INTRODUCTION

The Need for an LEP Plan

Individuals with a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing public services and benefits—including public transit services.

Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 signed on August 11, 2000, are the federal legislation necessitating LEP plans from public agencies receiving federal funds.

Title VI of the Civil Rights Act of 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 receives Federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, “Improving Access to Services with Limited English Proficiency,” requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. The Executive Order 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, private and non-profit entities, and sub-recipients such as public transit agencies.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on April 13, 2007. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests
that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

**KCATA’s LEP Plan**

The Kansas City Area Transportation Authority (KCATA) is the regional transit authority for the Greater Kansas City bi-state region and by federal compact is authorized to provide transit services in the Missouri counties of Cass, Clay, Jackson, and Platte and the Kansas counties of Leavenworth, Johnson, and Wyandotte. KCATA is a designated direct recipient of FTA funding and is required to develop and routinely update its LEP plan as part of its Title VI Program.

KCATA’s LEP plan is a critical component to best serving the transit needs of the diverse communities comprising its service area. Providing language assistance in a competent and effective manner will help ensure that KCATA’s services are safe, reliable, convenient, and accessible to LEP persons in the community. Ideally, these efforts will attract additional LEP riders to KCATA’s services.
THE “FOUR FACTOR ANALYSIS”

The DOT guidance outlines “four factors” recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP services. Through conducting the “Four Factor Analysis,” KCATA is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents. The four factors are as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the recipient and the overall cost.
KCATA’s “Four Factor Analysis”

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

For planning purposes, KCATA considers its current service area to be the ten communities it has annual service contracts with to provide transit services. The ten communities include the Missouri cities of Blue Springs, Gladstone, Independence, Kansas City, Lee’s Summit, Liberty, North Kansas City, Raytown, and Riverside and Kansas City, Kansas. Analysis of U.S. Census 2000 data was conducted to estimate the LEP population in KCATA’s service area. See Figure 1 for a map of KCATA’s service area.

Examination of Census 2000 SF-3 QT-P16 tables, “Language Spoken at Home: Population 5 Years and Over,” by geographic place determined that there are 10 non-English languages spoken at home by over 1,000 persons in KCATA’s service area (See Table 1). People who speak Spanish at home represent 5.59% of KCATA’s service area population. The other 9 languages were each spoken by less than 0.4% of the population in KCATA’s service area.

Table 1: Language Spoken at Home by 1,000+ Persons in KCATA’s Service Area

<table>
<thead>
<tr>
<th>Language Spoken at Home</th>
<th>Persons 5 Years and Over</th>
<th>Percentage of KCATA Service Area Population 5 Years and Over</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>769,468</td>
<td>91.01%</td>
</tr>
<tr>
<td>Spanish or Spanish Creole</td>
<td>47,244</td>
<td>5.59%</td>
</tr>
<tr>
<td>French</td>
<td>3,927</td>
<td>0.40%</td>
</tr>
<tr>
<td>German</td>
<td>3,417</td>
<td>0.40%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>3,379</td>
<td>0.40%</td>
</tr>
<tr>
<td>African languages</td>
<td>1,684</td>
<td>0.20%</td>
</tr>
<tr>
<td>Chinese</td>
<td>1,565</td>
<td>0.18%</td>
</tr>
<tr>
<td>Italian</td>
<td>1,524</td>
<td>0.18%</td>
</tr>
<tr>
<td>Arabic</td>
<td>1,230</td>
<td>0.15%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>1,141</td>
<td>0.13%</td>
</tr>
<tr>
<td>Miao, Hmong</td>
<td>1,040</td>
<td>0.12%</td>
</tr>
</tbody>
</table>
Figure 1: KCATA Service Area
Census 2000 SF-3 QT-P17 tables, “Ability to Speak English: Population 5 Years and Over by Language Spoken at Home and Ability to Speak English,” by geographic place were also examined. Using FTA guidelines, the LEP population—the population that speaks English less than “very well”—was estimated by summing the Census responses for Speak English “well,” “not well,” and “not at all.” The data is categorized by the language groups spoken by respondents: “Spanish,” “Indo-European,” “Asian or Pacific Islander,” or “Other.”

Study determined that approximately 4.32% (36,515 / 845,434) of the population over the age of 5 in KCATA’s service area speaks English less than “very well” and hence is characterized as LEP (See Table 2). The majority of the LEP population—approximately 25,058 of the 36,515 LEP non-English speaking persons—speaks Spanish. The remaining non-English speaking persons presumably speak one or more of the Indo-European, Asian/Pacific Islander, or Other languages. See Appendix for corresponding maps of concentrated populations by census tracts.

Table 2: Ability to Speak English by Place in KCATA’s Service Area

<table>
<thead>
<tr>
<th>Geographic Area (Place)</th>
<th>Population Age 5+</th>
<th>Speak only English</th>
<th>Spanish</th>
<th>Other Indo-European</th>
<th>Asian or Pacific Islander</th>
<th>All Other Languages</th>
<th>Estimated Total LEP Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blue Springs, MO</td>
<td>44,444</td>
<td>42,699</td>
<td>255</td>
<td>0.58%</td>
<td>172</td>
<td>0.39%</td>
<td>106 0.24%</td>
</tr>
<tr>
<td>Gladstone, MO</td>
<td>24,842</td>
<td>23,730</td>
<td>208</td>
<td>0.84%</td>
<td>87</td>
<td>0.35%</td>
<td>58 0.23%</td>
</tr>
<tr>
<td>Independence, MO</td>
<td>105,757</td>
<td>100,518</td>
<td>1,358</td>
<td>1.28%</td>
<td>389</td>
<td>0.37%</td>
<td>393 0.37%</td>
</tr>
<tr>
<td>Kansas City, KS</td>
<td>135,070</td>
<td>112,899</td>
<td>10,893</td>
<td>8.06%</td>
<td>541</td>
<td>0.40%</td>
<td>1,092 0.81%</td>
</tr>
<tr>
<td>Kansas City, MO</td>
<td>409,894</td>
<td>370,142</td>
<td>11,200</td>
<td>2.73%</td>
<td>2,434</td>
<td>0.59%</td>
<td>3,603 0.88%</td>
</tr>
<tr>
<td>Lee’s Summit, MO</td>
<td>65,321</td>
<td>62,641</td>
<td>90.30%</td>
<td>408</td>
<td>236</td>
<td>0.36%</td>
<td>126 0.19%</td>
</tr>
<tr>
<td>Liberty, MO</td>
<td>24,359</td>
<td>23,398</td>
<td>95.90%</td>
<td>157</td>
<td>120</td>
<td>0.49%</td>
<td>36 0.15%</td>
</tr>
<tr>
<td>N. Kansas City, MO</td>
<td>4,468</td>
<td>3,601</td>
<td>80.60%</td>
<td>192</td>
<td>245</td>
<td>5.48%</td>
<td>69 1.54%</td>
</tr>
<tr>
<td>Raytown, MO</td>
<td>28,623</td>
<td>27,385</td>
<td>95.67%</td>
<td>282</td>
<td>150</td>
<td>0.52%</td>
<td>82 0.29%</td>
</tr>
<tr>
<td>Riverside, MO</td>
<td>2,756</td>
<td>2,455</td>
<td>89.08%</td>
<td>105</td>
<td>7</td>
<td>0.25%</td>
<td>81 2.94%</td>
</tr>
<tr>
<td>KCATA Service Area</td>
<td>845,434</td>
<td>769,468</td>
<td>91.01%</td>
<td>25,058</td>
<td>4,381</td>
<td>0.52%</td>
<td>5,646 0.67%</td>
</tr>
</tbody>
</table>
Conclusions: Spanish is the most prevalent language spoken by LEP persons in KCATA’s service area and should be the primary focus of any translation or language assistance activities. There are populations in the community that speak non-English languages other than Spanish and it remains important to consider providing additional language assistance services as necessary and economically feasible.

Factor 2: The frequency with which LEP individuals come in contact with KCATA services.

KCATA operates the Regional Call Center (RCC) to provide customer assistance and travel information via telephone for those seeking to use KCATA services, and a language line (known as, “TeleLanguage”) is available for LEP customers. Records indicate that only 137 (0.04%) of the total annual 343,043 calls placed to the RCC in 2010 utilized the language line. Over 94% of the language line callers requested information in Spanish, while other language assistance requests included Hindi, Ibo, Korean, Mandarin, and Somali.

LEP individuals currently have infrequent and unpredictable contact with the RCC and KCATA services. However, the small and growing size of the LEP population in the KCATA service area will likely increase its future contact with KCATA services and it will be important to continue monitoring its population trends.

Factor 3: The nature and importance of service provided by KCATA.

Access to public transportation is critical for many to fully participate in society. KCATA provides a range of important transportation options to the community through its fixed-route, MetroFlex, and paratransit services. Riders use KCATA services for their multiple travel needs within the community, including trips to work, school, job interviews, grocery stores and retail shops, medical offices, community service agencies, and more.

Factor 4: The resources available to KCATA and the overall cost.

KCATA’s annual operating budget has for many years funded outreach efforts and translation services to effectively communicate with LEP persons in the community. As funding allows, KCATA intends to continue such efforts into the foreseeable future.

The KCATA Marketing Department spends approximately $5,000 annually in bilingual advertising placements in local community newspapers. Modest funding is available for
translation services, which are typically used for news releases, route information, passenger bulletins, and other marketing effort targeted at Spanish speaking audiences.

The KCATA Regional Call Center (RCC) annually budgets $1,500 to support the “TeleLanguage” translation phone line. Annual costs are dependent upon usage.
IMPLEMENTING THE LEP PLAN

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP notes that effective implementation plans typically include the following five elements:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons.
5. Monitoring and updating the plan.

KCATA LEP Plan Implementation

Element 1: Identifying LEP Individuals who need language assistance

1. Census data: As discussed above, Census 2000 data indicates that Spanish-speaking LEP persons are the primary group requiring language assistance in KCATA’s service area. In general, the highest concentrations of Spanish-speaking LEP persons are in the Argentine, Armourdale, Downtown, Rosedale, and Quindaro neighborhoods of Kansas City, Kansas, the Northeast and Westside neighborhoods of Kansas City, Missouri, and Riverside, Missouri. KCATA will continue monitoring and using Census data releases to identify and locate significant and emerging LEP populations.

2. Customer Satisfaction Survey: Every two years, KCATA conducts a “Customer Satisfaction Survey” which provides detailed information about passenger demographics and travel patterns. Future passenger satisfaction surveys will include questions to quantify LEP riders, their travel patterns, and route use. This will become important information in further identifying and understanding the transit needs of LEP persons.

3. Documenting Staff Encounters with LEP Persons at KCATA Public Meetings: When open houses or public meetings are held, KCATA staff will have the Census Bureau’s “I Speak” flashcards available to help identify LEP persons. While KCATA staff may not be able to provide translation assistance at the time, the flashcards will be an important asset in identifying language needs for future public events. A continuous record will be kept detailing the primary languages of LEP persons attending KCATA’s public meetings.
LIMITED ENGLISH PROFICIENCY (LEP) PLAN
Kansas City Area Transportation Authority

4. **Tracking Calls to the Language Line:** KCATA will continue to monitor and quantify the volume and trends of calls to the “TeleLanguage” line for language assistance.

**Element 2: Providing Language Assistance Measures**

KCATA currently employs various methods and strategies to provide LEP customers with information critical to using KCATA services. Many of these efforts focus on reaching Spanish-speaking persons, the dominant LEP population in KCATA’s service area.

KCATA’s current and planned efforts to provide language assistance to LEP customers into the near future include the following:

1. **Translation services via phone – “TeleLanguage”:** KCATA has access to interpreters who can assist riders with bus schedule information in more than 50 languages. Callers to the Regional Call Center (816-221-0660) and visitors to the KCATA Breen Building lobby needing language assistance are personally directed to the language line services. This free service is available from 6 a.m. to 7 p.m., Monday through Friday.

   KCATA has access to the following and more languages through this interpretation service: Arabic, Burmese, Cambodian, Cantonese Chinese, Croatian, Czech, Dutch, French, German, Greek, Hebrew, Hindi, Hmong, Hungarian, Italian, Japanese, Korean, Laotion, Malay, Mandarin Chinese, Mongolian, Persian, Portuguese, Pulaar, Punjabi, Romanian, Russian, Samoan, Serbian, Slovenian, Somali, Spanish, Swahili, Swazi, Swedish, Tagalog, Tamil, Thai, Tibetan, Turkish, Ukrainian, Urdu, Vietnamese, and Xhosa.

2. **Pocket schedules and route maps in Spanish:** Many route pocket schedules and maps are printed in both English and Spanish. Bilingual route literature is primarily available for routes serving Kansas City, Kansas, and the Northeast and Westside neighborhoods of Kansas City, Missouri—specific areas with concentrations of Spanish-speaking persons. Review of future biennial “Customer Satisfaction Survey” results will provide information about other routes frequented by LEP riders and needing bilingual printed passenger information.

3. **On-Board Announcements in Spanish:** From review of future “Customer Satisfaction Survey” results, routes frequented by Spanish-speaking riders will be identified and automated, on-board audio announcements in Spanish may be initiated on these routes to best communicate with riders.
4. “Non-English Resources” section of KCATA’s website: KCATA has a dedicated section of its website that discusses specific services available to non-English speaking persons and provides links to critical translated documents for download. KCATA will continue to promote and build this section of the website, found at the following link: [http://www.kcata.org/ride_guide/non_english_resources/](http://www.kcata.org/ride_guide/non_english_resources/)

5. KCATA Website translation: Cost-effective methods to provide translation services to the entire KCATA website, i.e. Google translator, will be researched and considered for future implementation.

6. Critical documents in Spanish: Applications in Spanish for reduced fare cards for seniors, youths, and persons with disabilities are available on the KCATA website and upon written, telephone or in-person request. An overview of KCATA’s Title VI Program and a Title VI complaint form are available in Spanish at the following link: [http://www.kcata.org/about_kcata/entries/title_vi_complaint_process/](http://www.kcata.org/about_kcata/entries/title_vi_complaint_process/)

7. Assisting LEP Persons on-board KCATA Buses: If an LEP passenger needs assistance while on-board a KCATA bus, recommended approaches to understand and appropriately respond to the passenger’s needs and situations are as follows:

   - The bus operator may inquire if another passenger can serve as a translator.
   - The driver could also direct the LEP person to any translated schedule and route information that has been placed aboard the vehicle or to the KCATA customer service line for language assistance.
   - More difficult or emergency situations may necessitate contacting Transportation Supervisors or Dispatch for additional help and phone access to language line interpreters.
Element 3: Training of Staff

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public will be trained on KCATA’s LEP plan for providing language assistance.

Recommended training efforts include the following:

- Executive staff should be familiarized with the LEP plan to reinforce its importance and ensure its implementation by KCATA.

- The staffs of the Planning & Special Services Department and Marketing Department will also be familiarized with the LEP plan, with particular emphasis on LEP outreach efforts at KCATA public meetings and open houses. Training will focus on using the “I speak cards” to communicate with and quantify the number of LEP persons at KCATA public meetings and open houses.

- The Customer Service Department, which is responsible for the Regional Call Center and the KCATA’s on-site reception area, will have periodic, refresher training on directing LEP callers and walk-in customers to the “TeleLanguage” phone line for interpretation services.

- The Transportation Department will train dispatchers, roadside supervisors, and operators on best practices and procedures for assisting LEP passengers needing help. LEP passenger assistance measures will be incorporated into orientation training for new operators and refresher training for current operators.

Element 4: Providing Notice to LEP Persons of the Availability of Language Assistance

KCATA’s current and planned measures to inform LEP persons of the availability of language assistance avenues includes, but is not limited, to the following:

1. **Placards on buses:** KCATA has informational placards on buses in Spanish that inform riders of KCATA’s language line and translation services. The placards also provide
information about route information and other documents available in Spanish. See Figure 2 for a current example.

Figure 2: Spanish informational placard for bus interiors

2. Local non-English newspapers: KCATA will continue to issue media press releases in Spanish and purchase advertisements in local non-English newspapers publicizing language assistance measures offered by KCATA.

3. Direct engagement with LEP populations and community organizations: Through working with various community organizations, KCATA will seek to identify and engage LEP populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting “How to Ride” clinics in partnership with community organizations continues to be a great tool in educating LEP persons how to use KCATA services. Direct engagement with LEP persons will also help KCATA learn what additional agency information may need translation.
Element 5: Monitoring and Updating the LEP Plan

KCATA will routinely review and update its LEP Plan as necessary. KCATA will continue to work with its regional transit and transportation partners—namely, Johnson County Transit, Unified Government Transit, and Mid-America Regional Council—in coordinating language assistance measures for transit riders in the region. Anticipated updates will include the incorporation of new Census data, LEP ridership trends identified through the biennial “Customer Satisfaction Survey,” and public comments about the LEP Plan. Full review of the LEP Plan will occur with each triennial Title VI program submission.
DISSEMINATION OF KCATA’S LEP PLAN

KCATA posts its LEP plan on its website at the following link:  
http://www.kcata.org/rider_guide/non_english_resources/
Any person or agency with Internet access will be able to access and download the plan from 
the KCATA website.

Alternatively, any person or agency may request a copy of the plan via telephone, email, fax, 
mail, or in person and shall be provided a copy of the plan at no cost. Requests for copies of 
KCATA’s LEP plan and questions or comments about the plan should be directed to the 
following:

KCATA Planning Department
1200 E. 18th Street
Kansas City, MO 64108
Phone: 816-346-0200
Fax: 816-346-0305
Email: metro@kcata.org
APPENDIX A: Census Tracts with LEP Concentrations

Limited English Proficiency Census Tracts - All LEP

- All LEP above KCATA Average
- KCATA Designated Service Area
- KCATA Service Area Census Tracts

KCATA service area ability to speak English less than "Very Well" average: 4.32%

Source: American Community Survey 2005-2009
APPENDIX B: Census Tracts with LEP Spanish Language Concentrations
APPENDIX C: Census Tracts with LEP Indo-European Language Concentrations
APPENDIX D: Census Tracts with LEP Asian & Pacific Island Language Concentrations

Limited English Proficiency Census Tracts - Asian

- Asian LEP above KCATA Average
- KCATA Designated Service Area
- KCATA Service Area Census Tracts

KCATA service area ability to speak English less than "very well" average: 4.32%

Source: American Community Survey 2005-2009

Projection: NAD 1983 StatePlane Kansas north FIPS 1501 Feet
APPENDIX E: Census Tracts with LEP Other Language Concentrations