Limited English Proficiency (LEP) Plan

Prepared by Capital District Transportation Authority (CDTA)

**In Compliance with Title VI of the Civil Rights Act of 1964
And Executive Order #13166**

Business Development Department
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INTRODUCTION

Individuals that have a limited ability to read, write, speak, or understand English are limited English proficient or (LEP). It is the intent of the Capital District Transportation Authority (CDTA) to serve these individuals to ensure a safe, reliable, 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.

Executive Order # 13166 "Improving Access to Services for Persons with Limited English Proficiency" directs Federal agencies to provide guidance and technical assistance in developing programs for LEP persons. USDOT LEP guidance in Circular 4702.1A and FTA Circular 4702.1A each provide information for grant recipients and sub recipients regarding LEP program guidelines.

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

THE FOUR FACTOR ANAYLSIS

FACTOR 1: THE NUMBER AND PROPORTION OF LEP PERSONS SERVED OR ENCOUNTERED IN THE ELIGIBLE SERVICES POPULATION

The non-English-speaking population in the Capital District is very small (<3%).

DEMOGRAPHICS
According to the US Census 2005-2009 American Community Survey, the population of individuals 5 years and older in Albany County is 282,953, and of that total, 250,825 of those individuals or 88.6% speak English at home. The rest or 11.4% speak a language other than English. See the tables below for data by county:

Table 1: Albany County Language Data

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	**282,953**	**+/-41**	**282,953**	**(X)**
English only	250,825	+/-1,390	88.6%	+/-0.5
Language other than English	32,128	+/-1,379	11.4%	+/-0.5
Speak English less than "very well"	10,401	+/-929	3.7%	+/-0.3
Spanish	9,732	+/-633	3.4%	+/-0.2
Speak English less than "very well"	2,657	+/-348	0.9%	+/-0.1
Other Indo-European languages	14,601	+/-1,075	5.2%	+/-0.4
Speak English less than "very well"	4,730	+/-608	1.7%	+/-0.2
Asian and Pacific Islander languages	5,712	+/-522	2.0%	+/-0.2
Speak English less than "very well"	2,570	+/-461	0.9%	+/-0.2
Other languages	2,083	+/-453	0.7%	+/-0.2
Speak English less than "very well"	444	+/-228	0.2%	+/-0.1

Table 2: Rensselaer County Language Data

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	**146,446**	*****	**146,446**	**(X)**
English only	136,054	+/-775	92.9%	+/-0.5
Language other than English	10,392	+/-775	7.1%	+/-0.5
Speak English less than "very well"	3,641	+/-534	2.5%	+/-0.4
Spanish	3,077	+/-332	2.1%	+/-0.2
Speak English less than "very well"	982	+/-228	0.7%	+/-0.2
Other Indo-European languages	4,493	+/-541	3.1%	+/-0.4
Speak English less than "very well"	1,372	+/-321	0.9%	+/-0.2
Asian and Pacific Islander languages	2,308	+/-453	1.6%	+/-0.3
Speak English less than "very well"	1,147	+/-315	0.8%	+/-0.2
Other languages	514	+/-220	0.4%	+/-0.1
Speak English less than "very well"	140	+/-92	0.1%	+/-0.1

Table 3: Schenectady County Language Data

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	**141,236**	**+/-78**	**141,236**	**(X)**
English only	126,967	+/-1,007	89.9%	+/-0.7
Language other than English	14,269	+/-1,002	10.1%	+/-0.7
Speak English less than "very well"	4,885	+/-535	3.5%	+/-0.4
Spanish	5,050	+/-492	3.6%	+/-0.3
Speak English less than "very well"	1,628	+/-300	1.2%	+/-0.2
Other Indo-European languages	5,928	+/-616	4.2%	+/-0.4
Speak English less than "very well"	1,873	+/-300	1.3%	+/-0.2
Asian and Pacific Islander languages	2,550	+/-529	1.8%	+/-0.4

LANGUAGE SPOKEN AT HOME				
Speak English less than "very well"	1,075	+/-322	0.8%	+/-0.2
Other languages	741	+/-338	0.5%	+/-0.2
Speak English less than "very well"	309	+/-164	0.2%	+/-0.1

Table 4: Saratoga County Language Data

LANGUAGE SPOKEN AT HOME				
Population 5 years and over	**204,449**	**+/-50**	**204,449**	**(X)**
English only	192,695	+/-937	94.3%	+/-0.5
Language other than English	11,754	+/-932	5.7%	+/-0.5
Speak English less than "very well"	3,099	+/-455	1.5%	+/-0.2
Spanish	3,165	+/-323	1.5%	+/-0.2
Speak English less than "very well"	917	+/-182	0.4%	+/-0.1
Other Indo-European languages	6,127	+/-791	3.0%	+/-0.4
Speak English less than "very well"	1,491	+/-354	0.7%	+/-0.2
Asian and Pacific Islander languages	1,839	+/-360	0.9%	+/-0.2
Speak English less than "very well"	526	+/-227	0.3%	+/-0.1
Other languages	623	+/-258	0.3%	+/-0.1
Speak English less than "very well"	165	+/-119	0.1%	+/-0.1

As shown in the tables above, the LEP population is small as compared to the overall population within each County. 2.8% percent of the region's population speaks English less than very well based upon the four county average results of the ACS 2005-2009 data.

Figure 1: LEP by County Compared to Bus Routes
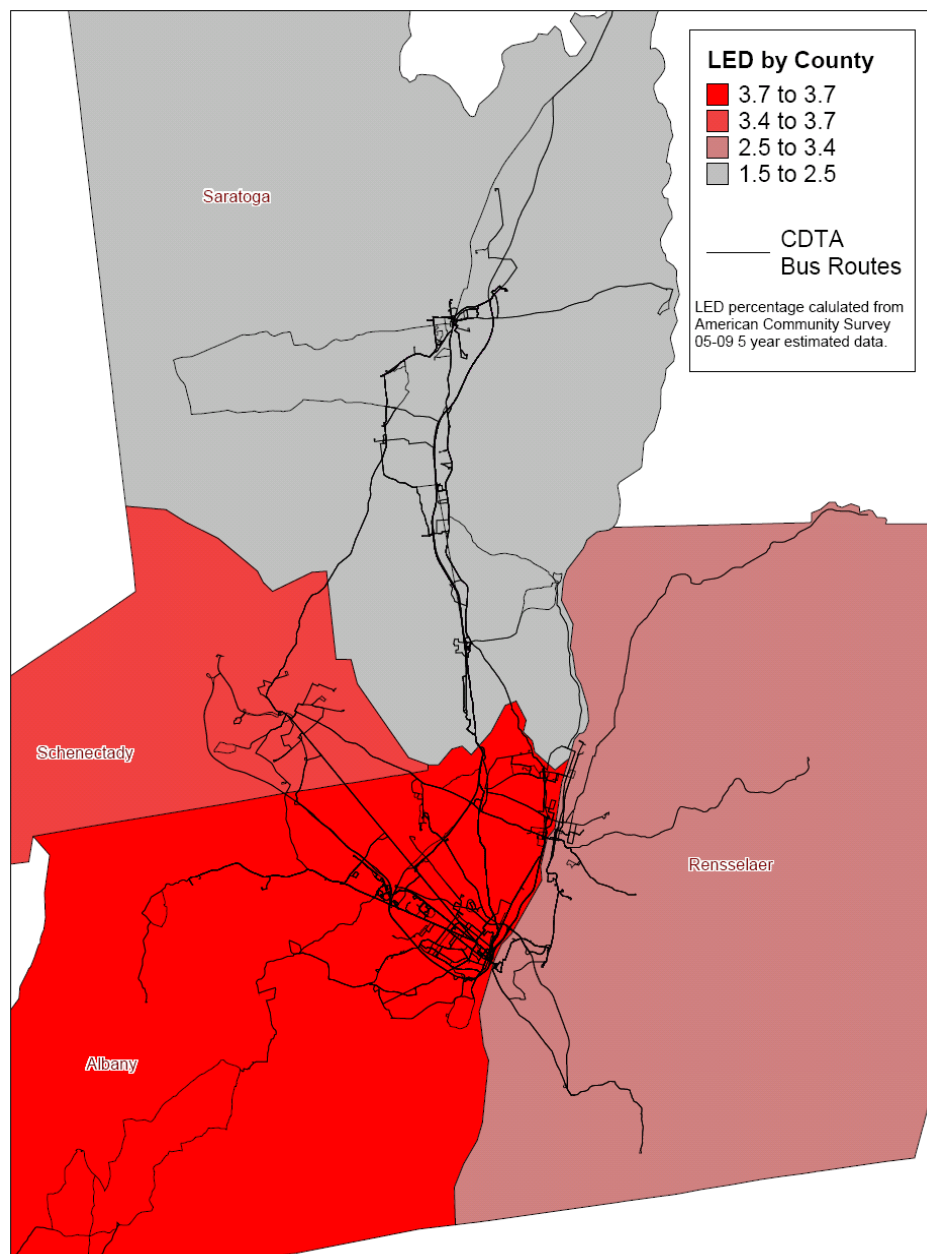
FACTOR 2: FREQUENCY IN WHICH LEP INDIVIDUALS COME INTO CONTACT WITH THE PROGRAM, ACTIVITY, OR SERVICE

CDTA's service routes provide virtually 100% of LEP population. The figure below further breaks down the county data above to the municipality level.

Figure 2: LEP Population by Municipality Compared to Bus Routes
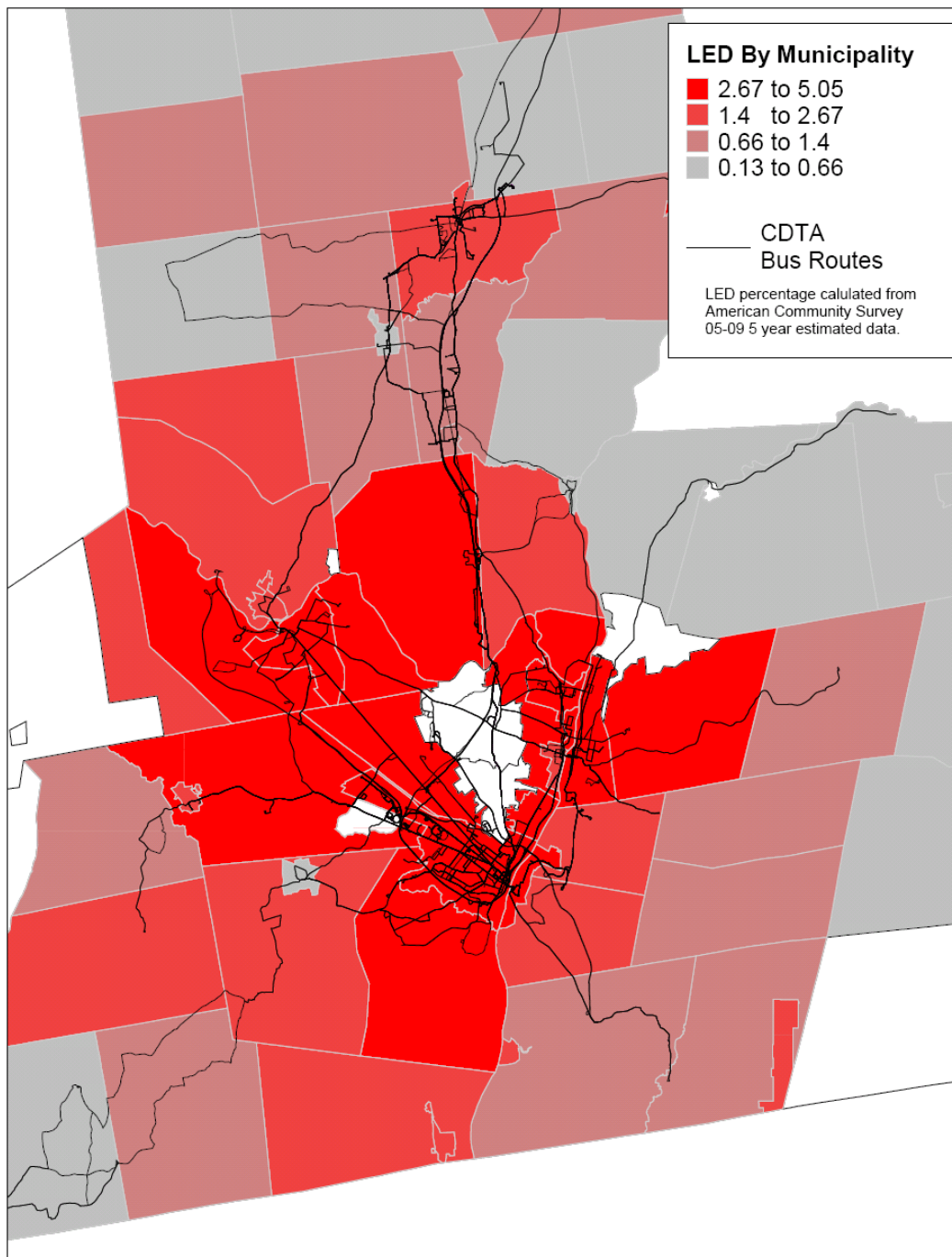
The Frequency with which CDTA comes into contact with LEP individuals is roughly one time per month on average. On occasion, contact is made via CDTA's Call Center, but more often through one of CDTA's travel trainers who is notified in the course of doing community outreach and travel training.

CDTA's travel trainers are highly visible in the community, and provide extensive outreach to citizens and multiple community based organizations and agencies who use CDTA's public transit system. CDTA employs four travel trainers, one for each of the four Counties within CDTA's service area, and one of the travel trainers is fluent in Spanish. The travel trainers provide a face-to face contact within the community to assist individuals who wish to learn more about CDTA's services, and train individuals on how to ride the bus so that they are comfortable and proficient with using the service, and understand how the service is provided. More information is provided about this program in the Implementation portion of this plan.

FACTOR 3: ASSESSING THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE PROVIDED BY THE PROGRAM

The nature and importance of the program can be assessed by the number and frequency by which LEP person's use CDTA's services. We have two way of doing this – the first is through our Travel Training Program and the second is through our regular route 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, the travel trainers have direct contact with the LEP community and can assess the needs of LEP persons. The travel trainers report back to CDTA's Business Development Department and the Deputy Executive Director so that the LEP program and activities can be assessed and modified at any given time. The various community organizations that CDTA works with that assist and refer LEP individuals to CDTA, provide the feedback to the way in which CDTA assist's LEP populations to determine how effectively we are serving those individuals. The tables on the following pages summarize the activities of CDTA's four travel trainers during FFY10.

Table 5: Summary of Travel Training Activities FFY09

	Trip Assists					Events					Job Fairs				
	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL
Oct-09	2	2	2		6	1		4		5		4	1		5
Nov-09	1	2	1		4	2	4	5	5	16			1	1	2
Dec-09			2	2	4		2			2	1	3			4
Jan-10			1	3	4		2	1		3				1	1
Feb-10			1	3	4		2			2			1		1
Mar-10				5	5		2	2	1	5			1	1	2
Apr-10			3	5	8		2	2	1	5		1	1	1	3
May-10				6	6	2		2	2	6			1		1
Jun-10	1	2	2	3	8	2	1	2		5				1	1
Jul-10	2			6	8	1	2	1	2	6	1	3		1	5
Aug-10	1	4		4	9	1	1	2	2	6	1	2		1	4
Sep-10	5	1	4		10	1		1		2	1	1	1		3
TOTAL	12	11	16	37	76	10	16	24	13	63	4	14	7	7	32
			Monthly Average:		6.3			Monthly Average:		5.3			Monthly Average:		2.7

	New Contacts					# of People (all activities)					Group Trainings				
	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL	Saratoga (AT)	Schenectady (BA)	Rensselaer (KI)	Albany (OC)	TOTAL
Oct-09	5	10	1	1	17	25	72	230	25	352		3	1		4
Nov-09	2	2	2	2	8	25	31	21	25	102		2	1	2	5
Dec-09	2	1	1	2	6	25	266	50	25	366	1	1	1	1	4
Jan-10					0	25	147	202	200	574	1	1	1	1	4
Feb-10	2	2	2	2	8	125	80	125	35	365	1	1	2	1	5
Mar-10	1	1	1	1	4	130	230	130	75	565	1	2	2	1	6
Apr-10	1	1	1	1	4	40	255	170	150	615	1	2	2	1	6
May-10	1	1	1	1	4	112	225	112	225	674	2		2	2	6
Jun-10	1	1	2	1	5	159	185	265	82	691	2	1	2		5
Jul-10	1	1	1	1	4	160	160	125	175	620	1	2	1	2	6
Aug-10	2	2	2	2	8	750	750	750	125	2375	1	1	2	2	6
Sep-10	1	1	1	1	4	350	750	350	25	1475	1		1		2
TOTAL	19	23	15	15	72	1926	3151	2530	1167	8774	12	16	18	13	59
			Monthly Average:		6.5			Monthly Average:		731.2			Monthly Average:		4.9

CDTA surveys its riders at regular intervals. The following table shows the ethnic make-up of our rider population, and supports our assessment from other data sources that the most need language assistance is Spanish.

Table 6: Ethnic Composition of CDTA Ridership

FACT FINDERS

CDTA

2009 CDTA Regular Route Rider
Satisfaction Research Program

ETHNIC BACKGROUND

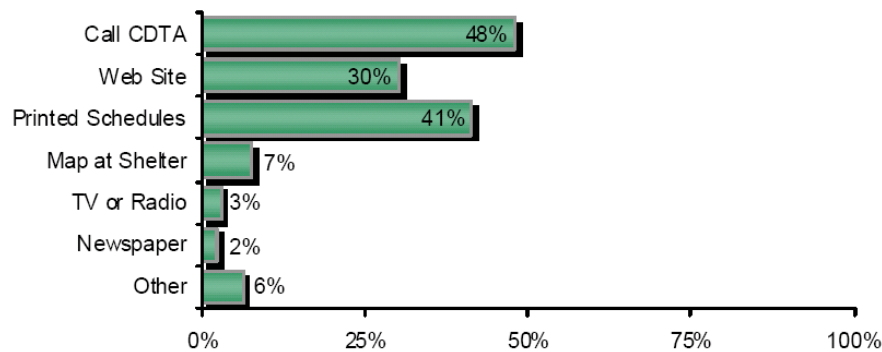| Ethnic Background	CDTA Regular Route Riders Year-to-Year Trend			
	May 2006	August 2007	August 2008	October 2009
White	52.9%	49.8%	52.8%	45.0%
Black / African-American	29.7%	34.1%	30.5%	40.0%
Asian	5.3%	3.5%	3.6%	2.4%
Native American	.7%	1.6%	.9%	1.0%
Hispanic / Hispanic-American	7.0%	8.1%	8.6%	7.9%
Other / MultiRacial	4.5%	2.9%	3.6%	3.7%
Total %:	100.0%	100.0%	100.0%	100.0%
(N)	741	627	663	917

We also ask our riders how they usually get information about our services. The following table is from our 2009 survey, and shows that the call center, the website, and our printed schedules comprise the majority of the information pathways that people get basic CDTA information.

Table 7: How CDTA Riders Get Information

FACT FINDERS

CDTA

2009 CDTA Regular Route Rider
Satisfaction Research Program

USUAL WAY TO OBTAIN CDTA INFORMATION
Among: 2009 Regular Route Riders

Source	Percentage
Call CDTA	48%
Web Site	30%
Printed Schedules	41%
Map at Shelter	7%
TV or Radio	3%
Newspaper	2%
Other	6%

USUAL WAY TO OBTAIN CDTA INFORMATION

Usual Way to Obtain CDTA Information	CDTA Riders - October 2009			
	Regular Route	Saratoga Routes	Express Routes	NX Routes
Call CDTA	48.0%	20.5%	36.1%	12.0%
Web Site	30.1%	32.5%	62.3%	65.3%
Printed Schedules	41.3%	47.0%	32.8%	21.3%
Map at Shelter	7.4%	8.4%	8.2%	1.3%
Newspaper	2.2%	4.8%	4.9%	4.0%
TV or Radio	2.8%	2.4%	.0%	1.3%
Other	6.2%	6.0%	6.6%	13.3%
(N)	940	83	61	75

How do you usually get information about CDTA? Call CDTA, Web site, printed schedules, map at shelter, newspaper, TV or radio, or other?

Note: Column may not sum to 100% due to the multiple response format of the question. This question was changed in 2009 from 'What would be the easiest way for you to get information about CDTA?'.

FACTOR 4: ASSESSING THE RESOURCES AVAILABLE TO THE RECIPIENT AND THE COST

Because CDTA's service area does not have a large LEP population, CDTA provides LEP services on a case by case basis. This methodology represents a cost effective method for applying LEP services because they are relatively infrequent. If the population of LEP individuals was much larger within CDTA's service area, then a broader array of services and materials would be required. CDTA's travel trainers perform extensive outreach and have offices that are located within the community based organizations that refer LEP individuals to CDTA. In this way, the travel trainers are able to keep tabs on how the number and frequency of LEP individuals who require or need access to CDTA services, and can inform CDTA staff of changes that may need to be made in the future should the frequency of LEP individuals using CDTA's services increase.

FIVE POINT IMPLEMENTATION PLAN

POINT 1: IDENTIFYING LEP PERSONS WHO NEED LANGUAGE ASSISTANCE

CDTA used the American Community Survey data to determine the number of LEP individuals residing in the four counties of Albany, Rensselaer, Schenectady, and Saratoga County that CDTA provides transit service to, as documented above.

CDTA assists LEP individuals roughly one time per month on average, and LEP individuals either directly contact CDTA's call center or contact one of CDTA's four travel trainers directly. CDTA has not, in general, provided multilingual materials. We do, however, provide interpretive services, upon request, to those using American Sign Language (ASL) at public meetings and through TTY technology on the telephone. We also have made it a point to have at least one of our Trip Planners, who are stationed in the area's One Stop Employment Centers, and one of the call taker's in CDTA's call center be fluent in Spanish, and when needed, utilize the North East Association for the Blind for when individuals need assistance in Braille and they also refer for assistance in American Sign Language (ASL). Once a need is identified, CDTA's travel trainer who is fluent in Spanish will reach out to that person to assist them in the knowledge and use of the system. We produced our Capital District Job Access Transportation Guide in both Braille and large print.

POINT 2: PROVIDING LANGUAGE ASSISTANCE

CDTA provides language assistance through one of our Spanish Speaking travel trainers, and through the use of a telephonic interpreting device known as the "One Moment Please"

tool are the primary means of assisting LEP individuals. The telephonic interpreting device provides customer assistance in a multitude of languages, and most all of the languages which are found within CDTA's service area. Since persons who speak Spanish represent the largest LEP community in the Capital District, CDTA's Spanish speaking travel trainer is able to assist those individuals on a one-on-one basis. If an LEP individual needs assistance in translating materials in a language other than Spanish, then the telephonic interpreting device or, if available, a translator is used. CDTA's staff uses "I Speak" cards to determine what language a person speaks, and from that information can then assist the individual accordingly through the telephonic interpreting tool.

CDTA is also prepared to use a commercial telephonic interpretation device if necessary to obtain interpreter services to assist individuals as needed. CDTA currently uses the "One Moment Please" telephonic interpreting tool.   The following table is a list of those organizations we work with when a specific community of the population requires translation or interpretation services are needed.

Table 8: Community Organizations that CDTA Works With to Assist LEP Individuals

Agency	Address
United States Committee for Refugees and Immigrants	991 Broadway, Albany NY 12202
Centro Civico Hispano	230 Green Street, Suite 2, Albany NY 12202
Catholic Charities	326 Clinton Ave, Albany NY 12202
Hispanic Outreach Center	30-40 N Main Ave, Albany NY 12202
Albany Housing Authority	625 S Pearl St., Albany NY 12202
One Stop Career Center	175 Central Avenue, Albany NY 12206
Schenectady County Department of Social Services	797 Broadway, Schenectady NY 12305
Independent Living Center of the Hudson Valley	15-17 Third Street, Troy NY 12180
Capital District Employment Opportunity Program	80 Vandenburgh Avenue, Troy, NY 12180
Washington Irving Adult Learning Education Center	422 Mumford Street, Schenectady, NY 12307
Schenectady Community Action Program	870 Albany St, Schenectady, NY 12307
Schenectady YMCA (Shelter Plus Program)	44 Washington Avenue, Schenectady, NY 12305
Back Stretch Workers Program	Saratoga Race Track, Saratoga NY 12305
North East Association for the Blind	301 Washington Ave, Albany, NY 12206
Capital District Center for the Disabled	314 South Manning Blvd, Albany NY 12208

POINT 3: TRAINING STAFF

CDTA provides "English as a Second Language" training for employees who wish to become more proficient in the English language. The training runs from May to September on Tuesdays and Thursdays. The program is provided through a joint effort by CDTA and the Capital Region Board of Cooperative Educational Services (BOCES) group and is held in CDTA's training room. The program is open to CDTA employees, BOCES referrals, community citizens, and individuals referred by Employment or Career Centers, and is a fairly well attended program.

POINT 4: PROVIDING NOTICE TO LEP PERSONS

CDTA provides assistance to LEP persons on an individual one-on-one basis, via CDTA's call center and through one of CDTA's four travel trainers. CDTA does not provide notice to LEP persons on a broader basis through a mass-media or various other means, due to the fact that the number of LEP persons in CDTA's service area is low. Through CDTA's travel trainers and the various community organizations they work with and outreach they perform daily, this method currently represents the most reasonable, cost effective method of providing notice to LEP individuals.

POINT 5: MONITORING/UPDATING THE PLAN

Because CDTA's travel trainers are highly visible within each of the four County's CDTA provides service to, and because the travel trainers have offices located in the community organizations that assist LEP individuals, CDTA is constantly gathering feedback concerning specific needs of LEP individuals, and CDTA's goal although we do not currently serve a large LEP population, is to monitor the needs of LEP individuals on a bi-annual basis. CDTA's travel trainers, call center, and business development staff will, make recommendations based upon individual customer, community feedback, as well as updated Census data and adjust this plan accordingly.