



Capital District Transportation Authority



LEP Language Assistance Plan 2020-2023

November 2020
Capital District Transportation Authority
110 Watervliet Avenue
Albany, NY 12206

Table of Contents

Introduction	3
About CDTA	3
The Four Factor Analysis	4
Analysis Factor 1 – LEP Persons Served or Encountered	4
Analysis Factor 2 – Frequency of Contact	11
Analysis Factor 3 – Importance to LEP Persons	12
Analysis Factor 4 – Resources Available	12
The Five Factor Implementation Plan	13
Plan Factor 1 – Identification of LEP Population	14
Plan Factor 2 – Language Assistance Measures	15
Plan Factor 3 – Training Staff	16
Plan Factor 4 – Providing Notice	17
Plan Factor 5 – Monitoring and Updating the LEP Plan	18
Appendix A – Sample Signage on Vehicles	20
Appendix B – Sample Pictographs on Vehicles	23
Appendix C – References	24

Introduction

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are designated as “limited-English proficient”, or “LEP” and, therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It is the intent of the Capital District Transportation Authority (CDTA) to serve these individuals by ensuring a safe, reliable, accessible, and efficient means of transportation.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d 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 financial Federal Assistance.

As per FTA Circular 4702.1B, consistent with Title VI of the Civil Rights Act of 1964, the implementing regulations of the Department of Transportation (DOT), and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient.

The DOT LEP Guidance recognizes that certain recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written plan. However, FTA has determined it is necessary to require its recipients to develop an assistance plan in order to ensure compliance. Although CDTA serves a relatively small LEP population for a region of its size, we feel that these equity considerations are important enough to develop a written plan to address the needs of this population.

This plan is consistent with the above-cited regulations. Following the Guidelines and Best Practices documents provided by USDOT, CDTA conducted an analysis of the four major factors that determine the level of need for LEP services, and outlined a five point implementation plan appropriate to the level of need and resources available as identified in the analysis.

About CDTA

The Capital District Transportation Authority (CDTA) is New York State’s Capital Region mobility company with an annual ridership of approximately 15.7 million. CDTA operates 262 buses from three facilities in Albany, Schenectady, and Troy. CDTA also owns and operates the rail stations in Saratoga Springs and Rensselaer. We serve a four-county area consisting of 852,072 people and have a workforce of approximately 650.

Our Mission

We plan, finance, and deliver transit services that take people where they want to go in the Capital Region safely, efficiently, and at a reasonable cost.

CDTA works to accomplish this mission by:

- Continually identifying ways to increase transit ridership and revenue
- Taking a leadership role to help mold regional growth and improve the transportation network
- Balancing regional needs for social service, congestion relief, and basic access
- Delivering a range of transportation services that meets a diversity of markets and customers
- Developing innovative ways to attract and retain a high quality workforce
- Identifying appropriate funding sources to meet the region’s transportation needs

The Four Factor Analysis

In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide.

The first activity CDTA undertook was to evaluate the extent of its obligation to provide LEP services. The regulation requires that reasonable steps be taken to ensure “meaningful access” to CDTA services by LEP persons. The starting point for this process is to apply a four factor analysis that identifies the LEP population and CDTA’s interaction with it, and balances that interaction with the resources available to provide LEP services. The four factors are:

- 1.) the number or proportion of LEP persons eligible to be served or likely to be encountered;
- 2.) the frequency with which LEP individuals come in contact with the program;
- 3.) the nature and importance of the program, activity, or services provided by the program to people’s lives; and
- 4.) the resources available to CDTA and costs.

After applying this analysis to the interactions CDTA has with the public, CDTA concluded that, in order to ensure meaningful access, different assistance measures are necessary for different services and, in many circumstances, should be handled on a case-by-case basis. This flexibility ensures that CDTA can utilize its scarce resources to align programs with where the demand is greatest.

Analysis Factor 1 – LEP Persons Served or Encountered

The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population

When addressing this factor, we first *examined CDTA’s prior experiences with LEP individuals* by examining a variety of quantitative and qualitative indicators of the number and proportion that we encounter. These include several different sources of survey data, Census and American Community Survey data, and qualitative evaluations of the environments where CDTA staff are likely to encounter LEP populations.

In late 2013, surveys were conducted with CDTA fixed route operators (the front line interaction with most of our customers), paratransit operators, sales outlet managers, customer service representatives, and community partners. The following key conclusions emerged from that study:

- In surveys from operators who interacted with customers who spoke languages other than English, 89% of those customers spoke Spanish, 48% spoke Chinese, 20% spoke Arabic, and 10% spoke Italian. This is NOT indicative of the total proportion of LEP population among our customers. Rather, it does indicate that of the interactions we do have, these were the languages represented.
- Of other employees surveyed who interact with customers who spoke languages other than English, 92% of those customers spoke Spanish, 23% spoke Chinese, 18% spoke Arabic, and 8% spoke Italian. This is NOT indicative of the total proportion of LEP population among our customers. Rather, it indicates that of the interactions we do have, these were the languages represented.
- Of other employees surveyed who interact with customers that spoke languages other than English, it occurred on average, twice per week. Typically when this happens, if the employee is not proficient in the language spoken by the customer, the employee sought assistance from a co-worker.
- Travel trainers and the sales managers are the only employees who have received requests for the need to translate information. Both of these employees speak Spanish. These requests are probably indicative of the fact that these employees are purposely placed in environments where the probability of need for LEP services is highest.
- Of external organizations surveyed that encounter LEP populations, 74% serve Spanish speakers, 38% serve Chinese speakers; 26% serve Russian speakers, 14% serve French speakers; and 3% serve Italian speakers.

- In CDTA sales outlets surveyed, customers who speak Spanish are encountered 75% of the time; Chinese 20% of the time; and Italian 5% of the time.

The findings of this survey remain well-corroborated by up-to-date ACS data that indicate Spanish is still the most common LEP population in the Capital Region, followed by Chinese, then several other languages at a significantly smaller rate of incidence.

Next, we *identified scenarios when LEP customers interacted with transit station managers* (e.g. superintendents, assistant superintendents, supervisors, travel trainers). Travel Trainers often aid in the ad-hoc translation of information for customers while representing CDTA at public events, or while simply riding the buses while training or en route to destinations. Other *community organizations identified* that have an increased probability of encountering LEP individuals that our staff proactively *works with and has contact with* include:

USSSA Ticket to Work program	P.A.L. (Police Athletic League)
Northeast Career Planning	Department of Social Services (Albany County)*
AIM Support Services (Saratoga County)	Department of Social Services (Saratoga County)*
U.S. Committee for Refugees and Immigrants **	Comfortex*
Equinox	The Albany Damien Center
Living Resources	Homeless and Travelers Aid Society
Experience Works	NYS Office for People with Developmental Disabilities
Alliance for Positive Health	Northeast Association of the Blind at Albany
St. Anne's Institute	ACCES-VR Adult Career and Continuing Education Services
Guilderland H.S.	Center for Community Collaboration
Albany School of Humanities	Capital City Rescue Mission*
Albany Law School	Albany Housing Coalition
Mental Health Association	15-Love
Capital Region Boces	Cohoes H.S.

* Organizations where we have worked directly with Spanish speaking customers.

** Includes support for Karen, Burmese, Arabic, Nepali, Chin, Farsi/Dari

There were no *customer service inquiries cataloged* in CDTA's customer service database last year requiring any sort of language assistance (in these cases, Spanish) out of a total of 3,008. While CDTA has no formal tracking mechanism for cataloging visits to CDTA headquarters, there is no quantitative or qualitative evidence that LEP customers have arrived in person. Access to CDTA's Title VI web page was accessed 77 times between 01/01/19 and 12/31/19, although some of these visits would be from CDTA employees. CDTA Title VI webpage visitors viewed it for approximately two minutes on average.

CDTA's ADA *paratransit system*, STAR, has a detailed database of client information, which is required because of the eligibility tracking requirements associated with the service (i.e., customers are not anonymous). 81 customers in our database are flagged as "does not speak English" out of a total of 16,657 active clients (0.5%). There have been no requests for LEP related services for paratransit in the past three years (*including applying for eligibility, making reservations, and communicating with drivers*), most likely due to the fact that a caretaker (or relative) typically calls for reservations on behalf of a non-English-speaking client. Additionally, an English-speaking Personal Care Assistant (PCA) typically accompanies the client on his/her trip. Speaking English is NOT an eligibility requirement for paratransit service.

The next step when addressing Factor 1 was to *become familiar with data from The U.S. Census*. Datasets reviewed include those from the American Community Survey (ACS). The ACS is a nationwide survey that collects and produces

information on demographic, social, economic, and housing characteristics about our nation's population every year. Most of the data was queried from table B16001 "LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER", from a universe of "Population 5 years and over".

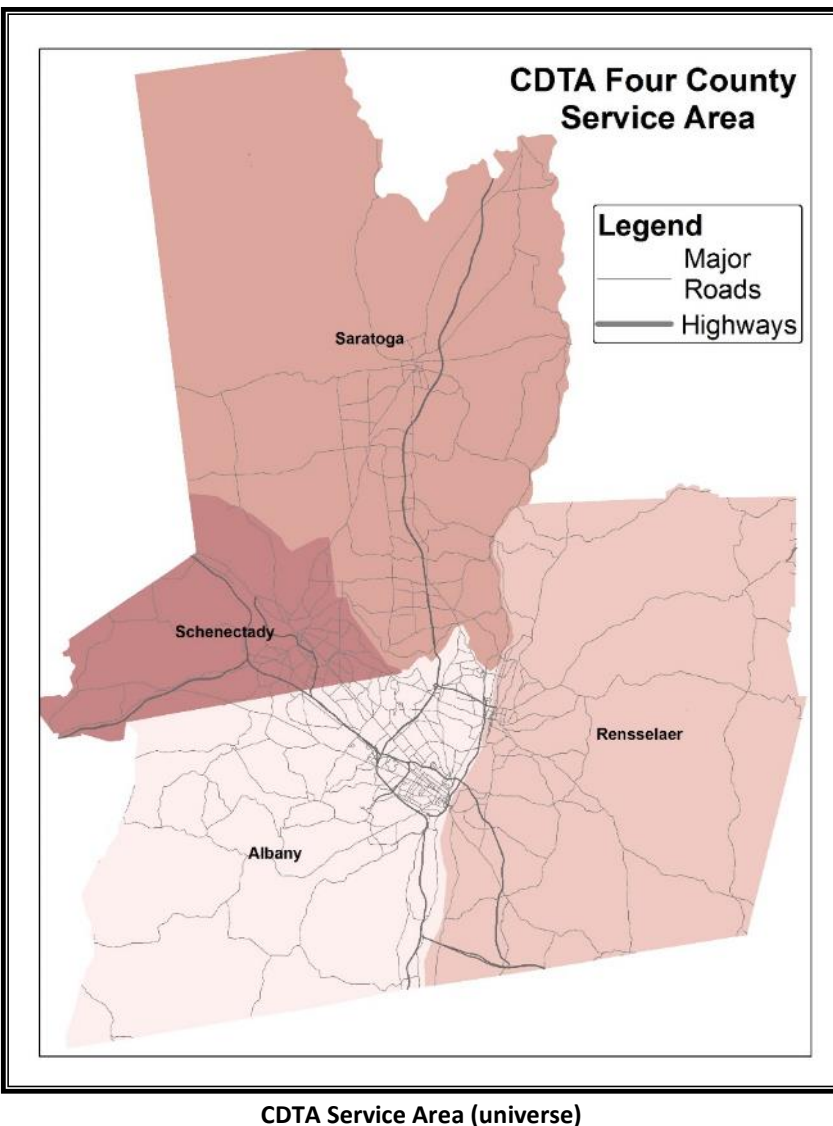
CDTA *identified the geographic boundaries of the area that our agency serves*. As per our enabling legislation, that universe of service area includes Albany, Schenectady, Rensselaer, and Saratoga counties:

Albany County takes up 523 square miles. 90% of the population is urban and 10% is rural. Major communities in Albany County include Albany, Cohoes, Watervliet, Colonie, and Guilderland. The median household income is *less* than the average for the CDTA service area. 24% of residents belong to minority groups.

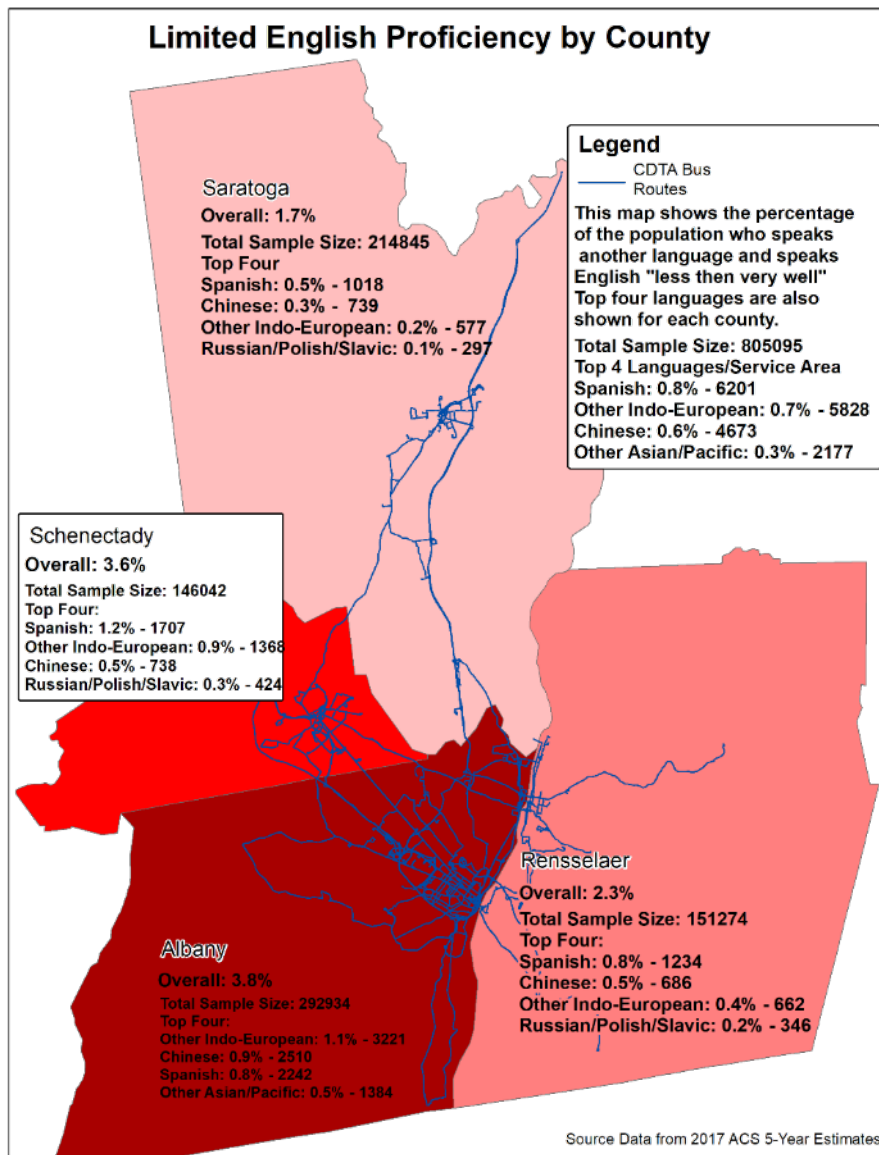
Rensselaer County takes up 654 square miles. 69% of the population is urban and 31% is rural. Major communities in Rensselaer County include Troy, Rensselaer, and East Greenbush. The median household income is *less* than the average for the CDTA service area. 14% of residents belong to minority groups.

Saratoga County takes up 812 square miles. 70% of the population is urban and 30% is rural. Major communities in Saratoga County include Saratoga Springs, Clifton Park, and Ballston Spa. The median household income *exceeds* the average for the CDTA service area. 7% of residents belong to minority groups.

Schenectady County takes up 206 square miles. 92% of the population is urban and 8% is rural. Major communities in Schenectady County include Schenectady, Rotterdam, Niskayuna, and Glenville. The median household income is *less* than the average for the CDTA service area. 22% of residents belong to minority groups.



Then, we proceeded to *obtain the census data on the LEP population* in our service area. Using ArcGIS, we overlaid census data onto a map that included every square mile in which we are allowed to provide service, based on our enabling legislation. From this process, LEP populations were indicated on the next map as follows:



After analyzing the data we collected at the county level, we drilled down into progressively smaller geographies, in order to build a more accurate understanding of where these populations reside. Our goal was to identify where the concentrations of LEP persons live, while avoiding analysis at the level at which the margin of error of ACS data begins to approach estimated totals (thereby compromising the integrity of our conclusions).

The CDTA service area, while legally comprising all four counties, is only served by a subset of municipalities. CDTA has the ability to implement service throughout the entire region, but 100% of our service is located within 31 select municipalities where transit tends to work best. The allocation of transit service is driven by the level of demand, both as revealed by present ridership and by targeting development patterns that are most likely to support transit.

Highest Concentrations of Any LEP Populations (county level)

deciding where to implement service. We use a set of standards set forth in our Transit Development Plan (TDP), as well as the Transit Propensity Index (TPI) described within that same document. Of the 2,200 square miles that we can legally serve, it has been 13 years since new service has been implemented anywhere outside of the 31 municipalities that currently have service. In short, the TPI helps guide us in determining where demand for transit is greatest.

Transit Propensity Index (TPI)

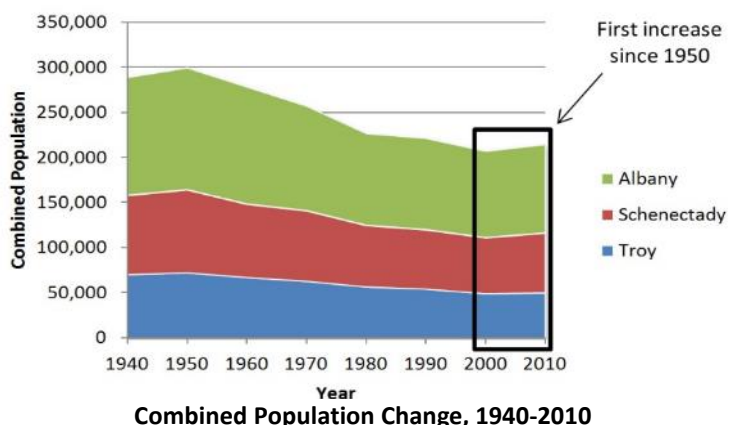
Throughout this decade, the demographic factors influencing transit propensity in the Capital Region have continued to move in a direction that encourages dense, urban development and more common use of public transit. In the 2010 Census, the region's three largest cities (Albany, Schenectady, and Troy) all experienced population increases

for the first decade since 1950. 5-year estimates from the American Community Survey in 2017 indicate that their populations have continued to increase, but at a slower rate.

The persistence of this trend suggests that more people are choosing to reside near CDTA services, which could increase the demand for transit along already productive corridors. Nationally, most central cities are now growing more quickly than in their suburbs as well. The Albany-Schenectady-Troy metropolitan area as a whole has grown as well, from 825,875 in 2000 to 850,251 in 2017.

While much of this growth has taken place outside the region's central cities, suburban growth also reveals possibilities for transit growth as employment centers such as shopping malls, hospitals, and office parks, which provide increased opportunities for reverse commuters. Many of CDTA's most-productive routes connect dense, urban neighborhoods to these large generators in more suburban environs.

This continuing trend represents a “double-edged sword” for CDTA, as we may recoup a larger share of expenses through fare revenues, but must also respond to increasing demand by increasing the level of service where necessary. Too great a ridership increase without targeted adjustments to capacity may result in overcrowding, which can drive away potential new customers. CDTA works to accommodate ridership growth through periodic service expansion initiatives, as well as the expansion of Bus Rapid Transit throughout the region.

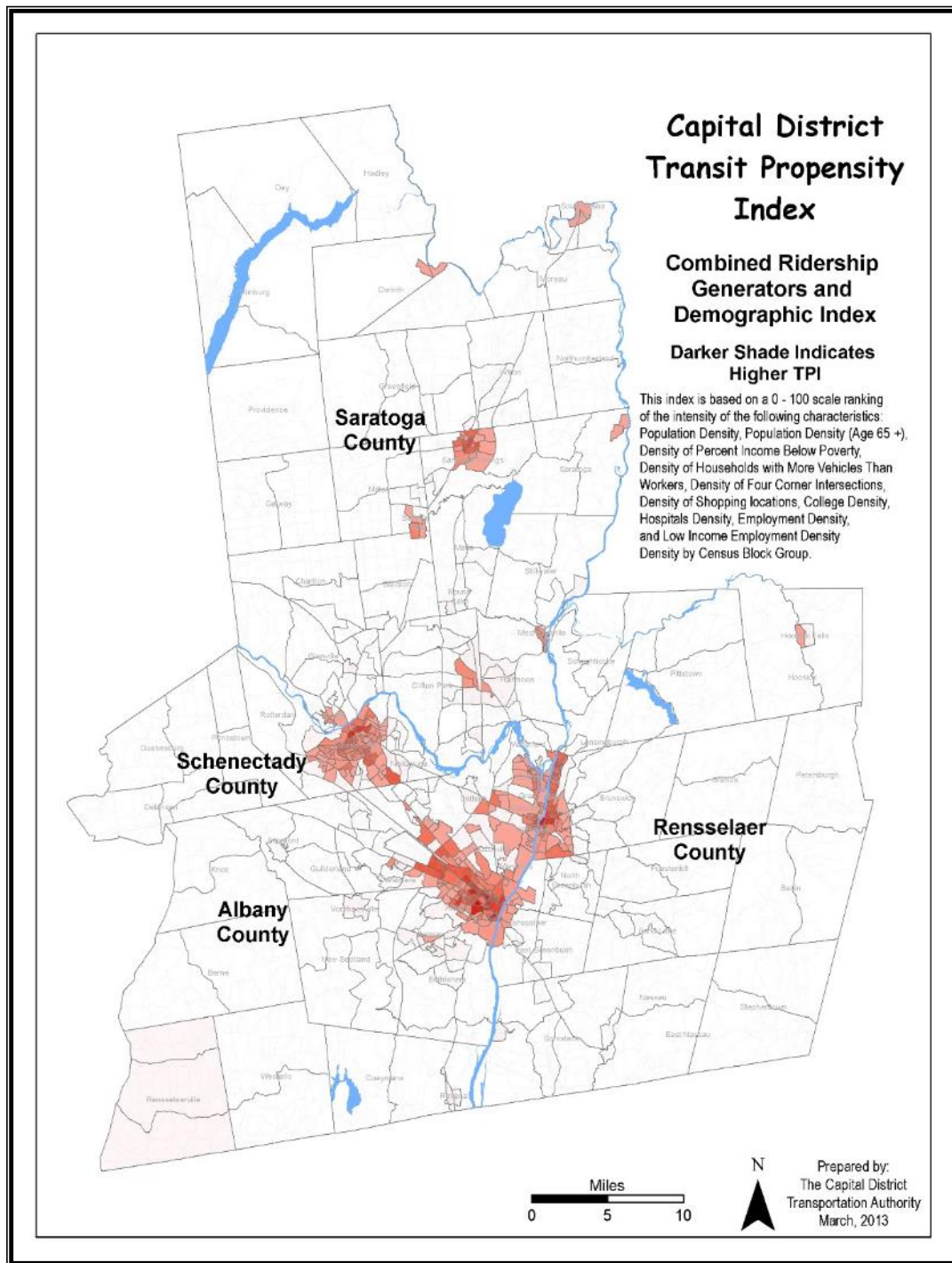


A large majority of development in CDTA's operating area over the last 50 years has been automobile-oriented in nature and is not transit-friendly. Therefore, many of the municipalities within CDTA's 4-county service area do not fit Land Use Standards delineated in our TDP. Serving these areas with transit is generally not financially responsible (i.e., transit to these areas is unlikely to generate enough riders to meet service performance standards).

However, after a half-century of auto-oriented development, a significant portion of residences and jobs remain in these areas. Some of these locations may still remain out of the reach of transit. For example, if many roadways have poor connectivity, most or all of the residences along those roadways are single family homes on large lots, and 99% of those households have two personal vehicles. However, some of these areas may have also begun to fill in roadway connectivity, added higher density residences with local services and jobs, and a higher percentage of households with no personal vehicle. The TPI takes a current, comprehensive view of relevant factors to determine where in CDTA's region transit is most viable.

Data is shown at the Block Group level, although some characteristics were only attainable at the Census Tract level. In those instances, all Block Groups in the Census Tract were assigned the same value for those characteristics. In addition, employment data was provided at the block level and aggregated to the block group level. Attributes at the Census Tract level are income below poverty, population and age, and households by vehicles.

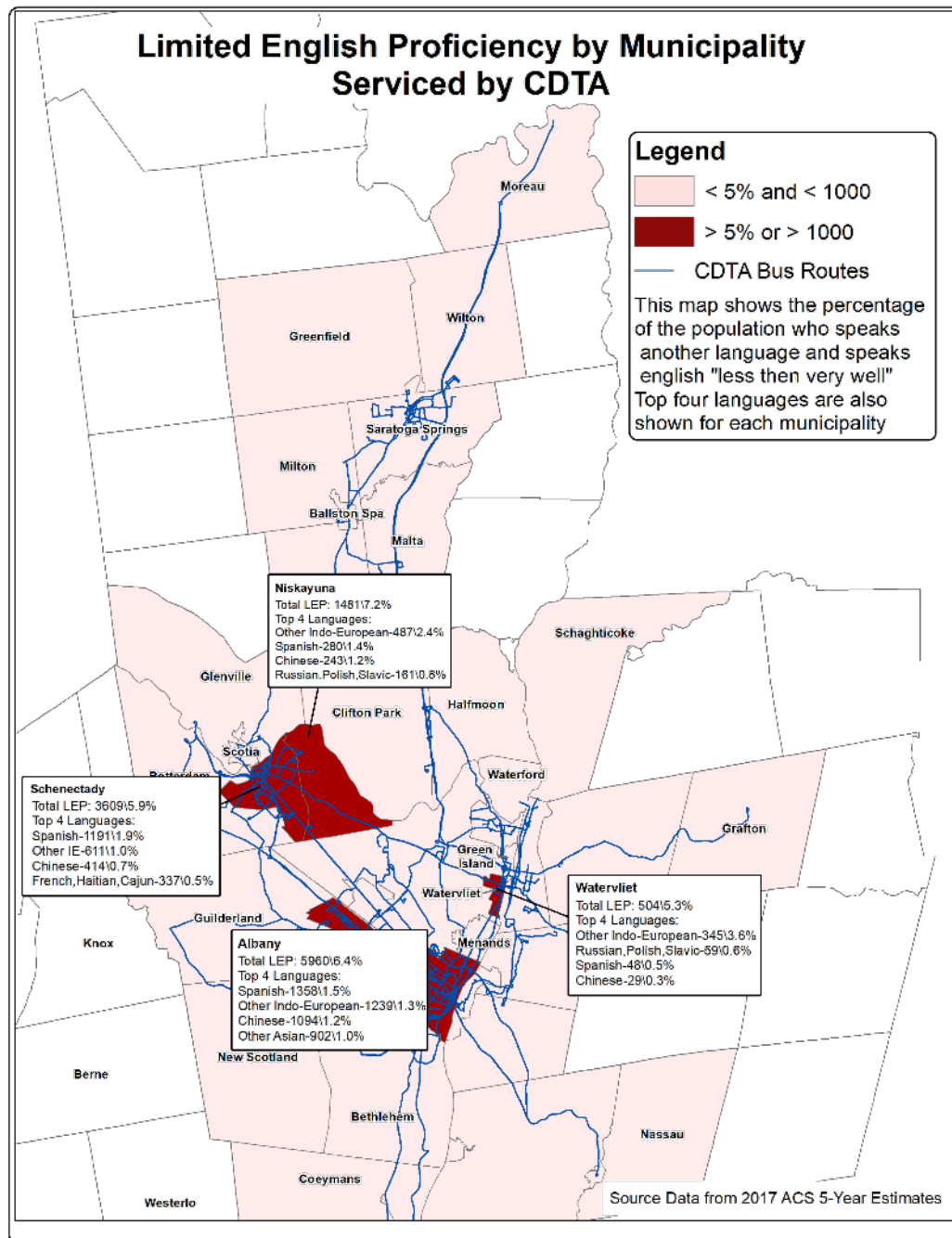
As shown in the resultant map, areas of high transit propensity are extremely localized. As a result, these areas are where we focus on service. The population density is too low and non-transit-dependent populations are too high in these outlying areas.



CDTA Transit Propensity Index - Actual Demand for Service in CDTA Service Area

The next step was to zero in on LEP populations within the municipalities we serve. This step enabled us to *obtain census data on the LEP population in our service area and identify any concentrations of LEP persons within our service area.*

A municipality level map was created using the American Community Survey 2017 5-year data, from table B16001 (language spoken at home with the ability to speak English for population 5 years and older). LEP data was calculated by summing all the languages spoken by persons speaking English “Less than very well”.



Highest Concentrations of LEP Populations (municipality level)

In this case, the *eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered* was very localized.

We then *consulted state and local sources of data*. CDTA surveys its riders at regular intervals. Through surveys, we identified the ethnic makeup of our rider population, and learned that it supported our assessment from other data sources that the most need language assistance is Spanish. We also asked riders if they speak any languages other than English at home.

Language Other Than English Spoken at Home	
Language Spoken at Home	Percentage of Riders
Only English	70.4%
Other Languages	29.6%

Ethnic Makeup of CDTA Ridership	
Ethnic Background	Percentage of Riders
White	40.5%
Black/African American	45.4%
Hispanic / Latino	14.4%
Asian	6.4%
Native American	2.9%

Analysis Factor 2 – Frequency of Contact

The Frequency With Which LEP Individuals Come in Contact With the Program, Activity, or Service

CDTA reviewed the relevant programs, activities, and services as we provide a variety of different services to the four-county Capital Region, with each tailored to the customer needs and market demand of the surrounding area. CDTA's service is primarily comprised of conventional bus service, which is divided into route classifications based on their level of frequency and span. CDTA operates a limited-stop bus rapid transit line called BusPlus along NYS Route 5 between Albany and Schenectady, as well as a commuter coach express service in Saratoga County ("Northway Xpress") along Interstate 87 to downtown Albany. CDTA also provides paratransit services ("STAR") to the disabled who are near our routes but do not have the ability to access them.

BusPlus is CDTA's version of Bus Rapid Transit (BRT), which is a service with enhanced features that improve operations and make it a more attractive travel option than conventional bus service. CDTA began operation of its first BusPlus line (Route #905 – Red Line) in April 2011 along the 17-mile stretch of NYS Route 5 between downtown Albany and downtown Schenectady. This service has been extremely successful since roll-out, with ridership growing by over 25% in its first five years. We plan to implement two more BusPlus lines during this decade.

In addition to our fixed-route bus service, CDTA offers STAR (Special Transit Available by Request), a paratransit service that provides door-to-door transportation on an advance reservation basis, for people with disabilities who are not able to ride an accessible fixed-route bus. STAR operates within $\frac{3}{4}$ of a mile of a CDTA's fixed route bus system, on the same days and times of the specific bus route that is within that distance. STAR is a shared ride with other passengers and provides origin to destination rides for work, appointments, shopping, and social activities. To become eligible to use STAR service, an individual must submit a completed pre-evaluation form and be certified eligible by an independent evaluator as determined by CDTA. Similar to the Northway Xpress as it is a unique, enhanced service, STAR has a separate fare structure than the fixed-route system.

The Northway Xpress (NX) is a premium-fare express services that runs from various Saratoga County locations, including park & ride lots along the Northway (I-87), to downtown Albany. Unlike other express routes, the NX is uniquely branded and is serviced by over-the-road commuter coach buses with improved comfort and passenger amenities. Because the NX operates longer distances and is a more attractive ride than a conventional transit bus, it has a separate zone-based fare structure.

CDTA operates a Summer Trolley service in the city of Saratoga Springs to help accommodate the increased volume of people who occupy the city during the tourist intensive summer months. The trolley service connects Saratoga Spa State Park, the Saratoga Performing Arts Center (SPAC), Saratoga Gaming and Raceway, the Saratoga Race Course, and the downtown shopping and entertainment district in a two-way belt. The trolley operates between Memorial Day and Labor Day, and changes its route pattern slightly to more directly serve the Saratoga Race Course at the start of “Track Season” in early July.

CDTA provides direct weekly service to shopping malls from parts of the region that are too difficult or inefficient to reach with the regular fixed-route transit system. The primary users of shopping buses are senior citizens, who may not have access to a car or be able to walk to regular transit services, but need regular transportation to gain access to essential items and services. CDTA operates shopping buses from the communities of Castleton-on-Hudson, North Greenbush, Ravena, Schenectady, and Troy.

Our review of on-board surveys conducted as described in the analysis assisted us in understanding types (demographics) of consumers we have, and the needs for LEP services.

As per the guidance/process in Factor 1, we have identified the programs, activities, and services offered by CDTA with which LEP persons most frequently come in contact. Additional information is located in the next section.

Analysis Factor 3 – Importance to LEP Persons

The Importance to LEP Persons of Our Program, Activities, and Services

CDTA reviews input from community organizations and LEP persons. We have two way of doing this – the first is through our Travel Training Program and the second is through on-board surveys.

Because CDTA’s travel trainers perform extensive outreach and have offices that are located within the community based organizations that refer LEP individuals to CDTA, they have direct contact with the LEP community and can assess the needs of LEP persons. The travel trainers report back to CDTA’s Customer Service Department and the Chief Executive Officer, so that the LEP program and activities may be assessed and modified at any given time. The various community organizations that assist and refer LEP individuals to CDTA provide feedback on the way in which CDTA assists LEP populations to determine how effectively we are serving those individuals.

Based on this feedback, we have determined that, for many, access to public transportation is a critical component of their ability to function within society and provide for themselves and their dependents. As shown in onboard survey results, CDTA riders depend on transit service for access to work, education, medical appointments, shopping, among other activities essential to everyday life. As such, CDTA strives to ensure that all individuals, including LEP persons, have full access to public transportation and associated language assistance services whenever necessary.

Analysis Factor 4 – Resources Available

The Resources Available to CDTA and Costs

As the budget for transit service is generally fixed and unable to cover everything that we would provide in an ideal scenario, the allocation of resources must be carefully balanced between our primary responsibility of providing service and all other programs and initiatives. However, it remains CDTA’s responsibility to ensure that all reasonable and cost effective measures are taken when executing the LAP.

The cost of implementation of this program is complex and varied. For example, CDTA spends between \$99,000 and \$120,000 per year on the printing of schedules. To double or triple that by printing the equivalent number of

schedules in one or more alternate languages would not justify the costs of doing so, even without including the staff time that would be required to develop the schedule proof in another language. That estimate only covers the cost of the printing itself.

Based on the current number of requests for interpretation and translation services in Spanish (very few), the costs to accommodate these requests on an as-needed basis are almost zero. CDTA is also confident that, due to the extremely low incidence of requests, on-demand translation services would be delivered in an extremely timely and convenient manner to the customer.

CDTA intends to continue the travel training program, as it is vital not just to the implementation of this plan, but a very important aspect of our customer service system in general. Also, translation of vital documents will continue to be available on the website, including the Title VI Notice, the Title VI Complaint Form, and the Title VI Complaint Procedure. Availability (and procedure) for translation services for other documents is also indicated on the website.

The Five Factor Implementation Plan

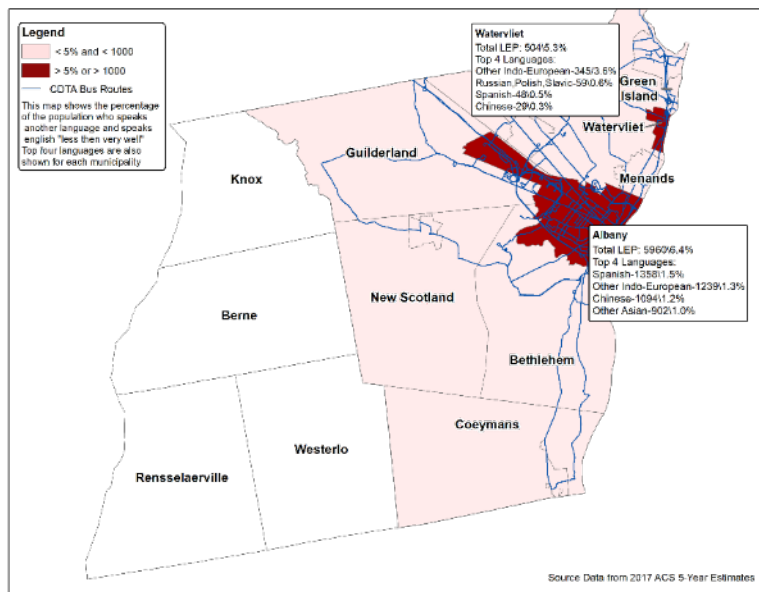
The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Properties with more limited budgets are typically not expected to provide the same level of language service as larger properties with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Having completed the above four-factor analysis, we can determine the appropriate “mix” of LEP services appropriate to this plan. CDTA has two main techniques to provide language services: oral interpretation, either in person or via telephone interpretation service, and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis, as well as the immediate situation. Circumstances may arise where the importance and nature of the activity and number or proportion and frequency of contact with LEP persons may be low and the costs and resources needed to provide language services may be high, in which pre-arranged language services for the particular service may not be necessary. The languages spoken by the LEP individuals with whom we have frequent contact determine the languages into which documents will be translated and the types of interpretation services provided.

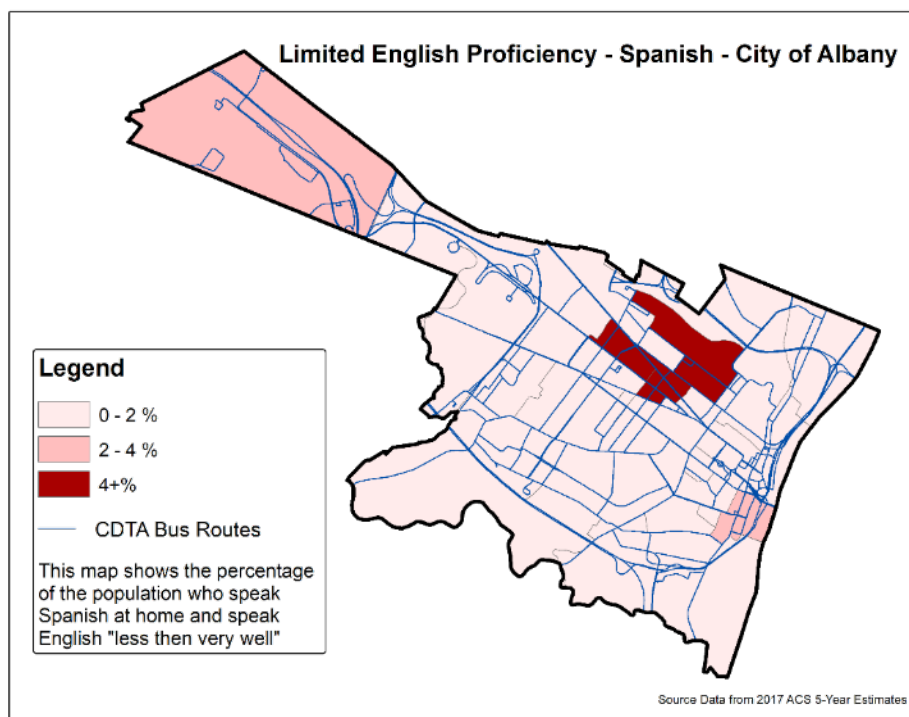
Plan Factor 1 – Identification of LEP Population

Most of this work was completed as part of the four-factor analysis. The highest concentrations of LEP populations exist in Albany County and Schenectady County. Looking closer at Albany County, we see that the highest concentrations (for ALL LEP populations combined together) exist in the City of Watervliet and the City of Albany:

However, within the County of Albany, a concentration of the language with the greatest (>5% or > 1000) number of occurrences (Spanish) exists only in the City of Albany. We drilled down further by census tract and block in Albany and ran the same “speak English less than very well” queries to see where the highest concentrations of those people resided.

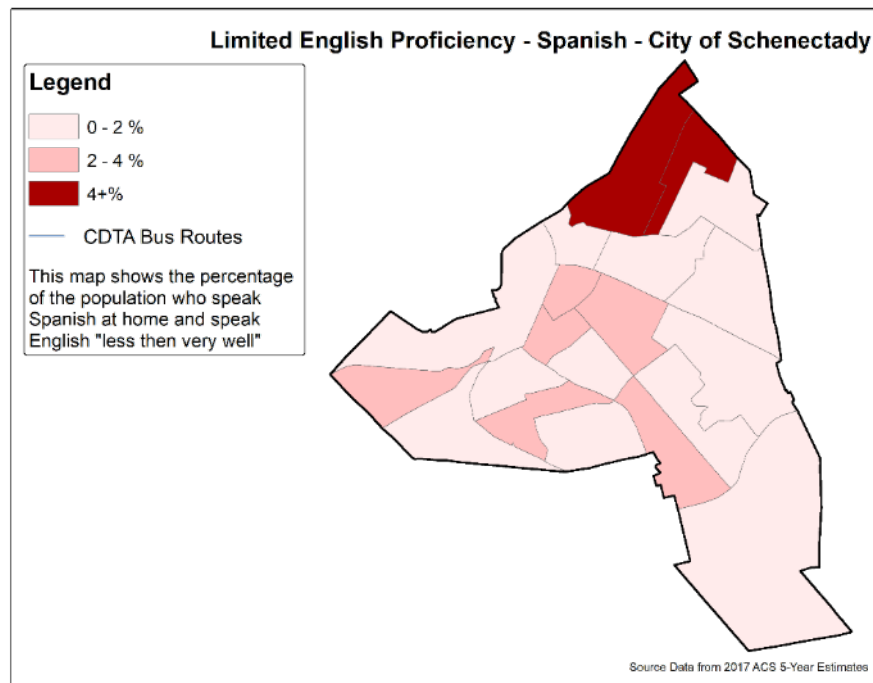


Concentrations of LEP populations in Albany County



Concentrations of LEP populations in the City of Albany

We performed the same review (using the same rationale) in the City of Schenectady:



Concentrations of LEP populations in the City of Schenectady

Going forward, this information will assist CDTA in using targeted, neighborhood-level approaches to outreach.

Plan Factor 2 – Language Assistance Measures

In summary, language assistance measures in place at CDTA include:

- Oral Language Assistance
 - CDTA Customer Service Call Center – Spanish greeting and options for callers are programmed in the phone system, and the Center is staffed with bilingual employees
 - Translators are provided at community public meetings as appropriate
- Trip planning and travel training is available in Spanish
- Written language assistance is available
- Key emergency and safety information on buses is displayed in Spanish
- Pictographs for key functions are displayed on buses
- CDTA website contains a translator service that enables users to translate most materials into over 60 languages. CDTA understands this is not considered the optimal approach for high volume LEP populations, but it does provide a cost effective attempt to provide services to the broadest range of languages. The most heavily needed language, Spanish (as per the analysis), still requires (and has) a more pointed approach.

Outreach opportunities are identified and evaluated on a case by case basis. We actively seek to engage in cost-effective ways to connect at events that have the highest probability of LEP population attendance. For example, as a targeted initiative, we maintain a table with Spanish interpreters at the Annual Albany LatinFest.

Translated rider guides are available and can be customized for specific audiences. For example, in cooperation with the Albany School for Humanities, we developed a rider guide for their Service Learning Club targeted toward

parents of students in their English as a Second Language (ESL) program. Travel trainers are instructed to continually look for other opportunities.

In our customer service call center (managed by the Customer Service Department), we have created queues with prompts in Spanish that indicate if a Spanish speaking operator isn't immediately available, they can leave a message for a call back.

The Customer Service Department employs bilingual representatives to assist with requests from CDTA's LEP population. When a non-bilingual employee receives a call and determines that the caller is LEP, the call-taker informs the LEP caller that he or she will be placed "on hold" and immediately transfer the LEP caller to a bilingual representative so that the appropriate customer service employee may assist the caller. If no available and appropriate customer service representative is present, the call-taker will transfer the caller to the Spanish queue (as applicable).

CDTA will take reasonable steps to develop in-house language competencies in the customer service center by seeking out applicants with specific language skills. Written requests for translation or interpretation services will be immediately forwarded to a bilingual employee in the Customer Service department. Requests in other languages will be coordinated with external partners (such as the U.S. Committee for Refugees and Immigrants).



Rider Guide

CDTA personnel in the field (primarily operators) in need of interpretation services will attempt to identify the LEP individual's primary language through the use of a language identification card. CDTA personnel are expected to follow the general procedures outlined in this plan. However, difficult circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual CDTA personnel. CDTA personnel may use family, friends, or bystanders for interpreting very informal, non-confrontational contexts, and only to obtain basic information at the request of the LEP individual since their use could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation. CDTA personnel should avoid using minor children to provide interpreter services.

Pictographs are useful tools that aid LEP populations in understanding policies and procedures. Pictographs are used on buses, in shelters, and on fareboxes. Examples of pictographs can be found in the appendix of this document. Important safety and procedural instructions are also posted in multiple languages (primarily English and Spanish) as well. Examples of these signs are also found in the appendix.

Plan Factor 3 – Training Staff

Of the limited LEP requests made and interactions that CDTA has, based on the data, the overwhelming majority of these interactions come from operators and customer service staff. Each new CDTA operator must participate in a mandatory 7 week operator training program (whether or not they have a CDL or prior experience). As part of this program, LEP concepts and procedures covered include:

- A summary of CDTA's responsibilities under the DOT LEP Guidance;
- A summary of CDTA's language assistance plan;
- A summary of the number and proportion of LEP persons in CDTA's service area, and the frequency of contact between the LEP population and the CDTA's programs and activities;

- A description of the type of language assistance that the CDTA is currently providing and instructions on how agency staff can access these products and services; and
- References to CDTA's cultural sensitivity policies and practices.

CDTA's Human Resources Training Department has a Spanish training audio course that facilitates speaking Spanish in real-world situations, learning grammar, and building vocabulary. The courseware includes an interactive audio course, e-book (including a conversation course, a beginner book, an advanced book, and a beginner's vocabulary supplement), games, and flash cards. Additional courseware can be purchased if demand exists.

The Human Resources Training Department also maintains a library of Computer Based Training (CBT) that employees can access with appropriate notification or direction from a supervisor. That content includes:

- Global Scenarios, Cross Cultural Communications – A general class on how to manage and work as a team when dealing with different cultures.
- Service Impact, Cross Cultural Communications – A short course showing a difference in style of communications over the phone.
- How To Deal With A Foreign Accent – Primarily intended for customer service representatives.

Customer Call Center (customer service) employees are instructed to notify a supervisor, or a multi-lingual employee, to assist with callers who may qualify as LEP. Details can be found in the Language Assistance Measures section of this plan. Those interactions are tracked and are identified in the Four Factor Analysis.

CDTA operates its programs and services without regard to race, color, national origin, gender, age, disability, economic status, or limited English proficiency in accordance with Title VI of the Civil Rights Act where applicable. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with CDTA. For more information on CDTA's civil rights program, and the procedures to file a complaint, contact 518-482-8822 (including TDD/TTY); email Titlevi@cdta.org; visit our administrative office at 110 Watervliet Ave, Albany, NY 12206; or visit www.cdta.org. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5thFloor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. If information is needed in another language, contact 518-482-8822.

The complaint should contain:

- Name, address, telephone number, and signature of complainant.
- Facts and circumstances surrounding the claimed discrimination, including date(s) of allegations, and basis of complaint (i.e., race, color, national origin, gender, age, disability).
- Names of any persons, if known, who the investigator could contact for additional information to support or clarify the allegations.
- Corrective action being sought by the complainant.

Within ten days of receiving a written complaint, CDTA's Customer Service Department will acknowledge receipt of the complaint. In cooperation with General Counsel, the Department will investigate and make recommendations for resolving the complaint as deemed appropriate.

Federal laws prohibit a recipient of federal funds from retaliating against any person who has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing.

Plan Factor 4 – Providing Notice

CDTA follows the applicable requirements as set for in our Public Participation Plan (PPP). The outreach here includes dissemination of information to local newspapers, the website, social media, and all CDTA vehicles and bus stations.

Additional measures taken to address LEP specific populations include focusing on communicating in venues, environments, events that have a higher than average probability of people attending who are LEP customers. These measures include outreach with organizations such as the United States Committee for Refugees and Immigrants, Catholic Charities, and the Hispanic Outreach Center, and participation with targeted events such as the Annual Albany LatinFest.

Signs are posted at intake areas such as our main administrative headquarters and customer service center. These signs not only notify the customer of their Title VI rights (in multiple languages), but that free language assistance is available. It is also important to state in vital outreach documents that the same free language assistance is available. The single most used document that CDTA distributes is its system map (which doubles as its rider guide). Since March 2014, this document has indicated (“tagged”) that free language assistance is available for Spanish speakers.

The Language Assistance Plan will continue to be

- Distributed to all CDTA supervisors who have direct contact with the public.
- Available in the Human Resources Department.
- Posted on CDTA’s website, www.cdfa.org (along with Title VI policies, and rights to translation and interpreter services)
- Explained in orientation and training sessions for CDTA supervisors and other staff who need to communicate with LEP clients.

Plan Factor 5 – Monitoring and Updating the LEP Plan

Frequency of consultation with community organizations as well as internal staff is commensurate with the limited numbers of LEP populations served (or likely to be served), as well as numbers related to LEP specific services. Even so, CDTA is committed to attending to the needs of these populations where reasonable. At a minimum, ACS/census data will be analyzed every three years to identify trends in LEP populations (increases, decreases, changes in distribution). Surveys with stakeholders (employees, sales outlets, community organizations) will be conducted and improved, aimed at identifying changes in LEP needs. Telephone customer service centers, electronic submission of comments/feedback, and direct interaction with CDTA personnel are always promoted as a mechanism for any and all feedback concerns, including LEP and Title VI related issues. Specific information received using any and all of those methods will also be considered when developing the plan.

CDTA will continue to work with the Customer Service, Transportation, and Human Resources Departments to evaluate and improve the effectiveness of LEP programs. Updated information (data) that was collected and provided as part of this plan will be reviewed, and ideas/recommendations from modifications will be solicited, considered, and, where appropriate, implemented. The integrity of Title IV and LEP communications will be assessed. Data collected as part of the STAR paratransit scheduling application, and the customer service/comments database will continue to be collected and used as part of the plan evaluation process. CDTA will continue to look for opportunities to collect additional information that could help with the execution of its LEP and Title VI programs.

Title VI and LEP considerations will always be a component of any public outreach or notification effort. The level and detail of that consideration varies based on the activity. For example, if we implement a major service restructuring, CDTA will evaluate LEP issues at the same time any kind of Title VI equity analysis takes place, and take steps to accommodate LEP populations as deemed appropriate by this plan. Any and all feedback received from outreach efforts will be considered during the development of the plan.

If/when CDTA expands its primary service area beyond the municipalities identified in the Four Factor Analysis, CDTA will incorporate the appropriate census data sets to determine which, if any, LEP populations are likely to be added to our ridership base. At that time, if we determine that a significant LEP population has emerged in our service area, we will either (a) target outreach, feedback, and communication efforts to that population, or (b) conduct a more in-depth analysis of this needs assessment (plan) and update it accordingly. Quantitative and qualitative data will be

used to discern if there have been any noticeable changes in the existing or proposed service areas. At a minimum, this plan is reviewed once every three years.

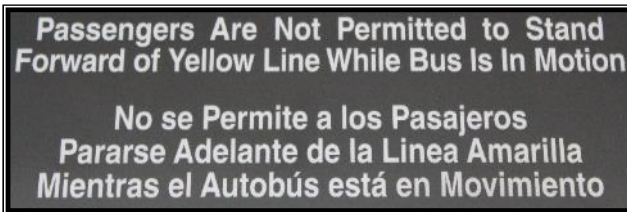
Appendix A – Sample Signage on Vehicles



Front (above driver compartment)



Exterior Bike Rack



Front (above driver compartment)



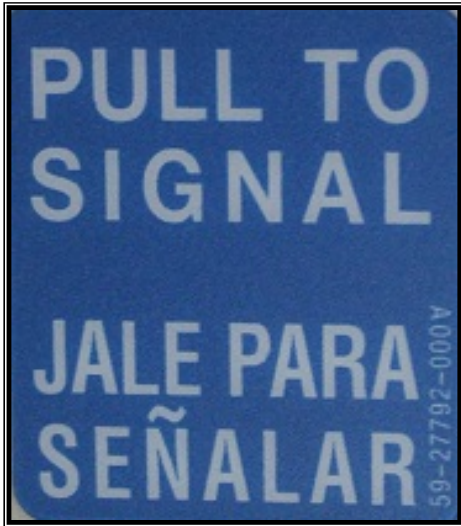
Street Side



Street Side



Both Sides



Interior



Rear Door



All Seats



Grab Handles



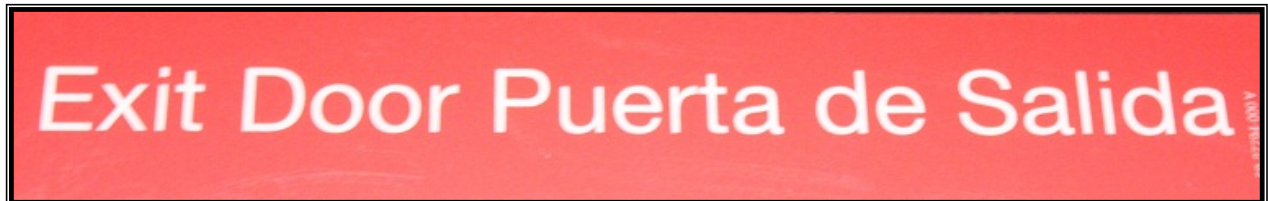
Roof Hatch



Curb Side



Rear Door



Rear Exit



Interior Rear Steps

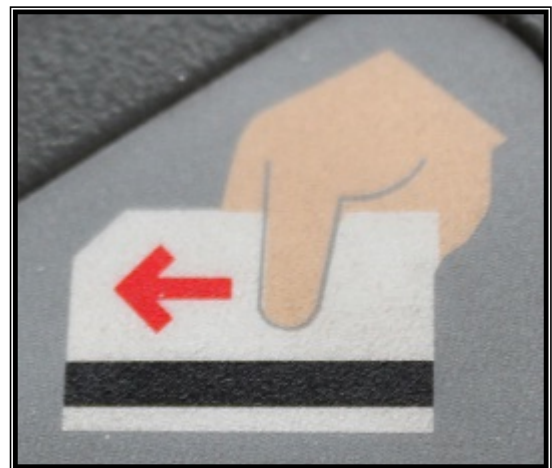
Appendix B – Sample Pictographs on Vehicles



Front (above driver compartment)



Farebox



Farebox

Appendix C – References

FTA C 4702.1B: “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, October 1, 2012, U.S. Department of Transportation Federal Transit Administration

“Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons - A Handbook for Public Transportation Providers”, 2007, The Federal Transit Administration Office of Civil Rights.

"Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons", December 14, 2005, Federal Register /Vol. 70, No. 239; Department of Transportation Office of the Secretary; [Docket No. OST–2001–8696]