of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that THE Lowndes County Transit System area's most prominent LEP group speaks Spanish. However, that group is still under the 5% threshold. Phone inquiries and staff survey feedback indicated that Lowndes County Transit System dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 17 years, Lowndes County Transit System has had 0 requests for translated documents.

## c. <u>Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the</u> Recipient to People's Lives

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilites to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

The Lowndes County Transit System contracts with the TPO for the TPO to use Federal funds to provide a complete, small Section 5311 Rural Transit assisted transportation projects and does not provide any direct service or program that requires vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter).

## a. Factor 4: The Resources Available to the Recipient and Costs

The resources available to the TPO from the Lowndes County Transit Department for the 5311 Transit System, and overall costs.

The final factor weighs the previous factors to assess the needs of LEP individuals regarding the 5311 Transit System against the resources available to the TPO for providing such assistance to LEP individuals in a language other than English. The TPO has a meaningful number of LEP residents within Lowndes County, but historically the frequency of their contact with the TPO has been low. Full translation of major TPO documents regarding the 5311 Transit System would be prohibitively expensive. The TPO is committed to the principle of inclusivity and uses more cost-effective means of outreach, such as the Google translator on its website. Should translation services regarding the 5311 Transit System be required in the future, the TPO will seek out additional translation and interpretation services and utilize all reasonable resources to accommodate the needs of the LEP populations.

## III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of 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

The five elements are addressed below.

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