

## Language Assistance Plan (LAP)

### **Efforts to Identify Additional Language Assistance Needs**

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on Limited English Proficient (LEP) persons because such conduct constitutes national origin discrimination. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121, August 16, 2000 directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

The Federal Transit Administration (FTA) Circular 4702.1B provides a summary of the LEP requirements as they apply to FTA recipients; recipients are encouraged to review DOT’s LEP guidance (70 FR 74087, Dec. 14, 2005). “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers,” published on April 13, 2007, provided additional guidance for recommended actions and methodologies for ensuring a compliant program for providing language assistance to LEP populations.

Chapter IV part 4 of the Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and subrecipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

CTDOT being a recipient of FTA assistance is required to develop an implementation plan to address the needs of the LEP populations they serve. The CTDOT Implementation Plan includes the following elements:

- Identifying LEP individuals
- Providing language assistance
- Training staff
- Providing notice to LEP persons
- Monitoring and updating the plan
- Language initiatives planned for the next twelve (12) months

### **Identifying LEP Individuals:**

CTDOT has conducted a Four-Factor Analysis to determine the following:

- Identify LEP populations in the State who may need language assistance.
- Frequency of which LEP persons come into contact with the program
- Importance of programs and services to LEP individuals
- Resources available and costs of providing language assistance services

CTDOT looked at the occurrence of LEP populations statewide meeting or exceeding “Safe Harbor” thresholds (5% or 1,000 individuals, whichever is less) for the purpose of identifying impacted individuals and to determine which languages require additional outreach or translations to ensure equitable access to CTDOT programs and benefits. CTDOT included anyone who spoke English “less than very well.” CTDOT looked at the Safe Harbor populations based on the eleven (11) bus service areas and the three (3) rail lines that service Connecticut. This allows CTDOT to do targeted outreach to LEP populations that reside in areas affected by service-specific, rather than state-wide, changes.

### **The Service Areas were defined as the following:**

#### **New Haven Rail Line (Metro North):**

The “New Haven Rail Line Service Area” map (September 2015) includes the New Haven Main line, and the New Canaan, Danbury, and Waterbury Branch Lines.

Metro North Rail operates all lines seven (7) days a week. The lines on the map extend from New Haven Union Station to the Connecticut/New York border near Greenwich, as well as the station stops for the branch lines that extend to New Canaan, Danbury, and Waterbury.

#### **Amtrak New Haven – Springfield:**

The “Amtrak New-Haven – Springfield Rail Line Service Area” map (September 2015) includes the line currently operated by Amtrak that runs from New Haven, CT to Springfield, MA.

Amtrak operates the line seven (7) days a week. The map shows the CT portion of the New Haven – Springfield line, and includes the defined service areas based on a 2.5 mile radius buffer around the rail stations of New Haven – Union, New Haven – State Street, Wallingford, Meriden, Berlin, Hartford – Union, Windsor, and Windsor Locks.

#### **Shore Line East Rail:**

The “Shore Line East Rail Line Service” area map (September 2015) includes the Shore Line East commuter rail service between New London and New Haven.

Amtrak operates Shore Line East for CTDOT seven (7) days a week. The map shows the Shore Line East line which runs from New Haven to New London, and includes the defined service areas based on a 2.5

mile radius buffer around the rail stations of New Haven – Union, New Haven – State Street, Branford, Guilford, Madison, Clinton, Westbrook, Old Saybrook, and New London.

#### **Hartford Division:**

The “Hartford Division Bus Service Area” map (September 2015) includes:

- local bus routes in the Hartford, New Britain, and Bristol divisions of CTtransit,
- the CTfastrak service area, and
- CTtransit Express routes that serve Hartford.

CTtransit Hartford Division operates seven (7) days a week. CTtransit's Hartford Division makes connections with Middletown Transit District, and CTtransit New Britain, Bristol, New Haven, and Waterbury divisions. CTfastrak services are also included in the Hartford Division.

The routes on this map extend north to the Massachusetts border and south to New Haven, west to Torrington and Waterbury, and east to Windham, Colchester, and Old Saybrook.

#### **New Haven Division:**

The “New Haven Division Bus Service Area” map (September 2015) includes local bus routes in the New Haven division of CTtransit.

CTtransit New Haven Division operates seven (7) days a week, connecting with other state-owned or subsidized bus services in Meriden, Wallingford, Milford, and the lower Naugatuck Valley areas, as well as with the New Haven Line and Shore Line East rail services.

The routes on this map extend north to Meriden and Waterbury, west to Seymour and Milford, and east to Madison.

#### **Stamford Division:**

The “Stamford Division Bus Service Area” map (September 2015) includes local bus routes and one (1) express route in the Stamford division of CTtransit.

CTtransit Stamford Division operates seven (7) days a week, connecting with services in Norwalk, with the New Haven Line in several locations, the Harlem Line on Metro-North Railroad, and with Bee-Line buses in Westchester County New York. The Stamford Division also operates the I-BUS, an express service between downtown Stamford and White Plains, New York.

The routes on this map extend east to Norwalk and Darien and west to Greenwich.

#### **Waterbury Division:**

The “Waterbury Division Bus Service Area” map (September 2015) includes local bus routes in the Waterbury division of CTtransit.

CTtransit Waterbury Division operates fixed route services seven (7) days a week in the Waterbury area. Fixed route bus service is provided to Waterbury, Watertown, Middlebury, Wolcott, Prospect and Naugatuck.

The routes on this map extend north of Waterbury to Watertown, south to Naugatuck and Beacon Falls, east to Southington and west to Middlebury.

#### **New Britain-Bristol Division:**

The “New Britain-Bristol Division Bus Service Area” map (September 2015) includes local bus routes in the New Britain-Bristol division of CTtransit.

CTtransit New Britain-Bristol Division operates ten (10) bus routes seven (7) days a week in Berlin, New Britain, Cromwell, Newington, Hartford, Plainville, Bristol and Meriden.

The routes on this map extend north of New Britain to West Hartford, south to Meriden, east to Newington and Hartford, and west to Bristol and Plainville.

#### **Meriden-Wallingford Division:**

The Meriden-Wallingford Division Bus Service Area” map (September 2015) includes local bus routes in the Meriden-Wallingford division of CTtransit.

CTtransit Meriden-Wallingford Division operates four (4) local fixed routes, three (3) in Meriden Monday through Saturday and one (1) route in Wallingford, Monday through Friday.

The routes on this map extend throughout Meriden and south of Meriden to Wallingford.

#### **Windham Region Transit District:**

The “Windham Region Transit District Bus Service Area” map (September 2015) includes local routes in the Windham Region Transit District.

The Windham Region Transit District operates fixed route rural bus service in Mansfield and Windham, Monday through Saturday, demand-response service in Ashford, Chaplin, Columbia, Coventry, Hampton, Lebanon, Mansfield, Scotland, Willington, and Windham, Monday through Friday, and commuter bus service to Norwich seven (7) days a week.

The routes on this map extend north of Windham to Mansfield and west to Columbia, south to Norwich and east to Brooklyn.

#### **Northwest CT Transit District:**

The “Northwest CT Transit District Bus Service Area” map (September 2015) includes local rural routes in the northwestern area of Connecticut.

The Northwestern CT Transit District provides service in Torrington, Harwinton, Winchester, Litchfield, Morris, Kent, Sharon, Falls Village, Colebrook, Goshen, Salisbury, Norfolk, New Hartford, Cornwall, Canaan, and Barkhamstead. Service operates over five (5) fixed routes Monday through Friday and on one (1) route on Saturdays.

The routes on this map extend north of Goshen to Norfolk, Canaan and Salisbury, west to Cornwall and Sharon, east to Torrington and south to Litchfield.

#### **Estuary Transit District:**

The “Estuary Transit District Bus Service Area” map (September 2015) includes local routes in the Estuary Transit District.

The Estuary Transit District serves Chester, Clinton, Deep River, Durham, Essex, East Haddam, Haddam, Killingworth, Lyme, Old Lyme, Old Saybrook and Westbrook. Connections are made in Madison, Middletown and New London to neighboring bus services, Monday through Saturday.

The routes on the map extend north of Old Saybrook to Chester and Middletown, east to East Lyme and New London, and west to Madison.

#### **Northeast CT Transit District:**

The “Northeast CT Transit District Bus Service Area” map (September 2015) includes local routes in the Northeastern CT Transit District.

The Northeastern CT Transit District provides service on routes in Brooklyn, Killingly, Putnam, and Thompson, Monday through Friday.

The routes on this map extend north of Putnam to Thompson and south to Killingly.

#### **Northeast Rural Transit District Elderly/Disabled:**

The “Northeast Rural Transit District Elderly/Disabled Bus Service Area” map (September 2015) includes towns that are provided Call & Ride service in the Northeastern CT Transit District.

The Northeastern CT Transit District provides Call & Ride services to the towns of Brooklyn, Canterbury, Eastford, Killingly, Plainfield, Putnam, Pomfret, Thompson and Woodstock, Monday through Friday.

The routes on this map extend north of Pomfret to Woodstock and Thompson, south to Canterbury and Plainfield, east to Killingly and west to Eastford.

Based on each service area, CTDOT calculated the number and percentage of LEP populations by language. If the number of LEP persons exceeded five percent (5%) of the total population, it would be considered an LEP language. If the LEP population exceeded five percent (5%) or 1,000 individuals, it would be considered a Safe Harbor language. Based on these calculations, it was determined that Spanish was the only language that exceeded five percent (5%) in any individual bus or rail service area.

The following languages below have been identified as LEP and Safe Harbor Languages for each service area. The number and percentage of speakers for each language for each Service Area is also included.

**New Haven Rail Line (MNR) –**

Total Population: 1,170,602

1. Spanish – 82,432 (7%)
2. Portuguese – 11,656 (1%)
3. Italian – 4,497 (.4%)
4. French/Creole – 4,437 (.4%)
5. Chinese – 4,297 (.4%)
6. Polish – 3,862 (.3%)
7. French/Patois Cajun – 2,696 (.2%)
8. Russian – 2,289 (.2%)
9. Vietnamese – 1,694 (.1%)
10. Greek – 1,395 (.1%)
11. Arabic – 1,253 (.1%)
12. Korean – 1,076 (.1%)
13. Japanese – 1,007 (.1%)
14. Urdu – 1,002 (.1%)

**Amtrak New Haven-Springfield –**

Total: 601,342

1. Spanish – 48,790 (8.1%)
2. Polish – 3,882 (.6%)
3. Chinese – 2,349 (.4%)
4. Italian – 2,010 (.3%)
5. French/Patois Cajun – 1,659 (.3%)
6. Portuguese – 1,614 (.3%)
7. Vietnamese – 1,305 (.2%)
8. Russian – 1,261 (.2%)

**Shore Line East Rail –**

Total: 366,760

1. Spanish – 20,253 (5.5%)
2. Chinese – 1,694 (.5%)
3. Italian – 1,192 (.3%)

**Hartford Bus Service Area –**

Total: 1,684,493

1. Spanish – 77,214 (4.6%)
2. Polish – 11,690 (.7%)
3. Italian – 6,389 (.4%)
4. Portuguese – 5,222 (.3%)
5. Chinese – 5,180 (.3%)
6. French/Patois Cajun – 4,350 (.3%)
7. Vietnamese – 2,680 (.2%)
8. Russian – 2,281 (.1%)
9. Korean – 1,624 (.1%)
10. Arabic – 1,616 (.1%)
11. Serbo-Croatian – 1,136 (.1%)
12. Urdu – 1,117 (.1%)

**New Britain-Bristol Bus Service Area –**

Total: 704,893

1. Spanish – 41,614 (5.9%)
2. Polish – 9,682 (1.4%)
3. Italian – 3,133 (.4%)
4. Portuguese – 2,426 (.3%)
5. French/Patois Cajun – 2,348 (.3%)
6. Chinese – 1,968 (.3%)
7. Vietnamese – 1,695 (.2%)
8. Russian – 1,388 (.2%)

**New Haven Bus Service Area –**

Total: 794,318

1. Spanish – 35,951 (4.5%)
2. Chinese – 3,527 (1.4%)
3. Italian – 3,527 (.4%)
4. Portuguese – 2,594 (.3%)
5. Polish – 2,244 (.3%)
6. French/Patois Cajun – 1,334 (.2%)
7. Korean – 1,005 (.1%)

**Stamford Bus Service Area –**

Total: 238,899

1. Spanish – 22,582 (9.5%)
2. French/Creole – 2,359 (1%)
3. Polish – 1,650 (.7%)
4. Italian – 1,221 (.5%)
5. Russian – 1,060 (.4%)

**Waterbury Bus Service Area –**

Total: 273,326

1. Spanish – 10,684 (3.9%)
2. Portuguese – 2,478 (.9%)
3. Italian – 1,513 (.6%)

**Windham Bus Service Area –**

Total: 144,878

1. Spanish – 4,831(3.3%)
2. Chinese – 1,592 (1.1%)

**Meriden-Wallingford Bus Service Area –**

Total: 100,815

1. Spanish – 6,035 (6%)

**Estuary Bus Service Area –**

Total: 161,410

1. Spanish – 1,785 (1.1%)

**Northwest Bus Service Area –**

Total: 90,757

1. Spanish – 1,548 (1.7%)

**Northeast Bus Service Area –**

Total: 53,801

**Northeast Elderly Disabled Rural Bus Service Area –**

Total: 78,341



**LEP and Safe Harbor Languages Statewide:**

A total of twenty-one (21) languages met the Safe Harbor threshold based on statewide LEP populations. There were no languages that reached five percent (5%) of the population statewide. The following LEP languages and the number of speakers for each language state-wide are as follows:

Total Population:	3,574,097	
Spanish or Spanish/Creole:	130,864	(3.66%)
Portuguese:	17,886	(.5%)
Polish:	15,612	(.44%)
Italian:	12,121	(.34%)
Chinese:	10,118	(.28%)
French:	7939	(.22%)
Russian:	5003	(.14%)
French Creole:	4908	(.14%)
Vietnamese:	3981	(.11%)
Korean:	3639	(.1%)
Greek:	2358	(.07%)
Gujarati:	2163	(.06%)
Serbo-Croatian:	2105	(.06%)
Tagalog:	2033	(.06%)
Arabic:	1999	(.06%)
Urdu:	1766	(.05%)
German:	1712	(.05%)
Hindi:	1551	(.04%)
Laotian:	1412	(.04%)
Japanese:	1328	(.04%)
Cambodian:	1163	(.03%)
Total LEP Population:	231,661	(6.48%)

CTDOT will utilize both the Service Area and Statewide identified LEP Languages, in order to determine the needed outreach to LEP communities, dependent upon the type of information and region affected.

**Providing Language Assistance:**

Over the next year key activities will be taken to address the unmet needs for language services, and to develop and implement a strong program of enhanced language assistance services.

CTDOT will enhance its outreach to assess the current language gaps in the dissemination of vital information to current users. CTDOT will seek to identify new potential customers who may not be accessing the system due to language barriers.

The data collection strategies to be utilized include:

- The collection of data from drivers, telephone call center employees, ticket agents, and security personnel regarding interactions with LEP population, language spoken, and nature of information request. CTDOT is working with CTtransit and Metro North to gain information from their front line employees.
- Website Data
- Bus Passenger Survey Data
- Rail Passenger Survey Data
- Collect information from Community Based Organizations (CBO) and Faith Based Organizations (FBO) relative to language gaps and information needs for LEP persons they serve for the purpose of having a more direct outreach to Safe Harbor populations and to provide translation services to those populations as CTDOT identifies the need. Office of Contract Compliance has compiled a database of CBOs and FBOs and will utilize the CBOs to help with outreach to the LEP populations. Outreach will be on-going to these Organizations.
- Collecting feedback information from public hearings and public meetings regarding language assistance requests or issues of concern from LEP population;
- Monitoring Voiance, CTDOT's over the phone interpretation service provider, for requested languages.

CTDOT will reach out to a broad base of community organizations state-wide in order to assure enhanced public involvement in the transportation and transit service planning processes. A natural by-product of this initial outreach effort will be to learn first-hand what types of special language assistance services would best meet the needs of the agencies and their LEP clients. Utilizing the information provided by the CBOs and FBOs, strategies can be developed to enhance targeted efforts to address the needs of LEP individuals.

#### **Additional Language Assistance Services to be provided by CTDOT**

The list of language assistance services has been developed and will continue to be updated. There are a number of resources that can provide access to LEP individuals. These include, but are not limited to:

- Utilizing Voiance, CTDOT's over-the-phone interpretation service provider.
- Utilizing CTDOT bilingual staff to act as interpreters and translators.
- Using "I Speak" cards to help determine the range of different languages being encountered routinely.
- Translation of vital documents.
- Pooling resources and standardizing documents to reduce translation needs.
- Using qualified translators and interpreters to ensure that documents provide accurate interpretations that do not cause delay or other costs.
- Media advertising in alternative languages by utilizing a standard announcement for the type of change, and providing contact information should additional language assistance be needed.
- Continuing to develop partnerships with community organizations that serve LEP populations.

## Language Services

There are two (2) main ways to provide language services: oral interpretation either in person or via telephone interpretation services and written translation. Oral interpretation can range from on-site interpreters for critical services to commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document.

When it is requested or otherwise determined that interpretation or translation services are needed, every reasonable effort will be made to provide services. Services will be provided offered free of charge.

## Voiance

In order to provide over-the- phone translation services for those who need language assistance, CTDOT has contracted with Voiance. This service allows for someone who is not fluent in English to call into CTDOT with questions or requests for services or general information. CTDOT is able to call into Voiance, who will provide an interpreter to translate both ends of the call and provide the individual with the needed assistance. This service can also be utilized for in-person contacts with LEP persons by utilizing the speaker function on the phone, with the CTDOT employee dialing in to the Voiance line, and both the CTDOT employee and the LEP individual speaking to the translator over the phone.

CTDOT has sent notification to all known Community and Faith Based Organizations to inform them of the availability of this service and encourage them to disseminate this information to their members. CTDOT has assigned Voiance access codes to 114 CTDOT employees and has provided language assistance training to the majority of these employees. Additional training sessions will also be scheduled for any employees who were unable to attend the initial training sessions. CTDOT will track the usage of this service to determine the languages requested and the types of information requested.

See Voiance Access Procedures and Guidelines, Connecticut Department of Transportation Employee User Guide ([attachment 31](#)).

## Procedures

CTDOT provides notice of “right to free language assistance” at no cost for non-vital yet important outreach documents, including project fact sheets, meeting notifications and other open house materials. CTDOT will continue to determine which documents are necessary to translate, the appropriate format to most effectively communicate the message, efforts necessary to provide timely relevant information about CTDOT programs and services to LEP communities, and how best to assess and monitor the effectiveness of CTDOT’s LAP Plan.

CTDOT will translate vital written materials into the languages identified as frequently encountered in compliance with the Four Factor Analysis and with Safe Harbor thresholds, or for populations likely to be affected by specific actions in a particular service area. Through the utilization of Service Area Maps (and further dividing these according to individual census tracts), CTDOT will be able to specifically

target the areas affected by service/fare changes or other changes to Transit operations that could affect these communities, and ensure the outreach will be directed to the specific LEP communities affected. The decisions regarding which documents to be translated may be impacted by feedback from the LEP community. This feedback will be collected by front-line employees who are receiving training in new procedures to be followed when they encounter an LEP customer including the use of “I Speak” cards for bus and train operators and other tools for other front-line employees such as telephone information center agents. This improved outreach will be supplemented by the use of printed documents to be placed in locations where customers or potential customers go for transit information, services, or questions.

As outreach is continuously conducted, vital written materials will be either fully translated in LEP Languages or a sufficient summary will be provided detailing information and providing contact information should additional information and/or further assistance be required. CTDOT has implemented a schedule for translating all vital documents in the top eight statewide Safe Harbor languages. The eight languages include all languages that have been identified as LEP in any service area as well as the most frequently spoken LEP languages in Connecticut. The eight languages cover eighty-eight percent (88%) of the entire LEP population in Connecticut. Additionally, CTDOT will consider all requests for language assistance.

Vital documents for bus transit will include:

- Service change notices – as they occur.
- Fare change notices – as they occur.
- Title VI notice to beneficiaries (including complaint procedure) – Completed June 2016.
- Notices of public hearings, with fully implemented Department process of public notifications – January 1, 2017.
- Applications or instructions on how to participate in a recipient’s program or activity or to receive recipient benefits or services (e.g., ADA Paratransit applications) – October 1, 2016.

The following additional documents are defined as vital documents by Metro-North and will be provided to Connecticut by Metro-North as our service contractor, following the same requirements as the Transit documents.

- Basic critical customer information on how to use and access rail services such as peak/off peak/monthly ticket purchasing instructions (currently in Spanish online and at stations with fare information poster) – October 1, 2016.
- Rail service change information – as they occur.
- Fare change notice – as they occur.
- Title VI notice to beneficiaries (including complaint procedure) – Completed June 2016.

In addition to the vital documents, CTDOT has also begun work on translating general information sheets on how to use its services, including information on buying a ticket, parking, transfer information, and Title VI complaint information. These documents will be translated into the top eight Safe Harbor

languages. This informational document has been completed for the New Haven Line. Work is currently underway to develop a similar document for Shore Line East and the CTtransit bus service.

CTDOT ensures that LEP persons have meaningful access to all FTA programs and activities. Whenever CTDOT holds a public hearing/meeting (whether during Environmental Assessment, Design, or service planning/monitoring), the legal notice regarding the hearing/meeting will indicate that LEP persons requiring language assistance may make reasonable requests to CTDOT within the time period provided. CTDOT staff in need of translation services at any hearing may consult Department of Administrative Services list of contracted service providers for translation and interpreting services. Metro North will follow the same procedure. For examples of MNR translated documents for Connecticut (see Attachment 30).

#### Language Assistance

CTDOT has a listing of firms that provide translation and interpretation services. See “A Reference Guide to Translation and Interpretation Services” (see attachment 11).

CTDOT also ensures that agency resources are utilized to address all immediate needs for interpretation and translation that may cause any barriers to the LEP population.

CTDOT has identified community-based organizations in the various service areas and has administered a survey and consulted with them to determine language gaps.

#### Training:

CTDOT has developed a training curriculum and a Title VI Training booklet. The training booklet provides a Title VI Overview with a brief history of the regulations and authorities; the FTA Title VI requirements; explains the Limited English Proficiency (LEP) requirements; explains the Four Factor Analysis and Safe Harbor requirements; and provides an explanation of Vital Documents. The PowerPoint presentation is included in the Title VI Training Booklet: “Title VI “The Basics”. The training was most recently conducted and completed with the CTDOT Title VI Liaisons in January 2015. Training is held every two years or as requested by the subrecipients.

- As training is completed for customer service agents, data is being collected in all the CTtransit travel information centers for interactions with non-English callers and how such calls are referred out to language assistance/translation contractors. Information centers already have Spanish-speaking agents, but the additional data can be used to better match demand with personnel assignments.
- For the rail service, LEP calls are handled in the following manner: several Customer Service Representatives are bilingual and are able to provide information in Spanish. If the Customer Service Representative does not know the customer’s native language, they are trained in how to determine if a caller needs further translation assistance. They then call the AT&T Language Line which provides support for customer inquiries in foreign languages. The Customer Service Representative then provides the relevant travel or service information via an interpreter who

speaks in the customer's native language. This service is accomplished via a three-way conference call and up to 180 languages are available under this contracted service.

CTDOT meets with administration representatives from CTtransit and Metro North on a quarterly basis to discuss Title VI activities, complaints, outreach activities, and Title VI compliance efforts. Discussions include the use of language assistance measures, such as Voiance, the process and procedures for handling Title VI complaints, strategies for outreach to LEP/EJ communities, and other methods for meeting Title VI requirements.

The administration representatives will then train their front line employees (including drivers, customer service representatives, operation supervisors, and other employees who have direct access to the public), which will include how to provide service to LEP customers (whether in person, by phone, or written communication), how to use phone translation service, providing Title VI policy in the employee handbook, and how to monitor encounters with LEP individuals.

In addition to the training given to CTDOT service providers, CTDOT is also working on including a Title VI component to the CTDOT employee orientation training. This would include ensuring understanding of what Title VI is, explaining the Title VI program is a department-wide responsibility, providing training on working with the LEP community (whether in person, by phone, or written communication), how to be in compliance with CTDOT's Title VI program, how to handle Title VI complaints, etc.

**Providing Notice to LEP Persons:**

CTDOT has translated its Title VI Notice to Beneficiaries into the top eight identified safe harbor languages. The document has been posted, in nine languages (including English), on the CTDOT website under the Non-Discrimination/Title VI Program webpage.

CTDOT will be adding the following statement on its website in the top eight identified safe harbor languages, "For language assistance for transit services, please call (XXX) XXX-XXXX." If language assistance is needed and an LEP individual calls into this number the receiver will access Voiance to interpret the phone call and provide the LEP caller with the information they are requesting.

CTDOT frequently consults with the CBOs and FBOs regarding public meetings and hearings, service and fare changes, available language services to the LEP community (such as Voiance phone translation), and other programs, activities, and benefits available to the LEP community. CTDOT encourages their participation to ensure their needs and interests are known and addressed. When communicating with the CBOs and FBOs, CTDOT provides instructions on how to notify the department if interpretation services are needed, or if additional translations are needed.

CTDOT provides notice of "right to free language assistance". CTDOT will continue to determine which documents are vital for translation and choose the format(s) to most effectively communicate the messages contained in the vital documents; provide timely relevant information about CTDOT programs and services to LEP communities; and develop a means to assess and monitor the effectiveness of CTDOT's LAP.

### **Monitoring and Updating the LAP Plan:**

CTDOT will monitor its LAP on an ongoing basis to ensure new LEP populations are identified and addressed. The plan will be reviewed each year and changes will be made as needed, but at a minimum the plan will be updated every three years to coincide with the CTDOT's Title VI submission to FTA. CTDOT will on an annual basis solicit feedback from the CBOs that serve LEP populations, and update the directory of CBOs/FBOs as needed. CTDOT will also monitor the LEP plan to ensure that it is effective. The plan will be evaluated annually unless it is determined that more frequent evaluations are necessary. Close attention will be given to requests for language assistance, census data changes and updates, complaints, feedback from community based organizations, faith based organizations, feedback from customers, changing technology or new resources available to provide language assistance, and other information that would enhance and help evaluate the effectiveness of the plan. Furthermore, CTDOT will include Title VI demographic questions as part of its ridership surveys in order to evaluate what LEP communities are included as part of CTDOT's ridership, and whether there are any issues or concerns from them receiving CTDOT's programs or benefits. Should any of these resources reveal issues with CTDOT's current LAP plan, CTDOT will make the necessary revisions and/or methods for providing information/outreach to the public to ensure no one is denied access to programs or benefits due to language barriers or their national origin.

The Title VI Workgroup meets on a quarterly basis, or on an as needed basis, to discuss and complete the tasks determined in the LEP Timeline. The workgroup works on the tasks associated with the implementation of the Title VI Program requirements, including the LEP Plan and to discuss any trends or patterns requiring attention. The workgroup is guided by an agenda and meeting minutes, as well as assignment due dates to track assignment progress. All members of the workgroup provide research, ideas and solutions, strategies and concepts that assist in the developments of a meaningful Title VI/LEP Plan.

In addition to the quarterly meetings with CTtransit and Metro North Rail, which includes status updates and monitoring of their Title VI programs, CTDOT is also developing a quarterly Title VI Activity Report, to provide a written summary of Title VI activities, outreach events, etc. This will allow CTDOT to continuously monitor transit related activities for Title VI Compliance.

### **Initiatives:**

CTDOT has laid out a set of activities and has drafted a schedule for design and implementation of the various tasks and products committed to in the LAP. The calendar commitments are stated in the federal fiscal year calendar.

Based on a review of the data and conclusions developed as a result of the Four-Factor Analysis a determination was made that the most prominent group of LEP persons speak Spanish. CTDOT has also taken steps to ensure that considerations relative to Safe Harbor are addressed.

- Consistent with the Four-Factor Analysis, CTDOT will translate vital documents in the top eight Safe Harbor Languages (Spanish, Italian, Chinese, Portuguese, Polish, French/Patois Cajun,

Russian, and French Creole), which compose eighty-eight percent (88%) of the state's LEP population, as dictated by the Safe Harbor provisions in the various service areas. Translations into any additional languages that fall within the Safe Harbor Thresholds will be initiated as determined necessary.

- CTDOT has provided notice to all identified Community and Faith Based Organizations of the availability of Voiance and encourage that this information be shared with their members and/or clients.
- CTDOT will post the following sentence on its website in the top eight safe harbor languages, "For language assistance for transit services, please call (XXX) XXX-XXXX".
- A resource list has been developed of translation and interpreting services by geographic area for use at public meetings, hearings and to translate important documents.
- CTDOT has printed "I Speak" cards for drivers and customer service and supervisory employees in order to assist LEP individuals, and will disseminate them as part of the front-line employee training.
- Consistent with the Four-Factor Analysis, determine which areas or languages require further research in order to determine importance of transit and level of contact with transit programs. Additional contact with community-based organizations, as will be detailed below in the internship item, will further supplement CTDOT's research in determining the level of engagement with transit services among LEP populations.

#### Title VI Language Assistance Plan Initiatives

Initiative	Due Date
Outreach to Community Based Organizations (CBO) and Faith Based Organizations to gather information on LEP populations served, determine needs of the LEP communities, and utilize the CBOs and FBOs to get CTDOT information to these groups.	On-going
Transitioning signs at bus/rail facilities to pictogram where capable.	On-going
Title VI Working Group meets on quarterly basis to discuss and complete tasks determined in LEP Timeline.	On-going
Translation of Vital Documents into Safe Harbor Languages	
Bus Transit: 1. Service change notices 2. Fare change notices 3. Title VI notice to beneficiaries (including complaint procedure) 4. Notices of Public Hearings (fully implement process for CTDOT) 5. Applications or instructions on how to participate in a recipient's program or activity or to receive recipient benefits or services (e.g., ADA Paratransit applications).  Metro North: 1. Basic critical customer information on how to use and access rail services such as peak/off peak/monthly ticket purchasing instructions (currently in Spanish online and at stations with fare information poster).	1. As Needed 2. As Needed 3. Completed June 2016  4. January 1, 2017  5. October 1, 2016   Metro North: 1. October 1, 2016



2. Rail Service change information 3. Fare change notice 4. Title VI notice to beneficiaries (including complaint procedure)	2. As Needed 3. As needed 4. Completed June 2016
Training Sessions for front-line employees, both in serving LEP population and collecting data/information regarding the LEP populations served.	On-going