



LIMITED ENGLISH PROFICIENCY PLAN

LIMITED ENGLISH PROFICIENCY (LEP) PLAN SUMMARY

LCTA has developed this Limited English Proficiency (LEP) Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by LCTA.

This 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 population(s) that communication assistance is available.

LCTA uses the United States Department of Transportation (U.S. DOT) outline of a 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 LCTA program, activity or service.
2. The frequency with which LEP persons come in contact with LCTA's programs, activities or services.
3. The nature and importance of programs, activities or services provided by LCTA to the LEP population.
4. The resources available to LCTA and overall cost to provide LEP assistance.

The number or proportion of LEP persons in the service area who may be served or are likely to encounter a LCTA program, activity or service.

The table below shows that 4.1 percent of the population in LCTA's service area is limited English proficient. This percentage is slightly higher than Luzerne County (3.9 percent)

LEP Population

	Luzerne County		LCTA's Service Area	
Population	303,969		223,860	
Speak only English	274,599	90.3%	202,971	90.7%
Speak English "less than very well"	11,919	3.9%	9,095	4.1%
<i>US Census, American Community Survey 2015 - 5-Year Estimates</i>				



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The US Census Bureau, American Community Survey table B16001 provides details for over forty languages for population 5-years and over by language spoken at home by the ability to speak English for LCTA's service area. The most recent table is for the years 2015 to 2019. The next table shows the number of people in LCTA's service area that speak English less than very well by language spoken at home.

Spanish spoken at home had the highest number (4,547) of individuals that spoke English less than very well. This is two percent of LCTA's service area population. The second highest number was "other Indic languages" was 0.5 percent of the population or 1,165 individuals that spoke English less than very well. There are multiple languages under the US Census "other Indic languages" and as such, the actual number for one specific language is much less. LCTA will continue to work with community groups to ascertain how LCTA can provide language assistance for LEP individuals who speak other Indic languages. At this time, LCTA's internal survey has not indicated that staff have encountered limited English proficient individuals that speak an Indic language. LCTA translates its vital documents into Spanish and will continue to monitor "other Indic languages".

LCTA LEP Population by Language

	Luzerne County		LCTA Service Area	
Total:	303,969		223,860	
Speak only English	274,599	90.3%	202,971	90.7%
Spanish or Spanish Creole:	20,403	6.7%	10,852	4.8%
Speak English less than "very well"	9,153	3.0%	4,547	2.0%
French (incl. Patois, Cajun):	847	0.3%	533	0.2%
Speak English less than "very well"	157	0.1%	144	0.1%
French Creole:	7	0.0%	17	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Italian:	1,148	0.4%	727	0.3%
Speak English less than "very well"	244	0.1%	130	0.1%
Portuguese or Portuguese Creole:	135	0.0%	456	0.2%
Speak English less than "very well"	7	0.0%	100	0.0%
German:	447	0.1%	522	0.2%
Speak English less than "very well"	50	0.0%	61	0.0%
Yiddish:	18	0.0%	41	0.0%
Speak English less than "very well"	18	0.0%	18	0.0%
Other West Germanic languages:	222	0.1%	243	0.1%
Speak English less than "very well"	43	0.0%	26	0.0%



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Scandinavian languages:	12	0.0%	12	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Greek:	54	0.0%	15	0.0%
Speak English less than "very well"	36	0.0%	-	0.0%
Russian:	369	0.1%	362	0.2%
Speak English less than "very well"	95	0.0%	117	0.1%
Polish:	885	0.3%	601	0.3%
Speak English less than "very well"	195	0.1%	82	0.0%
Serbo-Croatian:	97	0.0%	60	0.0%
Speak English less than "very well"	38	0.0%	33	0.0%
Other Slavic languages:	484	0.2%	386	0.2%
Speak English less than "very well"	137	0.0%	210	0.1%
Armenian:	0	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Persian:	51	0.0%	103	0.0%
Speak English less than "very well"	0	0.0%	66	0.0%
Gujarati:	217	0.1%	936	0.4%
Speak English less than "very well"	102	0.0%	664	0.3%
Hindi:	333	0.1%	430	0.2%
Speak English less than "very well"	94	0.0%	201	0.1%
Urdu:	68	0.0%	47	0.0%
Speak English less than "very well"	7	0.0%	10	0.0%
Other Indic languages:	576	0.2%	1,358	0.6%
Speak English less than "very well"	305	0.1%	1,165	0.5%
Other Indo-European languages:	368	0.1%	456	0.2%
Speak English less than "very well"	134	0.0%	113	0.1%
Chinese:	675	0.2%	814	0.4%
Speak English less than "very well"	460	0.2%	578	0.3%
Japanese:	94	0.0%	53	0.0%
Speak English less than "very well"	57	0.0%	33	0.0%
Korean:	219	0.1%	123	0.1%
Speak English less than "very well"	114	0.0%	44	0.0%
Mon-Khmer, Cambodian:	4	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Hmong:	0	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Thai:	55	0.0%	26	0.0%
Speak English less than "very well"	16	0.0%	16	0.0%



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Laotian:	31	0.0%	98	0.0%
Speak English less than "very well"	10	0.0%	30	0.0%
Vietnamese:	124	0.0%	222	0.1%
Speak English less than "very well"	39	0.0%	119	0.1%
Other Asian languages:	354	0.1%	266	0.1%
Speak English less than "very well"	116	0.0%	92	0.0%
Tagalog:	131	0.0%	93	0.0%
Speak English less than "very well"	42	0.0%	39	0.0%
Other Pacific Island languages:	66	0.0%	291	0.1%
Speak English less than "very well"	31	0.0%	221	0.1%
Navajo:	34	0.0%	34	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Other Native North American languages:	91	0.0%	-	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
Hungarian:	63	0.0%	50	0.0%
Speak English less than "very well"	15	0.0%	-	0.0%
Arabic:	523	0.2%	471	0.2%
Speak English less than "very well"	157	0.1%	175	0.1%
Hebrew:	33	0.0%	112	0.1%
Speak English less than "very well"	0	0.0%	40	0.0%
African languages:	106	0.0%	64	0.0%
Speak English less than "very well"	47	0.0%	21	0.0%
Other and unspecified languages:	26	0.0%	15	0.0%
Speak English less than "very well"	0	0.0%	-	0.0%
<i>US Census, American Community Survey 2015 - 5-Year Estimates</i>				

The frequency with which Limited English Proficiency (LEP) come in contact with a LCTA program, activity, or service?

LCTA continues to assess the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone requests for translation through Interpreters Unlimited. It also includes surveys of all employees.

The most recent employee survey revealed that 44 percent of employees frequently came in contact with LEP persons and the most prevalent language was Spanish. There were a few instances of contacts with persons that spoke Polish and Russian. Fixed route and shared-ride drivers often came in contact with LEP persons as well as dispatchers and customers service representatives.



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Employee Survey – Frequency of Contact with LEP Persons

Employee Survey		
Frequently	27	44%
Not Frequently	30	48%
Never	5	5%

The nature and importance of the program, activity, or service provided by LCTA to people's lives

LCTA provides public transportation services to persons who need to travel within and between 36 municipalities in Luzerne County, the largest of which are the Cities of Wilkes-Barre and Pittston, and the boroughs of Kingston and Nanticoke. Major destinations include medical facilities, Luzerne County Community College, industrial parks, Wyoming Valley Mall, and other shopping locations. Persons rely on public transit services to get to work, school, medical services, shopping, recreation, and other daily life-activities.

LCTA has identified access to our fixed route and shared ride services as potentially critical to the LEP persons. Examination of timetables, fare and payment information, system rules, how to ride, public service announcements and complaint and commendation forms are potential instruments that could be used to increase the LEP individual's access to our fixed route service. LCTA will continue to reach out to organization for assistance with its' LEP program.

The resources available to LCTA and costs

LCTA provides several options to assist in communicating with person(s) having a Limited English Proficiency (LEP).

LCTA contracts with Interpreters Unlimited, LLC to provide translation services as needed (<http://www.interpretersunlimited.com>) to provide language translation and interpretation services. A person who identifies their communication needs upon contacting LCTA, and a staff member (CSR/Dispatch) will conference call in a certified language interpreter/ translator. Many of staff members, including operators, are bilingual and as such, assist with translations.

LCTA has limited resources; however, the organization is committed to ensuring LEP persons have meaningful access to LCTA's programs, services and activities. LCTA will continue to monitor LEP populations and provide language services on an as-needed basis.



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Cost of Language Services

Cost of Language Services	
Document Translation	\$0.20 to \$0.28 per word
Telephone Interpretation/Over the Phone Interpretation	\$1.30 to \$1.70 per minute
Video Interpretation/Video Remote Interpretation	\$150 to \$160 per hour
On-site Interpretation	\$175 to \$200 per hour, plus travel time
Source: Keylingo (https://keylingo.com)	

Various tools such as Census Bureau's "I Speak" cards are used to help in the identification of specific languages for individuals with Limited English Proficiency.

Google Translate is available on LCTA's web site, lctabus.com, providing 80 different selected language translation options.

All translation and interpretation communications services are free of charge.

LCTA'S LIMITED ENGLISH PROFICIENT/LANGUAGE ASSISTANCE IMPLEMENTATION PLAN

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

- Analyze LEP interaction data to determine if requests for language assistance have been received in the past, either at meetings, reviewing monthly interpretation service invoices or over the phone, to monitor whether language assistance might be needed at future events or in daily operations.
- Language Identification Cards are available onboard all LCTA transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, the vehicle operators are instructed to try to obtain contact information to give to the operations manager for follow-up. Dispatchers, customer service representatives, and schedulers are surveyed regarding LEP individuals they encounter, either in-person or over the telephone.
- Language Identification cards are available at the Wilkes-Barre Intermodal Transportation Center Authority ticket office, and available at the reception desk for customer service staff at LCTA's administrative offices.
- Staff are periodically surveyed to determine the frequency in which they come in contact with LEP persons.



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LCTA will continue to monitor key program areas to assess major points of contact LEP population, such as:

- Encounters during use of fixed route and paratransit services
- Purchase of passes and tickets through the LCTA website, in-person, and over the phone
- Participation in public meetings
- Customer service interactions
- Requests for translations services (documents/interpretation, monthly invoices)
- Ridership surveys and focus groups
- Operator and internal operations' surveys

Language Assistance Measures

LCTA has implemented the following LEP procedures.

- Census Bureau's "I Speak" Cards are located in all buses, at the main office Customer Service desk, and at the Customer Service Desk in the Transit Center.
- When an interpreter is needed, in person or on the telephone, staff utilize Interpreters Unlimited services. Directions for using this service are given to all administrative staff.
- Periodically survey staff on how often they have occurrences with a Limited English Proficient passenger or client.
- Contact local community, cultural and human service organizations that provide services to LEP individuals and seek opportunities to provide information on LCTA programs and services.
- LCTA's website utilizes the "Google Translate" translation service. This service allows users to translate any, or all, parts of the website into their native language.
- Include the statement, "*Bilingual or Spanish speaking a plus*", on vehicle operator and customer service staff recruitment flyers and employment vacancy advertisements.
- When an interpreter is needed, either in person or on the telephone, LCTA staff member will attempt to determine what language is required and then access language assistance services from the contracted translator services.
- As needed, conduct cost benefit analysis for key/vital document translations, including: services, routes, schedules, fare information, how to ride, right-to-know, etc.
- Review routes and service materials for increasing symbolic signs (pictographs).

If we engage the services of a company, LCTA will:

- Ensure that our internal and external translators demonstrate their ability to accurately translate English and the other language in which they are fluent.
- Ensure that outside resources are versed in our industry terminology so they can better serve the community.
- Instruct the interpreter or translator that they should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translating.



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- Request that the interpreter or translator attest that they will not have a conflict of interest on the issues for which they would be providing interpretation services.

LCTA Staff Training

LCTA uses a standard presentation (See Attachment A) that provides employees with an overview of Title VI, LEP Policy, LEP Procedures, a review of Title VI requirements, procedures for staff to work effectively with LEP persons and a description of LCTA's LEP plan, services and materials. The training program includes a discussion of responding to LEP persons by telephone, in-person, correspondence, complaints as well as document needs.

Information and training are also a part of the orientation process for new hires.

Training refreshers will also be given to current staff on the following:

- Understanding the Title VI policy and LEP responsibilities;
- What language assistance services LCTA offers;
- Use of LEP "I Speak" Cards;
- How to use the Interpreters Unlimited interpretation and translation services; and
- Documentation of language assistance requests

The next three figures provides an example of LCTA's I Speak Cards followed by a copy of the most recent memorandum from the Executive Director disseminating the I Speak Cards to staff.



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I Speak Cards (3 Pages)

2004 Census Test	United States Census 2010
LANGUAGE IDENTIFICATION FLASHCARD	
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Ներդրում՝ հնդ նշում՝ կատարվեց այս բանակցություն, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ឈ្មួញក្នុងប្រព័ន្ធនេះ បើអ្នកមាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

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<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ.	24. Laotian
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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|---|----------------|
| <input type="checkbox"/> Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> Обележите овај квадратикћ уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> ให้กาเครื่องหมายลงในช่องดำทึบด้านหน้าของภาษาไทย. | 33. Thai |
| <input type="checkbox"/> Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | 37. Vietnamese |
| <input type="checkbox"/> באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |

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Dissemination of I Speak Cards



MEMO

To: All LCTA Employees
From: Robert Fiume, Executive Director
Date: August 14, 2024
RE: Language Identification Flash Cards

Language Identification 'Flash Cards'

There are ISPEAK Language Identification 'Flash Cards' located on every bus, van, and at each customer service window.

Please take the following steps to determine what language a person speaks:

- The Language Identification Card lists languages most frequently encountered in North America.
- To use this card effectively, show the person the packet so they may identify their language.
- Once the person identifies the language, you can process with using translation services provided by Interpreters Unlimited. If you are a driver, please call in to Dispatch.
- When using the translation process:
 - For CSR's:
 - Hit the "CONF" button and call Interpreters Unlimited at 1-877-652-6482.
 - Enter Code: 11478.
 - You will be conferenced in with a linguist, who will ask for the customer ID, which is your first and last name.
 - Connect the caller in by hitting the "CONF" button again.
 - The linguist will translate for you and the customer; ask for the customer's name and how we can help.
 - If you are unable to identify the language, contact your immediate Supervisor or Dispatcher for assistance.



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Outreach

The following are a few options that LCTA utilizes to conduct outreach to LEP individuals:

- When staff is making a presentation on a topic that might be of importance to LEP or if staff is hosting a meeting or workshop in a geographic location with a known concentration of LEP persons, meeting notices, advertisements, and agendas will include the alternative language based on the known LEP population;
- When publishing a general public meeting notice, based on the LEP population and when relevant, a clause that translates into “A (*insert language(s)*) translator will be provided.”
- Key printed materials can be translated and made available at LCTA’s Intermodal Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.
- LCTA utilizes Google translate on its web site.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and can be easily updated. At a minimum, LCTA will follow the Title VI Program update schedule for updating the LEP Plan.

Each update examines all plan components including:

- How many LEP persons were encountered;
- Were their needs met;
- What is the current LEP population in LCTA service area;
- Has there been a change in the types of languages where translation services are needed;
- Is there still a need for continued language assistance for previously identified LCTA programs?
- Have LCTA’s available resources, such as technology, staff and financial costs changed;
- Has LCTA fulfilled the goals of the LEP Plan; and
- Were any complaints received?

Dissemination of the Limited English Proficiency Plan

LCTA includes its LEP Plan on its website (lctabus.com) together with its Title VI Policy and Complaint Procedures. LCTA’s Notice of Rights under Title VI to the public is posted in LCTA’s transit center and in selected printed materials also refers to the LEP Plan’s availability.

Copies of the LEP Plan will be provided, on request, to any person requesting the document via telephone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.



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ATTACHMENT A – TITLE VI AND LEP TRAINING

8/19/2024

Title VI and LEP Training



1

What is Title VI?

Title VI of the Civil Right Act of 1964 provides that "no person in the United State shall, on the ground 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."

2

1



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LCTA operates its programs and services without regard for race, color, or national origin in accordance with Title VI of the Civil Right Act of 1964.

3

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with LCTA.

4

2



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Complaint forms are available:

- By calling 570-288-9356, ext. 227
- By emailing gwintermantel@lctabus.com
- By mailing a request or visiting 300 South Pennsylvania Ave., Wilkes-Barre, PA 18701
- On LCTA's web site, lctabus.com

5

A complainant may also file a complaint directly with the Federal Transit Administration.

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If Title VI information or complaint forms are needed in another language, customers may call 570-288-9356, ext. 227.

7

What does LEP mean?

A person who is "Limited English Proficient" (LEP) does not speak English as his or her primary language and can have a limited ability to read, speak, write, or understand English.

8



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What do you do if you come in contact with a person of Limited English Proficiency?

You should use all available resources to determine what language the person speaks so you may try to help him or her.

9

Language Assistance Resources Offered by LCTA:

- Census Bureau "I-Speak" Language Assistance Flash Cards on all buses and vans, as well as customer service windows at Main Office and Transit Center
- Interpreters Unlimited
- Google Translate on web site
- Bilingual Staff

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I-Speak Card:

The image displays three I-Speak cards, which are standardized forms used for language assistance. Each card is divided into two columns: the left column contains text in English, and the right column contains the same text in Arabic. The cards are numbered 1 through 3. Card 1 lists various transportation services such as 'Bus', 'Train', 'Taxi', and 'Bicycle'. Card 2 lists various transportation routes such as 'Main Street', 'Broad Street', and 'Market Street'. Card 3 lists various transportation services such as 'Bus', 'Train', 'Taxi', and 'Bicycle'.

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LCTA Documentation of LEP Requests

- Occasional surveys of all staff members by Title VI Program Manager
- Monthly logs kept by CSRs and turned in to Title VI Program Manager
- Data from Interpreters Unlimited

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LIMITED ENGLISH PROFICIENCY PLAN

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LEP Video

<https://www.lep.gov/video/understanding-and-abiding-title-vi-civil-rights-act-1964>

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Discussion and Questions

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