

Limited English Proficiency (LEP) Plan

Meaningful Access for People with LEP

Overview

On August 11, 2000, President Clinton issued Executive Order 13166, entitled “*Improving Access to Services for Persons with Limited English Proficiency*” (LEP).

On December 14, 2005, the United States Department of Transportation (USDOT) published revised guidance for its recipients on the implementation of Executive Order 13166. The Census definition of an LEP person is “...a person who speaks another language other than English at home and does not speak English well, or not at all.”

As a recipient of Federal Transit Administration (FTA) funding the Connecticut Department of Transportation (CTDOT) takes reasonable steps to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended. CTDOT adheres to acceptable compliance standards ensuring reasonable access to all federal-aid programs and activities by LEP persons. CTDOT supports the goals of the USDOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

CTDOT is committed to complying with the requirements of Title VI, Executive Order 13166, and US DOT LEP Implementing Guidance.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 200d et seq., and its implementing regulations provide 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 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. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

USDOT published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that USDOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. FTA published its LEP Guidance in its Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the USDOT LEP guidance.

This document provides CTDOT's Four-Factor Analysis that includes: Identification of LEP Individuals in the CTDOT transit service area who need language assistance; the frequency LEP individuals come in contact with transit programs, services, or activities; the importance of transit programs, services or activities to LEP individuals; and available resources and costs of providing language assistance services. This document also includes CTDOT's 2012-2014 Language Assistance Plan (LAP), which is composed of descriptions of language assistance measures employed by CTDOT and the status of efforts to implement the LAP. Finally, the document presents CTDOT's LEP Implementation Plan that includes the language initiatives planned for the next three years.

LEP Activities

Successful Activities to Continue:

Continuing development of partnerships with community organizations that serve LEP populations, translation of notices, and multi-lingual websites.

New Areas of Focus

Language Assistance: Provide free language assistance for non-vital, yet important outreach documents, either through Voiance, our over the phone interpretation service provider, or through the use of translators/interpreters. CTDOT will also provide an in-person interpreter for meetings where public testimony is solicited, and LEP populations have been identified in the impacted area.

Vital Documents: Determine which documents are vital for translation, and choose the formats to most effectively communicate the messages contained in those documents. Vital documents will be translated into required Safe Harbor languages by January 1, 2017.

Training: Train front-line and other staff to effectively engage and respond to LEP customers. Members of CTDOT's Title VI Workgroup meet with CTtransit and Metro North administrative staff on a quarterly basis to discuss processes and procedures for implementing Title VI requirements, and providing "training the trainers" to administrative staff regarding the roles and responsibilities of each agency for meeting Title VI requirements. The administrative staff of CTtransit and Metro North will then disseminate this information to their front-line employees.

Customer Information: Provide timely and relevant information about CTDOT programs and services to LEP communities in the LEP Languages.

Outreach: Conduct culturally-competent outreach to LEP communities to increase awareness and use of CTDOT services and programs.

CTDOT regularly communicates with Community Based Organizations (CBOs) and Faith Based Organizations (FBOs) that serve LEP communities to gain a better understanding of the needs of LEP populations, and develop strategies to ensure the LEP communities are well informed and well-served. Outreach to the CBOs and FBOs has already begun. CTDOT has developed a directory of CBOs and FBOs that serve LEP populations; CTDOT has also identified the specific languages serviced by these

organizations. CTDOT has recently contacted all identified CBOs and FBOs to advise them of the availability of language assistance services, and asked that they share this information with their members/clients.

Customer Surveys: Demographic information and travel patterns will be collected by through the use of customer surveys. Upon completion of the surveys, CTDOT will analyze the results to determine any changes related the locations and concentrations of LEP populations, and to assist in evaluating the effectiveness of current outreach to LEP individuals.

Research and Administration: Develop a means to assess and monitor the effectiveness of CTDOT's LEP Plan internally and externally on two levels:

1. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed.
2. Annual review to include any changes in demographics, types of services, or other LEP community needs.

A Title VI Input Committee was formed to discuss Title VI compliance and the effectiveness of current programs and policies. The Committee has quarterly meetings, with additional meetings scheduled as needed. Committee members include CTDOT staff from Public Transit, Planning, the Commissioner's Office, and the Title VI Coordinator and staff.

LEP Access Planning Process: To prepare a viable LEP Access Plan, CTDOT convened an LEP Workgroup to conduct the assessment of CTDOT's interaction with LEP Populations. Staff members from throughout the Agency were hand-picked for the workgroup. The workgroup included staff from Public Transportation, Planning, Civil Rights, and Administration.

This workgroup was tasked with the following:

1. Performing a needs assessment to identify high concentrations or high numbers of LEP individuals and determine if there were language barriers limiting the access of LEP persons to CTDOT services.
2. Developing an LEP plan and providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access CTDOT services and a method to evaluate and review the effectiveness of a LEP Plan.
3. Reporting findings to management with recommendations and timelines for compliance with Federal regulations.

Staff members were tasked with developing a work plan and helping the group complete the LEP assessment and plan. Workgroup members collected and analyzed data, audited agency databases and communication materials, and conducted research among CTtransit operators.

The following is a summary of the results from the Workgroup:

Applying the Four-Factor Analysis

The Workgroup's LEP assessment was based on the Four-Factor Framework outlined in the DOT LEP Guidance:

Four Factor Analysis - involves four steps:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

Factor 1: Number and Proportion of LEP Persons Eligible to be Served or Likely to be Encountered in the Service Area

DOT Guidance: "There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis."

CTDOT has researched and used several tools in order to determine the number and proportion of LEP persons eligible to be served or likely to be encountered by the transit system.

Census/ACS Data: The primary tool used for this Title VI study was the data from the 2010 U.S. Census Bureau. For this update, CTDOT also utilized the latest American Community Survey (ACS) data, which is also available on the U.S. Census Bureau website. The demographic analyses of the statewide, bus and rail service areas identified Spanish, Portuguese, Polish, Italian, Chinese, French/Patois Cajun, Russian, French Creole as the top eight languages spoken by people meeting the LEP standard of speaking English "less than very well", comprising 88% of the total LEP population in Connecticut.

In addition, 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 bus service areas and the three 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 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 days a week. The map shows the Connecticut 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 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.

The CTtransit Hartford Division operates seven 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, 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.

The CTtransit New Haven Division operates seven 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 express route in the Stamford division of CTtransit.

The CTtransit Stamford Division operates seven 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.

The CTtransit Waterbury Division operates fixed route services seven 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.

The CTtransit New Britain-Bristol Division operates ten bus routes seven 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.

The CTtransit Meriden-Wallingford Division operates four local fixed routes, three in Meriden Monday through Saturday and one 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 days a week.

The routes on this map extend north of Windham to Mansfield, 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 fixed routes Monday through Friday and on one 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 5% of the total population, it would be considered an LEP language. If the LEP population exceeded 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 5% in any individual bus or rail service area. Spanish exceeded the 5% LEP threshold in the following six (6) service areas: New Haven Rail Line (MNR), Amtrak New Haven-Springfield, Shore Line East Rail, New Britain-Bristol Bus Service Area, Stamford Bus Service Area, and Meriden-Wallingford Bus Service Area.

The following LEP and Safe Harbor Languages and the number of speakers for each language in each service area are as follows:

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%)
2. 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

There were also a total of twenty-one (21) languages that met the Safe Harbor threshold based on statewide LEP populations. No language reached the 5% of the population threshold for LEP languages 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/Patois Cajun:	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.

Other Data Sources: Other potential data sources were analyzed but for the moment, only the mapping and the data charts that were generated are being used as the first level of analysis of population demographics during the analysis of the service area.

School district data can often give good indicators of how many students or families of students require language services in languages other than English. CTDOT reviewed information available from the State Board of Education, but found that the information received did not provide meaningful insights into additional pockets of LEP populations that were not determined by analyzing the state wide and service area census and ACS data.

CTDOT frequently conducts outreach to organizations that work with LEP populations in areas determined to have large numbers of LEP persons or those meeting the Safe Harbor Thresholds. The organizations include local governmental agencies, faith-based organizations, neighborhood revitalization zones and community based organizations. This consultative outreach allows CTDOT to better understand the languages, trends, and services used by LEP persons. CTDOT has compiled a Community Based Organization listing ([See Attachment 9](#)) that is used to enhance CTDOT's outreach to LEP persons. CTDOT sends informational emails to all identified CBOs if the reason for outreach is statewide (i.e. availability of Voiance) or to CBOs in an identified service area if the reason for outreach is targeted to a specific service area (i.e., changes in bus service). The Listing is available on CTDOT's website and is routinely provided to subrecipients and to anyone requesting a copy. The Directory is updated periodically to ensure it is current and inclusive.

Conclusions and Recommendations:

CTDOT will make efforts to accommodate all reasonable requests for language assistance, regardless of the size of the LEP population. The largest LEP group identified was the Spanish-speaking population. CTDOT has also targeted Portuguese, Polish, Italian, Chinese, French/Patois Cajun, Russian, and French Creole as these languages, along with Spanish. While these languages do not rise to the LEP thresholds they fall under Safe Harbor and together with Spanish constitute 88% of the total LEP population statewide. These languages also include the languages identified by CBOs as frequently encountered and in need of general services. CTDOT will ensure that outreach is focused based on the service area(s) affected, languages present, and the needs of the community.

Factor 2: Frequency of Contact by LEP Persons with Transit Services

USDOT Guidance: *"Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily."*

CTDOT has researched and used several tools to determine the number and proportion of LEP persons encountered or served by transit in the normal course of business and the frequency of encounters with the system. The workgroup concentrated on an internal audit of LEP contact information generated by agency personnel, technological systems, and survey research.

Limited survey information has been available to routinely capture LEP contact data either from technological systems or from standard survey data. CTDOT is currently working on performing an updated customer survey of the bus and rail services that will include questions specifically targeted to determining LEP passenger usage, which it plans to complete by fall 2016.

CTDOT examined its prior experiences with LEP individuals by gathering information using the following methods: conducting surveys of front-line employees who interact with the public, CBOs, and ridership, and reviewing the use of website alternative language tools.

Survey of Front-Line Employees: CTDOT determined that an important way to gauge program enhancements that could improve the customer experience for LEP individuals would be to conduct a survey of front-line employees who interact with the public. A survey was developed and sent to bus and rail operators in the state for distribution to all front-line personnel that interact with the public in various functions of planning or taking a transit trip. This included employees who provide trip planning or other public information functions, bus drivers, rail ticket agents and conductors, dispatchers, etc. The survey was printable and available online. A total of 683 completed surveys were received and enumerated. Some operations were initially underrepresented (New Britain Transportation and Shore Line East). However, follow-up requests were made, and the survey deadline was extended for those operations to ensure they were adequately represented in the sample. Metro-North was not included in the survey.

Completed surveys were entered into an online database. These were analyzed in a statewide grouping, nine geographic bus service region groupings, and a rail grouping.

The survey measured both the frequency of contact with non-English speaking persons and the approximate number of non-English speaking persons encountered. The ten languages selected for inclusion on the survey were based on Connecticut census data for people who speak English at home “not well” or “not at all”. An additional category was added for “Language not listed”.

Frequency of contact with our transit systems was analyzed using a formula that assigned a weighted frequency score to each language (a weight of one (1) for “rarely”, five (5) for “sometimes” and ten (10) for “very often”). The approximate number of LEP individuals was estimated using the median of each range offered.

The results verified that our customers who were unable to communicate in English predominantly spoke Spanish. Spanish was identified over seven (7) times more frequently than the next most utilized language. The next highest non-English speaking community was Chinese followed by Polish, Italian, and Portuguese. The numbers of contacts from these languages were low. We will continue to monitor the number of LEP customer contacts for all languages, and make necessary adjustments should the

frequency of encounters change. CTDOT will also continue to utilize the CBOs to determine whether they serve any LEP communities that frequently utilize bus and rail transportation.

Conduct CBO Surveys

CTDOT conducts community outreach to organizations that work with LEP populations, in order to capture the number and proportion of LEP persons that are encountered or served by transit and frequency of encounters with the system. Information was gathered by consulting directly with LEP persons by coordinating with a selected group of Community Based Organizations (CBO) to administer and translate the surveys.

CTDOT conducted a CBO survey titled “LEP Customer Contact Survey” (see Attachment 10) that was used by the CBOs to conduct interviews with LEP persons they came into contact with. The survey consisted of questions specifically related to the use of Bus and Rail Services, Pass Purchases, Customer Service Interactions, information relative to Public Participation at meetings, and language use.

CTDOT used its Geographic Information System (GIS) Mapping which maps the LEP Populations within the service areas identified and referred to the CBO directory to select the organizations that best represented the impacted areas. The towns selected for the survey were large urban areas with large concentrations of LEP individuals, specifically Bridgeport, Stamford, and Hartford.

The procedure for administering the LEP Customer Contact Survey was as follows:

1. CTDOT issued an LEP Customer Contact Survey that consisted of a total of eleven (11) questions.
2. The survey was sent to the CBOs identified in the CBO listing via mail.
3. CTDOT made telephone contact with the CBO’s point of contact.
4. CTDOT provided an introduction, stating the reason for the phone call and discussed the survey.
5. The CBOs were given thirty (30) days to respond to CTDOT with customer responses.
6. The customer responses were to be mailed, faxed, emailed, or picked up by a CTDOT employee by the assigned due date.
7. CTDOT entered the survey data into a database upon receipt of the information.

Based on the survey data compiled by the CBOs, CTDOT analyzed survey responses and developed a report which summarized the information retrieved from the surveys. The report shows the frequency with which LEP individuals came into contact with the programs and services in each of CTDOT’s key modal program areas.

Bridgeport, CT (Survey Analysis)

In order to obtain additional resources on the LEP populations that come in contact with the CTDOT programs and services, the Office of Contract Compliance mailed out a set of thirty (30) surveys to a sample size group of CBOs in the Bridgeport, CT area. Of the thirty (30) surveys, CTDOT received fifteen

(15) survey responses. In review of the survey responses, it was identified that Spanish was the primary language spoken. Of those fifteen (15) people surveyed, twelve (12) responses indicated that Spanish was the primary language spoken, with the remaining three (3) indicating English. Seven (7) survey responses indicated they spoke English “very well”, three (3) spoke English “well”, two (2) spoke English “not very well”, and three (3) spoke English “not at all”. The majority of the individuals surveyed used bus transportation five or more times a week, while the majority used rail transportation less than once a week. Also, the primary type of fare/pass used for bus transportation services was the “per trip” pass and the “one way” pass was the primary type for the rail transportation services.

The individuals surveyed prefer to use the 211 Infoline for questions related to bus/rail transportation services and the subsequent preference was to contact the agency via telephone for inquiries. Additionally, the majority of the individuals surveyed use transportation service for work and medical appointments and primarily receive communication through the CBOs and television.

Stamford (Survey Analysis)

The Office of Contract Compliance mailed out a set of thirty (30) surveys to a sample size group of CBOs in the Stamford, CT area. Of the thirty (30) surveys, CTDOT received eleven (11) survey responses. In review of the survey responses, it was identified that Spanish was the primary language spoken. Of those eleven (11) responses, three (3) indicated they spoke English “very well”, five (5) spoke English “well”, two (2) spoke English “not very well”, and one (1) spoke English “not at all”. In addition, of the eleven (11) responses, eight (8) indicated there were members of the household that did not speak English at all. In those households, the languages spoken were Spanish, Polish, French, and Creole.

The majority of the individuals surveyed used bus transportation services five or more times a week while the majority used rail transportation less than once a week. Also, the primary type of fare/pass used for bus transportation services was the “per trip” pass and the “one way” pass was the primary type of fare for the rail transportation services.

The individuals surveyed prefer to use the Transportation Agency line for questions related to bus/rail transportation services and “Other” means not indicated on the surveys. Most contact the agency via telephone or utilize the website for inquiries. Additionally, the majority of the individuals surveyed use transportation service for work and shopping and primarily receives communication through family and friends or other sources, i.e. the 211 Infoline.

Hartford (Survey Analysis)

In order to obtain additional resources on the LEP populations that come into contact with CTDOT’s programs and services, the Office of Contract Compliance mailed out a set of thirty (30) surveys to a sample size group of CBOs in the Hartford, CT area. Of the thirty (30) surveys, CTDOT received eleven (11) survey responses. In review of the survey responses, it was identified that English was the primary language spoken. There were only three (3) responses that indicated Spanish was the primary language

spoken. There were ten (10) responses that indicated they spoke English “very well”, and one (1) spoke English “well”. There was one (1) survey response that indicated a member of the household did not speak English at all.

The majority of the individuals surveyed use the bus five or more times a week while the majority used rail transportation less than once a week. Also, the primary type of fare/pass used for bus transportation services was the “monthly” pass and the “one way” passes for the rail transportation services.

The individuals surveyed prefer to use the Transportation Agency telephone line for questions related to bus/rail transportation services. Most people who contact the agency prefer contact via telephone line. Additionally, the majority of the individuals surveyed use transportation service for work, health/medical appointments and shopping. The individuals surveyed primarily receive communication through Community Based Organizations.

The tables below show the overall LEP customer encounters and their responses for each question asked in the survey:

LEP Customer Encounters

1. Primary Language Spoken

	English	Spanish	Polish	French	Creole
Bridgeport	3	12	0	0	0
Stamford	1	7	1	1	1
Hartford	8	3	0	0	0
	12	22	1	1	1

	Portuguese	Italian	Chinese	Russian	Korean
Bridgeport	0	0	0	0	0
Stamford	0	0	0	0	0
Hartford	0	0	0	0	0
	0	0	0	0	0

	German	Japanese	Other
Bridgeport	0	0	0
Stamford	0	0	0
Hartford	0	0	0
	0	0	0

2. How well do you speak English?

	Very Well	Well	Not Very Well	Not at all
Bridgeport	7	3	2	3
Stamford	3	5	2	1
Hartford	10	1	0	0
	20	9	4	4

3. Are there any members of your household that do not speak English?

	Yes	No
Bridgeport	6	9
Stamford	8	3
Hartford	1	10
	14	22

4. How often do you use Bus Transportation Services?

	5 or more times a week	2-4 times a week	Once a week	Less than once a week or never
Bridgeport	8	3	3	1
Stamford	5	3	0	3
Hartford	9	2	0	0
	22	8	3	4

5. How often do you use Rail Transportation Services?

	5 or more times a week	2-4 times a week	Once a week	Less than once a week or never
Bridgeport	1	3	4	7
Stamford	3	2	1	5
Hartford	1	0	0	10
	5	5	5	22

6. What type of fare passes and/or tickets do you purchase for Bus Transportation services?

	Monthly	Weekly	All Day	Per Trip
Bridgeport	4	3	4	8
Stamford	1	2	1	5
Hartford	6	2	1	2
	11	7	6	18

7. What type of fare passes and/or tickets do you purchase for Rail Transportation services?

	Monthly Commutation	Weekly Commutation	10 Trip	One Way
Bridgeport	2	2	1	8
Stamford	2	2	0	7
Hartford	1	0	0	5
	5	4	1	21

8. Who do you contact for questions regarding Bus/Rail Transportation services?

	Transportation Agency	Community Organization	State/Local Government	211 Line	Other
Bridgeport	4	1	1	6	4
Stamford	4	1	0	1	4
Hartford	6	1	1	2	1
	14	3	2	9	9

9. When you have questions regarding Bus/Rail Transportation services, how do you contact the Transportation Agency?

	Telephone	In-Person	Website	On-Line Chat	Other
Bridgeport	7	5	1	3	0
Stamford	4	1	6	1	3
Hartford	10	0	1	0	0
	21	6	8	4	3

10. What do you use Public Transportation services for?

	Work	School	Health/Medical	Shopping	Other
Bridgeport	8	2	8	2	5
Stamford	10	1	1	4	1
Hartford	6	2	9	9	6
	24	5	18	15	12

11. How do you currently receive information about the Connecticut Department of Transportation's activities and services?

	TV	News-paper	Internet/Social Media	Friends/Family	Community Org.	Other
Bridgeport	2	4	1	2	5	4
Stamford	3	0	1	2	0	4
Hartford	0	1	1	1	4	0
	5	5	3	5	9	8

Website Data Translations: The second tool used to gauge the level of interaction in order to improve the customer experience for LEP individuals was to analyze the use of website alternative language use.

CTtransit already provides a custom-translated Spanish version of its website. CTtransit also offers Google Translate on its main website as well as on the websites of all other CTDOT subrecipients. MNR and SLE websites offer machine translations into Spanish and a number of other languages using Google Translate.

Google Translate is not as effective as custom translations on websites and elsewhere, but it is one tool that can be used to measure the level of interaction by LEP individuals. Google Translate offers machine translations so it is generally not desired to rely upon Google Translate for translation of vital documents or detailed information that would require more detailed translations. But CTDOT has found that the major transit websites should have Google Analytics (GA) installed so that speakers of some of the non-Spanish, non-English languages can at least get some idea of the information on these websites, and so that Google Translate interactions can be tracked and give some indication of the number and variety of different languages that website visitors request.

For the two major websites under the direct control of CTDOT, the analysis showed:

www.cttransit.com

The primary language used based on Google Analytics (GA) was English at 98.33%. The next most used language was Spanish at 0.53% of all website visits. Other languages fell at a level of 0.25% or below of all website visits. These levels did not reach our threshold level for additional analysis which has for now been established at 1% of all website visits for the quarter.

www.shorelineeast.com

The primary used language based on GA was English at 98.78%. The next most used language was French at 0.20%, and other languages fell at a level of 0.14% or below. These levels did not reach our threshold level for additional analysis which for now has been established at 1% of all website visits for the quarter.

In summary, less than two percent (2%) of all visits to the CTtransit or SLE websites involve use of language assistance services. This statistic is only one measure, and not a very reliable measure, of the demand from customers or potential customers. But the analytics for these interactions are fairly consistent with data from other sources on the occurrences of various other non-English languages.

Intuitively it is expected that a substantial portion of the LEP encounters with state-owned transit services will occur on the bus or train. Accordingly, it is reasonable that resources for language assistance be focused heavily on on-board activities.

Survey Analysis - In addition, the CTtransit ridership survey has also been extensively redesigned to gather income, race and LEP information and will enable such demographic data to be cross-tabulated with ridership levels to help assess frequency of interaction.

The latest bus system survey was conducted in November 2011. The initial returns indicate CTDOT should be getting some good feedback on the number of interactions with the system by LEP populations.

A total of 4,143 surveys were returned. By operating division, counting only valid surveys returned, there were 2,031 English-language responses from customers (local and express services) in greater Hartford; 930 in New Haven, and 377 English-language forms from the Stamford Division. 77 surveys were completed in Spanish by Stamford-area customers, a significant percentage of the returned surveys for that Division (nearly 17% of the whole). Over 34% of Stamford responses picked “yes” on the question of whether a language other than English was spoken at home (compared to a little less than 21% in Hartford and a little over 19% in New Haven). The English-language responses gathered in the other Divisions totaled: 276 from Waterbury; 113 from New Britain; 81 from Meriden, 50 in Bristol, and 16 from Wallingford passengers.

The breakdown by Division and by English-Spanish is:

	English Response	Spanish Response	Total by Division	Spanish as a Percent of Total	Percent Response Online
HARTFORD	2031	63	2094	3%	15%
NEW HAVEN	930	40	970	4%	14%
STAMFORD	377	77	454	17%	6%
WATERBURY	276	21	297	7%	8%
NEW BRITAIN	113	17	130	13%	6%
MERIDEN	81	9	90	10%	20%*
BRISTOL	50	0	50	0%	40%**
WALLINGFORD	16	3	19	16%	5%

The ridership survey was also distributed to users of the ADA Paratransit systems.

A total of 509 paratransit surveys were returned. Of the 507 valid surveys returned and analyzed, these included 293 English-language responses from customers in Greater Hartford, 33 in New Haven, and 51 from Stamford. It is interesting to note that the return on Spanish surveys for Paratransit ridership was low. Only seven (7) results were returned in the Hartford division making up 1.38% of the returns of all the paratransit surveys received. The English-language responses gathered in the other divisions totaled: ninety-three (93) from Waterbury, seven (7) from New Britain, thirteen (13) from Meriden, one (1) from Bristol, and six (6) from Wallingford.

PARATRANSIT SURVEY

	English Response	Spanish Results	Total by Division	Spanish as a percent of total	Percent Response Online
Hartford	293	7	300	1.38%	0%
New Haven	33	1	34	0.2%	0%
Stamford	51	2	53	0.39%	0%
Waterbury	93	0	93	0%	0%
New Britain	7	0	7	0%	0%
Meriden	13	0	13	0%	0%
Bristol	1	0	1	0%	0%
Wallingford	6	0	6	0%	0%

Mapping Tools: The new mapping as shown in the LEP Attachments 1 - 73 will also provide CTDOT with a stronger tool for identifying language “Hot Spot” locations in the service area that have the highest concentrations of LEP persons. Use of that mapping will help generally, but especially with specific projects or service changes to target language assistance services to the particular languages in that area.

Enhanced Data Collection Tools: In addition, CTDOT intends to enhance its outreach to CBOs and other groups in the three-year action plan that will follow in the Language Assistance Plan (LAP). These steps will assist with assessing the current gaps in dissemination of transit information to current users due to language barriers and try and identify new potential customers who may not now be accessing the system, especially those not accessing the system due to language barriers.

The types of approaches being considered at this time include:

- Collecting daily alternative language experiences from employees, especially those with routine contact such as drivers, telephone call center employees, ticket agents, and security personnel.
- CTDOT has already conducted an inventory of CBOs in the various service areas and has administered surveys and initiated conversations to determine any language gaps;
- Collecting feedback information from public hearings and public meetings regarding language usage;
- Monitoring the language line, once implemented, for requested languages.

Factor 3: Nature and Importance of Transit

DOT Guidance: “The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether

denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual..."

"...providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."

Identify Most Critical Services for CTtransit and Rail

Public transit is a key means of achieving mobility for many LEP persons on both a daily basis and in the event of emergency or urgent situations. According to the 2000 Census, nationally, more than eleven percent (11%) of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. Providing services to ensure access to LEP persons may help to increase and retain ridership among CTtransit's LEP communities. The Workgroup determined that CTDOT's most critical services were defined as fares and tickets; routes and schedules; and safety and security. These areas were selected because barriers in these areas could: (1) limit a person's ability to gain full benefit from services, or (2) safety and security issues could place a person in physical danger.

The table below, from the American Community Survey, demonstrates why transit is more important to people who don't speak English than it is to the general population. Though the LEP community comprises a little over 8% of the overall workforce in CT, the LEP community comprises close to 23% of the Public Transit users, meaning a greater importance in ensuring they have the ability to access and use the system.

ACS Table B08513 (2006-2010)

CT Statewide			
Total Workers 16+	1,713,303		
Speak English Only	1,363,189		
Speak Other Languages	350,114		
Speak English "very well"	206,381		
Speak English less than "very well"	143,733	53%	Spanish Speakers
Percent of Workers Speaking English less than very well		8%	

Public Transit Users	55,778		
Speak English Only	33,836		
Speak Other Languages	21,942		
Speak English "very well"	9,368		
Speak English less than "very well"	12,574	63%	Spanish Speakers

Percent Worker Transit Users that Speaking English less than very well 23%

In addition, in certain situations, the delivery of clear instructions regardless of language is required. For example, emergency evacuation instructions in stations and vehicles should be either non-written/non-verbal or provided in languages that meet the thresholds of LEP.

These needs are further emphasized by the results of the CBO surveys CTDOT conducted. 89% of respondents used bus services on at least a weekly basis, and 40.5% of respondents used train services on at least a weekly basis. Given these figures it is important to ensure information is available in the languages identified (all included in the top eight Safe Harbor languages) to have information available about how to use the service, and potential changes that could affect the use of service.

Regarding the best medium to reach LEP individuals, 56.7% of respondents stated they would contact the transportation provider directly via phone, and an additional 21.6% of respondents said they would use the website. Therefore, it's important to emphasize the availability of CTDOT's phone translation program Voiance, and to include available information or instructions how to reach CTDOT in the LEP languages.

CTDOT has developed an internal reporting system for the use of Voiance that asks both the language translated and the purpose of the phone call. Tracking the usage of the translation system will help clarify the needs of LEP communities. CTDOT has determined that its communication methods should include considerations of LEP populations. Language services will include manual translations into the top eight Safe Harbor languages, and will be used for information sheets on how to use bus and rail services, how to request language assistance, service and fare change notices, Title VI-related documents such as "Your Rights Under Title VI" and descriptions about how to file a Title VI complaint.

A full description of the services available for the LEP persons will be described more fully in the Language Assistance Plan (LAP).

CTDOT will also be initiating a program of using pictograms whenever possible to illustrate emergency procedures, travel directions, etc.

Factor 4: Available Resources and Costs of Providing Language Assistance Services

DOT Guidance: "A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.

... "large entities and those entities serving a significant number or proportion of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to be able to articulate, through documentation or in some other reasonable manner; their process for determining what language services would be limited based on resources or costs."

This last step of the Four Factor Analysis allows CTDOT to weigh the demand for language assistance against current and projected financial and personnel resources.

As described in Factors 1 and 2 above, CTDOT used various strategies for determining non-English language populations and interactions. The approach included using results from Census and American Community Survey data and mapping, website use, employee surveys, and other tools to gauge the level of interaction of customers with various aspects of the transit system.

Based on the ACS data, CTDOT determined that a total of twenty-one Safe Harbor languages exist state-wide. CTDOT calculated that eighty-eight percent (88%) of all LEP individuals in Connecticut fall within the top eight (8) languages: Spanish, Italian, Chinese, Portuguese, Polish, French/Patois Cajun, Russian, and French Creole. In addition to being the top eight Safe Harbor languages, these were the languages specifically referenced in the Community Based Organization surveys as languages that were frequently encountered and in need of general services. At the present time, CTDOT does not have sufficient data to determine the transit usage of LEP populations, which would be required to fully ensure the level to which the LEP populations are in need of the meaningful access to transit programs, services, and activities available. CTDOT intends to rectify this with ridership usage surveys, as well as the surveys of front-line staff that have direct interactions with the public, to be performed over the next year. CTDOT will translate all vital documents in the top eight Safe Harbor languages, which will be accomplished by January 1, 2017. CTDOT posts information in the eight Safe Harbor languages, both on its website and on buses and in train stations as part of public postings. Postings include information about CTDOT's programs, activities, services, and/or benefits.

CTDOT's Voiance system is capable of translating into almost any language including all twenty-one Safe Harbor Languages.

While expenditures related to providing language assistance have not necessarily been closely tracked historically, CTDOT can report on certain expenditures of funds on language-related services by the CTtransit bus operation.

- Initial development costs for the Spanish portion of the website (launched Feb 2009): \$17,000
- Yearly cost for Motion Point to maintain (including per word translation costs for new content) \$7,000
- Translation services (communications materials, signage, surveys, etc.) FY 2011 \$1,869
- In FY 2011, interior notices (Spanish) for new buses (all eight [8] Divisions) \$1,150
- In FY 2011, communications materials printed only in Spanish (vs. dual language materials) \$5,177

Such expenditures on language assistance activities such as those that follow will be monitored more closely from here on as part of the language assistance plan. But certainly at this level, the investment is not out of proportion with the number of LEP beneficiaries.

CTDOT will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan. CTDOT recognizes that to continue to expand the program, new sources of internal and/or external funding might be needed depending upon the cost and scope of new strategies and actions.

Current Language Assistance Measures

DOT Guidance: "An effective LEP plan would likely include information about the ways in which language assistance will be provided.

CTDOT supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons.

The information, presented above in earlier elements of the Four-Factor Analysis, and the focus on the top eight Safe Harbor languages that aligned with the responses from the CBO survey, helped tailor the specific type of language assistance CTDOT provided its LEP ridership during the reporting period. Future plans will be presented in the LAP.

The following section provides the status of CTDOT's initiatives established to address potential access barriers faced by LEP customers. The agency currently offers a number of language assistance services, including, those listed below.

Oral Translations

All Modes:

Through the Department of Administrative Services (DAS) the State has contracts for translation and interpretation services that any state agency including CTDOT can access (see Attachments 11, 12 and 13).

Telephone translations: Four (4) companies selected, sixty-nine (69) languages, ranges from \$.78 to \$.93 per minute (See Attachment 12).

In-person translations: thirteen (13) companies selected, six (6) languages, variable pricing – per hour or per word (See Attachment 13).

CTDOT may use available and authorized staff to translate upon immediate need.

Rail

Metro-North (MNR) Travel Information Center – Consistent with Metro-North’s Title VI Program, MNR customers have multi-language transportation available through an outside language line telephone service.

Bus

CTtransit provides oral information in Spanish through a telephone Customer Service Center. LEP customers who call the Telephone Center have direct access to bilingual customer service representatives and can be connected to a telephonic interpretation service with linguists who speak other languages at a per minute rate for services. CTDOT also informed CTtransit of its contract with Voiance, which CTtransit is looking into utilizing as well.

Written Translations

All Modes

- Written translations are available through some of the companies on CTDOT’s Reference Guide to Translation and Interpretation Services or through the DAS contracts also specified immediately above.

Rail

- MNR and SLE websites offer machine translations into Spanish and a number of other languages using Google Translate.
- MNR utilizes print and electronic media sources and language translations to communicate with the public and riders, including offering multiple language formats on ticket vending machines.

Bus

- CTtransit provides a custom-translated Spanish version of its website through an annual contract with Motion Point.
- Though less desirable than the custom translations noted previously, CTDOT also offers Google Translate on the CTtransit main website and all of the websites of CTDOT’s subrecipients
- All policy and informational interior notices on buses are posted in English and Spanish, with notices regarding a contact number available for additional information posted in the other seven Safe Harbor Languages.
- All written public informational communications materials are printed in English and Spanish, with notices regarding a contact number available for additional information posted in the other seven Safe Harbor Languages.

- In the New Britain service area where the number of Polish-speaking LEP persons exceeds the Safe Harbor Threshold for that service area, timetables have been published in Polish. Other notices are delivered to the Polish Community Center and Polish media who do their own translations and distribution of transit information.
- Materials critical for accessing and using CTtransit services and receiving transit benefits have been translated. Upon request, various documents identified can be translated into the regularly encountered languages in the region. If requests are received from individuals or organizations serving the LEP population, determinations can be made on a case-by-case basis about the necessity to do custom translations.
- At this time, no inquiries have been received requesting translation into other languages besides Spanish.

Public Outreach and Communications

Rail

- MNR News releases are distributed to media outlets that include the Amsterdam News and Spanish print and cable
- MNR advertises in local language paper LaVoz and local newspaper websites including Spanish language sites.

Bus

- CTDOT and CTtransit provide written notification to the public that language assistance services are available, upon request, free of charge for all public meetings and hearings.
- Public notification is provided that describes the patron's Title VI rights and the CTDOT and CTtransit Title VI complaint process.
- CTDOT and CTtransit work directly with the media outlets serving minority and ethnic populations to provide service information to their readers, listeners, and viewers. See LEP Exhibit C.
- CTtransit places Spanish language signage on vehicles for basic fare information and rights under Title VI as well as to announce service changes and other situations important to customer safety. CTDOT will undertake the efforts necessary to address other languages identified under Safe-Harbor. These efforts will include further engaging Community Based Organizations to assist with translation and the distribution of information.
- CTDOT is aware that some documents are translated into other languages by community organizations. For example, the Polish Community Center in New Britain does translate our public information brochures and meeting notices into Polish and posts them on their own website for use by their Polish-speaking stakeholders.