

HIRTA

Limited English Proficiency (LEP) Plan

Heart of Iowa Regional Transit Agency

HIRTA serves the counties of Boone, Dallas, Jasper, Madison, Marion, Story and Warren in Central Iowa

2026



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Introduction

This Limited English Proficiency (LEP) policy guidance clarifies the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and helps them meet those responsibilities to persons with Limited English Proficiency. It was 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 provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity receiving federal financial assistance. The Heart of Iowa Regional Transit Agency shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Purpose

This LEP Plan demonstrates compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166. It addresses persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. Such individuals may be eligible for language assistance with respect to a particular service, benefit, or encounter.

This Plan examines the services provided by the Heart of Iowa Regional Transit Agency (HIRTA), outlining the accommodations currently in place for persons with LEP as well as additional accommodations that could or should be made to improve accessibility to these services.

HIRTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services based on race, color, or national origin. This Plan serves as a guide for HIRTA administration and management in carrying out LEP-related activities.

Four Factors to Formulate a LEP Plan

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

1) Demography Factor: The number or proportion of people with LEP served or encountered in the eligible service population
2) Frequency of Contact Factor: The frequency with which people with LEP encounter the services, programs, or activities provided
3) Importance Factor: The nature and importance of the services, programs, or activities
4) Resources Factor: The resources available to the program and the costs of providing interpretation/translation services

Four Factor Analysis

1) Demography Factor

HIRTA assessed data from the 2020 Census on languages spoken at home and English-speaking ability in the United States. This data covers HIRTA's service area of Boone, Dallas, Jasper, Madison, Marion, Story, and Warren Counties.

The analysis shows that 92.48% of the population in HIRTA's region speaks only English. Of the remaining population, 2.41% speaks Spanish, 1.27% speaks Chinese, and 1.17% speaks other Indo-European languages. Spanish and Chinese speakers make up the two largest populations in the region who speak English less than "very well."

2) Frequency of Contact Factor

HIRTA assesses the frequency at which staff and drivers have or could possibly have contact with LEP individuals. This includes phone inquiries, driver interactions, and outreach or event participation.

People with LEP interact with HIRTA in the same ways as the general public when accessing transit services, including:

- Riding HIRTA and interacting with drivers
- Contacting HIRTA staff to schedule trips or request assistance
- Visiting the HIRTA office in person
- Attending public meetings and hearings
- Meeting with local human service agencies
- Getting schedule information by brochure, website, phone, or text
- Reporting a concern or compliment to HIRTA
- Completing a survey distributed by HIRTA

HIRTA tracks contacts with LEP individuals whenever a language barrier requires assistance. Over the past three years, telephone language assistance has been used more than 180 times to communicate with customers.

HIRTA regularly reminds staff of the language assistance services available to help communicate with customers with LEP, and contact information is posted in each staff member's work area. HIRTA tracks usage of language assistance through billing records.

3) Importance Factor

Transportation is vital for anyone accessing services across our seven-county region, particularly for individuals who are transit-dependent. This is especially significant in Perry, in Dallas County, where there is a dense concentration of Spanish speakers, making up 34.7% of the population.

4) Resources Factor

HIRTA annually assesses the resources available to support LEP assistance, including:

- The cost of professional interpreter and/or translation services
- The cost of electronic translation applications and devices
- Which documents should be translated, based on the needs of the LEP population
- An inventory of local organizations HIRTA could partner with for outreach and translation efforts
- The level of staff training needed to meet these objectives

After analyzing these four factors, HIRTA monitors conditions and conducts outreach to LEP individuals to ensure meaningful access to its services and programs.

Table 1: Population Demographics in the HIRTA Region

County	Census Year	Total Population	White		Black or African Am.		Hispanic or Latino Origin		American Indian or Alaska Native		Asian		Other		Two or more Races	
Boone County	2020	26,715	24,943	93.4%	301	1.1%	709	2.7%	65	0.2%	100	0.4%	251	0.9%	1,055	3.9%
Dallas County	2020	99,678	83,359	83.6%	2,698	2.7%	6,515	6.5%	224	0.2%	5,009	5.0%	2594	2.6%	5,794	5.8%
Jasper County	2020	37,813	34,866	92.2%	703	1.9%	1,087	2.9%	124	0.3%	215	0.6%	409	1.1%	1,496	4.0%
Madison County	2020	16,548	15,609	94.3%	50	0.3%	316	1.9%	25	0.2%	85	0.5%	115	0.7%	664	4.0%
Marion County	2020	33,414	31,156	93.2%	292	0.9%	700	2.1%	69	0.2%	401	1.2%	238	0.7%	1,258	3.8%
Story County	2020	98,537	81,046	82.2%	3,019	3.1%	5,032	5.1%	324	0.3%	5,461	5.5%	2675	2.7%	6,012	6.1%
Warren County	2020	52,403	48,539	92.6%	455	0.9%	1,658	3.2%	98	0.2%	383	0.7%	548	1.0%	2,380	4.5%
HIRTA Region		365,108	319,518		7,518		16,017		929		11,654		6,830		18,659	

Table 2: Individuals with Limited English Proficiency (LEP) in the HIRTA Region

Language Spoken	Boone County	Dallas County	Jasper County	Madison County	Marion County	Story County	Warren County	TOTAL REGION	Safe Harbor Provision %
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate		
Total:	24,927	83,553	34,969	15,295	31,317	92,954	47,811	330,826	
Speak only English	24,289	74,222	33,574	14,830	30,423	82,026	46,580	305,944	92.48%
Spanish:	483	3,736	558	259	460	1,902	568	7,966	2.41%
Speak English "very well"	310	2,076	319	242	334	1,431	435	5,147	1.56%
Speak English less than "very well"	173	1,660	239	17	126	471	133	2,819	0.85%
French, Haitian, or Cajun:	18	264	65	0	31	147	7	532	0.16%
Speak English "very well"	18	195	34	0	31	127	7	412	0.12%
Speak English less than "very well"	0	69	31	0	0	20	0	120	0.04%
German or other West Germanic languages:	17	181	75	71	136	467	94	1,041	0.31%
Speak English "very well"	17	160	69	33	72	467	28	846	0.26%
Speak English less than "very well"	0	21	6	38	64	0	66	195	0.06%
Russian, Polish, or other Slavic languages:	79	473	38	0	22	246	250	1,108	0.33%
Speak English "very well"	79	202	38	0	9	199	167	694	0.21%
Speak English less than "very well"	0	271	0	0	13	47	83	414	0.13%
Other Indo-European languages:	40	1,849	84	131	18	1,616	132	3,870	1.17%
Speak English "very well"	40	1,296	33	131	18	1,327	112	2,957	0.89%
Speak English less than "very well"	0	553	51	0	0	289	20	913	0.28%
Korean:	0	80	0	0	32	616	0	728	0.22%
Speak English "very well"	0	0	0	0	16	255	0	271	0.08%
Speak English less than "very well"	0	80	0	0	16	361	0	457	0.14%
Chinese (incl. Mandarin, Cantonese):	0	450	108	0	10	3,637	10	4,215	1.27%
Speak English "very well"	0	221	63	0	10	1,462	0	1,756	0.53%
Speak English less than "very well"	0	229	45	0	0	2,175	10	2,459	0.74%
Vietnamese:	0	239	20	4	0	556	104	923	0.28%
Speak English "very well"	0	89	5	4	0	184	57	339	0.10%
Speak English less than "very well"	0	150	15	0	0	372	47	584	0.18%
Tagalog (incl. Filipino):	0	93	9	0	66	249	0	417	0.13%
Speak English "very well"	0	70	7	0	42	200	0	319	0.10%
Speak English less than "very well"	0	23	2	0	24	49	0	98	0.03%
Other Asian and Pacific Island languages:	1	1,202	30	0	107	930	66	2,336	0.71%
Speak English "very well"	0	1,091	30	0	88	724	66	1,999	0.60%
Speak English less than "very well"	1	111	0	0	19	206	0	337	0.10%
Arabic:	0	474	240	0	0	189	0	903	0.27%
Speak English "very well"	0	332	89	0	0	152	0	573	0.17%
Speak English less than "very well"	0	142	151	0	0	37	0	330	0.10%
Other and unspecified languages:	0	290	168	0	12	373	0	843	0.25%
Speak English "very well"	0	81	153	0	12	191	0	437	0.13%
Speak English less than "very well"	0	209	15	0	0	182	0	406	0.12%

Safe Harbor Provision:

The U.S. DOT's LEP guidance references the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding the translation of written materials for populations with LEP.

In short, the Safe Harbor Provision recommends a written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less. It also adds the translation of non-vital documents, if needed, can be provided orally. Translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to individuals with LEP through competent interpreters where oral language services are needed and reasonable.

Table 2 provides a detailed breakdown of all the language group populations, as defined in the American Community Survey.

Two language groups within HIRTA's seven county region met the above Safe Harbor Provision criteria.

Spanish and Chinese (including Mandarin & Cantonese). Although these groups constituted less than 5% of the total population, greater than 1,000 people fell within these 2 groups.

See Figure 1 for a map summarizing limited English proficiency populations by census tract within the AAMPO region.

In the HIRTA region, those who are Spanish-speaking LEP constitute the 5% or 1,000 persons of population threshold for which written

translations of vital documents should be provided to meet the safe harbor standard.

HIRTA complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language.

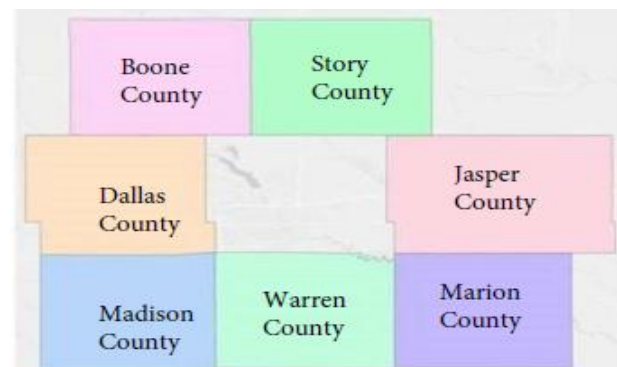
With respect to Title VI information, the following are available in Spanish:

- FTA Title VI Program
- HIRTA Brochure
- HIRTA Service Policies
- Limited English Proficiency (LEP) Plan
- Public Participation Plan
- Reasonable Modification Complaint
- Reasonable Modification Policy
- Reasonable Modification Request
- Title VI Nondiscrimination Notification
- Title VI Complaint Form
- Title VI Complaint Process
- Welcome Packet

The 2020 American Community Survey data includes Chinese (including Mandarin and Cantonese) as a new language population group within HIRTA's region.

HIRTA has determined there have been no reports of language difficulty or requests from riders for alternative language translation in Chinese. However, in 2027 HIRTA will begin translating vital documents such as the Title VI Complaint Forms, the Title VI reporting process, brochure and service policies, into Chinese as required by the Safe Harbor provision.

Figure 1



Identify Need for Language Assistance

Below are tools to help identify individuals who may need language assistance:

- Network with local human service organizations (such as Social Services and Public Health) to help identify LEP groups and individuals most in need of assistance, and to help distribute information about HIRTA's transit services
- Network with local faith-based and community-based organizations to help identify LEP groups and individuals most in need of assistance, and to help distribute information about HIRTA's transit services
- Review requests for language assistance from past meetings and events to anticipate possible needs at upcoming meetings
- When an interpreter is needed, staff will attempt to access language assistance services from a professional service if we don't have someone on staff available.

HIRTA Staff Training

HIRTA provides all staff with a copy of the LEP Plan and trains them on the procedures to follow. This training is part of the new hire orientation process and covers the following topics:

- Understanding Title VI policy and LEP responsibilities
- HIRTA's language assistance services and how to use them
- How to document language assistance requests
- How to handle a Title VI and/or LEP complaint

Should the need arise for additional staff in the future, HIRTA will consider candidates with bilingual capabilities.

Outreach Techniques

HIRTA currently uses a variety of outreach approaches, described below:

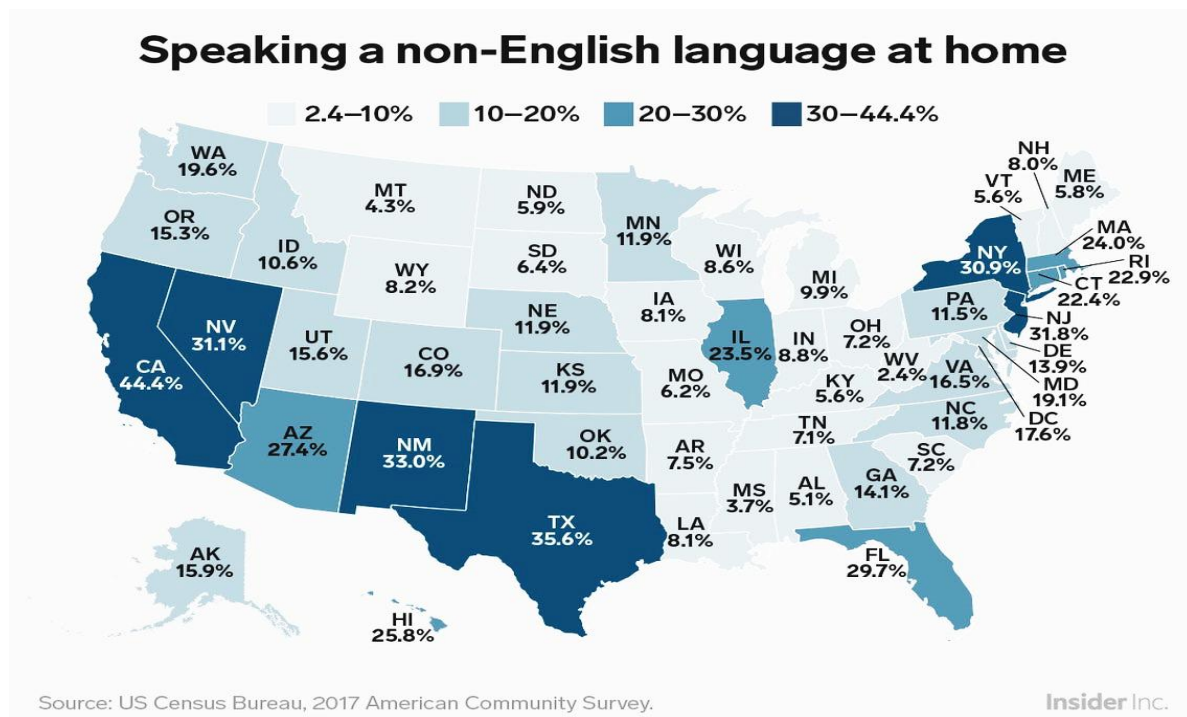
- When staff know they will present a topic of potential importance to a person with LEP or will host a meeting or workshop in a location with a known concentration of individuals with LEP, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language based on the known LEP population in that area.
- Interpreters are made available as needed.
- Key print materials, including but not limited to brochures and the rider's guide, are translated and made available in communities where a specific, concentrated LEP population has been identified and/or where a request has been made. HIRTA currently has materials available in Spanish.
- HIRTA participates in community activities that promote its transit services. These activities give a broad cross-section of the community access to transit information, including brochures and fliers.
- HIRTA has one bilingual staff member to better serve Spanish-speaking customers.



Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, HIRTA will follow the Title VI Program update schedule for the LEP Plan. Each update should examine all components of the Plan, including:

- Contact information for individuals with LEP
- How the needs of individuals with LEP have been addressed
- The current LEP populations in the service area or encountered by HIRTA
- Whether the need for translation services has changed
- The frequency of encounters with LEP language groups
- Available resources, potential sources of additional resources, and associated costs
- Staff knowledge and understanding of the LEP Plan, language assistance resources, and how to serve individuals with LEP
- Whether previously identified sources of assistance remain available
- Whether local language assistance programs have been effective and sufficient to meet need
- Whether HIRTA's financial resources are sufficient to fund the language assistance needed
- Whether HIRTA has fully complied with the goals of this LEP Plan
- Whether any complaints have been received regarding HIRTA's services failing to meet the needs of individuals with LEP
- Whether HIRTA's available resources, such as technology, staff, and funding, have changed



Review Results:

- Reviewed and updated LEP Plan 09/24/2026
- HIRTA believes it has fully complied with the goals of the previous LEP Plan.
- There have been no complaints from individuals with LEP over the past three years.

Since the last Title VI update, following data has been compiled:

Documented count of contacts with LEP individuals:	250
Use of interpretive over the phone language services:	187
Determination if interpretative services have been effective and sufficient to meet the needs:	HIRTA has determined that its current interpretive services have been effective and sufficient in meeting the needs of the LEP population it has served to date. This determination is based on our experience in providing these services and the absence of complaints or reported barriers to access. HIRTA will continue to monitor language assistance needs and will update its services as necessary if the LEP population within its service area changes or if gaps in access are identified.

Dissemination of the HIRTA Limited English Proficiency Plan

Copies of the LEP Plan are available to anyone who requests them by phone, in person, mail, or email. Individuals with limited English proficiency may also request a copy of the plan in another language. The plan is also available on our website at www.ridehirta.com

Any questions or comments regarding this plan should be directed to the CEO.

For information about this Plan, contact:

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