are used or perceived to be needed in this department.
3. Customer Service
- a. There are no Customer Service staff that can translate Spanish or any other language. However, when necessary, they obtain translation assistance from Ride staff.
  - b. Customer Service has investigated telephone translation services and technologies but has not yet found one that would work with RIPTA's phone system.
4. Planning Department
- a. Two staff members of the Planning Department are capable of translating Italian.
  - b. As the department responsible for conducting public hearings, the Planning Department uses the Communication Access Realtime Translation (CART), a service provided through the Commission on the Deaf and Hard of Hearing, which provides instant translation of the spoken word into English text using a stenotype machine, notebook computer and real time software. The current cost for this service ranges from \$36 to \$56 per hour, depending on the certifications and experience of the translator.
  - c. In 2005, the Planning Department partnered with the International Institute of Rhode Island to develop an instructional video entitled "How to Ride the Bus". The video included translations in Spanish, French, and Somali Bantu, and created as part of the Institute's Refugee Resettlement Program.
  - d. All fixed-route public timetables, designed by the Planning Department, include Spanish translation. Public timetables are the most commonly used documents produced by RIPTA.

**Additional Language Assistance Service to be Provided by RIPTA**

RIPTA will meet with local community organizations that work with LEP populations to identify documents, such as pages of the web site or public timetables that would assist LEP persons in accessing RIPTA programs and services if they were translated. The following strategies will be considered and discussed as language assistance services to LEP persons in RIPTA's service area:

1. Adopt procedures to be used by all RIPTA frontline employees when encountering an LEP customer. The procedures may vary by type of encounter, but may include consistent elements, such as:
  - Use of “I Speak” cards to identify the language spoken by the customer.
  - Language assistance notifications
  - Provision of written translated materials
  - Customer call center contact information
  - Emergency procedures
2. RIPTA’s web site is only available in English. The web site is currently being redesigned and will include the entire site being available for translation by Google Translate.
3. Provide written notification in languages that meet the 5% or one thousand persons threshold (these languages include: Spanish, Portuguese, French, Italian, Chinese, Cambodian, and Laotian), stating that language assistance services are available, upon request, free of charge. These language services can be requested for Board meetings, public hearings or for assistance in using RIPTA’s transit and paratransit services. RIPTA’s notification message will be similar to the following:

*Welcome to RIPTA. We hope that you have a safe and pleasant trip! RIPTA will provide free interpreter services to help you ride RIPTA. Please call us at 401-781-9400, if you speak Spanish press X. For all other languages press Y and stay on the line until a representative answers.*

Completion of this task is dependent upon an upgrade to RIPTA’s telephone system that would make it more compatible with available telephone translation services. This upgrade is currently being planned and should be completed in 2012.

The notification will be printed on “car cards” or posters that will be placed in:

- All RIPTA buses
  - Info-posts at major bus transfer locations throughout RIPTA’s service area
4. RIPTA will identify any documents that are considered “vital” to users of RIPTA buses, translate these materials, and distribute them to all areas that have significant LEP populations, and to community organizations identified as part of recent outreach efforts.
  5. Increase RIPTA’s internal bilingual capabilities by identifying and certifying bilingual employees to provide oral language assistance, as needed. RIPTA will develop a Language Assistance Team of employees willing to participate in interpreter training and willing to serve as interpreters at Board meetings, public hearings, and outreach activities.

RIPTA will also continue efforts to recruit and hire bilingual/multilingual frontline employees by participating in community job fairs and advertising in publications and media that reach diverse populations.

6. Continue to investigate telephone translation services and technologies for use by customer service phone room and Kennedy Plaza staff.

## Language Assistance Plan

### I. Language Assistance Measures

**DOT Guidance:** *“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.”*

As of August 2011, RIPTA has approximately 539 front line employees identified as the most likely to come into contact with LEP persons. These employees are comprised of the following categories:

Department	Count
Fixed-Route Bus Operator	360
Ride Bus Operator	125
Flex Operator	23
Supervisor	21
Customer Service	10

RIPTA will develop instructions for all front line employees, including customer service staff, fixed route and Ride vehicle operators, ticket sales agents, Transportation Supervisors, and any other agency staff who regularly interacts with the public, about how to respond to an LEP individual.

A policy will be developed identifying how RIPTA will ensure the competency of interpreters and translation services.

### II. Staff Training

**DOT Guidance:** *“Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:*

- *Staff knows about LEP policies and procedures.*
- *Staff having contact with the public (or those in a recipient’s custody) is trained to work effectively with in-person and telephone interpreters.*

Persons who lack proficiency in English frequently are unable to obtain basic knowledge of how to access various services provided by RIPTA. Many drivers, supervisors, customer service staff and other front line employees who interact with LEP individuals are neither bilingual nor trained in how to properly serve an LEP person. As a result, the LEP individual all too often is either turned away, forced to wait for substantial periods of time, forced to find his/her own interpreter who may not be qualified to interpret, or forced to make repeated visits until an interpreter is available.

RIPTA will develop a mandatory training program for front line employees and their managers and supervisors, to include the following information:

- A summary of RIPTA’s responsibilities under the DOT LEP Guidance.
- A summary of RIPTA’s Language Assistance Plan.
- A summary of the number and proportion of LEP persons in RIPTA’s service area, the frequency of contact between LEP populations and RIPTA’s programs and activities, and the importance of the programs and activities to the population.
- A description of the type of language assistance that RIPTA is currently providing and instructions on how RIPTA staff can access these services.

RIPTA may use the following resources in the development of its training programs:

- “Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice.” This video, which is available on DVD and as a streaming video link on [www.lep.gov](http://www.lep.gov), explains the language access requirements of Title VI and Executive Order 13166 through vignettes that expose the problems resulting from the absence of language assistance. The video goes on to show how these same situations could have been handled more appropriately if the service provider took reasonable steps to provide meaningful access.
- “Providing Language Access for Persons with Limited English Proficiency,” a PowerPoint presentation produced by the FTA Office of Civil Rights and available at [http://www.fta.dot.gov/civilrights/title6/civil\\_rights\\_5102.html](http://www.fta.dot.gov/civilrights/title6/civil_rights_5102.html).
- “How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision making,” available at <http://www.fhwa.dot.gov/hep/lowlim>. This report documents “best practices” in identifying and engaging low-literacy and LEP populations in transportation decision making. These “best practices” were collected during telephone interviews with individuals in 30 States.
- “Guidelines for Developing Traffic Safety Educational Materials for Spanish-Speaking Audiences,” a manual developed by the Education in Traffic Safety project, Education Development Center, Inc., with funding from the National Highway Traffic Safety Administration. The manual is organized into three sections: research and planning, creating materials, and dissemination and evaluation. Available at <http://www.nhtsa.dot.gov/people/injury/airbags/TESM/index.htm>

RIPTA will issue notices of the LEP policy and procedures to all of the front-line employees. RIPTA will explore integrating training on LEP policies and procedures in several training programs, including:

- New Employee Orientation
- Customer Service Training
- Training for Front Line Employees
- Training for Bus Operators
- Diversity Awareness Training – modify to include cultural sensitivity module

### III. Providing Notice To LEP Persons

**DOT Guidance:** *“Once an agency has decided, based on the four factors, that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge (emphasis added). Recipients should add this notice in languages LEP persons would understand.*

RIPTA will publish signs to be posted on buses and trolleys and at major transfer points throughout the service area with a notice similar to the following:

*Welcome to RIPTA. We hope that you have a safe and pleasant trip! RIPTA will provide free interpreter services to help you ride RIPTA. Please call us at 401-781-9400, if you speak Spanish press X. For all other languages press Y and stay on the line until a representative answers.*

This notice will be posted in several languages (including Spanish, Portuguese, French, Italian, Chinese, Cambodian, and Laotian) on cards, such as “car cards” placed for advertisement. This effort will be initiated by placing signs on buses and at the following locations:

- RIPTA headquarters at Elmwood Avenue in Providence
- Kennedy Plaza, Providence
- Pawtucket Transit Center, Pawtucket
- Gateway Center, Newport
- Olneyville Square, Providence
- Woonsocket Depot, Woonsocket
- Brewery Parkade, Cranston

Additionally, RIPTA will include the notices in outreach documents to be sent to community organizations and will place notices in the following locations:

- Local media, including newspapers serving LEP communities
- Schools, community and religious organizations
- RIPTA website
- As handouts in RIPTA staff training materials

#### **IV. Monitoring and Updating the LEP Plan**

**DOT Guidance:** *“Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees.*

RIPTA will monitor the strengths and weaknesses of the LEP plan on an ongoing basis using the following strategies:

- Solicit feedback from the LEP community by distributing a questionnaire to the organizations listed in the four-factor analysis and others identified during the year.
- Measure changes in the number and proportion of LEP persons eligible to be served by examining updates from the US Census and any available data from the public school districts in the RIPTA service area.
- Collect data from the community organizations that serve LEP communities.
- Measure actual frequency of contact by LEP persons by collecting information from the Customer Service Department, the new RIPTA website and front-line employees and through customer surveys of customers who request language assistance services.
- Consider conducting rider surveys to specifically collect LEP information.

RIPTA will make changes to the language assistance plan as needed, but at a minimum, the plan will be updated every three years to coincide with RIPTA’s Title VI submittal to the Federal Transit Administration.





## **HOW TO REACH US**

401 781 9400  
705 ELMWOOD AVE.  
PROVIDENCE, RI 02907

## **CALL CENTER HOURS OF OPERATION**

MONDAY TO FRIDAY 7:00AM – 7:00PM  
SATURDAY 8:00AM – 6:00PM

[WWW.RIPTA.COM](http://WWW.RIPTA.COM)

