

SESDAC, Inc. dba Vermillion Public Transit

Title VI Program

Effective: August 2014  
Revised: September 2017

Vermillion Public Transit  
604 ½ High St.  
Vermillion, SD 57069  
(605)-624-7433

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## **1. General Information**

SESDAC, Inc. dba Vermillion Public Transit is the public transit provider for the immediate Vermillion area including, Burbank, SD & Meckling, SD. We operate a demand response service in this area seven days per week. Monday – Friday, we provide service to Sioux Falls and coordinate with Yankton Transit to provide service between the two communities on an as needed basis.

The Title VI coordinator is Barb Ballensky. She was appointed on March 27, 2012. Training documentation:

- 11/14/2011 – Brookings, SD with June Hansen about Title VI requirements, pre-awards checklist, and four factor analysis. Attended by Barb Ballensky, Transit Director
- 01/24/2012 – Mitchell, SD with June Hansen about Title VI requirements, pre-awards checklist and four factor analysis. Attended by Barb Ballensky, Transit Director and Joe Hoose, Human Resources Director
- 02/19/2014 – Pierre, SD with June Hansen about Title VI three year reviews and updated Title VI Program requirements. Attended by Barb Ballensky, Transit Director

## **2. Title VI Notice to the Public**

The notice to the public is displayed in our office and a shorter version is displayed in the vehicles. The notice to the public is in Appendix G of the Vermillion Public Transit Title VI Plan. The plan is attached to this document.

## **3. Title VI Complaint Procedures**

The Title VI complaint procedure is in Section V of the Vermillion Public Transit Title VI Plan. The plan is attached to this document.

## **4. Title VI Complaint Form**

The Title VI complaint form is in Appendix C of the Vermillion Public Transit Title VI Plan. The plan is attached to this document.

## **5. List of Title VI investigations, complaints and lawsuits**

There are no current Title VI investigations, complaints or lawsuits. The log is attached.

## **6. Public Participation Plan**

### **1. General Information**

The Federal and State government mandate public involvement, because it helps to guide department decisions in providing public transportation

services. Public Involvement also benefits SESDAC, Inc. dba Vermillion Public Transit (VPT) and the public, by allowing for the development of services that meet the needs of area citizens/customers.

The Federal government mandates public involvement prior to raising fares, implementing major reductions in service or applying for grants/loans to finance transportation improvement projects.

## 2. Public Participation/Engagement

### A. Public Meetings

VPT has an advisory board that meets quarterly on the last Tuesday of the month at 3pm. This meeting is open to the public. Location of the meeting is determined at the previous meeting. Interested parties may contact VPT for the location, date and time of an upcoming meeting. There are no regularly scheduled customer informational meetings. VPT will schedule public meetings on an as needed basis.

When a public meeting is scheduled, VPT will post an announcement on the buses, place ads in both local shoppers and send out announcements to a list of local agencies that we coordinate with asking them to post the announcement at their place of business so their clients are aware of the meeting. All meetings locations are accessible. Other accommodations will be made upon request.

### B. Coordination

We solicit input from many organizations in the community about our services and opportunities to coordinate or our ability to assist them in providing their services. A list of these agencies is attached.

Annually, we attend the health fair at the senior center to promote our services. We are a United Way agency, so we attend their annual fundraising kickoff to educate the public about transit. There are other events that we attend that are not annual events, but we participate when the opportunity presents itself.

### C. Public Studies

VPT conducts an annual customer satisfaction survey in January. We ask about current services and any needs customers have that are not being met. We also conduct surveys at other times when public comment is warranted, such as a fare increase, expansion of service or major reduction in service.

## 3. Public Outreach Plan

### A. Forms of Advertising

VPT advertises services provided and the hours of service on the local shopper bi-weekly. When offering special services, we advertise these events in the local shopper as well, an example would be free rides to the polls on Election Day. We advertise weather related service closings on the radio and television.

B. Outreach to minority, LEP and other underserved populations

We contacted the English as a Second Language instructor at the SD Department of Labor and the International Student Club at the University of South Dakota for input on how to reach out to minority, LEP and other underserved populations. These organizations are promoting our services with their participants.

We have an account with Language Services Associates, who will serve as our interpreter when needed. They also are able to print written materials in any language. We will use them as we get requests for this service.

4. Type of Public Involvement

VPT involves current riders by conducting customer surveys annually. We have conducted surveys through the chamber of commerce to get input from non-riders, business and community leaders. We have representation from City Council, the Chamber of Commerce, Department of Labor, Head Start, riders and the University of South Dakota on our advisory board. We have included faith based, academic and medical institutions in the surveys and interviews we conducted to prepare our Title VI and general coordination plans. We also work with the university to provide a community service known as Safe Ride. It is a late night service that operates during the university school year to provide a safe late night transportation alternative.

**7. Language Assistance Plan**

VPT completed a four-factor analysis to determine the need for a Limited English Proficiency (LEP) Plan. Based on current demographics and demand for language assistance, it has been determined that a formal plan is not necessary. However, VPT provides meaningful access to LEP individuals by utilizing a call-in translation center. English proficiency will be noted at the intake/orientation process. "I Speak" cards will be used to identify the language that the person speaks.

Call Center Information:

Language Services Associates

INTERPRETALK

800-305-9673

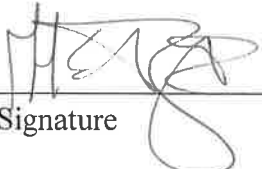
**8. Table of Membership**

<b>Body</b>	<b>Caucasian</b>	<b>Native American</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>
<b>Population</b>	90%	2%	4%	2%	2%
<b>Executive Board</b>	100%	0%	0%	0%	0%
<b>Advisory Board</b>	100%	0%	0%	0%	0%


**9. Title VI Equity Analysis**

Vermillion Public Transit has not constructed a facility in the last three years.

This Title VI Program Plan was adopted by SESDAC, Inc., dba Vermillion Public Transit on August 4, 2014.

  
\_\_\_\_\_  
Signature

11 Sept 2017  
\_\_\_\_\_  
Date

VERMILLION PUBLIC TRANSIT  <b>AGENCY POLICY AND PROCEDURE</b>	<b>EFFECTIVE DATE</b>  04/02/2012	<b>NUMBER OF PAGES</b>  3	<b>SECTION</b>  <b>VPT</b>
<b>SUBJECT:</b>  <b>Title VI Plan</b>	<b>AUTHORIZATION SIGNATURE</b> 		<b>REVIEWED</b> 09/14/2015 02/06/2017 09/11/2017

**POLICY:**

**I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d).

SESDAC, Inc. dba Vermillion Public Transit (VPT) is committed to ensuring that no person is excluded from participation in, or denied benefits of its transit services on the basis of race, color or national origin, as protected by Title VI in Federal Transit Administration’s (FTA) most current circular and by other civil rights laws that prohibit discrimination on the basis of age, gender, religion and disability.

This plan was developed to guide VPT in its administration and management of Title VI-related activities.

**Title VI Coordinator Contact**

Barb Ballensky  
604 ½ High St.  
Vermillion, SD 57069  
605-624-7433

**II. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the Administrative Offices of VPT at 604 ½ High St., Vermillion, South Dakota 57069. The name of the Title VI coordinator will be displayed on the poster. Additional information relating to nondiscrimination obligation can be obtained from the VPT Title VI Coordinator.

During new employee orientation and subsequent employee trainings, information relative to the provisions of Title VI, and VPT’s expectations to perform their duties accordingly will be reviewed and discussed. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (Appendix A & B).

VPT will ensure that all riders are provided with a copy of the Title VI Plan upon request. The plan will be translated upon request.

The Title VI Plan will be posted on the Vermillion Public Transit page of the SESDAC, Inc. website for reference.

### **III. Subcontractors and Vendors**

All subcontractors and vendors who receive payments from VPT where funds originate from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through bid specification package which becomes an associated component of the contract.

### **IV. Record Keeping**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from employees indicating the receipt of the VPT Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

### **V. Title VI Complaint Procedure**

#### **Filing a complaint**

Any person can file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information (Appendix C):

- Complainant's name, mailing address and viable contact information
- How, when, where and why the complainant believes that they were discriminated against. Include the location, names and contact information of any witnesses
- Other information that is deemed significant

The Title VI Complaint Form (Attached) may be used to submit the complaint information. The complaint may be filed in writing with the VPT at the following address:

Vermillion Public Transit  
604 ½ High St.  
Vermillion, South Dakota 57069

VPT encourages all complainants to certify all mail that is sent through the U. S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged dates of discrimination.

#### **Complaint process**

All complainants alleging discrimination based on race, color or national origin in a service or benefit provided by VPT will be directly addressed by VPT. VPT shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, VPT shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of the complaint will be mailed within seven days (Appendix D). Please note that in responding to any requests for additional information, a



complainant's failure to provide the requested information may result in the administrative closure of the complaint.

### **Notification of Complaint**

VPT will send a final written response letter (Appendix E & F) to the complainant. This written response may be drafted subject to review by the VPT attorney. In the letter notifying complainant that the complaint is not substantiated, the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from VPT, and/or 2) file a complaint externally with the Department of Transportation, and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

June Hansen, Civil Rights Compliance Officer/ADA Coordinator  
SDDOT – Office of Legal Counsel/Civil Rights Program  
700 E. Broadway Ave.  
Pierre, SD 57501  
Phone: 605-773-3540  
Fax: 605-773-4442  
Email: [june.hansen@state.sd.us](mailto:june.hansen@state.sd.us)

### **VI. Limited English Proficiency (LEP) Plan**

VPT performed a four-factor analysis to determine the need for a Limited English Proficiency (LEP) Plan. Based on current demographics and demand for language assistance, it has been determined that a formal plan is not necessary. However, VPT provides meaningful access to LEP individuals by accessing a call-in translation center. English proficiency will be noted at the intake/orientation process. "I Speak" cards will be used to identify the language that the person speaks.

Call Center Information:

Language Services Associates  
INTERPRETALK  
800-305-9673

### **VII. Community Outreach**

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

- VPT will ensure all riders are provided with a copy of the Title VI Plan upon request. The plan will be posted on the Vermillion Public Transit page of the SESDAC, Inc. website ( [www.sesdac.org](http://www.sesdac.org)). Any questions or concerns may be forwarded to the Title VI Coordinator through the transit operator or an appointment may be made in person to discuss questions or concerns with the Title VI Coordinator.
- A satisfaction survey is provided to all transit riders on a yearly basis. This survey is reviewed by the Director, Title VI Coordinator and SESDAC Executive Director.
- Customers' complaints are forwarded to the Director for review and investigation.

**Appendix A**  
**Employee Annual Education Form**

**Title VI Policy**

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of VPT are expected to consider, respect and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Title VI Coordinator and Director of VPT.

**Appendix B**  
**Acknowledgement of Receipt of the Title VI Plan**

I hereby acknowledge the receipt of the VPT Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration's (FTA) most current circular.

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Employee Signature

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Print Name

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Date

**Appendix C**  
**TITLE VI COMPLAINT FORM**

Title VI of the 1964 Civil Rights Act Requires 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 subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Vermillion Public Transit  
604 ½ High St.  
Vermillion, SD 57069

Please print clearly:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: Home: \_\_\_\_\_ Cell: \_\_\_\_\_

Message: \_\_\_\_\_

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

\_\_\_\_\_ race or color  
\_\_\_\_\_ national origin

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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Please list any and all witnesses' names and phone numbers:

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What type of corrective action would you like to see taken?

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Please attach any documents you have which support the allegation. Then date and sign this form and send it to the Title VI Coordinator at:

VPT  
Barb Ballensky  
Title VI Coordinator  
604 ½ High St.  
Vermillion, South Dakota 57069  
605-624-7433

---

Signature

---

Print Name

---

Date

**Appendix D**  
**Letter Acknowledging Receipt of a Complaint**

Today's Date

Complainant's Name and address

Dear \_\_\_\_\_:

This letter is to acknowledge receipt of your complaint against Vermillion Public Transit alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 605-624-7433 or write to me at this address.

Sincerely,

Barb Ballensky  
Title VI Coordinator

**Appendix E**  
**Letter Notifying Complainant that the Complaint is Substantiated**

Today's date

Complainant's Name and Address

Dear \_\_\_\_\_:

The matter referenced in your letter of \_\_\_\_\_ (date) against Vermillion Public Transit alleging Title VI violation has been investigated.

(An/several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. (If a hearing is requested, the following sentence may be appropriate) You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Barb Ballensky  
Title VI Coordinator

**Appendix F**  
**Letter Notifying Complainant that the Complaint is not Substantiated**

Today's Date

Complainant's Name and address

Dear \_\_\_\_\_:

The matter referenced in your complaint of \_\_\_\_\_ (date) against Vermillion Public Transit, alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color or national origin in any program receiving federal financial assistance.

VPT has analyzed the materials and facts pertaining to your case for evidence of the agency's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from VPT, and/or 2) file a complaint externally with the South Dakota Department of Transportation:

June Hansen, Civil Rights Compliance Officer/ADA Coordinator  
SDDOT – Office of Legal Counsel/Civil Rights Program  
700 E. Broadway Ave.  
Pierre, SD 57501  
Phone: 605-773-3540  
Fax: 605-773-4442  
Email: [june.hansen@state.sd.us](mailto:june.hansen@state.sd.us)

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Barb Ballensky  
Title VI Coordinator



## Appendix G

### Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin on programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance” (42 U.S.C. Section 2000d).

VPT is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI in Federal Transit Administration’s (FTA) most current circular. If you feel you have been denied participation in or being denied benefits of the transit services provided by VPT, or otherwise being discriminated against because of your race or color national origin our contact information is:

VPT  
Barb Ballensky  
Title VI Coordinator  
604 ½ High St.  
Vermillion, South Dakota 57069  
605-624-7433

Date of Complaint	Issue Involved	How complaint was resolved

**Appendix H**  
**Four Factor Analyses for Vermillion Public Transit**

**Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population**

**Task 1, step 1: Examine prior experience with LEP individuals**

In the 14 years that Vermillion Public Transit has been in operation, we have had very few customers with limited English proficiency (LEP). We have always been able to communicate well enough to help them with their transportation needs. Many of these customers are here attending the University of South Dakota or are spouses of the students and have conversational English skills.

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

The census information is from the 2010 U. S. Census. The tables for Clay County, South Dakota and Vermillion, South Dakota are attached.

These sections from the U. S. Census Bureau illustrate the top languages spoken in Clay County, South Dakota and the number of people who speak that language as follows:

12,422	English	92.1%
329	Spanish	2.5%
146	German	1.1%
78	Other Asian Languages	0.58%
37	Hindi	0.28%
29	Chinese	0.22%
29	Hebrew	0.22%
16	Arabic	0.12%
15	Vietnamese	0.11%
14	Other Indic languages	0.11%
13	Korean	0.098%
12	Scandinavian	0.090%

The most common languages spoken besides English are Spanish and German.

The numbers of people who speak English “less than very well” are as follows:

Spanish	86
Hebrew	29
German	21
Hindi	11
Other Asian Languages	9
French	5
African languages	5

**Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves**  
Vermillion Public Transit serves the immediate area around Vermillion, SD, and on a more as needed basis: Burbank, SD, Meckling, SD and limited service to communities along I-29 from Vermillion, SD to Sioux Falls, SD.

**Task 1, Step 2B: Obtain Census Data on the LEP population in your service area\***  
Since we provide the majority of service within the city of Vermillion, SD, here is the number of people who speak English “less than very well”:

Spanish	68	0.67%
German	23	0.22%
Other Native North American languages	13	0.13%
Hebrew	12	0.12%

\*See attached data from the US Census Bureau.

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

There are approximately 166 people in Clay County that speak English “less than very well”. Spanish speaking is the highest at 86 with 68 living within Vermillion city limits. German is second at 23 people. Clay County has 1.25% of the population that speaks English “less than very well”.

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

Of the 166 people in Clay County that speak English “less than very well”, 157 live in Vermillion, SD. Within Vermillion, Spanish is the highest at 68 people. German is 23, other native North American is 13 and Hebrew is 12.

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

We consulted the Department of Labor’s special tabulation of Census data on LEP populations for South Dakota. The table with this data is attached.

There are 45,575 people in South Dakota who speak a language other than English. 16,375 of these people or 2.5% speak English “less than very well”.

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

We contacted the organizations listed below.

**Task 1, Step 4A: Identify community organizations**

1. University of South Dakota international student services
2. The local Department of Labor and Regulation office
3. Vermillion School District
4. Vermillion Food Pantry
5. Churches – Trinity Lutheran Church, Hillside Community Church, Cornerstone Assembly of God, Concordia Lutheran Church, First Baptist Church, First United Methodist Church, St.

Agnes Catholic Church, St. Paul's Episcopal Church, United Church of Christ, Providence Reformed Church, Grace Baptist Church, Faith Fellowship of the Open Bible and Apostolic Faith Church.

**Task 1, Step 4B: Contact relevant community organizations**

I mailed a survey to the above listed organizations, except the local Department of Labor and Regulation office which we contacted in person, regarding our desire to improve language services we provide and asking them to partner with our agency to accomplish this. I also emphasized that we are not looking for individual information, but for general information to assist us in serving the areas LEP population with their transportation needs.

**Task 1, Step 4C: Obtain Information**

I spoke with Dan Hart from Department of Labor & Regulation and Faith Tieszen who teaches English as a Second Language at Job Link in the Vermillion office. There are currently 8 people in the English as a Second Language class. Their countries of origin are: China, Russia, Korea and Senagal. The languages spoken are Chinese, Russian, Korean, French and one African tribal language that Faith was not sure of. The participants are all women between the ages of 20 – 64. Their education levels range from one high school graduate to one with a PHD and several having a master's degree. They are participating to learn conversational English skills. From this group, several have expressed a need for transportation and one has inquired with our agency. The cost of the service was a barrier. Most of the service would be to and from these classes, but several have children and may have other needs. We discussed meeting with the class, but Faith felt that the attendance was so inconsistent; it would not work out very well. I gave some brochures to Faith for all the clients she serves.

Of the other agencies I sent surveys to, I had six responses. The Providence Reformed Church stated they had no one who uses public transportation.

The Vermillion Food Pantry serves all of Clay County. They served 4,000 people between the ages of 18 - 80 in 2011 and the population they serve is increasing. They have some folks who immigrated from north Europe and a few Spanish speaking countries. Everyone they serve speaks English. They feel anyone who needs transit knows how to access the bus.

St. Agnes Catholic Church serves the Vermillion area and has over 500 registered families in their church and continues to increase. They do have folks from Kenya, Mexico and China. The languages that the congregation speaks are English and Spanish and they are all able to read. There has been no inquires about public transportation.

The First United Methodist Church also serves the Vermillion area and has over 100 people in the congregation. They have experienced a decrease in attendance. They have people from Cashmere, Haiti and Africa and these folks mainly speak English. They do have a few folks who use transit to get to Sunday service and the Welcome Table meal on Mondays. The people who utilize the transit service are all English speaking.

The United Church of Christ serves the Vermillion area and has approximately 560 members, with about 200 being active. Their membership is increasing. They report that their members speak English.

The University of South Dakota international student services said they serve approximately 200 people and their services are increasing. The top 3 countries they serve are China, India and Canada. The top languages spoken are: Mandarin, Hindi, Spanish, Korean and English. Almost all participants can function with English at a university level. These folks came from countries where public transit is common, not only in a community, but from city to city as well. They do inquire about how to access public transportation and use it for shopping and personal business around Vermillion.

**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**

We provide transportation service for the Vermillion area. Trips for health issues, employment and shopping are a vital part of anyone's life. People without alternative transportation are dependent on our services.

We also sell tickets for Jefferson Lines, which is the regional bus line that connects with other bus lines throughout the country.

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

From the organizations that responded, it appears most people speak English or speak it well enough to participate in the community. In the case of the Department of Labor, they are attending a class to learn English.

**Task 2, Step 3: Consult directly with LEP persons**

Along with the organization surveys, I also sent individual surveys that organizations could give to their patrons to complete. I did not receive any completed surveys.

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

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

We are the only local public transportation provider in Vermillion.

**Task 3, Step 2: Review input from community organizations and LEP persons**

From the information we received, there doesn't appear to be a large population of people with limited English proficiency in the Vermillion area.

**Factor 4: The resources available to the recipients and the costs**

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

We have been able to communicate with all customers to date at no additional cost to our agency.

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

During the process of completing this analysis, we have partnered with Language Services Associates to provide interpretation by telephone services and written translation services on an as needed basis.

**Task 4, Step 3: Analyze your budget**

The frequency of using the call-in translation service will be so minimal that we will be able to absorb this expense into our budget. The cost of this service is \$1.95 per minute and decreases as the usage increases.

**Task 4 Step 4: Consider cost effective practices for providing language services**

We utilize the "I speak" cards to determine what language the person speaks and contract with Language Services Associates to provide the translation service to assist us in improving service for people with limited English proficiency.

\*Census data was updated on 7/18/2014.