

LEP Language Assistance Plan 2014-2016



October 2013
Capital District Transportation Authority
110 Watervliet Avenue
Albany, NY 12206

Table of Contents

Introduction	4
About CDTA.....	4
The Four Factor Analysis.....	5
Analysis Factor 1 – LEP Persons Served or Encountered	5
Analysis Factor 2 – Frequency of Contact.....	12
Analysis Factor 3 – Importance of LEP Persons	13
Analysis Factor 4 – Resources Available	13
The Five Factor Implementation Plan.....	13
Plan Factor 1 – Identification of LEP Population.....	14
Plan Factor 2 – Language Assistance Measures	16
Plan Factor 3 – Training Staff	17
Plan Factor 4 – Providing Notice.....	18
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 can be “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, 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 above 15.5 million. CDTA operates 270 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 metropolitan area of 800,000 people and have a workforce of 630.

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 to ensure meaningful access, different assistance measures are necessary for different services and in many circumstances, are 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 looking in a number of areas. Surveys were conducted with CDTA fixed route operators (the front line interaction with most of our customers), paratransit operators, managers of sales outlets, customer service representatives, and community partners. Some key points garnered from that process include:

- Of operators surveyed who interact 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 was NOT indicative of what percentage of our overall ridership is composed of an LEP population. 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 was NOT indicative of what percentage of our overall ridership is composed of an LEP population. It does indicate 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.

Next, we *identified scenarios when LEP customers interacted with transit station managers* (superintendants, assistant superintendants, supervisors, travel trainers). Last year, our travel trainers formally trained (in-person)

five (5) Spanish speaking clients. Anecdotally, while staffing various information booths for CDTA, Travel Trainers often aided in the ad-hoc translation of information for customers. For example: College of St. Rose student/parent orientation, Alive @ 5, Saratoga's Race Track event for the Back stretch staff (all of whom speak Spanish, but are not necessarily LEP), or simply riding the buses while training or en route to destinations. These customers amount to approximately 175.

Other *community organizations identified* that have an increased probability of encountering LEP individuals that our staff proactively *works with and has contact with* include:

Ticket to Work and Work Initiatives	P.A.L. Police Athletic League
Northeast Career Planning	Department of Social Services (Albany)*
AIM Support Services (Saratoga County)	Department of Social Services (Saratoga)*
U.S. Committee for Refugees and Immigrants **	Comfortex*
Clear View Center (Equinox)	The Albany Damien Center
Living Resources	Homeless and Travelers Aid Society
Experience Works	NYS Office for People with Developmental Disabilities
AID's Council	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 four (4) *customer service inquires cataloged* (calls to the customer service center combined with inquires on the CDTA website) last year requiring any sort of language assistance (in these cases, Spanish) out of 381,947 (< 1/100 of 1%). 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 accounted for 24 new and 48 returning visitors between 04/01/13 and 08/12/13, although some of these visits would be from CDTA employees.

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 – the customers are not anonymous. There are 28 customers in our database who are flagged as “does not speak English” out of a total of 8849 active clients (0.3%). 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 typically a caretaker (or relative) calls for reservations on behalf of a non-English speaking client. Additionally, an English speaking Personal Care Assistant (PCA) usually accompanies the client on his/her trip. Speaking English is NOT an eligibility requirement for paratransit service. Prior to the past three years, there have been a small number of requests (less than 10) for Spanish interpretation/translation services through STAR. In these cases, a Spanish speaking customer service representative (or operator) was engaged to assist. The last time we conducted community hearings (Title VI, which included specific outreach to LEP populations), 0 attendees were from LEP populations.

The next step when addressing Factor 1 was to *become familiar with data from The U.S. Census*. Datasets reviewed includes 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" with a Universe of "Population 5 years and over".

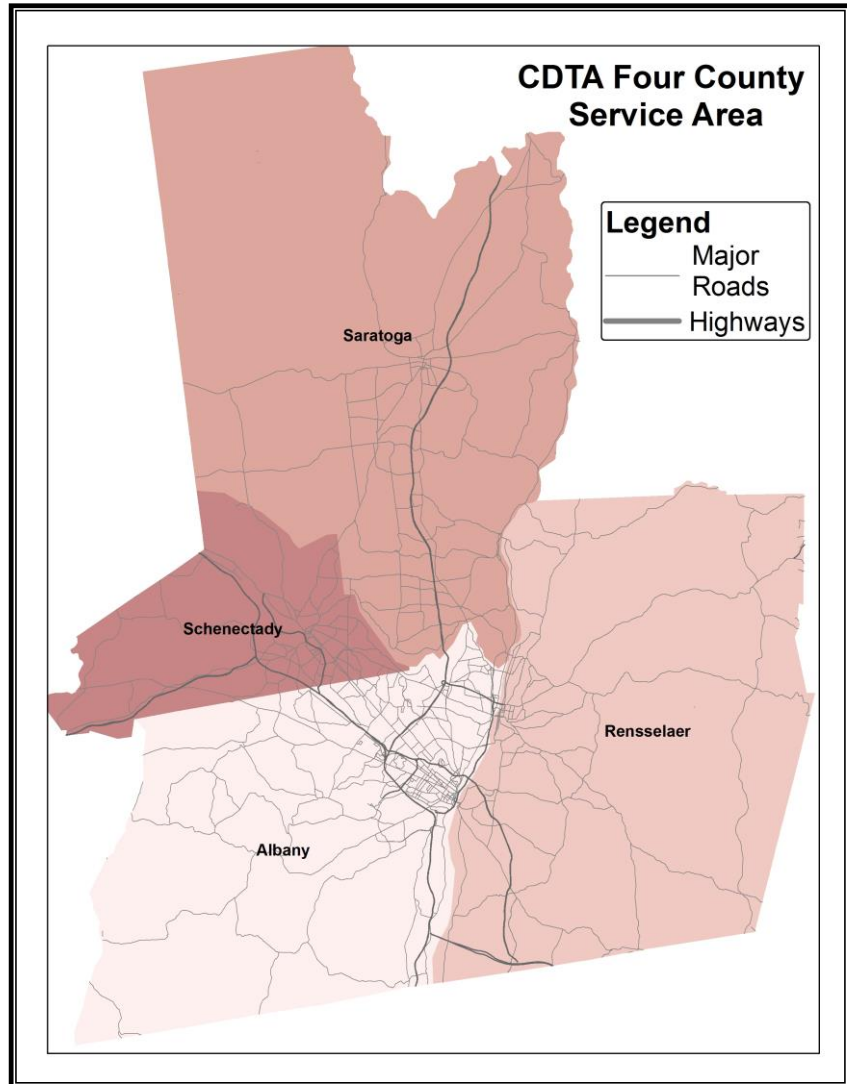
CDTA *identified the geographic boundaries of the area that our agency serves*. As per our enabling legislation, that universe of service area includes Albany, Schenectady, Rensselaer, and Saratoga counties:

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. 22% 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. 12% of residents belong to minority groups.

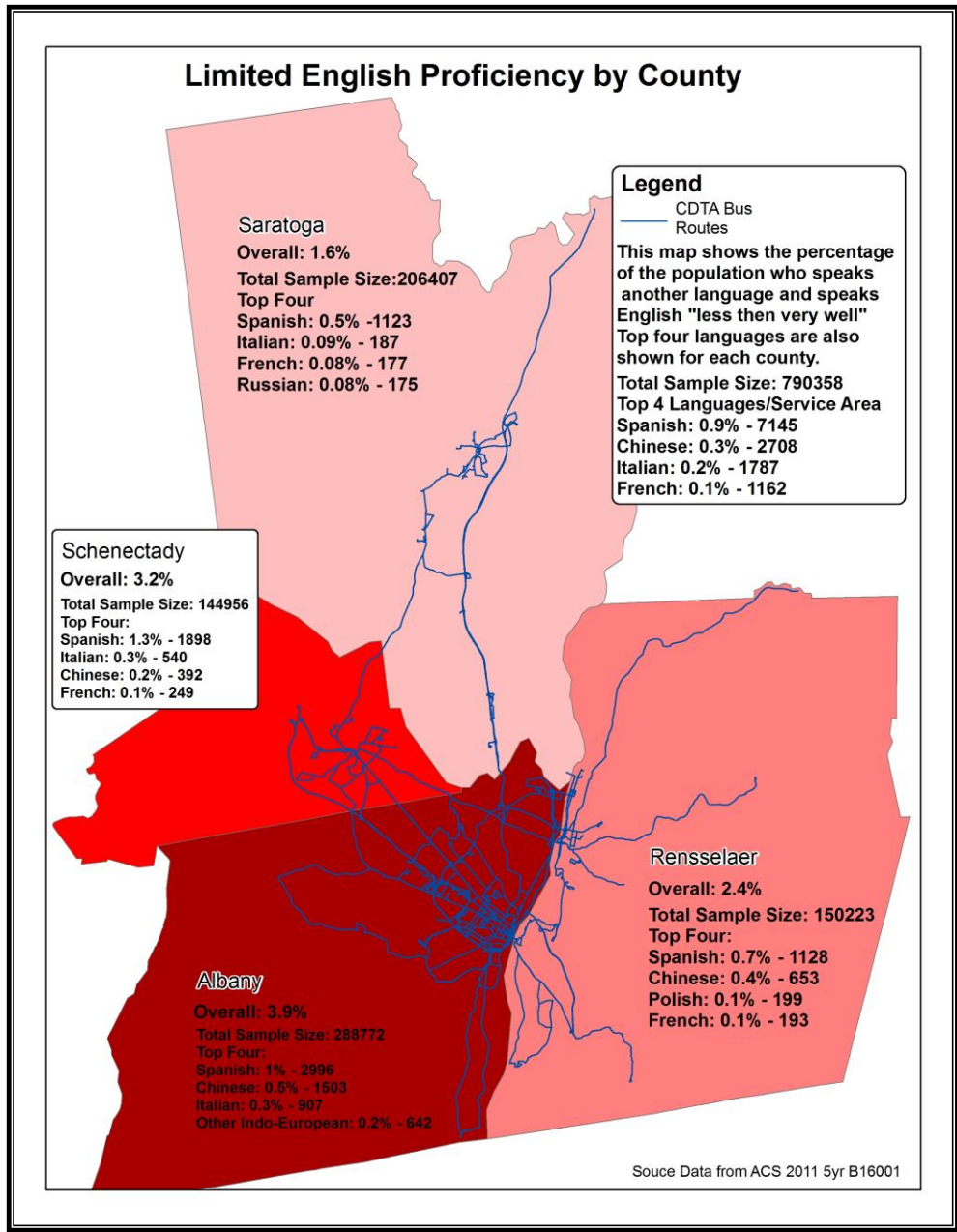
Saratoga County takes up 812 square miles. 70% of the population is urban and 30% is rural. Major communities in Saratoga County include Saratoga Springs, Clifton Park, and Ballston Spa. The median household income exceeds the average for the CDTA service area. 6% of residents belong to minority groups.

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. 20% of residents belong to minority groups.



CDTA Service Area (universe)

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:



Highest Concentrations of Any LEP Populations (county level)

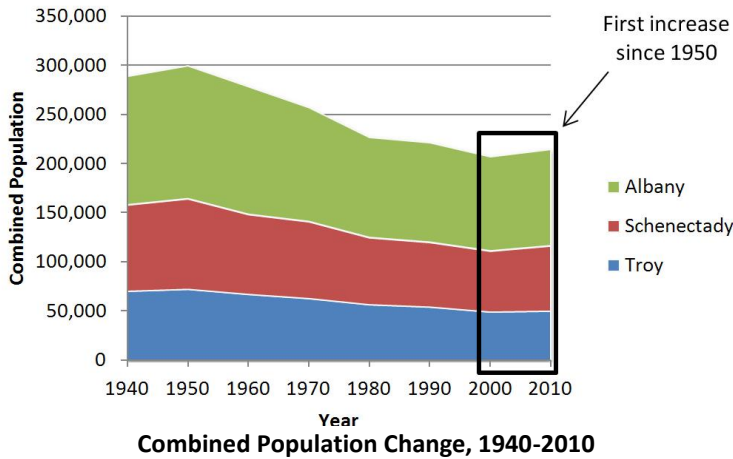
After analyzing the data we collected, we felt that we could drill down further on the data to get a more accurate measure of where these populations resided. We wanted to get to a higher level of detail in terms of understanding specifically where the concentrations of LEP persons live, while at the same time not getting to such a low level that we explain away the relevance. This universe of service area is only realistically 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 select municipalities. This manifestation is driven by demand, as CDTA takes a measured approach to deciding where to implement service (based on a set of

standards). These standards are

described in CDTA's Transit Development Plan (TDP) as well as the Transit Propensity Index (TPI) section within that same document. Of the 2,200 square miles that we can legally serve, it has been 10 years since service has been implemented anywhere outside of the 33 municipalities that currently have service. In short, the TPI helps guide us in determining where demand for transit is greatest. For purposes of this analysis, we focused on those "LEP persons likely to be encountered".

Transit Propensity Index (TPI)

The Capital Region has undergone an increasing number of significant changes throughout the past decade, many of which may help re-establish transit as a more competitive mode of transportation. In the 2010 Census, the region's three largest cities (Albany, Schenectady, and Troy) all experienced population increases for the first decade since 1950.

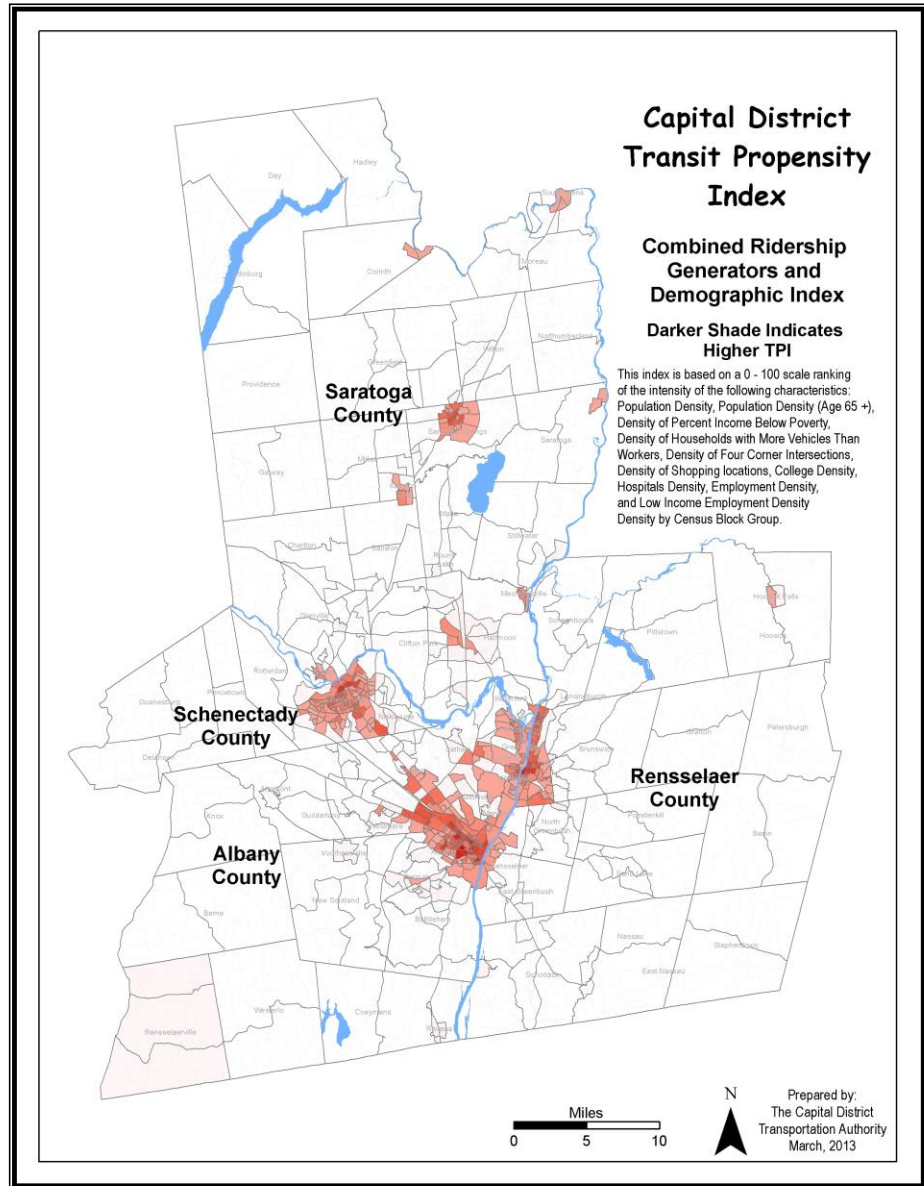


This trend possibly indicates that a larger volume of people are residing near CDTA services, which could increase the demand for transit along already-productive corridors. Nationally, most central cities are now growing more quickly than in their suburbs as well. The Albany-Schenectady-Troy metropolitan area as a whole has grown as well, from 825,875 in 2000 to 870,716 in 2010. While much of this growth occurred 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 provide increased opportunities for reverse commuters.

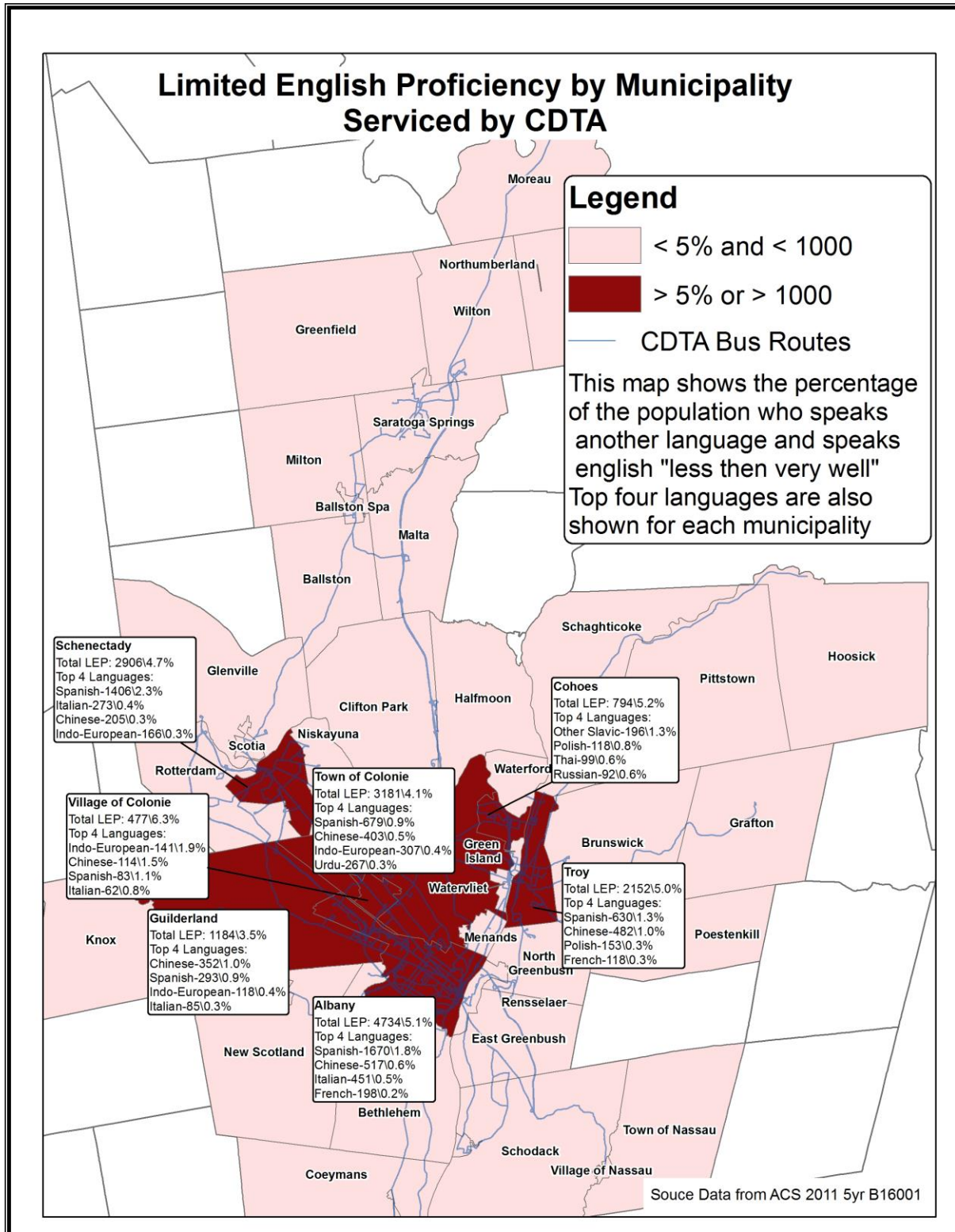
This growth also represents a “double-edged sword” for CDTA, as we may recoup a larger share of expenses through fare revenues, but must also respond to increasing demand by increasing the level of service where necessary. Too great a ridership increase without thoughtful accommodations in capacity may result in overcrowding, which can drive away potential new customers.

A large majority of development in CDTA’s operating area in the last 50 years has occurred for the personal automobile and is not transit-friendly – in other words, it does 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



Actual Demand for Service in CDTA Service Area

unlikely to generate enough riders to meet service performance standards.



Highest Concentrations of Any LEP Populations (municipality level)

However, after many years of transit-unfriendly development, a significant portion of residences and jobs are 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 at the block level and was aggregated to the block group level. Attributes at the Census Tract level are income below poverty, population and age, and households by vehicles. Since these are all demographic attributes, the ridership generators index appears to be more finely grained than the demographic index.

As you can see, the generators are VERY localized – and as a result, this is where we focus on service. The population density is too low and the populations that are not transit dependent are just too high in those outlying areas. 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 5yr (2007-2011) data, from table B16001 (language spoken at home with the ability to speak English for population 5yr and over). Data at the municipality geography (places) was not available for the level of language detail required for this study. This data is only available at the county and census tract geographies.

To get the necessary data for the municipalities we used data at census tract geography. Census tract boundaries conform to municipality boundaries which allowed us to sum all of the data from each census tract and assign those values to the municipality that the tracts fall within geographically. This calculation included the ¾ mile buffer around fixed route service as required by regulations for paratransit service. LEP data was calculated by summing all of the languages that were defined by persons speaking English “Less than very well”.

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 ask our riders how they usually get information about our services. This information is from our FY 2013 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.

How CDTA Riders Get Information	
Source of Information (NOT mutually exclusive)	Percentage of Riders
Printed Schedules	46%
Website	43%
Phone Call	33%
Smart Phone	16%
Social Media	3%
Other	3%

Ethnic Makeup of CDTA Ridership	
Ethnic Background	Percentage of Riders
White	47%
Black/African American	31%
Asian	6%
Hispanic / Hispanic-American	6%
Native American	0%
Other / Multi Racial	9%

Additional sources of information are described earlier in this section.

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 comprised of primarily 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.

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 one of CDTA's express services that run 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 with over-the-road commuter coach buses which have 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 provides additional service between SPAC and the downtown on event nights, based on an agreement between CDTA and LiveNation.

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 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 of 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 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 Customer Service Department and the Chief Executive

CDTA Travel Trainer Interactions	
Activity	Quantity
Presentations/Events/Informational Tables/Fairs	217
Number of Attendees	10,396
New Contacts	302
Trip Plans (including assessments)	170
Trip Assists	193
Group Trainings	49
Overall Number of Customer Contacts	811

Officer so that the LEP program and activities can be assessed and modified at any given time. The various community organizations that assist and refer LEP individuals to CDTA, provide the feedback on the way in which CDTA assists LEP populations to determine how effectively we are serving those individuals. The table above summarizes the activities of CDTA’s travel trainers during October 2012 to July 2013. The *most critical services* CDTA provides are identified in priority order in Analysis Factor 2.

Analysis Factor 4 – Resources Available

The Resources Available to CDTA and Costs

It comes as no surprise that funding is a major concern in the transit industry. However, it is CDTA’s responsibility to ensure that reasonable and cost effective measures are taken when executing the LAP. The costs for the program are many and varied. For example, CDTA spends between \$90,000 and \$110,000 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 be cost prohibitive, and this does not include the staff time that would be required to develop the schedule proof in another language. These estimates are just for the cost of printing.

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’s travel training program is an important part of our service (our travel trainers do much more than just Spanish translation). CDTA intends on continuing the program. Translation of vital documents is 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.

CDTA will examine the costs of purchasing the “Basic Spanish for Transit Employees” guide that was developed by Colorado Mountain College and Roaring Fork Transportation Authority.

The Five Factor Implementation Plan

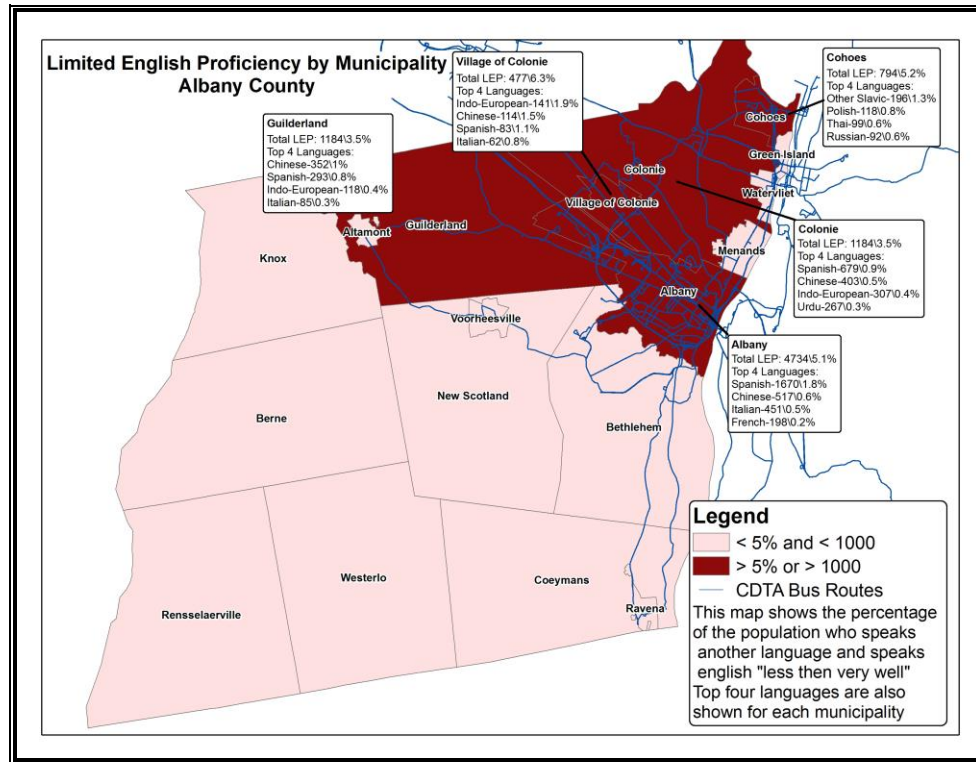
The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Properties with more 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.

After completing the above four-factor analysis, we can determine the appropriate “mix” of LEP services required. We have two main ways 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. There may be circumstances 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.

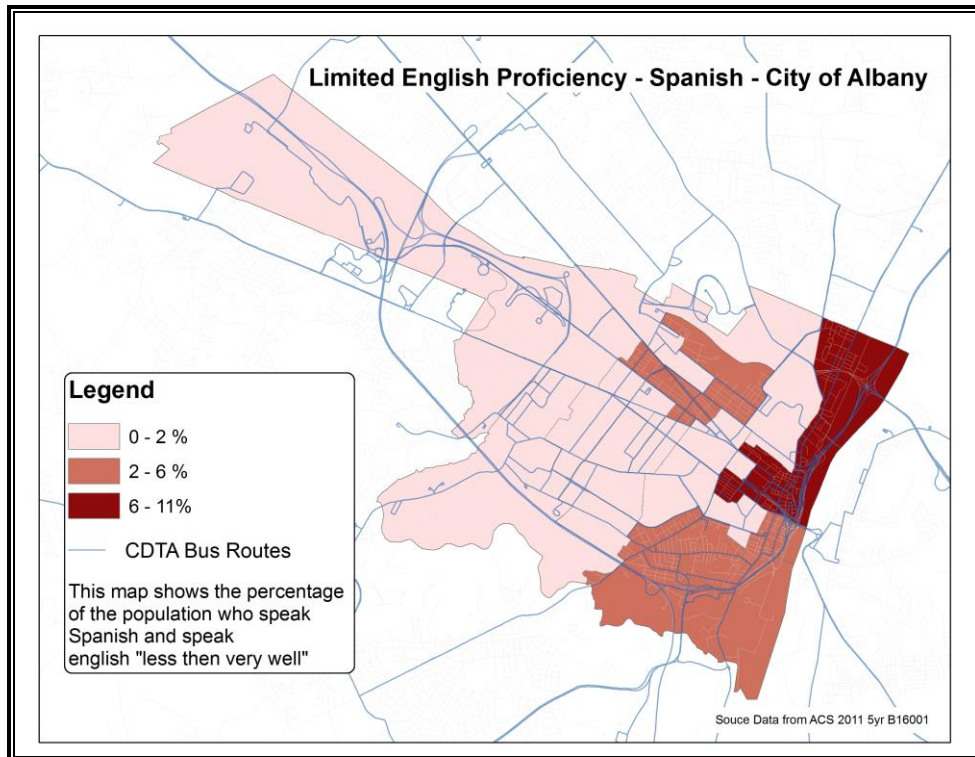
Plan Factor 1 – Identification of LEP Population

Most of this work was completed as part of the four factor analysis. The highest concentrations 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 Guilderland, Colonie, Cohoes, and the City of Albany:



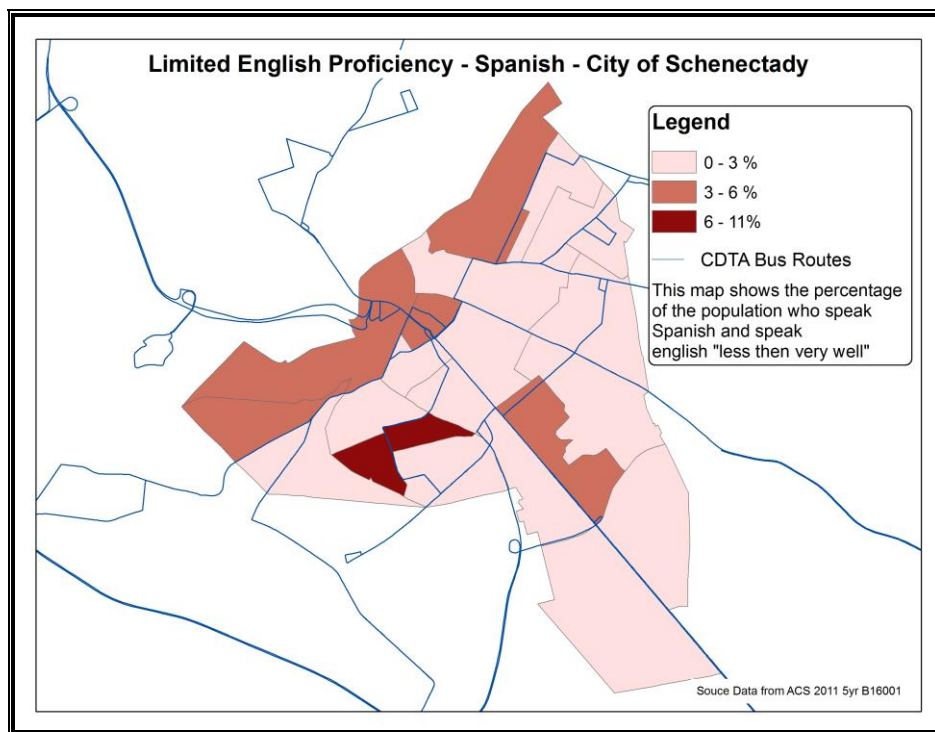
Concentrations of LEP Population in Albany County

However, within the County of Albany, the languages with the greatest (>5% or > 1000) number of occurrences (Spanish) exist 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 Spanish LEP Population in City of Albany

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



Concentrations of Spanish LEP Population in 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 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 Latin Fest.

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.cdt.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 the Title VI 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, Centro Civico Hispano, Catholic Charities, and the Hispanic Outreach Center, and participation with targeted events such as the Annual Albany Latin Fest.

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). Beginning in March 2014, this document will indicate (“tagged”) that free language assistance is available for Spanish speakers. In the future, we will assess translating the entire document into Spanish.

The Language Assistance Plan will 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.cdt.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 queried every three years to identify trends in LEP populations (increases, decreases, changes in distribution). Additionally, surveys with stakeholders (employees, sales outlets, community

organizations) will also 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, included 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 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 and considered. 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 also 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. If we were to implement a supplementary bike sharing program, the outreach may not be so comprehensive. 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 mine the appropriate census data sets to evaluate what, if any LEP populations are affected. At that time, if we determine that there is a significant affected LEP population, 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, the plan is reviewed once every three years.

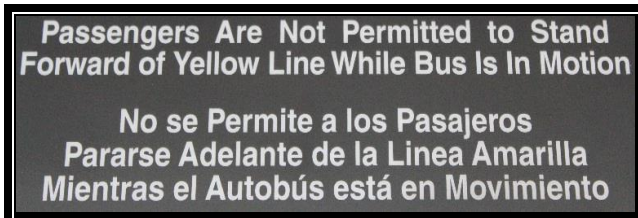
Appendix A – Sample Signage on Vehicles



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

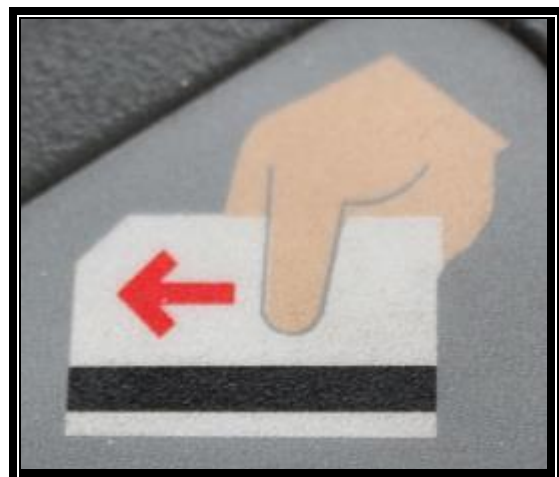
Appendix B – Sample Pictographs on Vehicles



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]