



Alaska Railroad Corporation
Limited English Proficiency Plan

Revised 2018

I. Introduction

This Limited English Proficiency (LEP) Plan addresses the Alaska Railroad Corporation's ("ARRC") responsibility for providing assistance to LEP persons in accordance with Title VI of the Civil Rights Act of 1964, which states that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

II. LEP Defined

LEP is a term used to describe individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

III. Four Factor Analysis

In order to determine the reasonable steps that ARRC must take to ensure that LEP persons have meaningful access to ARRC services, activities, and programs, it is necessary to undertake an analysis based upon the United States Department of Transportation's Four Factor Test as follows:

1. The number or proportion of LEP persons eligible in the ARRC service area who may be served or likely to encounter an ARRC program, activity or service.

ARRC provides transportation services to local, national, and international passengers. It is ARRC's experience that limited and non-English speakers most often travel in tour groups, with a group leader who translates and communicates with the group.

ARRC has examined the most current U.S. Census report for major Alaska rail belt boroughs and continues to track demographic changes through other local resources, including the Alaska Department of Labor and Workforce Development Research & Analysis Section; University of Alaska Anchorage, Institute of Social and Economic Research; and the Anchorage School District (ASD), which is one of the most diverse districts in the country.

In 2016, the American Community Survey found that 110,312 (16.2%) of Alaskans spoke a language other than English. In the largest borough along the rail belt, the Municipality of Anchorage, 48,516 (17.5%) of residents indicated they spoke a language other than English.

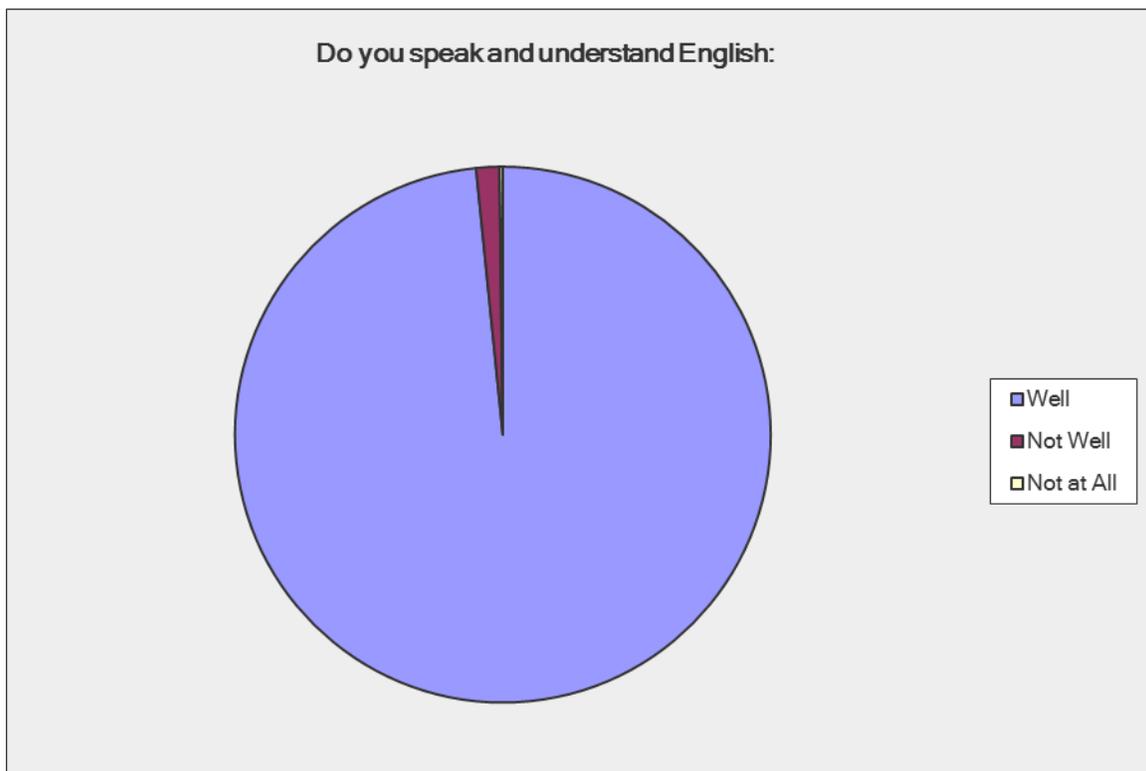
The statewide top five non-English languages spoken were Yu'pik, Inupiaq, Spanish, Tagalog and Russian.

In 2017, Anchorage School District students spoke 100 different languages at home. After English, the five most common home languages in schools were Spanish, Samoan, Hmong, Filipino, and Yu'pik.

Although the above statistics are instructive, a better indicator of the number of LEP individuals who actually come into contact with the ARRC's most important activity—its public transportation service—may be derived from the on-board surveys conducted by the ARRC.

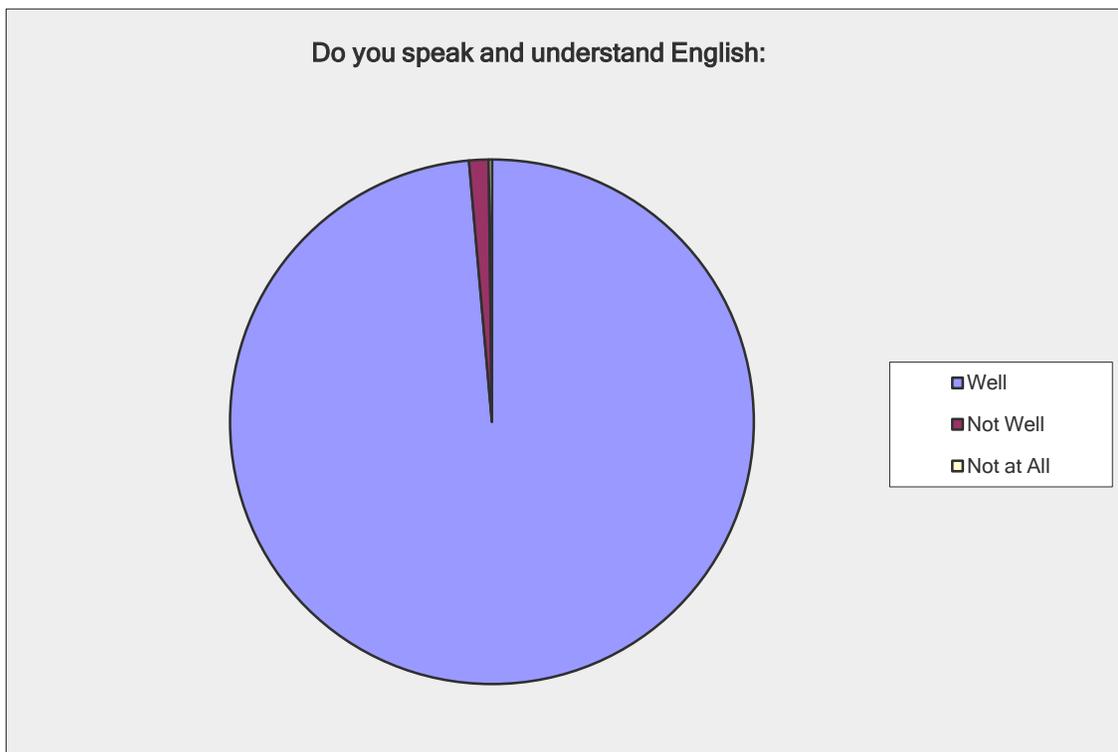
The survey results for 2016 show:

Do you speak and understand English:		
Answer Options	Response Percent	Response Count
Well	98.0%	6,325
Not Well	1.9%	123
Not at All	0.1%	8
If not, what language do you speak?		8
	<i>answered question</i>	6,456
	<i>skipped question</i>	334



The survey results for 2017 show:

Do you speak and understand English:		
Answer Options	Response Percent	Response Count
Well	98.5%	7,525
Not Well	1.2%	95
Not at All	0.3%	21
If not, what language do you speak?		12
<i>answered question</i>		7,641
<i>skipped question</i>		593



The survey results for 2018 to date show:

Do you speak and understand English:		
Answer Options	Response Percent	Response Count
Well	98.7%	1873
Not Well	1.1%	21
Not at All	0.2%	3
If not, what language do you speak?		1
<i>answered question</i>		1897
<i>skipped question</i>		112



2. The frequency with which LEP individuals come in contact with an ARRC program, activity or service.

The most frequent way in which LEP persons come into contact with an ARRC service is through ARRC’s provision of public transportation, which is busiest from mid-May through mid-September of each year (peak). During that period, ARRC operates four regular rail services per day. During the less busy times of the year, ARRC operates passenger trains to Fairbanks on a weekly basis and the Hurricane Turn the first Thursday of each month. Information regarding LEP ridership 2016 to 2018 (to date) is set forth above.

LEP persons would most likely come into contact with ARRC's other programs and activities through the public participation opportunities offered in connection with ARRC's capital projects and other programs. From 2001 to date, the ARRC has held hundreds of public meetings on various issues, including capital projects, its Disadvantaged Business Enterprise Program, and environmental concerns.

ARRC's public transportation schedules and brochures, as well as all notices for public meetings, contain information informing potential travelers and meeting attendees that special services are available by contacting ARRC. No individuals have ever contacted ARRC for assistance with English or any other language. When the need to speak with passengers in any language other than English has arisen, ARRC has been able to accommodate the passengers' needs through ARRC staff members who speak languages other than English.

3. The nature and importance of the program, activity or service provided by ARRC to the LEP community.

In the Alaska Railroad Corporation Act, AS 42.40.010 *et seq.*, the Alaska Legislature declared it is the policy of the State "to provide safe, economical, and efficient transportation to residents, businesses, visitors, and military installations in the state." Further, "[t]he continued operation of the Alaska Railroad ... is considered an essential government function of the state." AS 42.40.010. Thus, it is clear that the ARRC's provision of public transportation to the people of the State of Alaska, both LEP and non-LEP alike, is of great importance.

ARRC provides public transportation on a fixed route rail system from Seward, Alaska to Fairbanks, Alaska and points in between. Some ARRC services, such as the Glacier Discovery and the Hurricane Turn, serve areas in which the railroad is the only mode of transportation for the residents. These areas are not populated by LEP persons, however. ARRC's other programs and activities, such as its DBE program and capital projects programs, are of great importance to the communities along the Railbelt, and LEP persons may be impacted by those programs.

4. The resources available to ARRC and overall costs.

ARRC has assessed its available resources that could be used for LEP assistance. ARRC participated and supported a local partnership to develop a centralized Language Interpreter Center, which was established in 2007 as a demonstration project funded in part by FTA. Interpreters have received formal training on appropriate interpretation and translation.

IV. LEP Plan Outline for Providing Meaningful Access

Having considered the Department of Transportation's Four Factor test set forth above, the ARRC has developed the following steps for assisting LEP persons:

1. Perform a needs assessment and identify persons who may need language assistance. ARRC will:

- Analyze the onboard and online passenger survey data to determine if translation and language assistance needs, if any, are being met;
- Assess whether there are LEP persons in a project area who could be potentially impacted;
- Review and analyze attendees for the public meetings and activities;
- Monitor the ARRC's ridership survey results to keep apprised of changes; and
- Make the "I Speak Cards" available to passenger reservations and follow-up with reservations and on-board staff to determine usage. The "I Speak Cards" will be available to any other segment of the ARRC when desired for public activities.

2. Provide for oral language assistance

- Oral language assistance will be provided to LEP persons free of charge upon request;
- ARRC will ensure that it advertises and posts that LEP assistance is available;
- ARRC will continue to collaborate with community partners to support the centralized Language Interpreter Center; and
- If ARRC is unable to provide assistance to LEP persons through the use of the Language Interpreter Center or ARRC staff, ARRC will utilize reputable online translation services, such as Languageline.com or a similar program.

3. Notify LEP customers of availability of language assistance services

- ARRC will advertise that LEP assistance is available at no cost to LEP persons; and
- Notice of the availability of LEP assistance will be published in schedules and general announcements and will be posted in public areas, e.g., depots and open houses.

4. Translation of vital documents in languages other than English

ARRC will monitor the demographics of its customers and determine whether the translation of documents may be necessary.

5. Train Staff

ARRC Staff will be trained on ARRC's obligation to provide assistance to LEP persons. The training will include:

- Understanding Title VI and the ARRC's LEP responsibilities;
- The languages in which the ARRC can provide assistance;
- The use of the "I Speak Cards";
- ARRC reservation system and translation abilities;
- Documentation of language assistance requests;
- How to coordinate obtaining language assistance; and
- How to handle a Title VI or LEP complaint.

6. Develop guidance for employees

ARRC will provide guidance to employees on the following:

- Identifying and assessing language needs;
- Coordinating oral language assistance; including vendor charges for services, and procedures for accessing and requesting translation assistance;
- Coordinating written translation of materials and publications (as needed);
- Notifying persons of language assistance services; and
- Monitoring access to language assistance.

V. Monitoring, Assessing and Updating the LEP Plan

ARRC will monitor and evaluate its provision of assistance to LEP persons to ensure that they have meaningful access to ARRC programs and activities. ARRC will monitor and assess:

- The current LEP composition of ARRC's service area;
- The current communication needs of LEP persons;
- Whether existing assistance meets LEP needs;
- Whether staff is knowledgeable about policies and procedures and how to implement them;
- Whether sources of and arrangements for assistance are still current and viable.
- How many LEP requests have been made and how each was addressed;
- Whether the needs of LEP individual(s) have been met;
- Whether there have been changes in primary languages spoken in the service area;
- The need, if any, for the translation of documents;

- Technology changes, staff changes and changes in available resources;
- The adequacy of existing services;
- Whether the ARRC has fulfilled the purpose of the LEP Plan; and
- Whether any complaints have been received.

In order to monitor and assess ARRC's provision of assistance to LEP persons, ARRC will maintain records of the following:

- Race of LEP persons requesting assistance (voluntary);
- Ethnicity of LEP person requesting assistance (voluntary);
- Number of LEP persons in attendance at public meetings;
- Primary language of the population in a given project area;
- Number of LEP persons, by language group, who have received language services from ARRC.

VI. Dissemination of the ARRC LEP Plan

The LEP Plan is included as part the ARRCs Title VI Plan and is posted on the ARRC website at www.alaskarailroad.com. The notice of rights is posted on the internet, in ARRC facilities and railcars, and will be made available upon request from:

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 P.O. Box 107500
 Anchorage, AK 99510-7500
 Fax: (907) 265-2443 or email: sellerswarehamt@akrr.com
 (907) 265-2461

Guidance/Resources

The resources listed below will assist in implementing LEP requirements and may be used in conjunction with this LEP plan.

- U.S. Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, Federal Register Vol. 70, No. 239 (Dec. 14, 2005).
- U.S. Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, A Handbook for Public Transportation Providers, prepared by FTA Office of Civil Rights, April 13, 2007.
- U.S. Department of Transportation Guidance to Recipients on Special Language Services to Limited English Proficient Beneficiaries, Federal Register Vol. 66, No. 14, January 22, 2001.
- U.S. Department of Justice Policy Guidance, Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination Against Persons With Limited

English Proficiency, Federal Register Vol. 65, No. 159, August 16, 2000.

- U.S. Department of Justice Clarifying Memorandum, dated October 26, 2001. <https://www.justice.gov/crt/federal-coordination-and-compliance-section-201>.
- U.S. Department of Justice, Tips and Tools for Reaching Limited English Proficient Communities in Emergency Preparedness, Response, and Recovery, prepared by Civil Rights Division, 2016.
- The Alaska Language Interpreter Center, <http://www.akijp.org/language-interpreter-center/>.
- How to Engage Low-Literacy and Limited English Populations in Transportation Decision Making – US Department of Transportation, Federal Highway Administration, February 2006.
- U.S. Department of Justice, “I Speak” cards and/or Social Security Administration poster.
- Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance, <https://www.lep.gov/resources/selfassesstool.pdf>.