Siouxland Regional Transit System (SRTS)

Language Assistance Plan



Ensuring Meaningful Access for Limited English Proficient Individuals

www.Siouxland Regional Transit System - SIMPCO
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Board Approved September 25, 2025

Purpose

The purpose of this Language Assistance Plan (hereinafter "LAP") is to meet the Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", indicates differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination.

As a recipient of Federal financial assistance for the operation of its rural public transit system, Siouxland Regional Transit System (SRTS) resolves to take reasonable steps to provide meaningful access to its services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

The completion of this LAP for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The LAP provides guidance to SRTS staff who may interact directly with LEP individuals or whose work involves providing information or services to the public. The plan provides protocols for identifying LEP individuals, language assistance measures, and staff responsibilities and training related to ensuring meaningful access for LEP individuals.

To provide effective and meaningful access for LEP clients, FTA has established the following guidelines to consider in developing an LAP:

1. Identifying LEP individuals who need language assistance (Four Factor Analysis)
2. Providing language assistance measures
3. Providing notice to LEP individuals
4. Training staff
5. Monitoring, evaluating, and updating the plan

For questions regarding this plan, please contact:

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Four-Factor Analysis

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

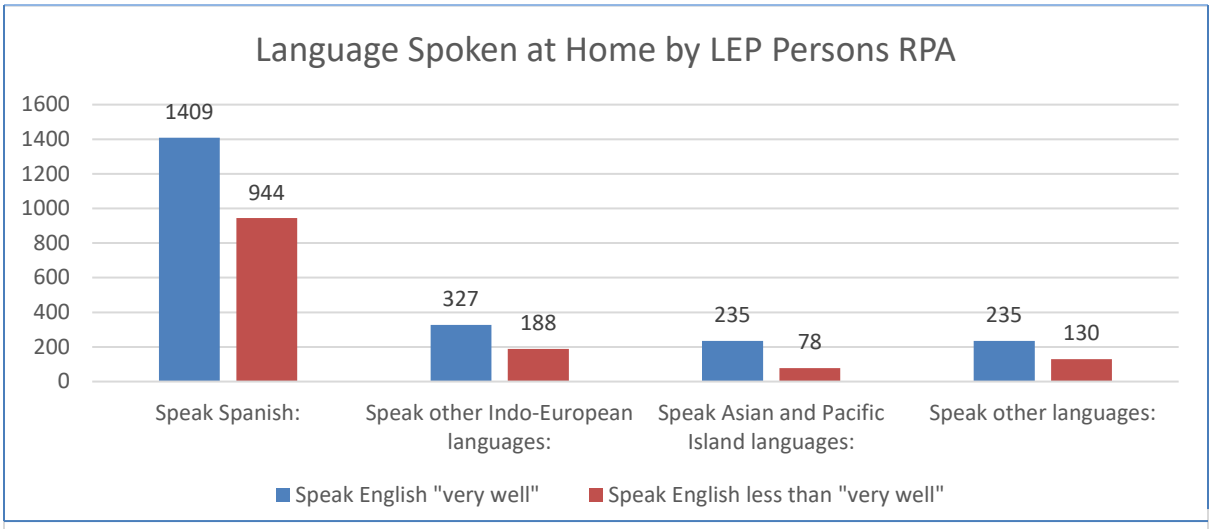
SRTS reviewed the U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimate, to determine the number of LEP persons within the Iowa regional planning area (Plymouth, Cherokee, Woodbury, Ida, and Monona Counties). Because the service area is not identical to the geographic boundaries of the five-county planning area since it excludes the metropolitan planning area, the data included only reflects the area which does not fall within the MPO. LEP was defined as persons who speak English less than "very well". Based on the data from the American Community Survey, which includes information for each of the five counties within the regional planning area, it is determined that across the planning area 2.19 percent of the population is LEP persons (see Table 1, page 2). The affected population per county is less than 1,000 persons.

Table 1: LEP Persons in the Regional Planning Area (excluding the metropolitan area)

	Cherokee	Ida	Monona	Plymouth	Woodbury	Total
Total Population (age 5+)	10,994	6,583	8,211	24,135	14,441	64,364
Speak only English	10,513	6,381	8,061	22,302	7,310	54,567
Speak another language, but speak English "very well"	386	202	150	911	486	2,135
Speak another Language and speak English less than "very well"	95	29	39	922	324	1,409
Percent that speak another language and speak English less than "very well"	0.86%	0.44%	0.47%	3.82%	2.24%	2.19%

Source: 2022 ACS 5-year

Figure 1: Language Spoken at Home by LEP Persons Residing in Regional Planning Area



Source: 2022 ACS 5-year Estimates. Note: Numbers exclude meto area data.

SRTS researched state and local data sources and reached out to local community organizations that work with LEP persons to corroborate our finding that few LEP persons are served by SRTS supported by U.S. Census American Community Survey data. Additionally, SRTS examined prior experiences with LEP individuals and the frequency they have received requests for translation services. Specifically, we:

- Contacted the transit vehicle operator and learned that non-English speaking passengers do not typically utilize services in that area;
- Confirmed with the dispatch service that they do not receive many calls or inquiries from LEP persons needing transportation services in that area;
- Looked into usage of Language Link and learned since 2017 until present there have only been 20 instances in which services were used;
- Reviewed information in the local online directories and determined there are very few local agencies or community organizations in that area that are readily available and specifically serve LEP persons;
- Traveled to counties and communities in the service area to visit with local government, business and residents about available services and specific needs of LEP populations.

Factor 2: The Frequency with Which LEP Individuals Come into Contact with SRTS Programs, Activities, and Services

Based on the information collected under Factor 1 from the transit vehicle operator and dispatch service, we determined that the LEP individuals within the regional planning area do not frequently come into contact with SRTS programs, activities, and services.

Factor 3: The Importance of LEP Persons to SRTS Programs, Activities, and Services

The most critical services provided by SRTS are access to medical appointments, pharmacies, nutrition services, employment and education. Additionally, services provide transportation to places that improve the quality of life including friends, relatives and entertainment.

Factor 4: The Resources Available to SRTS and Overall Costs to Provide LEP Assistance

SRTS current language services focus on providing language interpreters, as needed, for LEP persons. Currently, SRTS does employee a person in dispatch that is fluent in Spanish, and they also collaborate with the local school district which employs an interpreter that is available for SRTS use. SRTS also has readily available Language Link, an interpreting by telephone service that provides language interpretation for over 200 languages, 24 hours a day, 365 days a year. Costs to SRTS for these services are not well defined, because these services are not used on a regular basis. Dispatch confirmed that currently little staff time is associated with requests for language assistance.

The American Community Survey data shows that 2.19 percent of the regional planning area population serviced by SRTS is LEP persons speaking languages other than English at home. SRTS staff has not received any requests for information to be translated into additional languages or for additional written or oral language services.

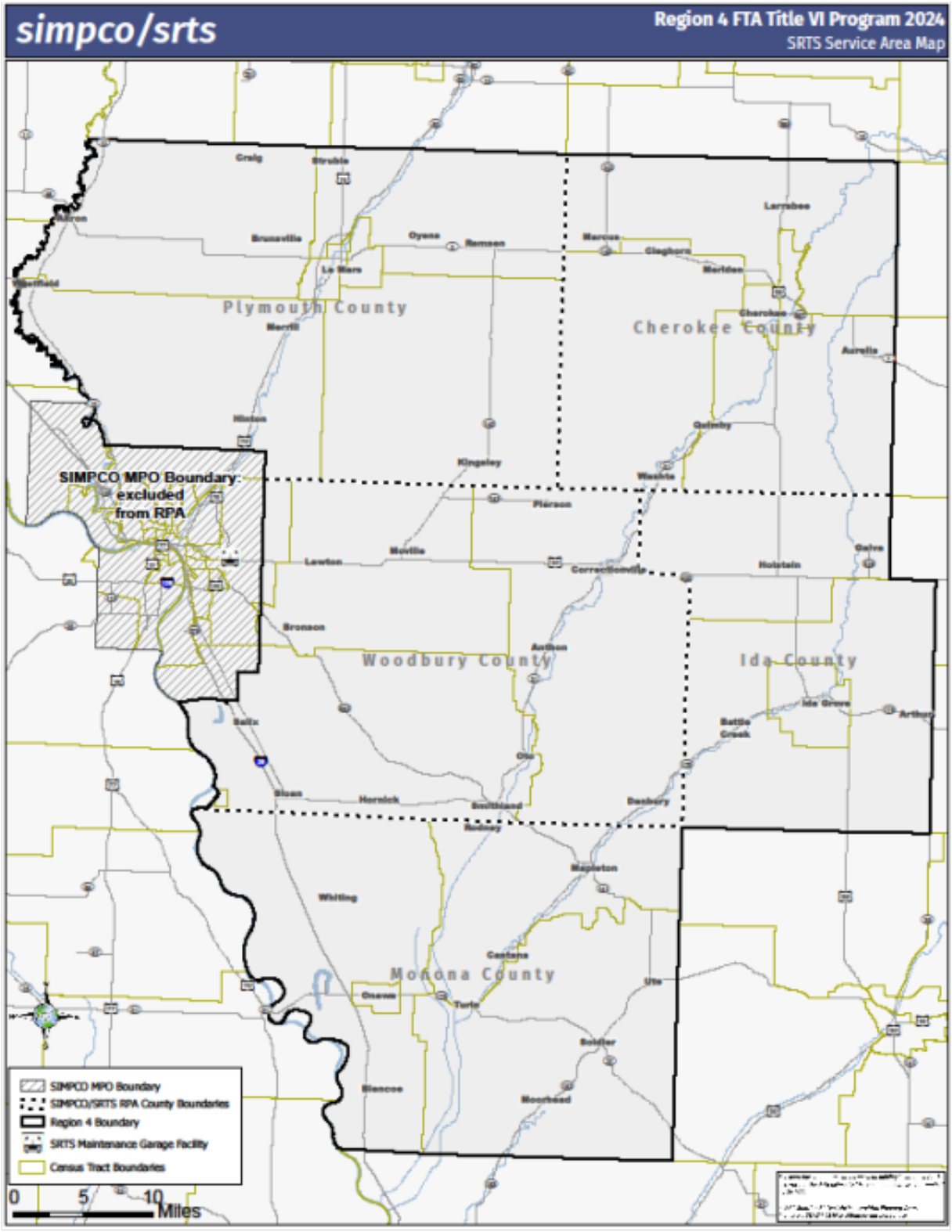
Because 2.19 is a low percentage and additional language services have not been requested, a large portion of our operating budget should not be devoted to additional language services specifically for the LEP population.

Based on the finding that LEP persons per county in Iowa regional planning area are less than 5 percent or 1,000, SRTS has determined a written LEP is not needed at this time. However, per FTA requirements, a Language Assistance Plan (LAP) will be developed as guidance for language assistance to LEP individuals in the SRTS service area.

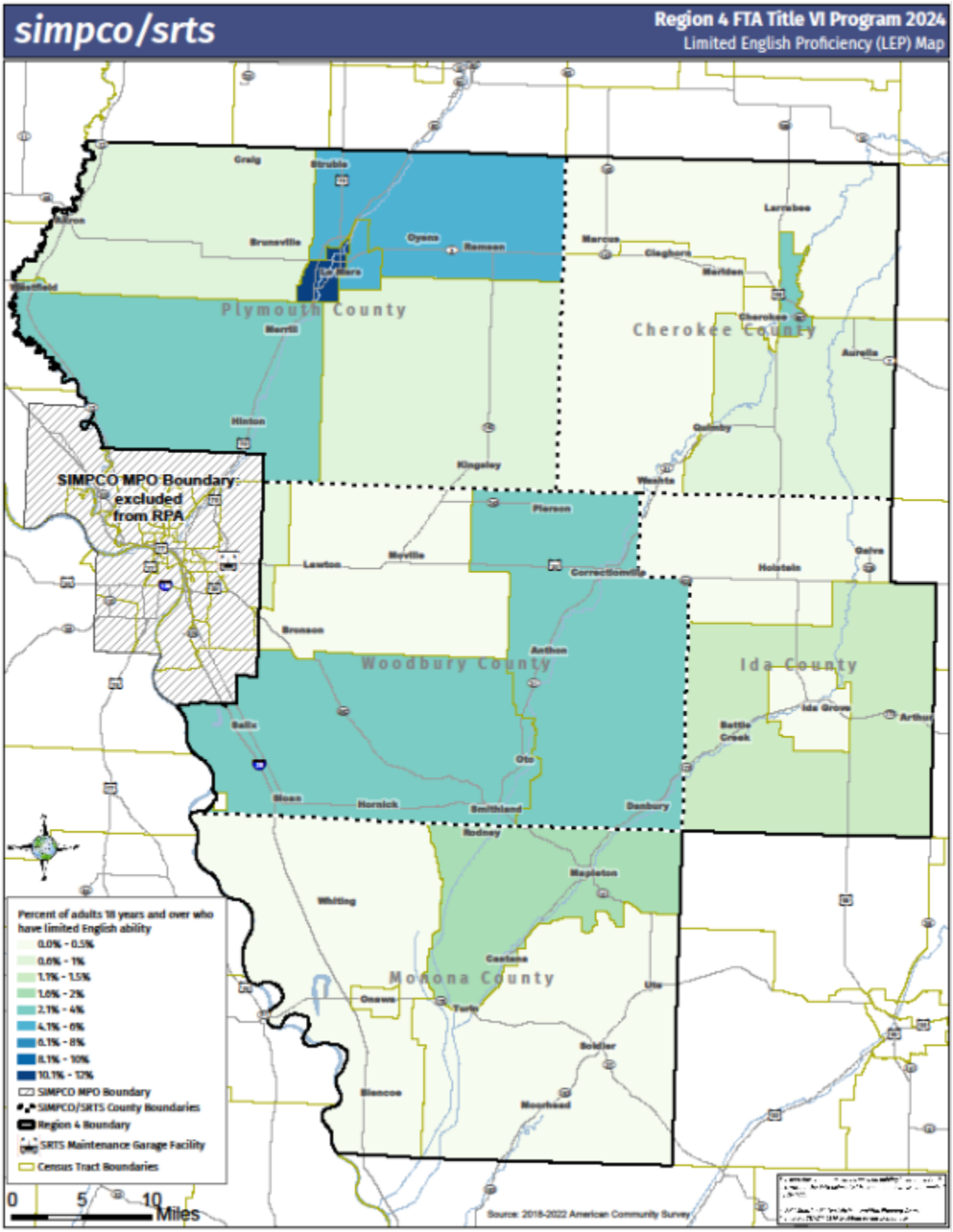
Appendix

- U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates
  S1601 Language Spoken at Home by Ability to Speak for the Population 5 Years and Over

- Maps of the service area


simpco/srts
Region 4 FTA Title VI Program 2024
SRTS Service Area Map
Plymouth County
Cherokee County
Woodbury County
Ida County
Monona County
SIMPCO MPO Boundary: excluded from RPA
Craig
Struble
Brunsville
Oyens
Remsen
Marcus
Cleghorn
Meriden
Larrabee
Le Mars
Merrill
Cherokee
Aurelia
Hinton
Quimby
Kingsley
Washta
Pierson
Moville
Lawton
Correctionville
Holstein
Galva
Bronson
Anthon
Ida Grove
Arthur
Battle Creek
Salix
Oto
Sloan
Hornick
Smithland
Danbury
Rodney
Mapleton
Whiting
Castana
Onawa
Turin
Ute
Soldier
Blencoe
Moorhead
SIMPCO MPO Boundary
SIMPCO/SRTS RPA County Boundaries
Region 4 Boundary
SRTS Maintenance Garage Facility
Census Tract Boundaries
0
5
10
Miles

Map of the Regional Planning Area with LEP persons concentration



S1601-Language Spoken at Home	Cherokee County, Iowa											
	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	10,994	±53	(X)	(X)	10,899	±58	99.1%	±0.7	95	±80	0.9%	±0.7
Speak only English	10,513	±126	95.6%	±1.3	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	481	±141	4.4%	±1.3	386	±96	80.2%	±12.9	95	±80	19.8%	±12.9
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	426	±135	3.9%	±1.2	336	±91	78.9%	±13.2	90	±74	21.1%	±13.2
5 to 17 years old	112	±65	1.0%	±0.6	109	±66	97.3%	±4.1	3	±4	2.7%	±4.1
18 to 64 years old	292	±112	2.7%	±1.0	205	±88	70.2%	±21.2	87	±75	29.8%	±21.2
65 years old and over	22	±29	0.2%	±0.3	22	±29	100.0%	±55.5	0	±16	0.0%	±55.5
Other Indo-European languages	26	±25	0.2%	±0.2	26	±25	100.0%	±51.0	0	±16	0.0%	±51.0
5 to 17 years old	1	±2	0.0%	±0.1	1	±2	100.0%	±100.0	0	±16	0.0%	±100.0
18 to 64 years old	7	±13	0.1%	±0.1	7	±13	100.0%	±98.3	0	±16	0.0%	±98.3
65 years old and over	18	±20	0.2%	±0.2	18	±20	100.0%	±61.3	0	±16	0.0%	±61.3
Asian and Pacific Island languages	24	±22	0.2%	±0.2	24	±22	100.0%	±53.1	0	±16	0.0%	±53.1
5 to 17 years old	4	±7	0.0%	±0.1	4	±7	100.0%	±100.0	0	±16	0.0%	±100.0
18 to 64 years old	20	±19	0.2%	±0.2	20	±19	100.0%	±58.2	0	±16	0.0%	±58.2
65 years old and over	0	±16	0.0%	±0.2	0	±16	-	**	0	±16	-	**
Other languages	5	±24	0.0%	±0.2	0	±16	0.0%	±100.0	5	±24	100.0%	±100.0
5 to 17 years old	0	±16	0.0%	±0.2	0	±16	-	**	0	±16	-	**
18 to 64 years old	5	±24	0.0%	±0.2	0	±16	0.0%	±100.0	5	±24	100.0%	±100.0
65 years old and over	0	±16	0.0%	±0.2	0	±16	-	**	0	±16	-	**
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	9,018	±72	(X)	(X)	8,926	±102	99.0%	±0.9	92	±81	1.0%	±0.9
Speak only English	8,682	±119	96.3%	±1.4	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	336	±124	3.7%	±1.4	244	±95	72.6%	±19.2	92	±81	27.4%	±19.2
Spanish	289	±118	3.2%	±1.3	202	±92	69.9%	±20.9	87	±75	30.1%	±20.9
Other languages	47	±35	0.5%	±0.4	42	±30	89.4%	±39.2	5	±24	10.6%	±39.2

Table: ACSST5Y2022.S1601

S1601-Language Spoken at Home	Ida County, Iowa											
ACS 2018-2022 5-year Estimates	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	6,583	±15	(X)	(X)	6,554	±30	99.6%	±0.3	29	±21	0.4%	±0.3
Speak only English	6,381	±72	96.9%	±1.0	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	202	±65	3.1%	±1.0	173	±56	85.6%	±8.5	29	±21	14.4%	±8.5
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	160	±60	2.4%	±0.9	139	±52	86.9%	±10.8	21	±21	13.1%	±10.8
5 to 17 years old	33	±19	0.5%	±0.3	33	±19	100.0%	±45.3	0	±15	0.0%	±45.3
18 to 64 years old	122	±49	1.9%	±0.7	102	±43	83.6%	±14.4	20	±21	16.4%	±14.4
65 years old and over	5	±6	0.1%	±0.1	4	±5	80.0%	±52.9	1	±2	20.0%	±52.9
Other Indo-European languages	22	±13	0.3%	±0.2	20	±13	90.9%	±18.0	2	±4	9.1%	±18.0
5 to 17 years old	6	±8	0.1%	±0.1	6	±8	100.0%	±100.0	0	±15	0.0%	±100.0
18 to 64 years old	10	±10	0.2%	±0.1	8	±9	80.0%	±38.8	2	±4	20.0%	±38.8
65 years old and over	6	±5	0.1%	±0.1	6	±5	100.0%	±100.0	0	±15	0.0%	±100.0
Asian and Pacific Island languages	16	±19	0.2%	±0.3	10	±16	62.5%	±53.0	6	±11	37.5%	±53.0
5 to 17 years old	0	±15	0.0%	±0.4	0	±15	-	**	0	±15	-	**
18 to 64 years old	7	±11	0.1%	±0.2	7	±11	100.0%	±98.3	0	±15	0.0%	±98.3
65 years old and over	9	±12	0.1%	±0.2	3	±5	33.3%	±56.5	6	±11	66.7%	±56.5
Other languages	4	±6	0.1%	±0.1	4	±6	100.0%	±100.0	0	±15	0.0%	±100.0
5 to 17 years old	0	±15	0.0%	±0.4	0	±15	-	**	0	±15	-	**
18 to 64 years old	4	±6	0.1%	±0.1	4	±6	100.0%	±100.0	0	±15	0.0%	±100.0
65 years old and over	0	±15	0.0%	±0.4	0	±15	-	**	0	±15	-	**
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	5,240	±42	(X)	(X)	5,229	±42	99.8%	±0.2	11	±12	0.2%	±0.2
Speak only English	5,116	±61	97.6%	±0.9	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	124	±50	2.4%	±0.9	113	±45	91.1%	±8.6	11	±12	8.9%	±8.6
Spanish	88	±41	1.7%	±0.8	85	±40	96.6%	±4.4	3	±4	3.4%	±4.4
Other languages	36	±22	0.7%	±0.4	28	±19	77.8%	±25.6	8	±11	22.2%	±25.6

Table: ACSST5Y2022.S1601

S1601-Language Spoken at Home	Monona County, Iowa											
2018-2022 ACS 5-year	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	8,211	±13	(X)	(X)	8,172	±26	99.5%	±0.3	39	±25	0.5%	±0.3
Speak only English	8,061	±56	98.2%	±0.7	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	150	±57	1.8%	±0.7	111	±51	74.0%	±15.9	39	±25	26.0%	±15.9
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	118	±53	1.4%	±0.6	79	±47	66.9%	±20.8	39	±25	33.1%	±20.8
5 to 17 years old	34	±42	0.4%	±0.5	34	±42	100.0%	±44.6	0	±15	0.0%	±44.6
18 to 64 years old	76	±28	0.9%	±0.3	43	±23	56.6%	±26.0	33	±24	43.4%	±26.0
65 years old and over	8	±7	0.1%	±0.1	2	±3	25.0%	±40.5	6	±7	75.0%	±40.5
Other Indo-European languages	32	±21	0.4%	±0.3	32	±21	100.0%	±46.0	0	±15	0.0%	±46.0
5 to 17 years old	7	±9	0.1%	±0.1	7	±9	100.0%	±98.3	0	±15	0.0%	±98.3
18 to 64 years old	13	±9	0.2%	±0.1	13	±9	100.0%	±72.1	0	±15	0.0%	±72.1
65 years old and over	12	±11	0.1%	±0.1	12	±11	100.0%	±75.1	0	±15	0.0%	±75.1
Asian and Pacific Island languages	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
5 to 17 years old	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
18 to 64 years old	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
65 years old and over	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
Other languages	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
5 to 17 years old	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
18 to 64 years old	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
65 years old and over	0	±15	0.0%	±0.3	0	±15	-	**	0	±15	-	**
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	6,760	±70	(X)	(X)	6,725	±84	99.5%	±0.4	35	±25	0.5%	±0.4
Speak only English	6,655	±83	98.4%	±0.5	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	105	±35	1.6%	±0.5	70	±28	66.7%	±20.4	35	±25	33.3%	±20.4
Spanish	80	±30	1.2%	±0.4	45	±23	56.3%	±25.3	35	±25	43.8%	±25.3
Other languages	25	±16	0.4%	±0.2	25	±16	100.0%	±52.0	0	±15	0.0%	±52.0

Table: ACSST5Y2022.S1601

S1601: Language Spoken at Home	Plymouth County, Iowa											
2018-2022 ACS 5-year Estimates	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	24,135	±30	(X)	(X)	23,213	±202	96.2%	±0.8	922	±203	3.8%	±0.8
Speak only English	22,302	±276	92.4%	±1.2	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	1,833	±286	7.6%	±1.2	911	±226	49.7%	±8.9	922	±203	50.3%	±8.9
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	1,137	±203	4.7%	±0.8	441	±112	38.8%	±9.1	696	±178	61.2%	±9.1
5 to 17 years old	278	±137	1.2%	±0.6	160	±80	57.6%	±11.3	118	±68	42.4%	±11.3
18 to 64 years old	833	±93	3.5%	±0.4	259	±90	31.1%	±11.9	574	±138	68.9%	±11.9
65 years old and over	26	±16	0.1%	±0.1	22	±15	84.6%	±22.5	4	±6	15.4%	±22.5
Other Indo-European languages	158	±97	0.7%	±0.4	114	±72	72.2%	±27.1	44	±54	27.8%	±27.1
5 to 17 years old	0	±19	0.0%	±0.1	0	±19	-	**	0	±19	-	**
18 to 64 years old	128	±89	0.5%	±0.4	100	±69	78.1%	±30.9	28	±47	21.9%	±30.9
65 years old and over	30	±30	0.1%	±0.1	14	±18	46.7%	±53.3	16	±24	53.3%	±53.3
Asian and Pacific Island languages	182	±90	0.8%	±0.4	125	±87	68.7%	±17.5	57	±21	31.3%	±17.5
5 to 17 years old	25	±30	0.1%	±0.1	25	±30	100.0%	±52.0	0	±19	0.0%	±52.0
18 to 64 years old	157	±63	0.7%	±0.3	100	±60	63.7%	±16.5	57	±21	36.3%	±16.5
65 years old and over	0	±19	0.0%	±0.1	0	±19	-	**	0	±19	-	**
Other languages	356	±149	1.5%	±0.6	231	±135	64.9%	±26.9	125	±100	35.1%	±26.9
5 to 17 years old	137	±82	0.6%	±0.3	137	±82	100.0%	±16.6	0	±19	0.0%	±16.6
18 to 64 years old	211	±89	0.9%	±0.4	86	±80	40.8%	±38.7	125	±100	59.2%	±38.7
65 years old and over	8	±14	0.0%	±0.1	8	±14	100.0%	±92.0	0	±19	0.0%	±92.0
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	18,646	±128	(X)	(X)	18,347	±138	98.4%	±0.7	299	±135	1.6%	±0.7
Speak only English	17,823	±171	95.6%	±0.9	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	823	±166	4.4%	±0.9	524	±162	63.7%	±14.8	299	±135	36.3%	±14.8
Spanish	440	±113	2.4%	±0.6	258	±91	58.6%	±17.4	182	±98	41.4%	±17.4
Other languages	383	±122	2.1%	±0.7	266	±122	69.5%	±24.4	117	±102	30.5%	±24.4

Table: ACSST5Y2022.S1601

S1601-Language Spoken at home	Woodbury County, Iowa											
ACS 2018-2022 5-year Estimates	Total		Percent		Percent of specified language speakers							
					Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	98,399	±13	(X)	(X)	90,150	±662	91.6%	±0.7	8,249	±661	8.4%	±0.7
Speak only English	80,214	±891	81.5%	±0.9	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	18,185	±890	18.5%	±0.9	9,936	±751	54.6%	±3.0	8,249	±661	45.4%	±3.0
SPEAK A LANGUAGE OTHER THAN ENGLISH												
Spanish	13,226	±618	13.4%	±0.6	7,581	±612	57.3%	±3.4	5,645	±487	42.7%	±3.4
5 to 17 years old	3,594	±383	3.7%	±0.4	3,287	±404	91.5%	±4.3	307	±152	8.5%	±4.3
18 to 64 years old	8,989	±394	9.1%	±0.4	4,219	±419	46.9%	±4.1	4,770	±405	53.1%	±4.1
65 years old and over	643	±84	0.7%	±0.1	75	±59	11.7%	±9.0	568	±92	88.3%	±9.0
Other Indo-European languages	1,284	±414	1.3%	±0.4	665	±249	51.8%	±15.2	619	±308	48.2%	±15.2
5 to 17 years old	113	±128	0.1%	±0.1	68	±96	60.2%	±27.5	45	±43	39.8%	±27.5
18 to 64 years old	957	±343	1.0%	±0.3	481	±211	50.3%	±18.6	476	±268	49.7%	±18.6
65 years old and over	214	±158	0.2%	±0.2	116	±89	54.2%	±44.8	98	±136	45.8%	±44.8
Asian and Pacific Island languages	2,341	±352	2.4%	±0.4	911	±257	38.9%	±8.9	1,430	±285	61.1%	±8.9
5 to 17 years old	381	±150	0.4%	±0.2	285	±175	74.8%	±36.4	96	±137	25.2%	±36.4
18 to 64 years old	1,564	±313	1.6%	±0.3	596	±222	38.1%	±11.0	968	±241	61.9%	±11.0
65 years old and over	396	±64	0.4%	±0.1	30	±29	7.6%	±7.4	366	±69	92.4%	±7.4
Other languages	1,334	±441	1.4%	±0.4	779	±348	58.4%	±14.1	555	±235	41.6%	±14.1
5 to 17 years old	303	±217	0.3%	±0.2	297	±217	98.0%	±4.0	6	±10	2.0%	±4.0
18 to 64 years old	945	±310	1.0%	±0.3	424	±202	44.9%	±15.2	521	±222	55.1%	±15.2
65 years old and over	86	±48	0.1%	±0.1	58	±45	67.4%	±30.9	28	±27	32.6%	±30.9
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	73,210	±563	(X)	(X)	69,271	±595	94.6%	±0.6	3,939	±461	5.4%	±0.6
Speak only English	64,184	±640	87.7%	±0.8	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	9,026	±628	12.3%	±0.8	5,087	±522	56.4%	±4.2	3,939	±461	43.6%	±4.2
Spanish	6,522	±462	8.9%	±0.6	3,804	±399	58.3%	±4.5	2,718	±355	41.7%	±4.5
Other languages	2,504	±438	3.4%	±0.6	1,283	±336	51.2%	±9.0	1,221	±290	48.8%	±9.0

Safe Harbor Provision

Federal law provides a "Safe Harbor" stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translations under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under 'safe harbor' includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

In the SRTS service area, the LEP population is less than the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided to meet the safe harbor standard.

To meet the needs of all clients, SRTS is considering translation of vital documents upon request using *Google Translate*, multi-lingual staff from area school districts, organizations offering immigration services such as Mary J. Treglia Community House in Sioux City and college students seeking community projects.

Language Assistance Plan

Identify an LEP Person in Need of Language Assistance

Below are tools to help SRTS in identifying persons who may need language assistance:

Networking

Continue reaching out to human services organizations (such as Social Services and Public Health) for assistance in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about SRTS' transit services.

Communicate with local faith-based and community-based organizations to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about SRTS' transit services.

LEP Persons Survey

The need for a survey to determine LEP persons will be discussed annually with the Transportation Advisory Groups (TAG). If a survey is warranted, SRTS will communicate this survey to the human service agencies it works with through the coordinated passenger transportation planning process to receive input from those LEP persons accessing services throughout the SRTS service area.

SRTS Staff Survey

SRTS dispatch and driving staff will be surveyed annually about LEP requests for transit services.

Providing Language Assistance Measures

SRTS has or will consider implementation of the following LEP procedures. These steps are based on the low percentage of persons speaking other languages or with limited ability to speak English.

Free LEP Assistance Notice

To inform passengers that LEP Assistance is available to them free of charge a notice will be placed on the SRTS website and included in brochures and newsletters.

Over-the-Phone Interpretation

SRTS has a contractual agreement with Language Link for Over-the-Phone Interpretation services which is an efficient and cost-effective way to serve persons with limited English proficiency. Top-notch interpreters are available in over 200 languages and dialects, 24 hours a day, 365 days a year. Costs are currently shown on their website as $0.57 per minute across all languages.

Language Identification Cards

SRTS will look at utilizing "I Speak" cards as a tool to determine the language of LEP individuals requesting transit services information. If initiated, LEP individuals served each year will be documented to determine preferred national language if communication in English is a barrier in receiving SRTS transit services.

Website Translation

SRTS has worked with the Siouxland Interstate Metropolitan Planning Council (SIMPCO) to implement Google Translate on the SRTS website. This is now available to anyone via a drop-down button to change the language on the site to the preferred language. SRTS will continue to provide website information in a translatable format.

Translation of Vital Documents

Although SRTS does have website translation available, under consideration is translation of documents related to the SRTS Title VI/Nondiscrimination policy, marketing (brochures), and

safety into Spanish. These items would be posted on the website and available in print upon request.

Staff Communication

During driver and dispatch meetings, administrative staff will initiate an open discussion about experiences and/or problems encountered during contact with LEP persons and workable solutions.

Website Auditory Output

SRTS has explored providing assistance to individuals who are blind or have visual impairments. The cost of read aloud programs for the website would have to be considered, and while the availability of Braille services is limited and costly these could possibly be offered upon request.

Providing Notice to LEP Individuals

SRTS is using and/or considering communicating with LEP populations about transit services and information as follows:

- Language identification card
- Arranging for availability of oral translators
- Communication with LEP persons' groups about transit services
- Newspaper notices are currently published in the local Hispanic newspaper, Mundo Latino.
- SRTS has interpreters available via the Language Link.
- Translation services will continue to be offered on the SRTS website.
- Transit staff will identify key locations to post notices in appropriate languages informing LEP persons of the services available.
- If staff knows they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- Key print materials, including but not limited to brochures, Title VI documents, rider reservations and riding policies will be translated and made available in communities when a specific and concentrated LEP population is identified. Spanish translation is currently under consideration.
- SRTS engages in community activities that promote its transit services. These activities include functions where a broad cross-section of the community can access available transit information, including brochures and fliers.

SRTS staff should make an effort to track the following information for future reference:

- Number of LEP contacts documented.
- Use of interpretive over-the-phone language services and translations services requested.
- Number of written vital documents requested by LEP persons.
- Determination if interpretative services have been effective and sufficient.

Training Staff

To ensure transit staff, and/or appropriate overall agency staff, understand the obligations to provide meaningful access to information and services for LEP individuals, all employees in public contact positions will be properly trained. This plan outlines the training provided on an annual, on-going and/or on-demand basis to implement the following:

- All staff will be provided with a copy of the Title VI and LAP plan and made aware of where they can be located on the office server.
- All staff will be trained to understand the Title VI policy and LAP procedures.
- All staff will be trained to know the language assistance services SRTS offers.
- If "I Speak" cards are selected, all staff will be trained on implementation.
- All staff will be trained to track LEP information needed for future reference.
- New staff will have appropriate training as part of the orientation for new employees
- Staff who have contact with the public will be trained to work effectively with in-person interpreters and Language Link over-the-phone interpreters.
- Management staff, even if they do not interact regularly with LEP individuals, will be fully aware of and understand the plan to reinforce the importance of the program and ensure it is implemented accordingly by/to staff.

Monitoring, Evaluating and Updating Plan

SRTS has developed a process for determining whether new documents, programs, services, and activities need to be made accessible for LEP individuals and will provide notice of any changes in services to the LEP public and to staff. The process includes an annual review to consider changes in demographics, types of services, or other needs that may require an annual reevaluation. SRTS will also seek feedback from LEP populations and community outreach programs with follow-up meetings, focus groups and/or with surveys. The SRTS LAP will be updated no less than every three years to coincide with submission of the Title VI Update.

The Language Assistance Plan considers the following five elements:

1. Identifying LEP individuals who need language assistance (Four Factor Analysis)
2. Providing language assistance measures
3. Providing notice to LEP individuals
4. Training staff
5. Monitoring, evaluating, and updating the plan

In addition to the five elements, the plan sets clear goals, management accountability, and opportunities for staff and community input and planning throughout the process.

Areas of consideration when monitoring, evaluating and updating include:

- Current LEP populations in the service area or population affected or encountered.
- Frequency of encounters with LEP language groups.
- Nature and the importance of activities to LEP persons.
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed.

- Whether existing assistance is meeting the needs of LEP persons.
- Staff's knowledge of and understanding of the LAP Plan, language assistance resources, and how to serve LEP individuals
- Whether identified sources for assistance are still available and viable.
- Review any complaints from LEP individuals received during the past year.
- Whether the needs of LEP people have been addressed.
- Whether SRTS has fully complied with the goals of this LAP Plan.
- Whether SRTS transit services and financial resources are sufficient to fund language assistance resources needed.
- Whether complaints have been received concerning transit services failure to meet the needs of LEP individuals.
- Review available resources, such as technology, staff, and financial costs for changes.