

Madison Athens-Clarke Oconee Regional Transportation Study
(MACORTS) & Athens Transit System (ATS)

Limited English Proficiency Plan

Final February 19, 2014

Prepared by Athens-Clarke County Planning Department



2014

Limited English Proficiency Plan
for
Madison Athens-Clarke Oconee Regional Transportation Study
and
Athens Transit System

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Prepared By:

Athens-Clarke County Planning Department

The Limited English Proficiency Plan (LEP) is established pursuant to and in accordance with Title VI of the Civil Rights Act and Executive Order 13166, "Improving Access to Services for Persons With Limited English Proficiency."

The opinions, findings, and conclusions in this publication are those of the author(s) and are not necessarily those of the Federal Transit Administration, Federal Highway Administration, or Georgia Department of Transportation.

**RESOLUTION BY THE MADISON ATHENS-CLARKE OCONEE REGIONAL
TRANSPORTATION STUDY (MACORTS) POLICY COMMITTEE**

WHEREAS, federal regulations require that the Limited English Proficiency Plan for urbanized areas must be completed and periodically be updated and,

WHEREAS, the Technical Coordinating Committee of MACORTS in coordination with the Federal Highway Administration, Federal Transit Administration, and the Georgia Department of Transportation has reviewed the Limited English Proficiency Plan,

WHEREAS, the Technical Coordinating Committee at its January 22, 2014 meeting recommended the approval of the Limited English Proficiency Plan for MACORTS and the Athens Transit System:

NOW, THEREFORE, BE IT RESOLVED that the MACORTS Policy Committee concurs with the recommendation of the Technical Coordinating Committee of MACORTS to approve the Limited English Proficiency Plan.

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution adopted by the Madison Athens-Clarke Oconee Regional Transportation Study Policy Committee, at their meeting held on February 19, 2014.

Recommended by:



Brad Griffin
TCC Chairman / MPO Director

February 19, 2014



Melvin Davis
MACORTS Policy Committee Chairperson

February 19, 2014

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Introduction

On August 11, 2000, President William J. Clinton signed Executive Order 13166, “Improving Access to Service for Persons with Limited English Proficiency”, to clarify Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color, or national origin by any entity receiving federal financial assistance. Administrative methods or procedures that have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations are prohibited. The purpose of Executive Order 13166 is to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

Purpose

The purpose of this Limited English Proficiency (LEP) Plan is to demonstrate compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. The LEP Plan is for persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such persons may be eligible to receive language assistance with respect to a particular service, benefit, or encounter. This Plan will examine the services and products provided by the Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) and the Athens Transit System (ATS). The Plan will outline current accommodations made for LEP persons and possible future accommodations that can and/or should be made to make these services and products more accessible to LEP persons.

Four Factors to Formulate an LEP Plan

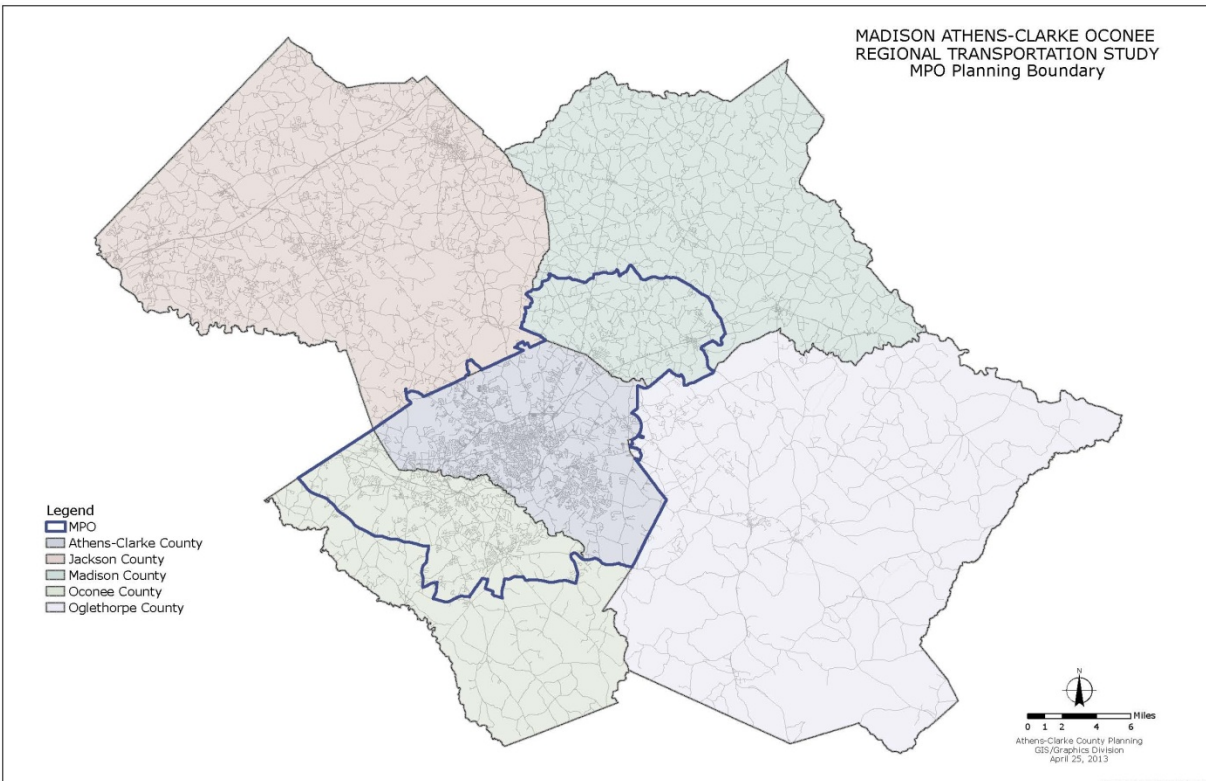
In determining how to provide effective and meaningful access for LEP customers, the U. S. Department of Transportation (DOT) has established the following four guidelines to consider in determining “reasonable steps” to be taken by MACORTS and ATS:

1. The number or proportion of LEP persons served or encountered in the eligible service population,
2. The frequency with which LEP persons encounter the services, programs, or activities provided,
3. The nature and importance of the services, programs, or activities; and
4. The resources available to the program and the costs of providing interpretation/translation services.

Madison Athens-Clarke Oconee Regional Transportation Study

The Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) was formed in 1969 and is the Metropolitan Planning Organization for transportation planning in Athens-Clarke County and portions of Madison, Oconee, Oglethorpe, and Jackson Counties. MACORTS is responsible for implementing the 3-C (comprehensive, cooperative, and continuing) transportation planning process.

Figure 1: Madison Athens-Clarke Oconee Regional Transportation Study Planning Boundary



The Athens-Clarke County Planning Department, in conjunction with the Georgia Department of Transportation, is responsible for carrying out the transportation planning process as mandated under federal legislation. MACORTS products include, but are not limited to, the Long Range Transportation Plan, the Transportation Improvement Program, the Unified Planning Work Program, and the Participation Plan.

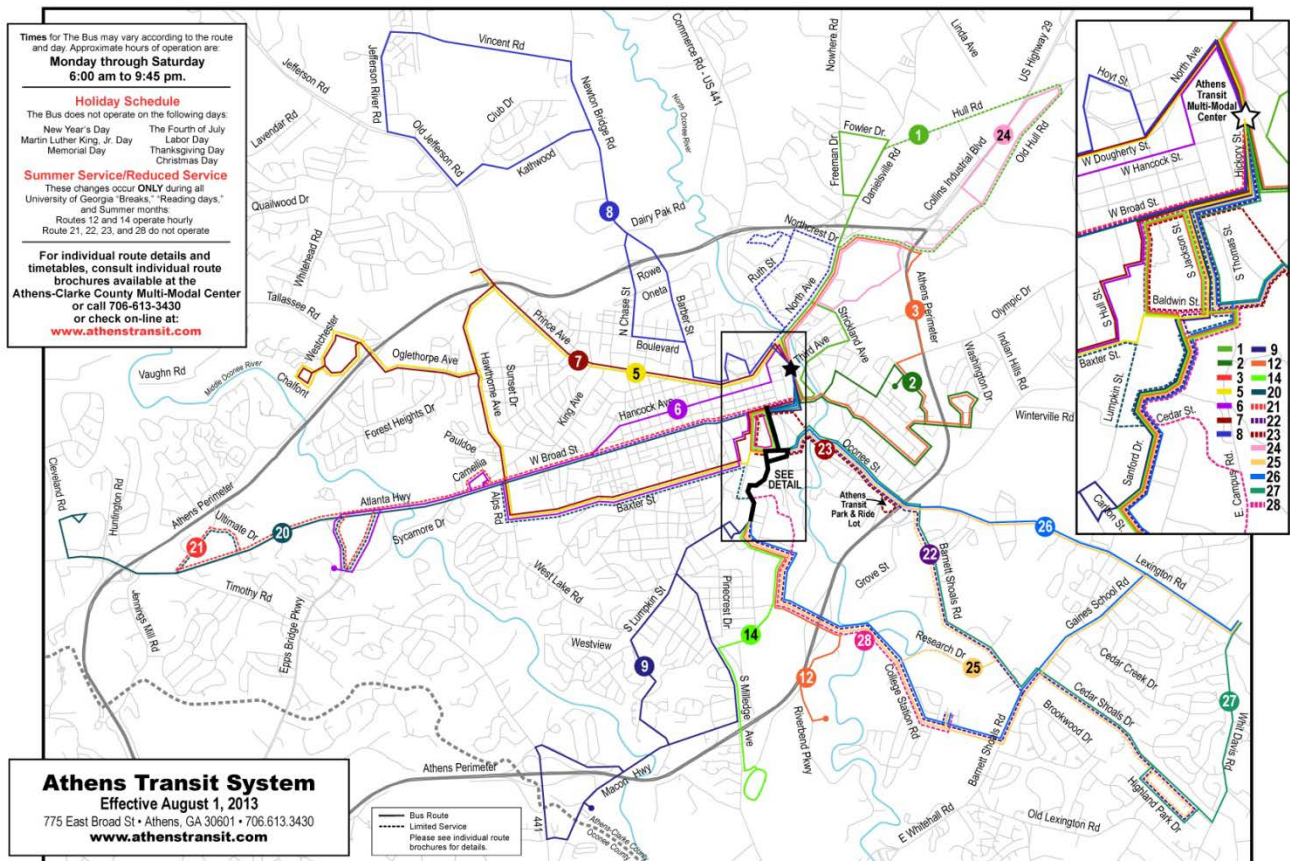
The Long Range Transportation Plan outlines the transportation planning vision for the next 20 years. The Transportation Improvement Program (TIP) is an annually updated program of projects to receive federal funding during the next 4 fiscal years for implementation. The Unified Planning Work Plan (UPWP) is the annual operating and capital budget for MACORTS. The Participation Plan outlines how and when public involvement activities will be conducted. These documents are the main work efforts of MACORTS.

Athens Transit System

Athens Transit System is a department of the Athens-Clarke County Unified Government that provides public transportation for Athens-Clarke County with 23 buses on 19 bus routes throughout the county. Athens Transit System offers “The Bus” service, which is fixed route buses that operate Monday – Saturday from approximately 6:00 am to 11:00 pm, depending on the route, day, and time of year. In FY 2012, the Athens Transit provided over 1.8 million rides on the fixed route service. All fixed route vehicles are ADA-accessible.

Athens Transit offers a Demand Response transportation option for people with a mobility impairment called "The Lift". This service is provided for those patrons who cannot ride the fixed route bus service. In FY 2012, the Athens Transit System provided 9,234 rides on demand response service. Additionally, Athens Transit has a “Bus-N-Bike” program which makes daily commuting much easier, safer, and more convenient for cyclists to ride the bus. All fixed route vehicles are equipped with a bicycle rack mounted to the front of the bus.

Figure 2: Athens Transit System Map



Limited English Proficiency Analysis

This plan uses the four factors outlined by the US Department of Transportation to determine the level and extent of language assistance necessary to reasonably ensure meaningful access to public transit and MACORTS services within the MPO area. Data used in this analysis was obtained from the U.S. Census Bureau, either from the decennial Census or the American Community Survey's 5-year estimate. Due to the constraints of the available data, the member counties were analyzed in their entirety, without regard to how much of the county is included within the MPO boundary. Therefore, it should be noted that the number of LEP persons within the MACORTS area is significantly smaller than this data suggests. Recommendations are based on the results of the analysis including the available data.

Factor 1: The number of LEP persons served in the eligible service population

The MPO has developed a demographic profile of the population in the MACORTS region and ATS service area. As illustrated in Table 1, the MPO region has a total population of 272,075 individuals. This total represents the entirety of Athens-Clarke, Madison, Oconee, Oglethorpe, and Jackson Counties, not just the area included in the MPO. The race and ethnic breakout is as follows:

Table 1 - Total 'Speakers' by Race Age 5 - 65+

Census Source	Race	Athens-Clarke Co.	Madison Co.	Oconee Co.	Oglethorpe Co.	Jackson Co.	Total
QT-P4	Caucasian	72,238	24,634	29,004	11,662	52,496	190,034
QT-P4	African American	30,988	2,355	1,635	2,566	4,103	41,647
QT-P4	American Indian	247	74	49	35	124	529
QT-P4	Asian	4,869	178	1,022	65	1,033	7,167
QT-P4	Hawaiian / Islander	84	1	5	2	13	105
QT-P4	Other Race	5,763	527	641	285	1,649	8,865
QT-P4	Two or More Races	2,525	351	452	284	1,067	4,679
QT-P10	Hispanic	12,192	1,139	1,436	546	3,736	19,049
	Total	128,906	29,259	34,244	15,445	64,221	272,075

Source: US Census Bureau 2010, SF1 – Forms QT-P4 (Race, Combination of Two Races, and Not Hispanic or Latino) and QT-P10 (Hispanic or Latino by Type)

Though the regional total speakers for the MACORTS region is 272,075 and for Athens-Clarke County is 128,906, the MPO staff has based the LEP analysis upon the Census data reported for persons ages 18-65. This age group represents the ‘customers’ of ATS and MACORTS. Services and products provided by ATS and MACORTS have a greater impact on the lives of this age group. MACORTS products, particularly, are not suited nor intended for consumption by minors. Children, too, would generally have guidance from adults on navigating the Athens Transit System. Table 2 shows the number of total speakers in the 18 - 65+ age group broken out by race and by county. The total number of speakers in this age group for the region is 208,824. For Athens-Clarke County alone, the number of total speakers in this age group is 104,224. These are the totals that were used as a basis for the analysis of the number of LEP individuals in the region and ATS service area.

Table 2 - Total 'Speakers' by Race Age 18 - 65+

Census Source	Race	Athens-Clarke County	Madison County	Oconee County	Oglethorpe County	Jackson County	Total
P10	Caucasian	63,968	18,860	20,968	9,008	39,142	151,946
P10	African American	22,492	1,749	1,211	1,977	3,019	30,448
P10	American Indian	181	56	28	25	89	379
P10	Asian	4,290	138	706	49	689	5,872
P10	Hawaiian / Islander	59	1	2	2	10	74
P10	Other Race	3,669	291	384	163	994	5,501
P10	Two or More Races	1,632	151	206	120	497	2,606
P11	Hispanic	7,933	642	854	318	2,251	11,998
	Total	104,224	21,888	24,359	11,662	46,691	208,824

Source: U.S. Census Bureau, Census 2010, SF1 – Form P10 (Race for the Population 18 years and over) and P11 (Hispanic or Latino, and Not Hispanic or Latino by Race for the Population 18 years and over)

Table 3 shows the 10 most prevalent languages spoken in the MACORTS region as reported by the U.S. Census Bureau. This data includes all age brackets from 5 years old and up. A more detailed breakdown of the data was not available from the U.S. Census Bureau.

Table 3 – Top Ten Languages Spoken in MACORTS Region

5 yrs and over Population	231,464	
English	209,226	90.4%
Spanish or Spanish Creole	14,127	6.1%
Chinese	1,117	0.5%
Korean	1,042	0.5%
French (incl. Patois, Cajun)	790	0.3%
Hmong	572	0.2%
Arabic	467	0.2%
Other Indo-European Langs	419	0.2%
German	376	0.2%
Other Indic Langs	364	0.2%
Total	228,500	98.7%

Source: U.S. Census Bureau, American Community Survey 5-yr Estimate: 2006 –2010; B16001 – Language Spoken at Home By Ability to Speak English for Population 5 years and older (county level)

Table 4 shows the 10 most prevalent languages spoken in Athens-Clarke County as reported by the U.S. Census Bureau. This data includes all age brackets from 5 years old and up. A more detailed breakdown of the data was not available from the U.S. Census Bureau.

Table 4 – Top Ten Languages Spoken in Athens-Clarke County

5 years and over population	107,985	
English	93,550	86.6%
Spanish or Spanish Creole	8,963	8.3%
Chinese	1,067	1.0%
Korean	638	0.6%
French (incl. Patois, Cajun)	462	0.4%
Arabic	389	0.4%
Other Indo-European Langs	366	0.3%
German	296	0.3%
Other Indic Langs	275	0.3%
African Langs	228	0.2%
Total	106,234	

Source: U.S. Census Bureau, American Community Survey 5-yr Estimate: 2006 –2010; B16001 – Language Spoken at Home By Ability to Speak English for Population 5 years and older (county level)

The Census Bureau has four classifications for how well people speak English. The classifications are ‘very well’, ‘well’, ‘not well’, and ‘not at all’. For the purposes of the LEP Plan, people who were categorized as speaking English ‘not well’ or ‘not at all’ by the U.S. Census Bureau have been considered to be Limited English Proficient persons. As Table 5 shows, Athens-Clarke County has the highest percentage of LEP individuals with 3.5%, while the entire region has approximately 2.5% of the population categorized as having limited English proficiency.

**Table 5 – Total Limited English Proficient Speakers
18 years of age and over**

	Total Speakers	Total LEP Individuals	Total % LEP Individuals
Athens-Clarke Co.	104,224	3,649	3.5%
Madison Co.	21,888	318	1.5%
Oconee Co.	24,359	392	1.6%
Oglethorpe Co.	11,662	52	0.4%
Jackson Co.	46,691	802	1.7%
Total	208,824	5,213	2.5%

Source: U.S. Census Bureau, American Community Survey 5-yr Estimate: 2006 – 2010; B16004 – Age by Language Spoken at Home by Ability

Figures 3 and 4 on the following pages illustrate graphically the density of LEP persons by census tract. Figure 3 shows the density based on the regional totals. Figure 4 shows the concentration of LEP persons in Athens-Clarke County compared to the ATS service area.

Figure 3: Concentrations of LEP persons (18+ years of age) by Census Tract within the MACORTS planning area counties compared to regional totals

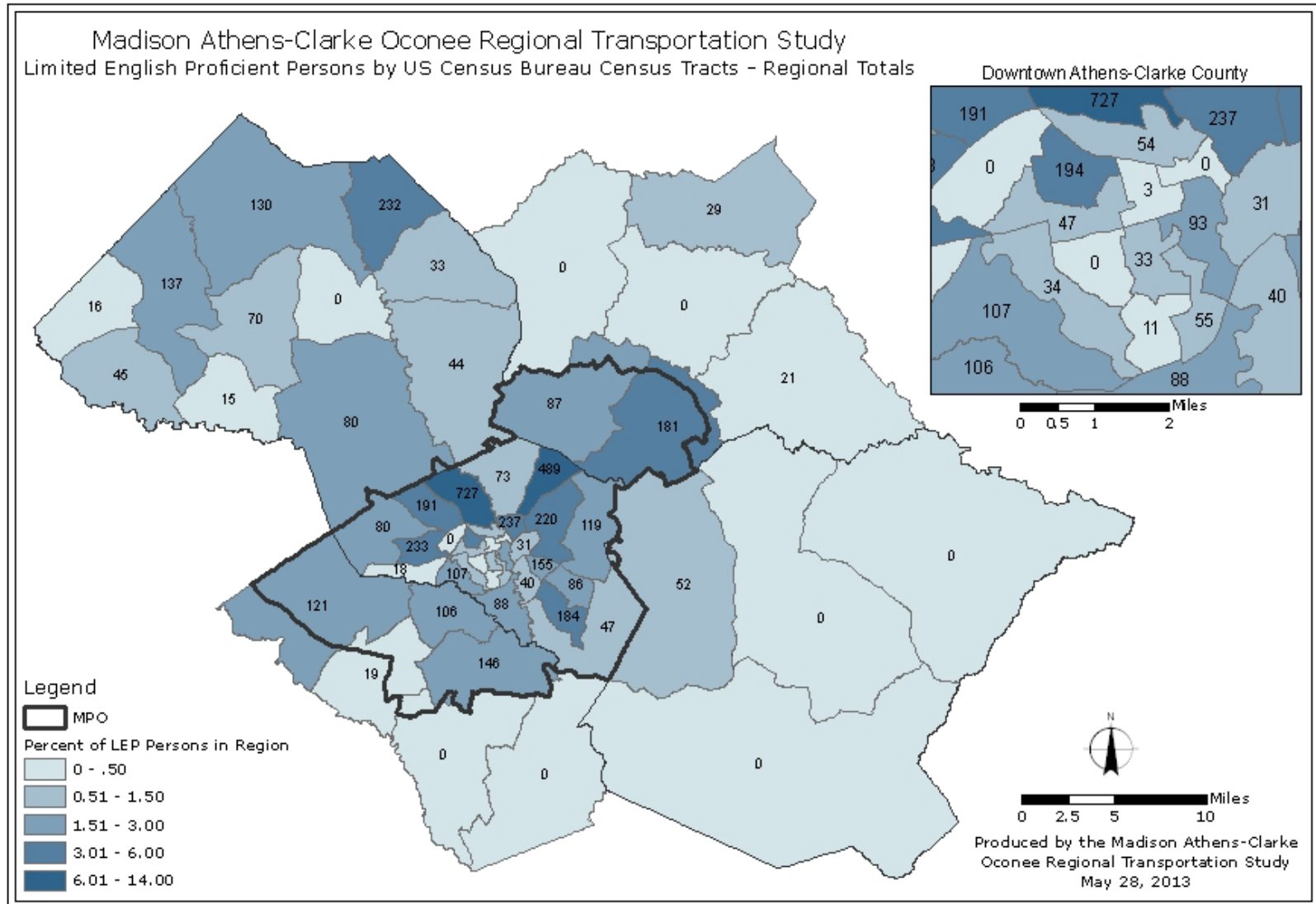
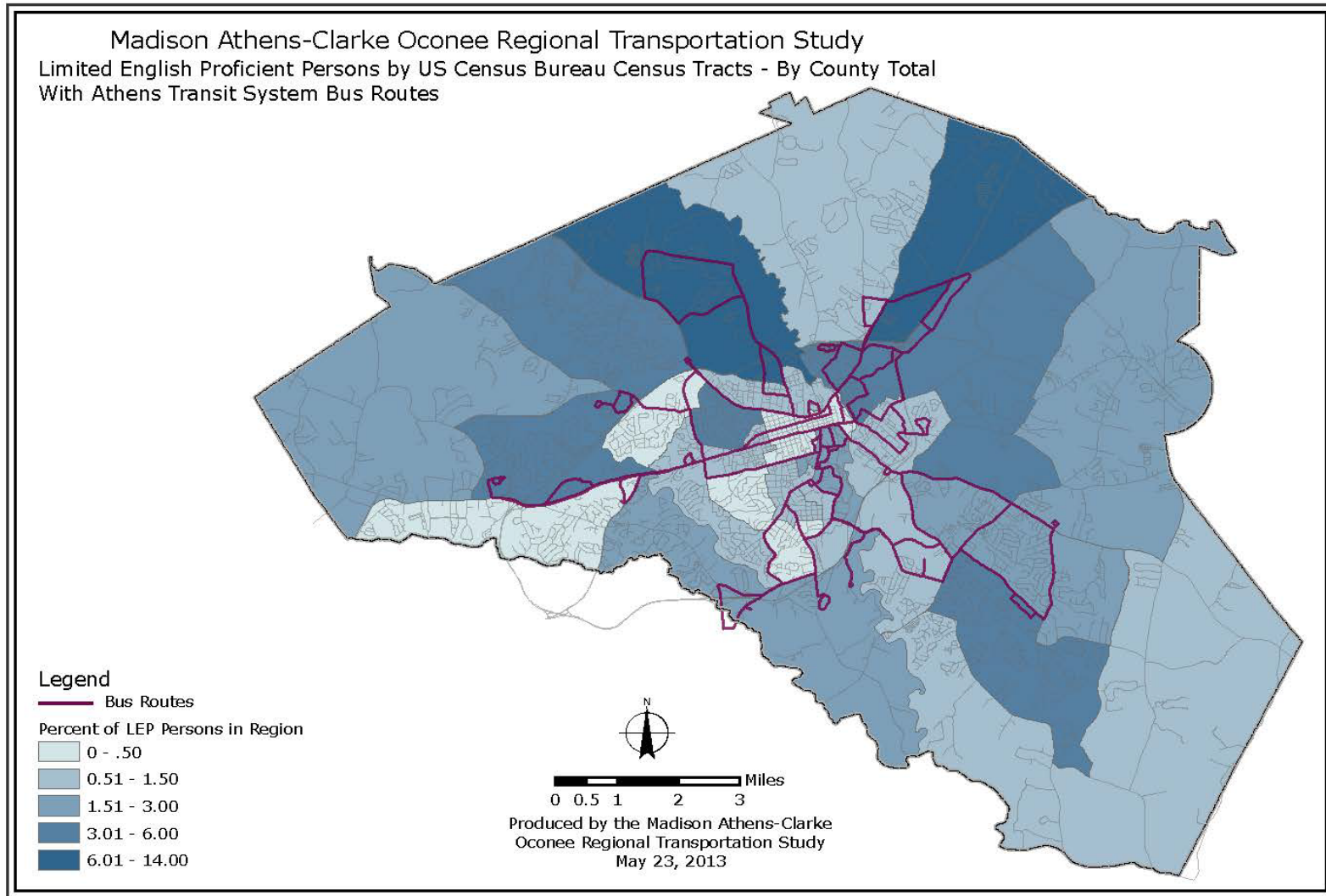


Figure 4: Shows the concentrations by Census Tracts of LEP persons(18+ yrs of Age) within Athens-Clarke County with ATS service



Factor 2: The frequency with which LEP persons encounter the services provided.

To date, the MPO has had very little contact with LEP persons in the course of MPO business. ATS has more contact with LEP’s persons due to the nature of services provided and number of persons with whom the staff interacts with on a weekly basis, but the percentage is still quite small. ATS and MPO planning staff were surveyed in regards to their interactions with LEP individuals in an average week. The MPO staff has had no requests for assistance from LEP persons in the last 13 years. Anecdotally, MPO staff noted only interacting once with LEP individuals during the course of their public interactions or day-to-day business. The remainder of the Athens-Clarke County Planning Department staff, who are housed with the MPO staff, indicated that they encounter only 1 or 2 LEP persons per week. Other than a very rare exception, these people bring another person with them who speaks English to assist them, according to the survey. Table 6 shows the Athens-Clarke County Planning Department number of customers and the number of LEP persons on an annual basis. LEP individuals make up approximately 0.1% of the customers annually.

Table 6 – Limited English Proficiency Customers of Athens-Clarke County Planning Department

LEP Persons Per Week	Extrapolated LEP Persons Per Year	Total Customers Per Week	Extrapolated Customers Per Year	Weekly Percentage LEP Customers	Annual Percentage LEP Customers
1	35	719	35,950	0.14%	0.10%
<i>Additional Notes: This data came from a survey of employees of the Athens-Clarke Planning Department. They were asked how many LEP persons were encountered in an average week. This office handles zoning, land use, and plans review. The MPO, MACORTS, is administered out of this department. The number of customers per year was derived from a survey of total customers during the week of Dec. 3 - 7, 2012</i>					

The staff of the Athens Transit System was surveyed as well. They were asked how many LEP persons they encounter in the average week. Responses ranged from zero to 30 persons per week. The informal accounting of LEP persons was extrapolated to annual totals and compared to the number of people that ride ATS by route and by the total annual ridership. Table 7 illustrated that the highest percentage by route was on Route 27 – Barnett Shoals / Cedar Shoals with 0.9% of ridership being classified as LEP. When compared to the total annual ridership, the percentage of LEP persons is approximately 0.2%.

Table 7 – Limited English Proficiency Riders of Athens Transit System

Bus Rts	Average Annual Number of LEP Riders	Average Annual Ridership	LEP Annual Percentage	Bus Rts	Average Annual Number of LEP Riders	Average Annual Ridership	LEP Annual Percentage
1	0	77,214	0.0%	14	234	235,638	0.1%
2	130	36,168	0.4%	20	322	143,461	0.2%
3	0	24,935	0.0%	21	0	27,587	0.0%
5	225	125,682	0.2%	22	208	43,186	0.5%
6	52	78,701	0.1%	24	104	56,097	0.2%
7	364	73,620	0.5%	25	125	146,108	0.1%
8	322	61,990	0.5%	26	208	98,607	0.2%
9	364	100,191	0.4%	27	858	90,482	0.9%
12	182	348,610	0.1%	28	0	13,805	0.0%
				Total	3,699	1,782,082	0.2%

Factor 3: The nature and importance of the services and programs.

MACORTS is responsible for regional transportation planning. Denial or delay of access to services or information provided by the MPO would not have life threatening or even serious implications on an LEP individual. This is especially true if compared to services such as healthcare, emergency transportation, water, sewer, fire protection, police protection, and other essential services.

Athens Transit System provides public transportation to the Athens-Clarke County area giving people access to work, healthcare, and other programs and/or services. Without access to public transportation, many of these individuals would not be able to take advantage of other services that could potentially be life changing or life sustaining. Therefore, lack of public transportation services could have an adverse effect on LEP individuals.

Factor 4: The Resources Available to the MACORTS, ATS, and Overall Cost

MACORTS serves a very small percentage of LEP persons, less than 2.5 % or approximately 5,213 in the region and has limited funds available for LEP services. Providing translation assistance to LEP persons would be funded entirely from existing MACORTS operating funds and would compete with other operational requirements for funding. MACORTS’s annual

federal allocation is approximately \$173,000 for a total base grant amount of approximately \$216,000. The total budget varies from year to year depending upon regulations regarding carryover funding.

Given the small number of LEP people within the region and the MACORTS budget, it would be burdensome to produce written translations for the core MACORTS documents. The expense and time required to provide these translated documents could jeopardize the mandated objectives of the transportation planning program. It is appropriate, however, for MACORTS to provide translated summaries of core products as requested by LEP persons. A translation option is provided on each page of the MACORTS website (www.macorts.org) so that pages from the website can be translated into any of several languages (Chinese, Dutch, French, German, Greek, Italian, Japanese, Korean, Portuguese, Russian, or Spanish).

The Athens Transit System has been very proactive in their treatment of LEP persons. ATS has funding available through federal grants and the local government to continue to enhance their services for the LEP population.

Providing Notice to LEP Persons

MACORTS will provide statements offering language assistance in public information, public notices, and on the MACORTS website to those persons requiring language assistance or special accommodations. MACORTS and ATS provide the technology to translate their websites into several languages. ATS has translated public materials, such as route guides and schedules, available in Spanish.

Implementation of LEP Initiatives

With advance notice of three to seven calendar days, MACORTS will provide interpreter services at the Technical Coordinating Committee meetings, Policy Committee meetings, or other public meetings. Interpreters will provide services for both the foreign language and hearing impaired. Public notices will provide the contact information for this service. “I Speak” cards or a list of identifiers in the various languages will be provided for use at all public meetings to help identify the needs of LEP persons attending. Public meetings notices are published in Spanish in a local Spanish-language publication for all MACORTS public meetings.

The Athens Transit System is providing many services to LEP persons currently. ATS schedules are available in Spanish and Braille. A picture book was developed that shows how to ride “The Bus” for non-English speakers. The ATS website includes a mechanism to translate the content into one of several languages. There are currently four ATS staff members that speak Spanish fluently and are available to assist in interpretation as needed. ATS actively markets to the Spanish-speaking population.

MACORTS and ATS Staff Training

MACORTS staff members are provided training on the requirements for providing meaningful access to services for LEP persons. Additional training opportunities will be taken advantage of as they become available.

ATS staff members receive training regarding the Limited English Proficiency regulations and available resources as part of the Sensitivity Training at New Employee Orientation. Periodic refresher courses are provided as part of ATS monthly staff meetings. ATS staff has access to take classes in Command Spanish through the Unified Government of Athens-Clarke County periodically. Twenty copies of Rosetta Stone's Spanish class have been purchased by ATS for use by employees who desire to learn Spanish voluntarily. It is available for use at the Operations and Maintenance Facility.

LEP Plan Access

MACORTS and ATS will post the LEP Plan on their websites at www.macorts.org and www.athenstransit.com, respectively. Anyone with internet access will be able to access the plan. For those without personal Internet service, several area libraries offer free Internet access. Digital versions or hardcopies of the LEP Plan will be provided to MACORTS members, the Georgia Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy, free of charge.

Any questions or comments regarding this plan should be directed to the MACORTS staff:

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