



Tahoe Transportation  
DISTRICT

LEP

**LIMITED ENGLISH  
PROFICIENCY PLAN**

Updated: July 2023

Adopted: August 2023



## **I. INTRODUCTION AND POLICY STATEMENT**

### **A. PURPOSE OF THIS LEP PLAN**

The Tahoe Transportation District (TTD) is a recipient and subrecipient of federal financial assistance and grants from Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As such, TTD must comply with Executive Order 13166-- Limited English Proficiency (LEP).

This LEP Plan is designed to assist management and staff to understand their roles and responsibilities with respect to overcoming barriers for LEP individuals. This LEP Plan will provide guidance to staff on translation, interpretation, and outreach services for LEP individuals seeking access to TTD programs and services. This LEP Plan supplements TTD's Title VI Program Plan and Public Participation Plan.

TTD developed this LEP Plan by using the Federal Transit Administration (FTA), Office of Civil Rights "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons" handbook and performing the Four-Factor analysis therein.

### **B. POLICY STATEMENT**

TTD, under Title VI of the Civil Rights Act of 1964, ensures that no person shall, on the basis 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 it administers.

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency. It is the policy of TTD to provide timely, reasonable, effective and meaningful access for LEP persons to all its programs and activities. All staff shall provide free language assistance services to LEP individuals with whom they encounter or whenever an LEP person requests language assistance services. All staff shall ensure the public is treated with dignity and respect, identify the language needs of TTD customers, and utilize available bilingual resources to assist customers, when needed.

TTD will ensure the provisions of this LEP Plan will apply and be incorporated into agreements with subgrantees and contractors as subrecipients of federal financial assistance.

## **II. SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS**

TTD is a bi-state public entity that delivers transportation projects in the Lake Tahoe basin, including transit services and capital improvement projects. This section sets forth the Four-Factor analysis used to determine the appropriate, reasonable, resource effective and meaningful access for LEP persons. In determining "reasonable," there are four factors to be considered:

**Factor 1 - The Number and Proportion of LEP Persons Served or Encountered in TTD's Service Area**

TTD provides year-round transportation on the South Shore of the Lake Tahoe basin, in the City of South Lake Tahoe, California and Stateline, Nevada. The service area population is approximately 30,940. There is also commuter bus service between Stateline, Carson City, and Minden/Gardnerville, Nevada. The population of that service area is 44,706.

TTD used the 2021 American Community Survey Five-Year Estimates to seek information on persons who speak languages other than English at home and who speak English less than very well.

**Statistical Language Breakdown  
Source: Census 2021**

**South Shore Service Area**

**Total Population: 30,940**

	<b>Number who Speak English Less Than Very Well</b>	<b>% Who Speak English Less Than Very Well</b>
Spanish	2,120	6.9%
Tagalog	251	0.8%
Other Indo-European	109	0.3%

**Express Service Area**

**Total Population: 44,706**

	<b>Number who Speak English Less Than Very Well</b>	<b>% Who Speak English Less Than Very Well</b>
Spanish	1,357	3.04%
Tagalog	153	0.3%

A review of the above tables shows Spanish as the highest percentage of the total population who speak English less than very well in both service areas, with Tagalog as the second highest.

The California Department of Education report of English Learners by Language for the Lake Tahoe Unified School District confirms Spanish and Tagalog are the number one and two languages spoken at home.

**Factor 2 - The Frequency with Which LEP Individuals Come into Contact with TTD Services**

TTD serves LEP persons daily via the fixed route bus and complementary paratransit services. Approximately two out of every ten calls the dispatch office receives are Spanish speaking customers. The Lake Tahoe Basin has over 200,000 visitors a year who enjoy the winter, spring, fall and summer recreational activities. Visitors include international multi-lingual guests. TTD recognizes that the international visitors may be LEP and access TTD transit services during their temporary stay in the area.

**Factor 3 - Nature and Importance of the Services Provided**

TTD's transit services provide an important means of transportation for much of the public, including the LEP population, in South Lake Tahoe. TTD provides residents and visitors, including LEP persons, transportation services for commuting to work, shopping, recreational needs, school, health care, and other service needs. Transportation services provides a key role in connecting LEP persons to these essential services.

**Factor 4 - Resources Available to TTD to Ensure Meaningful Access to Services by LEP Individuals**

TTD continues to assess available resources in order to provide efficient, effective and meaningful LEP services. TTD has several dispatchers, bus operators, and a transit supervisor who are fluent in Spanish and provide translation services when needed. Transit supervisors have the Google Translate App on their company phones to assist with translations. TTD has the following documents translated to Spanish:

- Title VI policy statement, complaint procedure, and complaint form
- Paratransit service application and rider guide
- ADA complaint procedure and complaint form
- Route notifications
- Service policy changes
- Transit project information, meeting notices, and other notifications as necessary

When possible, TTD will:

- Share language assistance materials and services among and between other transit agencies and advocacy groups
- Share information through community groups who serve LEP persons
- Use telephonic and video conferencing interpretation services

- Use qualified translators and interpreters to ensure accuracy of translated documents
- Request and use qualified community volunteers in a formalized manner

Procedures are in place to provide language assistance to LEP individuals as part of the standard business practices. The standard business practices to LEP individuals will include:

- Continued translation of vital bus service documents and notices to Spanish
- Have Spanish translators available at public participation events, and if necessary, Tagalog translators
- Advise the public that TTD provides free LEP services to its programs and activities
- A translation button on our website to translate the site into various languages

### **III. LEP PLAN**

The LEP Plan reflects the overall goal of improving and maintaining language access for TTD's customers as transit riders and project recipients. The intent is to achieve a balance that ensures meaningful access to programs and services while avoiding undue burdens on TTD's resources. It is important to inform LEP individuals that services are available in Spanish, and other languages when needed, and they are free of charge. TTD will continue to use existing resources to meet the requirements of Executive Order 13166. The most widely used LEP services will be translating oral and written communications.

#### **A. Identifying LEP Individuals Needing Language Assistance**

- TTD may examine customer service records to look for previous language assistance and to determine if language assistance might be needed at future events.
- Have language identification cards available for individuals to identify the language they speak.

#### **B. Language Assistance Measures**

- Language assistance will be provided to LEP individuals through the translation of vital documents, as well as through oral language interpretation when necessary and possible. LEP individuals are not obligated to provide their own interpreter, although many do so.
- Interpreters will be provided at public meetings when necessary.
- In-coming calls by Spanish speaking individuals will be transferred or conferenced with TTD's Spanish speaking employees.
- Vital notices are published in local Spanish newspapers, as needed.

### C. Training Staff

- Staff will be trained on the following:
  - TTD's Title VI policy and LEP responsibilities
  - Documentation of language assistance requests
  - How to handle a potential Title VI/LEP complaint

### D. Providing Notice to LEP Individuals

- Provide a statement affirming TTD will make reasonable accommodations to provide an interpreter at public meetings and hearings with advance notice.
- Continue to provide vital documents, such as Title VI complaint form and various brochures in Spanish
- Include in notifications that there is no charge for language assistance

## IV. MONITORING AND UPDATING THE LEP PLAN

TTD's Title VI Coordinator shall monitor implementation of this LEP Language Assistance Plan, making revisions to the plan, as may be required periodically. In monitoring compliance, an assessment will be made whether the plan allows LEP individuals to overcome language barriers and participate in a meaningful way in the program activities and services.

Monitoring shall consider information from the following sources and criteria, as well as other factors as may be appropriate:

- Changes in demographics, including new language groups, types of services and other activities.
- Frequency of encounters with LEP persons.
- Whether existing LEP language services are adequate.
- Availability of new resources, including technology.

Full review of the LEP Plan will occur with each triennial Title VI program submission.

## v. DISSEMINATION OF TTD'S LEP PLAN

TTD's LEP Plan is available to be downloaded on the agency's website at [www.tahoetransportation.org](http://www.tahoetransportation.org) for those with internet access or a copy of the plan will be provided upon request at no charge. TTD will provide LEP individuals a translated copy of the plan upon request.

Questions or comments regarding the LEP Plan may be submitted to:

Title VI Coordinator  
P.O. Box 499, Zephyr Cove, NV 89448  
Phone: 775-589-5502  
Fax: 775-588-0917  
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