

Madison Athens-Clarke Oconee Regional Transportation Study  
(MACORTS) & Athens Transit System (ATS)

# Limited English Proficiency Plan

Final November 1, 2010

Prepared by Athens-Clarke County Planning Department



2010

**Limited English Proficiency Plan**  
**for**  
**Madison Athens-Clarke Oconee Regional Transportation Study**  
**and**  
**Athens Transit System**

FINAL

November 10, 2010

Prepared By:

Athens-Clarke County Planning Department

*The Limited English Proficiency Plan (LEP) is established pursuant to and in accordance with Title VI of the Civil Rights Act and Executive Order 13166, "Improving Access to Services for Persons With Limited English Proficiency."*

*The opinions, findings, and conclusions in this publication are those of the author(s) and are not necessarily those of the Federal Transit Administration, Federal Highway Administration, or Georgia Department of Transportation.*

**RESOLUTION BY THE MADISON ATHENS-CLARKE OCONEE REGIONAL  
TRANSPORTATION STUDY (MACORTS) POLICY COMMITTEE**

WHEREAS, federal regulations require that the Limited English Proficiency Plan for urbanized areas must be completed and,

WHEREAS, the Technical Coordinating Committee of MACORTS in coordination with the Federal Highway Administration, Federal Transit Administration, and the Georgia Department of Transportation has reviewed the Limited English Proficiency Plan,

WHEREAS, the Technical Coordinating Committee at its October 27, 2010 recommended the approval of the Limited English Proficiency Plan for MACORTS and the Athens Transit System:

NOW, THEREFORE, BE IT RESOLVED that the MACORTS Policy Committee concurs with the recommendation of the Technical Coordinating Committee of MACORTS to approve the Limited English Proficiency Plan.

**CERTIFICATION**

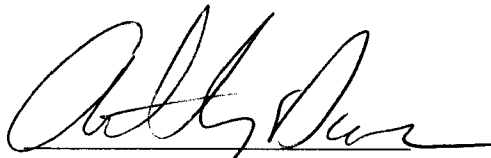
I hereby certify that the above is a true and correct copy of a Resolution adopted by the Madison Athens-Clarke Oconee Regional Transportation Study Policy Committee, at their meeting held on November 10, 2010.

Recommended by:



Brad Griffin  
TCC Chairman / MPO Director

November 10, 2010



Anthony Dove  
MACORTS Policy Committee Chairperson

November 10, 2010

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## **Introduction**

On August 11, 2000, President William J. Clinton signed Executive Order 13166, “Improving Access to Service for Persons with Limited English Proficiency”, to clarify Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color, or national origin by any entity receiving federal financial assistance. Administrative methods or procedures that have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations are prohibited. The purpose of Executive Order 13166 is to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

## **Purpose**

The purpose of this Limited English Proficiency (LEP) Plan is to demonstrate compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. The LEP Plan is for persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such persons may be eligible to receive language assistance with respect to a particular service, benefit, or encounter. This Plan will examine the services and products provided by the Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) and the Athens Transit System (ATS). The Plan will outline current accommodations made for LEP persons and possible future accommodations that can and/or should be made to make these services and products more accessible to LEP persons.

## **Four Factors to Formulate an LEP Plan**

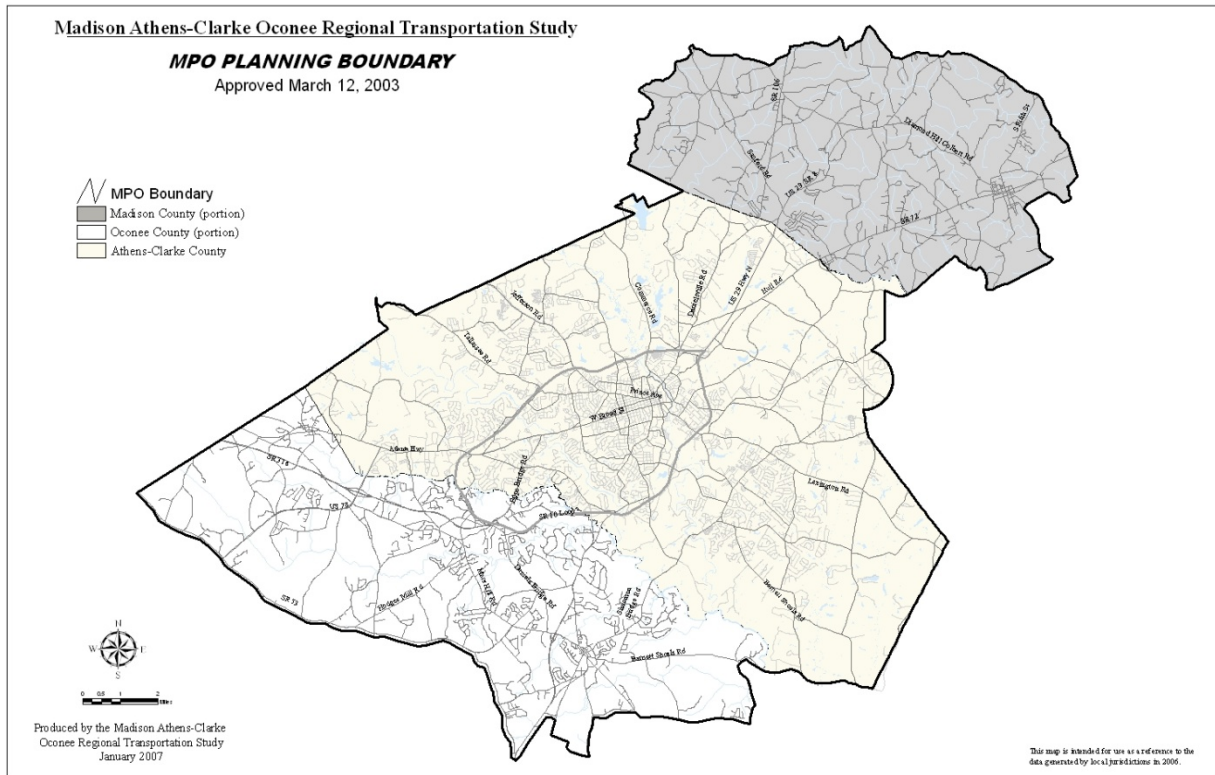
In determining how to provide effective and meaningful access for LEP customers, the U. S. Department of Transportation (DOT) has established the following four guidelines to consider in determining “reasonable steps” to be taken by MACORTS and ATS:

1. The number or proportion of LEP persons served or encountered in the eligible service population,
2. The frequency with which LEP persons encounter the services, programs, or activities provided,
3. The nature and importance of the services, programs, or activities; and
4. The resources available to the program and the costs of providing interpretation/translation services.

## Madison Athens-Clarke Oconee Regional Transportation Study

The Madison Athens-Clarke Oconee Regional Transportation Study (MACORTS) was formed in 1969 and is the Metropolitan Planning Organization for transportation planning in the Madison, Athens-Clarke, and Oconee County region. MACORTS is responsible for implementing the 3-C (comprehensive, cooperative, and continuing) transportation planning process.

Figure 1: Madison Athens-Clarke Oconee Regional Transportation Study Planning Boundary



The Athens-Clarke County Planning Department, in conjunction with the Georgia Department of Transportation, is responsible for carrying out the transportation planning process as mandated under federal legislation. MACORTS products include, but are not limited to, the Long Range Transportation Plan, the Transportation Improvement Program, the Unified Planning Work Program, and the Participation Plan.

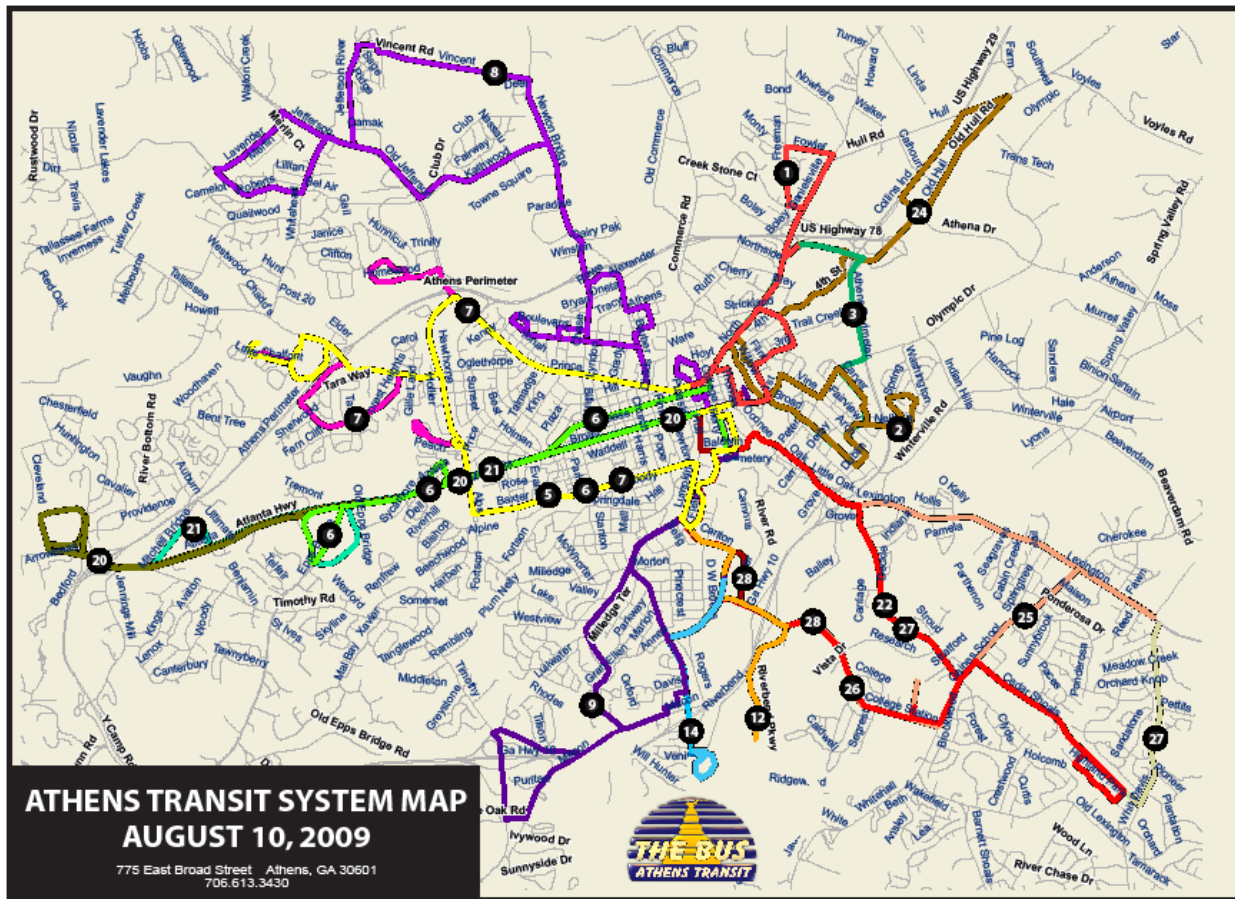
The Long Range Transportation Plan outlines the transportation planning vision for the next 20 years. The Transportation Improvement Program (TIP) is an annually updated program of projects to receive federal funding during the next 4 fiscal years for implementation. The Unified Planning Work Plan (UPWP) is the annual operating and capital budget for MACORTS. The Participation Plan outlines how and when public involvement activities will be conducted. These documents are the main work efforts of MACORTS.

## Athens Transit System

Athens Transit System is a department of the Athens-Clarke County Unified Government that provides public transportation for Athens-Clarke County with 31 buses on 18 bus routes throughout the county. Athens Transit System offers “The Bus” service, which is fixed route buses that operate Monday – Saturday from approximately 6:00 am to 11:00 pm, depending on the route, day, and time of year. In FY 2010, the Athens Transit provided over 1.7 million rides on the fixed route service. All fixed route vehicles are ADA-accessible.

Athens Transit offers a Demand Response transportation option for people with a mobility impairment called "The Lift". This service is provided for those patrons who cannot ride the fixed route bus service. In FY 2010, the Athens Transit System provided 9,000 rides on demand response service. Additionally, Athens Transit has a “Bus-N-Bike” program which makes daily commuting much easier, safer, and more convenient for cyclists to ride the bus. All fixed route vehicles are equipped with a bicycle rack mounted to the front of the bus.

Figure 2: Athens Transit System Map



## LEP Analysis

This plan uses the four factors outlined by the US Department of Transportation to determine the level and extent of language assistance necessary to reasonably ensure meaningful access to public transit and MACORTS services within the MPO area. Data used in this analysis was obtained from the U.S. Census Bureau. Recommendations are based on the results of the analysis.

### Factor 1: The number of LEP persons served in the eligible service population

The MPO has developed a demographic profile of the population in the MACORTS region and ATS service area. As illustrated in Table 1, the MPO region has a total population of 151,078 individuals. The race and ethnic breakout is as follows:

**Table 1 - Total 'Speakers' by Race Age 5 - 65+**

Census Source	Race	Athens-Clarke Co.	Madison Co.	Oconee Co.	Total
PCT62A	Caucasian	63,275	21,239	21,848	106,362
PCT62B	African American	25,693	1,982	1,476	29,151
PCT62C	American Indian	220	69	84	373
PCT62D	Asian	3,029	152	428	3,609
PCT62E	Hawaiian / Islander	48	2	6	56
PCT62F	Other Race	2,587	319	409	3,315
PCT62G	Two or More Races	1,199	194	141	1,534
PCT62H	Hispanic	5,401	442	835	6,678
	Total	101,452	24,399	25,227	151,078

Source: Census 2000, SF3

Though the regional total speakers for the MACORTS region is 151,078 and for Athens-Clarke County is 101,452, the MPO staff has based the LEP analysis upon the Census data reported for persons ages 18-65. This age group represents the 'customers' of ATS and MACORTS. Services and products provided by ATS and MACORTS have a greater impact on the lives of this age group. MACORTS products, particularly, are not suited nor intended for consumption by minors. Children, too, would generally have guidance from adults on navigating the Athens Transit System. Table 2 shows the number of total speakers in the 18 - 65+ age group broken out by race and by county. The total number of speakers in this age group for the region is 125,811. For Athens-Clarke County alone, the number of total speakers in this age group is 87,671. These are the totals that were used as a basis for the analysis of the number of LEP individuals in the region and ATS service area.

**Table 2 - Total 'Speakers' by Race Age 18 - 65+**

Census Source	Race	Athens-Clarke Co.	Madison Co.	Oconee Co.	Total
PCT62A	Caucasian	58,133	16,960	16,475	91,568
PCT62B	African American	19,501	1,503	1,092	22,096
PCT62C	American Indian	170	60	70	300
PCT62D	Asian	2,606	101	289	2,996
PCT62E	Hawaiian / Islander	48	2	6	56
PCT62F	Other Race	1,953	219	299	2,471
PCT62G	Two or More Races	919	125	56	1,100
PCT62H	Hispanic	4,341	306	577	5,224
	<b>Total</b>	<b>87,671</b>	<b>19,276</b>	<b>18,864</b>	<b>125,811</b>

Source: Census 2000, SF3

Table 3 shows the 10 most prevalent languages spoken in the MACORTS region as reported by the U.S. Census Bureau.

**Table 3 – Top Ten Languages Spoken in MACORTS Region**

18 and over Population	125,811	
English	108,959	86.6%
Spanish or Spanish Creole	6,078	4.8%
Chinese	1,001	0.8%
French (incl. Patois, Cajun)	705	0.6%
German	514	0.4%
Korean	439	0.3%
African Languages	293	0.2%
Japanese	284	0.2%
Portuguese	223	0.2%
Arabic	186	0.1%
<b>Total</b>	<b>118,682</b>	<b>94.3%</b>

Source: Census 2000, SF3, PCT10

Table 4 shows the 10 most prevalent languages spoken in Athens-Clarke County as reported by the U.S. Census Bureau.

**Table 4 – Top Ten Languages Spoken in Athens-Clarke County**

18 and over population	87,671	
English	73,544	83.9%
Spanish or Spanish Creole	5,018	5.7%
Chinese	885	1.0%
French (incl. Patois, Cajun)	601	0.7%
German	434	0.5%
Korean	407	0.5%
African Languages	293	0.3%
Japanese	284	0.3%
Portuguese	223	0.3%
Arabic	186	0.2%
<b>Total</b>	<b>81,875</b>	

*Source: Data Compiled from Census 2000, SF 3, PCT 10*

The Census Bureau has four classifications for how well people speak English. The classifications are ‘very well’, ‘well’, ‘not well’, and ‘not at all’. For the purposes of the LEP Plan, people who were categorized as speaking English ‘not well’ or ‘not at all’ by the U.S. Census Bureau have been considered to be Limited English Proficient persons. As Table 5 shows, Athens-Clarke County has the highest percentage of LEP individuals with 6%, while the entire region has approximately 4.8% of the population categorized as having limited English proficiency.

**Table 5 – Total Limited English Proficient Speakers**

	<b>Total Speakers</b>	<b>Total 'Not Well' / Not At All</b>	<b>% ' Not Well' / Not At All</b>
<b>Athens-Clarke Co.</b>	87,671	5,286	6.0%
<b>Madison Co.</b>	19,276	360	1.9%
<b>Oconee Co.</b>	18,864	438	2.3%
<b>Total</b>	<b>125,811</b>	<b>6,084</b>	<b>4.8%</b>

*Source: Census 2000, SF3, PCT62A-H*

Figures 3, 4, and 5 on the following pages illustrate graphically the density of LEP persons by census tract. Figure 3 shows the density based on the regional totals. Figure 4 shows the density based on the county totals. Figure 5 shows the concentration of LEP persons in Athens-Clarke County compared to the ATS service area.

Figure 3: Shows the concentrations of LEP persons within the MPO planning area based upon regional totals.

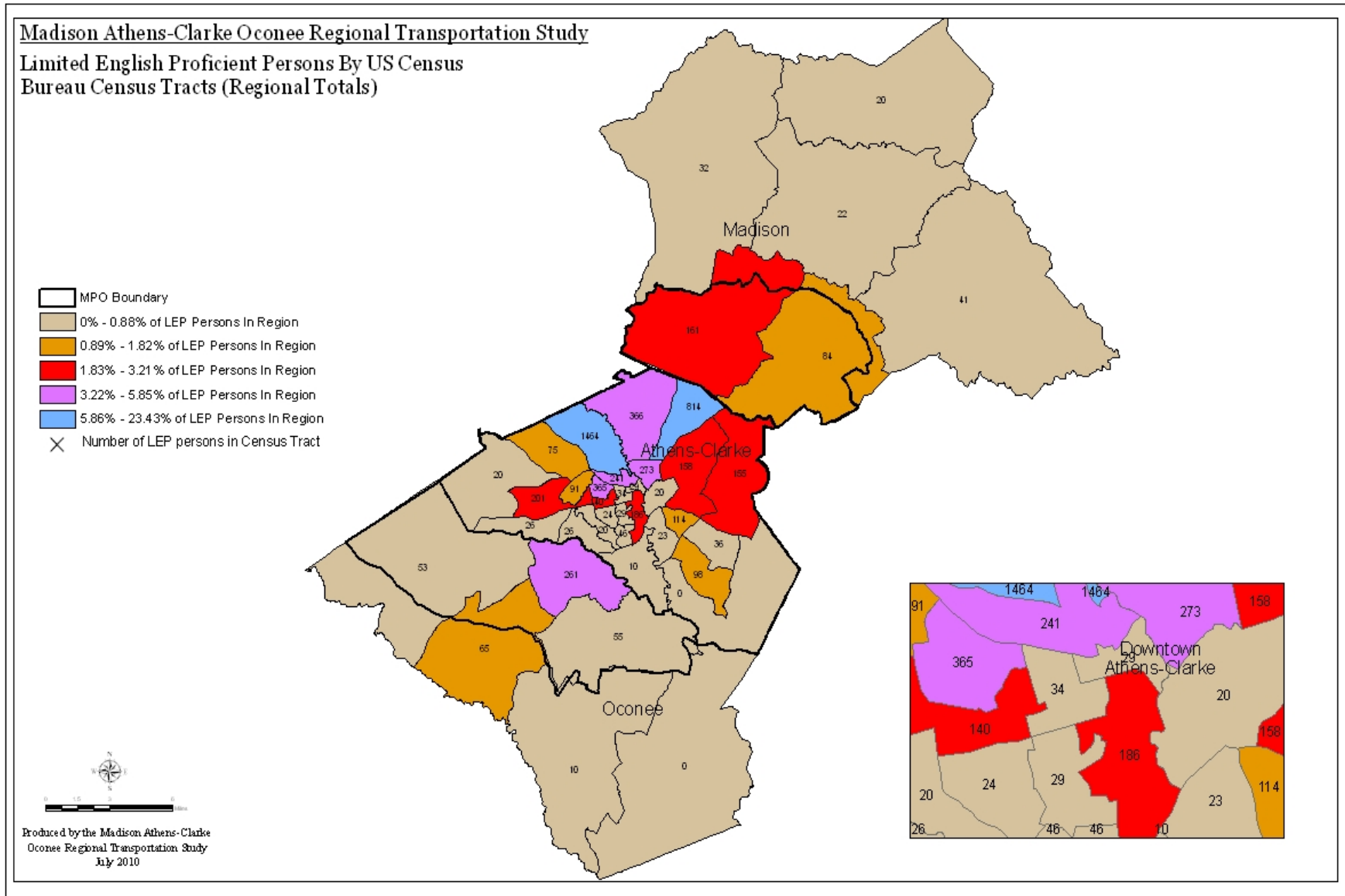
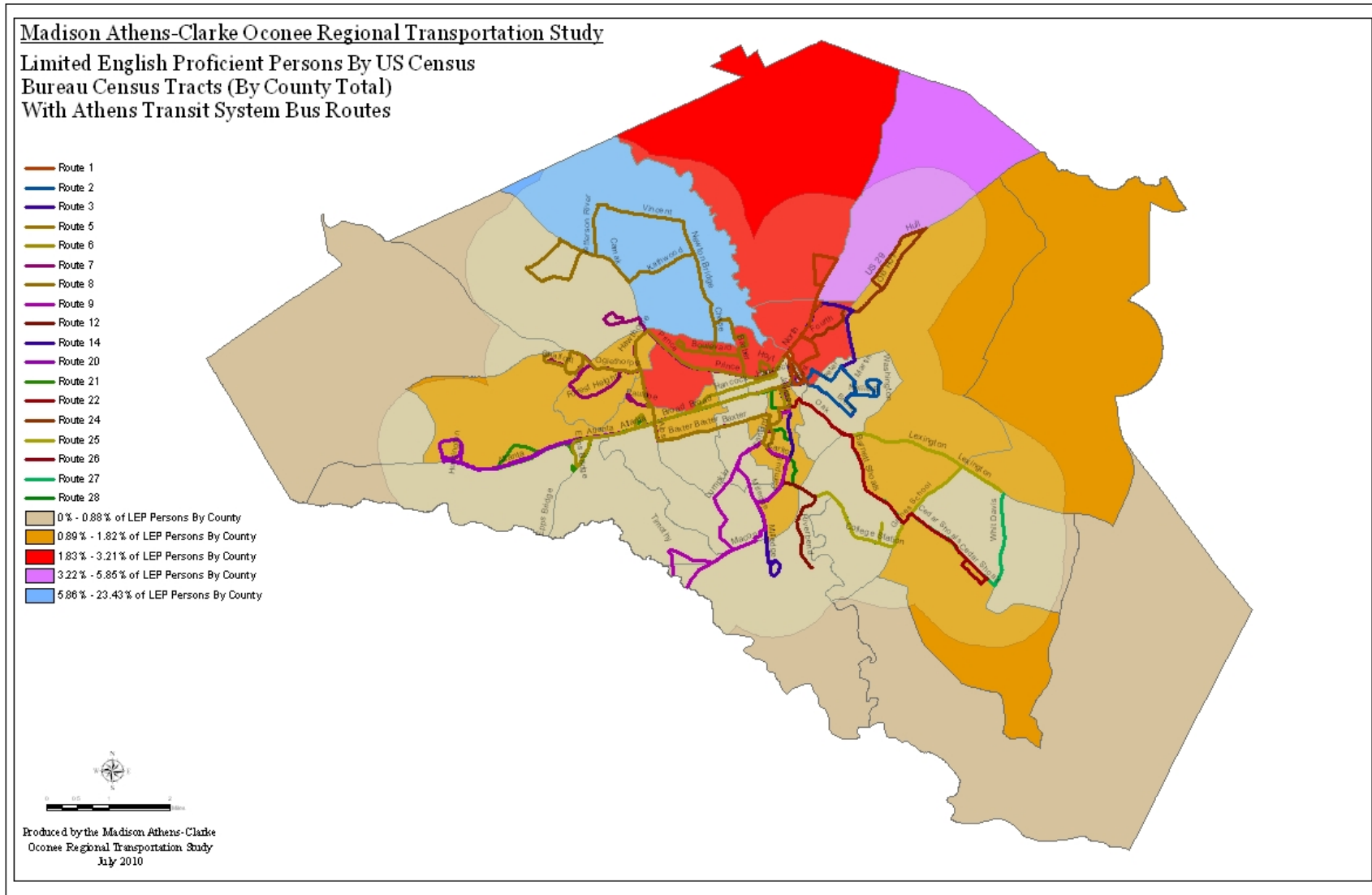


Figure 4: Shows the concentrations of LEP persons within Athens-Clarke County with ATS service overlay.



**Factor 2: The frequency with which LEP persons encounter the services provided.**

To date, the MPO has had very little contact with LEP persons in the course of MPO business. ATS has more contact with LEP’s persons due to the nature of services provided and number of persons with whom the staff interacts with on a weekly basis, but the percentage is still quite small. ATS and MPO planning staff were surveyed in regards to their interactions with LEP individuals in an average week. The MPO staff has had no requests for assistance from LEP persons in the last 10 years. Anecdotally, MPO staff noted only interacting once with LEP individuals during the course of their public interactions or day-to-day business. The remainder of the Athens-Clarke County Planning Department staff, who are housed with the MPO staff, indicated that they encounter only 1 or 2 LEP persons per week. Other than a very rare exception, these people bring another person with them who speaks English to assist them, according to the survey.

The staff of the Athens Transit System was surveyed as well. They were asked how many LEP persons they encounter in the average week. Responses ranged from zero to 20 persons per week. The informal accounting of LEP persons was compared to the number of people that ride ATS by route and by the total ridership. The highest percentage by route was on Route 3 – East Athens / North side with 2.1% of ridership being classified as LEP. When compared to the total weekly ridership, the percentage of LEP persons is approximately 0.34%.

**Table 6 – LEP Riders of Athens Transit System**

<b>Bus Routes</b>	<b>Average Number of LEP Riders</b>	<b>Average Weekly Ridership</b>	<b>LEP Percentage Per Week</b>	<b>Bus Routes</b>	<b>Average Number of LEP Riders</b>	<b>Average Weekly Ridership</b>	<b>LEP Percentage Per Week</b>
1	6	1,333	0.5%	14	2	4,052	0.0%
2	8	828	1.0%	20	10	2,560	0.4%
3	10	445	2.2%	21	10	636	1.6%
5	6	2,333	0.3%	22	6	693	0.9%
6	6	1,462	0.4%	24	4	899	0.4%
7	3	1,426	0.2%	25	8	2,516	0.3%
8	3	1,183	0.3%	26	2	1,637	0.1%
9	10	2,023	0.5%	27	10	1,552	0.6%
12	0	6,847	0.0%	28	5	323	1.5%
				<b>Total</b>	<b>52</b>	<b>17,880</b>	<b>0.3%</b>

### **Factor 3: The nature and importance of the services and programs.**

MACORTS is responsible for regional transportation planning. Denial or delay of access to services or information provided by the MPO would not have life threatening or even serious implications on an LEP individual. This is especially true if compared to services such as healthcare, emergency transportation, water, sewer, fire protection, police protection, and other essential services.

Athens Transit System provides public transportation to the Athens-Clarke County area giving people access to work, healthcare, and other programs and/or services. Without access to public transportation, many of these individuals would not be able to take advantage of other services that could potentially be life changing or life sustaining. Therefore, lack of public transportation services could have an adverse effect on LEP individuals.

### **Factor 4: The Resources Available to the MACORTS, ATS, and Overall Cost**

MACORTS serves a small percentage of LEP persons (4.8% or 6,000 in the region) and has limited funds available for LEP services. Providing translation assistance to LEP persons would be funded entirely from existing MACORTS operating funds and would compete with other operational requirements for funding. MACORTS's total budget for FY 2011 is approximately \$225,000 and varies from year to year.

Given the small number of LEP people within the region and the MACORTS budget, it would be burdensome to produce written translations for the core MACORTS documents. The expense and time required to provide these translated documents could jeopardize the mandated objectives of the transportation planning program. It is appropriate, however, for MACORTS to provide translated summaries of core products as requested by LEP persons. A translation option has been added to the MACORTS website ([www.macorts.org](http://www.macorts.org)) so that pages from the website can be translated into any of several languages (Chinese, Dutch, French, German, Greek, Italian, Japanese, Korean, Portuguese, Russian, or Spanish).

The Athens Transit System has been very proactive in their treatment of LEP persons. ATS has funding available through federal grants and the local government to continue to enhance their services for the LEP population.

### **Providing Notice to LEP Persons**

MACORTS will provide statements offering language assistance in public information, public notices, and on the MACORTS website to those persons requiring language assistance or special accommodations. MACORTS and ATS provide the technology to translate the ATS website into several languages. ATS has translated public materials, such as route guides and schedules available in Spanish.

## **Implementation of LEP Initiatives**

With advance notice of seven calendar days, MACORTS will provide interpreter services at the Technical Coordinating Committee meetings, Policy Committee meetings, or public meetings. Interpreters will provide services for both the foreign language and hearing impaired. Public notices will provide the contact information for this service. “I Speak” cards or a list of identifiers in the various languages will be provided for use at all public meetings to help identify the needs of LEP persons attending.

The Athens Transit System is providing many services to LEP persons currently. ATS schedules are available in Spanish and Braille. A picture book has been developed that shows how to ride “The Bus” for non-English speakers. The ATS website includes a mechanism to translate the content into one of several languages. There are currently three ATS staff members that speak Spanish fluently and are available to assist in interpretation as needed. ATS is currently developing a marketing program that targets the Spanish-speaking population.

## **MACORTS and ATS Staff Training**

MACORTS staff will be provided training on the requirements for providing meaningful access to services for LEP persons. Additional training opportunities will be taken advantage of as they become available.

ATS staff will receive training regarding the Limited English Proficiency regulations and available resources as part of the Sensitivity Training at New Employee Orientation. Periodic refresher courses will be provided as part of ATS monthly staff meetings. ATS staff will have access to take classes in Command Spanish through the Unified Government of Athens-Clarke County. Twenty copies of Rosetta Stone’s Spanish class have been purchased by ATS for use by employees who desire to learn Spanish voluntarily. It is available for use at the Operations and Maintenance Facility.

## **LEP Plan Access**

MACORTS and ATS will post the LEP Plan on their websites at [www.macorts.org](http://www.macorts.org) and [www.athenstransit.com](http://www.athenstransit.com), respectively. Anyone with internet access will be able to access the plan. For those without personal Internet service, several area libraries offer free Internet access. Digital versions or hardcopies of the LEP Plan will be provided to MACORTS members, the Georgia Department of Transportation, Federal Highway Administration, the Federal Transit Administration, and any person or agency requesting a copy.

Any questions or comments regarding this plan should be directed to the MACORTS staff:

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