

Lewiston Transit System
City of Lewiston, Idaho

Title VI Policy

Updated: December 2021



Introduction

This program reflects the Lewiston Transit's commitment to ensuring that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, gender identity or expression, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by Lewiston Transit.

Notification of Lewiston Transit's Title VI obligations

Lewiston Transit publicizes its Title VI program by posting its commitment to providing services without regard to race, color, or national origin at Lewiston Transit, on the Lewiston Transit buses, and all the transit tubes (signs at stops). Lewiston Transit also provides information regarding their obligations on their website at www.ridethevalley.org. A copy of the notice can be found in **Attachment A**.

Title VI Complaint Procedures

Lewiston Transit has a standard process for investigating all complaints. Members of the public may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. Full procedures for filing a complaint and Lewiston Transit's procedures for investigating complaints can be found as **Attachment B**.

A complaint form is provided in **Attachment C**. This form is provided for convenience, and is not required to file a complaint.

Record of Title VI investigations, complaints, or lawsuits

Over the reporting period, Lewiston Transit has had no Title VI complaints, investigations, or lawsuits filed against it.

Public Participation Policy

A public participation policy that includes an outreach plan, as well as a summary of outreach efforts made since the last Title VI program submission can be found in **Attachment D**.

City of Lewiston Limited English Proficiency Plan

A full copy of Lewiston Transit's Limited English Proficiency Plan can be found in **Attachment E**.

Transit-related, non-elected planning boards, advisory councils or committees

Currently, Lewiston Transit does not have any non-elected planning boards, advisory

councils, or committees.

Subrecipients

Lewiston Transit, the primary recipient, has not had, nor currently has any subrecipients. However, if in the future, Lewiston Transit will award funds to a subrecipient, Lewiston Transit will ensure the subrecipient will comply with Title VI regulations, as well as maintain a schedule of subrecipient Title VI program submissions.

Title VI Equity Analysis

Over the last three years, Lewiston Transit did not construct a facility, such as a vehicle storage facility, maintenance facility, operation center, etc. However, in the event that such a facility will be constructed in the future, Lewiston Transit will conduct a Title VI Equity Analysis during the planning stage with regard to the location of the facility.

Service Standards and Policies

Service standards and policies including vehicle load standards, vehicle headway standards, On-time performance standards, service availability standards, vehicle assignment policy and transit amenities policy are included in **Attachment G**.

Signed Policy Statement

A policy statement signed by the City Manager assuring the Lewiston Transit's compliance with Title VI of the Civil Rights Act of 1964 can be found in **Attachment F**.

Attachment A: Notice to the Public

**LEWISTON TRANSIT
Title VI
Notice to the Public**

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

The Lewiston Transit System assures full compliance with the Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities.

Title VI provides that no person in the United States shall, on the grounds of race, color, nation origin, gender, age, disability, economic status, or limited English proficiency be excluded from participation in, or be denied the benefits of, any service, program, or activity of the Lewiston Transit System.

If you have questions, concerns, complaints, or would like additional information regarding Title VI, please contact:

**Lewiston Transit System
Transit Operations Supervisor
P.O. Box 617
Lewiston, ID 83501
(208) 298-1340**

AMERICANS WITH DISABILITIES (ADA)

The Lewiston Transit System is committed to full compliance with ADA. The ADA prohibits discrimination based on disability in admission or access to Lewiston Transit System facilities, programs, services and activities.

If you need help in order to use our services, please make your request know to the Lewiston Transit System staff serving this facility.

Questions, concerns, complaints or requests for additional information may be sent to the address above.

Attachment B: Complaint Procedure

Discrimination Complaint Procedure

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with the City of Lewiston. A complaint may also be filed by a representative on behalf of such a person.
2. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. If necessary, Lewiston Transit staff will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature.
 - b. Include the date of the alleged act of discrimination date when the Complainant became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
3. Within 10 days of receipt of the complaint, the City Attorney will determine its jurisdiction, acceptability, and/or need for additional information. The Complainant will be provided with a written acknowledgement that the City has either accepted or rejected the complaint.
4. A complaint may be dismissed for the following reasons:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
5. Within 60 days the Transit Operations Supervisor will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Transit Manager. The complaint should be resolved by informal means whenever possible. Such information attempts and their results will be summarized in the report of findings.
6. Within 90 days of receipt of the complaint the Transit Manager will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the appropriate Federal or State agency, if they are dissatisfied with the final decision rendered by the Lewiston Transit.
 - a. Lewiston Transit will reconsider this determination if new facts come to light.
 - b. If Complainant is dissatisfied with the determination and/or resolution set forth by Lewiston Transit, the same complaint may be submitted to the

appropriate Federal or State agency for investigation.

7. Lewiston Transit will also provide the appropriate Federal or State agency with a copy of the decision and summary of findings upon completion of the investigation within 120 days of the receipt of the complaint.

8. Contacts for the different Title VI administrative jurisdictions are as follows:

Idaho Transportation Department
EEO Office
3311 West State Street
PO Box 7129
Boise, ID 83707-1129

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Seattle Regional Office of FHEO
U.S. Department of Housing and Urban Development
Seattle Federal Office Building
909 First Avenue, Room 205
Seattle, Washington 98104-1000

Attachment C: Complaint Form

Lewiston Transit Discrimination Complaint Form

Lewiston Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Transit Operations Supervisor at (208) 298-1340.

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work/Cell):	
E-mail:		
Accessible Format Required? (please specify)		
Section II:		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are filing the complaint:		
Please explain why you are filing this complaint for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No
Section III:		
I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of Alleged Discrimination: (month, day, year):		
Please explain, as clearly as possible, what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form:		
Section IV		

Name of agency complaint is against:		
Contact Person:		
Title:		
Telephone:		
Have you previously filed a Title VI complaint with this agency:	Yes	No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	Yes	No
If yes, check all that apply and specify:		
<input type="checkbox"/> Federal Agency:	<input type="checkbox"/> Federal Court:	
<input type="checkbox"/> State Agency:	<input type="checkbox"/> State Court:	
<input type="checkbox"/> Local Agency:		
Please provide contact information at the agency/court where the complaint was filed:		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Email:		

You may also attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature	Date
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Please submit this form by mail to:

Lewiston Transit
 Attn: Transit Operations Supervisor
 PO Box 617, Lewiston, ID 83501

In person: 215 D Street, Lewiston
 By Fax: (208) 298-1339
 Email: cusher@cityoflewiston.org

Filing a complaint with Lewiston Transit is voluntary. However, without the information requested above, we may be unable to proceed with your complaint. We collect this information under authority of Title VI of the Civil Rights Act of 1964 and other civil rights statutes. We will use the information you provide to determine if we have jurisdiction, and if so, how we will process your complaint. Information submitted on this form is treated confidentially and is protected under the provisions of the Privacy Act of 1974. Names or other identifying information about individuals are disclosed when it is necessary for investigation of possible discrimination, for internal systems operations, or for routine uses, which include disclosure of information outside Lewiston Transit for purposes associated with civil rights compliance and as permitted by law. It is illegal for a recipient of Federal financial assistance to intimidate, threaten, coerce, or discriminate or retaliate against you for filing this complaint or for taking any other action to enforce your rights under Federal civil rights laws. You are not required to use this form. You may also email or write a letter and send it to the address above.

Attachment D: Public Participation Policy

Lewiston Transit Public Participation Policy

Lewiston Transit recognizes that public input is crucial in order to provide effective service to the public. The following policy outlines the local process for soliciting and considering public comment prior to implementing fare changes, service changes or adjustments, and how the public can make comments on the annual budget.

Definitions:

1. *Major Service Change*: A reduction in service that impacts 25 percent or more of the total service hours of a route, and/or a reduction of 25 percent or more in total miles of a route, and/or the elimination of an existing bus stop.
2. *Minor service change*: Minor adjustments to a route or route time, or a service change that does not meet the definition of a major service change
3. *Fare Increase*: Any increase to the base fare for any individual that would be required to pay every time that individual boarded a vehicle.
4. *Fare Decrease*: Any decrease to the base fare for any individual that would be required to pay every time that individual boarded a vehicle.
5. *Service Increase*: An increase of service that impacts 25 percent or more of total service hours of a route, and/or an increase of 25 percent or more in total miles of a route, and/or the addition of a bus stop.
6. *Special Fares*: Any fare that is charged other than the published fixed route or paratransit rate.

Fare increases or major service changes: In order to solicit and consider public comment regarding a fare increase or a major service change, a public meeting before the City Council will be required. Notice of the public meeting shall include the proposed fare increase(s) or major service change(s), the date, time and location of the meeting and shall be published in the newspaper at least ten (10) calendar days prior to the meeting. In addition, notice of the public meeting shall be posted for at least ten (10) calendar days prior to the meeting in the buses used for fixed route or paratransit services within the City of Lewiston. After receiving public comment either in writing or at the public meeting, the City Council shall approve or deny each request. The City Council may also use its discretion to alter or partially approve a request.

Fare decreases, service increases, or "special fares": In order to solicit public comment regarding fare decreases, service increases, or "special fares", a notice will be placed on the Lewiston Transit buses describing the action proposed. The notice will be posted on the buses for at least fifteen (15) days. After fifteen days from the posting date, if there are no protests, the fare decrease, service increase, or implementation of a special fare may be implemented. If there are protests, a public meeting will be scheduled before the City Council with publication of the meeting at least fifteen (15) days prior to the meeting in the newspaper and in the buses.

Minor service changes: In order to notify the public of a minor service change, a notice of the proposed change will be placed in the busses for at least fifteen (15) calendar

days. The public may comment on the change to the Transit Manager either in person, by phone, or by email. The Transit Manager will consider public comments prior to any minor service change taking place.

Annual Budget. Public input is welcome on Lewiston Transit's budget through the City Council's annual budget process, which consists of work sessions and public meetings each summer. Comments may be in person or in writing. For more information on the City's budget meetings visit www.cityoflewiston.org.

Summary of Public Participation Efforts

Due to the Covid-19 pandemic, most outreach efforts were canceled. Most of our outreach was through our website and through regular monthly meetings with the Lewiston Interagency Group. This group represents the health and welfare groups and nonprofits in the Lewis Clark Valley and when there are needs, they represent them.

In addition, we participate in the outreach done for the Human Services Transportation Plan, managed by the Lewis Clark Valley MPO represents the transportation needs in our region.

**Lewiston Transit System
City of Lewiston, Idaho**

Limited English Proficiency Plan

Updated: December 2021



I. Introduction

This *Limited English Proficiency Plan (LEP)* has been prepared to address Lewiston Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

II. Plan Summary

Lewiston Transit has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available

In order to prepare this plan, Lewiston Transit used the four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Lewiston Transit.
2. The frequency with which LEP persons come in contact with Lewiston Transit services.
3. The nature and importance of services provided by Lewiston Transit to the LEP population.
4. The interpretation services available to Lewiston Transit and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

III. Meaningful Access: Four-Factor Analysis

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Task 1, Step 1: Examine prior experiences with LEP individuals

There is no large geographic concentration of any type of LEP individuals in the

service area for the Lewis Clark Valley MPO. Not even a specific neighborhood or church we could reach out to. As to transit, the dispatch personnel cannot recall a single caller or rider that would be an LEP individual since 2016, two plan updates ago. Lewis Clark State College continues to host the Institute of Intensive English (IIE) program, in which students from different countries come to learn the English language. Prior to Covid, we presented public transportation options available to these individuals within their first week of class in August and in January, so they get an overview of our system. Most of the time, their English is quite good however so we haven't had any comprehension issues. These students stay for a limited amount of time in the Lewis Clark Valley. We hope to continue to present to this group.

Task 1, Step 2: Become familiar with data from the U.S. Census

The 2011-2015 American Community Survey (ACS) describes the languages spoken in the City of Lewiston and number speaking each language as follows: https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_B16001&prodType=table. This data was used in our prior Title VI plan but I could not locate more recent data where the language was called out individually versus lumped together.

2011-2015 American Community Survey (ACS)	Lewiston, ID-WA Metro Area	
	Estimate	Margin of Error
Total:	58,216	+/-78
Speak only English	56,089	+/-343
Spanish or Spanish Creole:	762	+/-230
Speak English "very well"	639	+/-226
Speak English less than "very well"	123	+/-69
French (incl. Patois, Cajun):	76	+/-53
Speak English "very well"	76	+/-53
Speak English less than "very well"	0	+/-27
French Creole:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Italian:	14	+/-14
Speak English "very well"	7	+/-9
Speak English less than "very well"	7	+/-11
Portuguese or Portuguese Creole:	37	+/-41
Speak English "very well"	37	+/-41
Speak English less than "very well"	0	+/-27
German:	192	+/-84
Speak English "very well"	133	+/-77
Speak English less than "very well"	59	+/-34

Yiddish:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other West Germanic languages:	86	+/-93
Speak English "very well"	86	+/-93
Speak English less than "very well"	0	+/-27
Scandinavian languages:	1	+/-29
Speak English "very well"	1	+/-29
Speak English less than "very well"	0	+/-27
Greek:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Russian:	65	+/-79
Speak English "very well"	34	+/-47
Speak English less than "very well"	31	+/-34
Polish:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Serbo-Croatian:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other Slavic languages:	9	+/-9
Speak English "very well"	0	+/-27
Speak English less than "very well"	9	+/-9
Armenian:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Persian:	5	+/-9
Speak English "very well"	0	+/-27
Speak English less than "very well"	5	+/-9
Gujarati:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Hindi:	7	+/-11
Speak English "very well"	7	+/-11
Speak English less than "very well"	0	+/-27
Urdu:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other Indic languages:	83	+/-67
Speak English "very well"	83	+/-67
Speak English less than "very well"	0	+/-27
Other Indo-European languages:	8	+/-13

Speak English "very well"	8	+/-13
Speak English less than "very well"	0	+/-27
Chinese:	119	+/-52
Speak English "very well"	51	+/-45
Speak English less than "very well"	68	+/-56
Japanese:	19	+/-21
Speak English "very well"	19	+/-21
Speak English less than "very well"	0	+/-27
Korean:	35	+/-38
Speak English "very well"	35	+/-38
Speak English less than "very well"	0	+/-27
Mon-Khmer, Cambodian:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Hmong:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Thai:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Laotian:	1	+/-4
Speak English "very well"	1	+/-4
Speak English less than "very well"	0	+/-27
Vietnamese:	40	+/-45
Speak English "very well"	17	+/-16
Speak English less than "very well"	23	+/-34
Other Asian languages:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Tagalog:	39	+/-49
Speak English "very well"	36	+/-48
Speak English less than "very well"	3	+/-6
Other Pacific Island languages:	4	+/-5
Speak English "very well"	2	+/-5
Speak English less than "very well"	2	+/-4
Navajo:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
Other Native North American languages:	494	+/-109
Speak English "very well"	473	+/-103
Speak English less than "very well"	21	+/-18
Hungarian:	0	+/-27
Speak English "very well"	0	+/-27

Speak English less than "very well"	0	+/-27
Arabic:	8	+/-13
Speak English "very well"	8	+/-13
Speak English less than "very well"	0	+/-27
Hebrew:	0	+/-27
Speak English "very well"	0	+/-27
Speak English less than "very well"	0	+/-27
African languages:	14	+/-23
Speak English "very well"	14	+/-23
Speak English less than "very well"	0	+/-27
Other and unspecified languages:	9	+/-12
Speak English "very well"	2	+/-3
Speak English less than "very well"	7	+/-12

Totals

Speak English "very well"	1769
Speak English less than "very well"	358

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves.

The LCVMPPO's area is defined by the Urbanized Area (UZA) Boundary directed by the United States Census. Although Lewiston Transit's fixed route is within the boundaries of the City of Lewiston, we recognize that the individuals that utilize our service also live in Asotin County. Therefore, this report was done for the Lewis Clark Valley UZA.

Task 1, Step 2B: Obtain Census data on the LEP population in your service area

Go to

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_B16001&prodType=table for the table.

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: POPULATION 5 YEARS AND OVER
Data Set: 2010-2014 American Community Survey 5-Year Estimates
Survey: American Community Survey 2011-2015

NOTE. Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates
https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_B16001&prodType=table

Task 1, Step 2C: Analyze the data you have collected.

Non-proficiency is determined by adding those who speak English in any category other than *very well*. In the Lewis Clark Valley Metropolitan area, a total of 358 persons [0.6%] are identified with limited English proficiency – this is a reduction of 13% over the 2016 Title VI plan that showed 411 individuals spoke English less than “very well”. Of these individuals, 123 [34%] of the LEP population] speak Spanish, 59 [16%] speak German, 68 [19%] speak Chinese, 31 [9%] speak Russian, 21 [6%] speak Other Native North American languages, 10 [3%] speak Other Indo-European languages, 9 [2.5%] speak Other Slavic languages, 2 [.5%] speak Other Pacific Island languages, and 5 [1.3%] speak Persian.

Task 1, Step 2D: Identify any concentration of LEP persons within your service area.

There is no large geographic concentration of any type of LEP individuals in the service area for the LCVMPPO.

Task 1, Step 3: Consult state and local sources of data

According to the US Dept. of Justice, Civil Rights Division, Idaho has a total LEP population of 4% (2014).

Nez Perce County, Idaho, has a total population of 37,342 of which only 326 are considered LEP, which is .87% or less than 1 percent of the population.

Asotin County, Washington, has a total population of 20,714 of which only 147 are considered LEP at .71% - less than 1 percent

Source: <https://www.lep.gov/maps/lma2014/Final/>

Task 1, Step 4: Reach out to community organizations that serve LEP persons

The overwhelming majority of the population, 96.3%, speak only English. As a result, there are few social, service, professional and leadership organizations within the Lewis Clark Valley Metropolitan area that focus on outreach to LEP individuals. However, Lewis Clark State College, located in the City of Lewiston, has International Programs Office, which houses the Institute of Intensive English (I.I.E) where individuals learn English as a second language. We assist these students by presenting the public transportation options available to them when they first arrive in August and January annually since 2017.

Factor 2: The frequency with which LEP individuals come into contact with your

programs, activities, and services

Task 2, Step 1: Review the relevant programs, activities, and services you provide

Lewiston Transit staff are most likely to encounter LEP individuals through dispatch, administrative offices, or bus drivers. To date, Lewiston Transit has had no requests for interpreters and no requests for translated program documents.

Task 2, Step 2: Review information obtained from community organizations

The fixed route drivers have indicated that groups of students will occasionally (once a month) get on the bus to go shopping. These students appear very comfortable using public transportation, as it is widely used in the bigger cities of other countries.

Task 2, Step 3: Consult directly with LEP persons

City personnel consult directly with the International students attending Lewis Clark State College that come to stay to learn English. As stated previously, we train the students on their public transportation options, and travel train them on how to go grocery shopping, within their first week of class at the beginning of Fall and Spring semesters since 2017.

Factor 3: The importance to LEP persons of your program, activities, and services

Task 3, Step 1: Identify your agency's most critical services

Lewiston Transit's most critical service is the ability to access public transportation and the ability to comment on any service changes when they are proposed.

Factor 4: The resources available to the recipient and costs

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs

In 2009, the City of Lewiston opened a Personal Interpreter account with Language Line Services for translation services. The cost of this service is billed when it is used. To date, it has not been necessary to use the service.

Task 4, Step 2: Determine what, if any additional services are needed to provide meaningful access

Due to the majority of the population speaking English “very well”, and the fact that services have not been requested, it is determined that it is not necessary to provide any additional services at this time.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Lewiston Transit services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the City of Lewiston staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Lewiston Transit staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All Lewiston Transit staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When Lewiston Transit sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

1. Language Assistance Measures

Although there is a very low percentage in the City of Lewiston of LEP individuals, that is, persons who speak English “not well” or “not at all”, Lewiston will strive to offer the following measures:

- A. The City of Lewiston staff will take reasonable steps to provide the

opportunity for meaningful access to LEP clients who have difficulty communicating English.

- B. The following resources will be available to accommodate LEP persons:
- There are 4 languages that potentially could be equally encountered according to the Census: Spanish, Chinese, Russian and German. For this reason, the “I Speak” cards will be used to determine the language and document sources would be translated at the point.
 - Language interpretation will be accessed for all languages through a telephone interpretation service

IV. STAFF TRAINING

The following training has been and will be again provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards and telephone interpretation service.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the City of Lewiston will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

Lewiston Transit weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents, there is no one higher percentage language besides English, and other relevant factors, at this time it is an unnecessary burden to have any documents translated. However, when and if the need arises for LEP outreach, the City of Lewiston will consider the following options:

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.

VI. MONITORING

Monitoring and Updating the LEP Plan

Lewiston Transit will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every two years with the American Community Survey updates, or when it is clear that higher concentrations of LEP individuals are present in the Lewiston Transit service area. Updates will include 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 whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Lewiston Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Lewiston Transit fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE LEWISTON TRANSIT LEP PLAN

- Post the LEP plan on Lewiston Transit's Website at www.ridethevalley.org.
- State on agendas and public notices in the language that LEP persons would understand that documents may be made available in that language upon request.

Attachment F: Policy Approval

**Lewiston Transit
Title VI
Non-Discrimination – Policy Statement**

Lewiston Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title I of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To obtain more information on Lewiston Transit's nondiscrimination obligations or to file a Title VI complaint, contact Lewiston Transit's Title VI Coordinator at:

Lewiston Transit
Attn: Transit Operations Supervisor
PO Box 617, Lewiston, ID 83501

In person: 215 D Street, Lewiston
By Fax: (208) 298-1339
Email: cusher@cityoflewiston.org

You may file a written complaint no later than 180 calendar days after the date of the alleged discrimination.

Attachment G: Service Standards and Service Policies

Vehicle Load Standards

Vehicle Type	Seated	Standing	Total	Max Load Factor
24'-27' bus (DAR)	10	2	12	1.2
30'-32' bus (FR)	22	6	28	1.3

Vehicle Headway Standards

Two separate buses run two routes in a figure-eight pattern, with transfer points available along the routes. From the originating point, it takes one hour to complete the two routes. Therefore, for this purpose, our headways are one hour.

On-time Performance Standards

Lewiston Transit vehicles are on-time if they complete their runs no more than 5 minutes late in comparison to the published timetables. A periodic sampling of arrival/departure times will be performed to ensure Lewiston Transit is meeting its goal of 90% or greater on-time performance.

Service Availability Standards

Although Lewiston Transit does not set standards in regard to distance of stops, rider input and passenger usage are considered when adding new stops or improving existing stops.

Vehicle Assignment Policy

Lewiston Transit provides fixed route and ADA paratransit service with a total of 9 vehicles in the fleet. Each vehicle is designated to a specific mode.

Transit Amenities Policy

Installation of transit amenities are based on passengers boarding at stops. Lewiston Transit provides “flag stops” along the routes. For planning purposes, if passengers are frequently flagging the bus at specific areas along the route, Lewiston Transit would consider adding transit amenities in that area.