

# Limited English Proficiency



## Program Plan Document

**(Providing Language Access to Persons with  
Limited English Proficiency and Low Literacy)**

**(Appendix to Title VI / Civil Right Act, 1964 as amended)**

City of Key West  
Department of Transportation  
Limited English Proficiency (LEP) Standards

**Introduction**

The Federal Transit Administration (FTA) and the US Department; along with the State of Florida Department of Transportation district offices require a Limited English Proficiency Plan for those individuals to be afforded the same or equal opportunity to all services rendered of all public transportation agencies. Thus, a plan for evaluation, development and implementation of Limited English Proficiency in the fixed route public transit service area is required.

Title VI of the Civil Rights Act 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receive Federal financial assistance.

**Executive Order 13166**

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" reprinted at 65 FR 50121 (August 16, 2000) directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the County, private, and non-profit, and subrecipients.

**Application of the Four Factor Framework**

FTA/Region IV provides best practices and standards which include the "Four Factor Framework" as guidance to assist agencies with assessment, development and implementation of a Limited English Proficiency (LEP) program plans. This plan is then required to be adopted and included as the City of Key West Department of Transportation (KWDoT) also known as Key West Transit (KWT) Title VI of the Civil Rights Plan.

In Circular C, FTA 4702.1B refers to assistance of whom, how and other facts rendered on the legal basis for language assistance programs and requirements. This section is intended to provide necessary framework via FTA/LEP guidance for applying the four factors of data to the LEP program plan – for compliance and update, as follows below:

- Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program or Recipient.
- Factor 2: The Frequency with which LEP Persons come into Contact with the Program.
- Factor 3: The Nature and Importance of the Program, Activity, or Services provided by the Program to people's lives.
- Factor 4: The Resources Available to the Recipient for LEP outreach, as well as the Costs Associated with that Outreach.

## **Four Factor Analysis**

### **1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, recipient, or service**

Agencies are recommended to examine prior experiences with LEP individuals which also provides for agency insight and adoption of best practices methodologies on how to measure the ratio of customers or populations in your service area who may have limited English proficiency by communicating on a regular basis with your agencies dispatchers, bus drivers and supervisors, as well as maintenance employees who are the frontline employees that come into contact with these individuals of limited English proficiency in performance of their daily job duties. Those positions that are included in this process at KWDoT are:

- Transit vehicle operators
- Transit mechanics / helpers
- Dispatch
- Supervisors

Additional mechanisms which are factored into our data collection include but are not limited to:

- Call records to the agency
- Attendance and participation of civic organization events, public hearings, city commission meetings and other community outreach events.
- Website information postings via [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov)
- Real Time public transit information system (GPS, AVL, IVR and posted web-based notices on [www.kwtransit.com](http://www.kwtransit.com) - where text, voice and mapping options are available 24 hours per day / 7 days per week, via (305) 600-1455.

By utilizing data via State and Federal (2018 US Census) information – it is recommended that recipients and subrecipients become familiar with information available, along with data from the American Community Survey (ACS) branch; and incorporate this data into the evaluation process. This will serve to assist agencies with identifying geographic boundaries of the area that each agency serves in order to evaluate the need for language assisted programs.

City of Key West Department of Transportation (KWDoT) / Key West Transit (KWT) incorporates quarterly staff meetings with drivers and dispatch personnel to identify specific areas of service that might require language assisted programs be developed. To date, KWT is aware that LEP programs need to be offered to two (2) distinct populations in the City of Key West – they are Spanish and French or Creole speaking customers.

Part of our new driver orientation and training process includes distribution of pocket reference booklets to be used by our operators in an active bus route service - to assist with any issue which may arise regarding a language barrier situation but also to further the process of identification of the LEP persons' primary language so that we can offer and provide necessary translation services as may be required. The City of Key West Police Department (KWPD) has contract providers on call 24/7 for this service.

It is required to analyze the data collected; and, then identify concentrations of LEP persons within the service area. This has been successfully accomplished most recently with information gathered via our quarterly bus driver and supervisory staff meetings but also as a direct result of recent 2018 US Census data.

By using State and Local resources which we also incorporate into our data gathering processes; together with agencies requiring a community outreach or reach out program for identified LEP organizations or persons. All of which is included in our quarterly exchange of information internally and externally as well as our efforts to be involved and participate at as many community programs as possible but a minimum of four (4) per calendar year.

# PEOPLE

Population	
Population estimates, July 1, 2019, (V2019)	74,228
Population estimates base, April 1, 2010, (V2019)	73,090
Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)	1.6%
Population, Census, April 1, 2010	73,090
Race and Hispanic Origin	
White alone, percent	89.3%
Black or African American alone, percent(a)	6.9%
American Indian and Alaska Native alone, percent(a)	0.5%
Asian alone, percent(a)	1.4%
Native Hawaiian and Other Pacific Islander alone, percent(a)	0.1%
Two or More Races, percent	1.8%
Hispanic or Latino, percent(b)	24.9%
White alone, not Hispanic or Latino, percent	65.8%

**Fact Notes:** (a) includes persons reporting only one race, (b) Hispanics may be of any race, so also are included in applicable race categories

## 2. The frequency with which LEP individuals come in contact with the program.

Requires that the agency identify programs and services rendered, along with the information gathered from the community, civic and governmental organizations for assessment of the language assisted program highlights and areas of service in concentrated populations.

KWT participates in community organizational events and public meetings such as Local Coordinating Board (LCB), City of Key West Commission Meetings, Goombay Activities, College of the Florida Keys Community Day, National Night Out, and few other events. These events are held at a minimum of once per quarter/year in all areas of Key West and the Lower Keys, Florida.

KWT is fortunate to have a good representation internally of employees who are of the Hispanic and Creole/French ethnicity. These employees are also great ambassadors for KWT with regard to their immediate residential communities as well as the religious affiliated organizations. See table below for language spoken in Monroe County.

Monroe County, Florida							
		Percent of specified language speakers					
2018 ACS 5-Year Estimates		Total		Speak English only or speak English "very well"			
				Speak English less than "very well"			
		Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over		72,775	+/-46	65,373	+/-620	7,402	+/-627
Speak only English		55,809	+/-904	(X)	(X)	(X)	(X)
Speak a language other than English		16,966	+/-911	9,564	+/-780	7,402	+/-627
SPEAK A LANGUAGE OTHER THAN ENGLISH							
Spanish		12,773	+/-721	6,979	+/-608	5,794	+/-582
Other Indo-European languages		3,121	+/-625	2,066	+/-429	1,055	+/-340
Asian and Pacific Island languages		820	+/-234	337	+/-126	483	+/-200
Other languages		252	+/-138	182	+/-108	70	+/-60

**3. The nature and importance of the program, activity, or service provided by the program to people’s lives**

KWT Operations are aware of the importance of providing meaningful access to information and services for LEP persons. Due to the large share of Spanish and French/Haitian Creole speaking persons in the Key West Transit’s service area, Customer Service Representatives, bus operators, management are available to provide assistance to customers who speaks Spanish and French/Creole.

KWT will work with social services, Monroe County Transit (MCT), Key West Housing Authority, and other public services within the fixed route service area that focuses on outreach to these LEP populations.

**4. The resources available to the grantee/recipient and costs.**

All processes have been identified earlier in the Plan document which the agencies should constantly monitor and evaluate their LEP plans for revision accordingly – all based on feedback from both customers and employees, community representatives, staff and internal monitoring, as well as obvious changes to demographic structures or environmental issues or concerns.

KWT will consider new techniques to reach the LEP population, such as (1) the translation of key elements of the Transit Website, (2) the translation of other appropriate materials typically used to increase ridership and help LEP individuals best utilize the system. Additionally, KWT will continue to explore the use of internal and City staff in other departments to assist with citizen outreach.

**Section III Developing a Language Assistance Plan**

**Task 1** – Identify LEP persons, communities or neighborhoods within your service areas is critical to the success of any LEP program. Based on the current resources available, KWT is providing the most cost-effective means of delivering LEP assistance in its service area. KWT will continue to monitor the need for additional language assistance in Spanish or translation to new languages for the following:

- Requests for information in a language other than English
- Translation requests for materials
- Translation requests for public meetings

Key West Transit is very fortunate with employing a diverse multilingual staff to assist with any issue which may arise regarding a language barrier situation. The City of Key West Police Department (KWPD) has contract providers on call 24/7 for this service.

**Task 2** - Providing the LEP assistance identified and required to customers of the transit agency is also critical to the successes of any program – this requires that we identify programs and services rendered,

along with the information gathered from the community, civic and governmental organizations for assessment of the language assisted program highlights and areas of service in concentrated populations.

In order to plan for efficient, effective, safe, equitable, and reliable transportation service, KWT must have input of its public. The City and KWT spends extensive staff and financial resources in furtherance of this goal and strongly encourages the participation of the entire community. Any person may attend the City Commission meeting and speak during the Public portion of the agenda concerning a matter of City business of concern to the person. City Commission meetings are generally held the first and third Tuesday of each month, held at the City of Key West City Hall, 1300 White Street, Key West, FL 33040. Workshop and/or special meetings are on an “as needed basis” and are scheduled and publicly noticed if needed. Interested parties should check the City’s website [www.cityofkeywest-fl.gov](http://www.cityofkeywest-fl.gov) or [www.kwtransit.com](http://www.kwtransit.com) for any changes to meeting dates, times, and location.

**Task 3** - Providing notice to LEP persons – requires agencies work toward establishing a needs assessment process and hosting of various public hearings with language assisted services advertised for said meetings in identified LEP translated forms.

KWT will provide the Title VI information in English on the City’s website as well as the Transit’s website. Notices are also posted in the Transit Facility lobby and in all transit vehicles. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

**Task 4** – This plan is designed to be flexible and will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determine as to whether the need for translation services has changed

Key West Transit understands the value that its service plays in the lives of individual who rely on this service and the importance of any measures undertaken to make the use of system easier.

**Task 5** – Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions to implement Task 5 of the Language Assistance Plan:

- Identify agency staff likely to come into contact with LEP individuals
- Identify existing staff training opportunities
- Provide regular re-training for staff dealing with LEP individual needs
- Designing and implementing LEP training for agency staff

Key West Transit is very fortunate to have good representation internally of employees who are of Hispanic and Creole ethnicity.