

Limited English Proficiency

Four Factor Analysis and Language Assistance Plan

Greater Hartford Integrated Mass Transit Planning Study, Hartford CT

EXECUTIVE ORDER 13166, August 11, 2000:

IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

In carrying out this order, agencies shall ensure that stakeholders, such as LEP persons and their representative organizations, recipients, and other appropriate individuals or entities, have an adequate opportunity to provide input. Agencies will evaluate the particular needs of the LEP persons they and their recipients serve and the burdens of compliance on the agency and its recipients. This input from stakeholders will assist the agencies in developing an approach to ensuring meaningful access by LEP persons that is practical and effective, fiscally responsible, responsive to the particular circumstances of each agency, and can be readily implemented.[extract]

The Capitol Region Council of Governments is the direct recipient of a Federal Transit Administration National Research Grant, which is an earmark for the City of Hartford. While CRCOG has had an effective Limited English Proficiency analysis and assistance plan since 2005, the FTA requires specific information from their grant recipients. Guidance on these requirements is available in *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers*. The following documents the **Four Factor Analysis** undertaken and the **Language Assistance Plan** developed for the National Research Program Allocation, CT E2009-NATR-8101 Greater Hartford Integrated Mass Transit Planning Study, Hartford CT.

The objectives of this Planning Study project are: 1) to review and synthesize all existing transportation studies and plans into a single concise, coherent and financeable Hartford Transportation Strategy (HTS); 2) to integrate the HTS with City's development program into a detailed Hartford Transportation Action Plan (HTAP); 3) to develop and support a program to move the HTAP forward to implementation; and 4) to develop a final technical report with national applicability regarding efforts to consolidate multiple transit studies into a single action plan.

The FTA guidance is directed at "public transportation providers". While neither CRCOG nor the City of Hartford provide public transportation services, the guidance can be generally applied to a transit planning/research effort. We therefore followed the guidance, keeping in mind that some of the specifics could not be applied to our effort.

Four Factor Analysis

1. Assessing the number and proportion of LEP persons served or encountered in the eligible service population

According to the Census Bureau’s American Community Survey, 114,422 people live in the City of Hartford. Of those, 54% or 61,850 speak only English. 37% of City residents or 42,271 speak Spanish and 42% (17,764) of those who speak Spanish, speak English less than “very well”. That is 16% of the total population. As shown in the chart below, no other population of persons speaking a language other than English comes close to that number. The total of all other people who do not speak English “very well” (all alternate languages except Spanish) was less than 5,000 or about 4%.

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: POPULATION 5 YEARS AND OVER¹

Data Set: 2005-2009 American Community Survey 5-Year Estimates

Survey: American Community Survey

	Hartford Estimate	
Total:	114,422	100%
Speak only English	61,850	54%
Spanish or Spanish Creole:	42,271	37%
Speak English less than "very well"	17,764	16%
French (incl. Patois, Cajun):	1,426	1%
Speak English less than "very well"	399	0%
Italian:	713	1%
Speak English less than "very well"	314	0%
Portuguese or Portuguese Creole:	1,181	1%
Speak English less than "very well"	755	1%
Polish:	920	1%
Speak English less than "very well"	546	0%
Serbo-Croatian:	947	1%
Speak English less than "very well"	558	0%
Other Indo-European languages:	607	1%
Speak English less than "very well"	232	0%
Chinese:	654	1%
Speak English less than "very well"	396	0%
Vietnamese:	329	0%
Speak English less than "very well"	254	0%
Other Asian languages:	372	0%
Speak English less than "very well"	167	0%
Arabic:	323	0%
Speak English less than "very well"	170	0%
African languages:	908	1%
Speak English less than "very well"	461	0%

It is therefore obvious that any alternate language assistance plan must include the Spanish language. However, individuals who do not speak English “very well” but do speak a language other

¹ Languages with less than 100 persons who speak English less than “very well” were omitted.

than Spanish also need to be accommodated as well as possible given the available resources. This will be taken into consideration when the Language Assistance Plan is developed.

In addition to reviewing census data, we reached out to City agencies that have an opportunity to interact with City residents, including the Board of Education, social service agencies, and the City library; and to agencies that provide public transportation services in the City.

City Services. The City operates a 311 call center through which all information about government and City services are available to residents. Many of the service representatives are fluent in Spanish and for other language needs, the City subscribes to a language interpretation service through A T & T Language Line Services.

The Hartford Public Library conducts programs for English Speakers of Other Languages (ESOL) and programs for learning English. The City also provides financial support to a number of private and non-profit organizations that provide ESOL services.

Board of Education. The City Board of Education estimates that nearly 50% of all students who enter the Hartford Schools come from a home where a language other than English is spoken. School notices are sent home in both English and Spanish. Calls for translation in other languages happen about 3 times a week. Since there is usually someone at the schools that speak Spanish, the frequency at certain schools needing Spanish translation is daily while others may be less.

In order to support the schools in communicating with parents who speak a language other than English, the Office for English Language Learner Services has developed a plan for Translation /Interpreter Services. There are about 3,700 ELL students in the Hartford school system. This is about 17.7% of all students (almost 20% of the elementary students and 13.6% of the secondary students). 85.3% of the ELL students have a dominant language of Spanish.

CT Transit. As the operator of the local bus service, CT Transit has developed a robust program of outreach to passengers who do not speak English “very well”. Through partnerships with providers of ESL/LEP services, CT Transit has provided programs in “how to ride the bus” to ESL classes and on cable access channels. In 2009, a Spanish language translation of CTTransit’s website was launched. The site updates automatically, and all content (except PDFs) is translated, including image tags. Previously, only key public meetings and major fare or service change information was available in Spanish. Now all the content is available to their Spanish-speaking customers. A link to the translated Home Page is <http://escttransit.convertlanguage.com/enes/>. Other languages are available through the Google Translate feature.

CT Transit (along with CRCOG in the past) sponsors occasional Bus Users Forums, which provide passengers a “formal” opportunity to provide input on the local bus service. On board bus notices and advertisements announcing the Bus User Forums are made available in both English and

Spanish. Interpreters attend the meetings, to assist any person desiring Spanish interpretation of the proceedings.

Greater Hartford Transit District. The Greater Hartford Transit District (GHTD) is the owner of Union Station, the downtown multimodal transportation center in Hartford; provides transportation services for elderly residents; and is the operator of ADA paratransit services. GHTD provides language assistance services by assuring that employees who work directly with customers and the general public are bilingual. They require their contracted service operator to have staff fluent in Spanish available to provide information to the passengers and the general population. Informational materials and other announcements are posted on each vehicle in Spanish. They provide applications and informational materials in Spanish. Language translation and signing interpreters are available at all public meetings and procedures for requesting such services are included in meeting notices. The contracted service operator's telephone system allows an individual to select Spanish as an alternative language. And, they engage in ongoing outreach to community organizations and agencies to regularly assess and update the needs of LEP individuals in the region.

Of a monthly average 18,200 calls for information to GHTD, about 350 (less than 1%) press the number for a Spanish speaking individual. Out of approximately 35 certification interviews conducted on a monthly basis, approximately 5 individuals (14%) need translation assistance. GHTD employs six reservationists, of which three speak Spanish.

2. Assessing the frequency with which LEP individuals come into contact with the program, activity, or service

The frequency with which LEP individuals may come into contact with the planning effort that is the subject of this report is difficult to predict. However, since the first task is to review existing transportation and land use plans that have been developed for the City and nearby communities, we felt that it would be appropriate to assess the frequency with which LEP individuals sought information through those planning efforts. A summary of a few programs for which information was available is provided below.

- Northwest Corridor Study: interpretation services were offered for every public meeting, but none were requested.
- I-84 Viaduct Study: interpretation and translation services offered in all outreach materials (meeting announcements, newsletters, website, and postcards), but none were requested.
- Griffin Busway Feasibility Study: interpretation services were offered for every public meeting, but none were requested.

CRCOG itself, a planning agency for 30 municipalities, including the City of Hartford, has a LEP program that was first established in 2005. We have translated into Spanish an information brochure describing the function of an MPO, and generally describing opportunities to comment on

our planning efforts. For major planning efforts such as the update to the Regional Transportation Plan and the Transportation Improvement Program, we offer the opportunity to provide a Spanish language interpreter for meetings and we provide translated executive summaries on our website and at public information meetings. We publish public information meeting notices in a Spanish language newspaper. For every special study, we do an early analysis of the population that may be affected by the study and develop a custom LEP (and environmental justice) outreach program for the study. We also have an arrangement with A T & T's Language Line Services in the event that we receive a phone call from a citizen requiring interpreter services. We have twice provided requested interpreter services at transit related meetings (none for other types of transportation planning) and once accessed the Language Line Service.

3. Assessing the nature and importance of the program, activity, or service provided by the program.

The federal guidance for this Factor includes: *“the recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual...”* A planning project, the main goal of which is to understand, consolidate and move forward several transportation and land use grants for the City, is not life threatening or even “serious”. The existing plans have already been subjected to significant public outreach and for the most part have been adopted by the appropriate governmental agency. Consolidation and the execution of an implementation plan will change nothing about the existing plans, except to assure that plans move forward in a coordinated manner.

That said, we are not attempting to minimize the requirement to have an open process and an informed citizenry. An LEP outreach program will be undertaken in conjunction with the normal public involvement process, so that persons with LEP will be assured equal access to information about the planning effort and afforded equal opportunities to comment on the project.

4. Assessing the resources available to the recipient and costs

The grant for this project amounts to \$475,000. \$72,150 has been budgeted for a task to coordinate with all stakeholders, including federal, state, regional and local agencies as well as local citizens; and to advocate for timely implementation of the Hartford Transportation Strategy and Action Plan. Line item budgeting for this task has not been developed as yet, but will be when a consultant is retained. In addition, the project can take full advantage of the City's existing language assistance services.

Language Assistance Plan

An appropriate outreach program to citizens who do not speak English “very well” will be developed as part of the Coordination and Implementation tasks of the project. The project will take advantage of the existing language assistance services already in place within the City, including the 311 call center and

the Language Line Services. Meeting notices will be sent to City agencies, private agencies and non-profit groups who serve persons who do not speak English “very well”. Interpreters will be made available upon request and at a minimum an executive summary of the Hartford Transportation Strategy and Action Plans will be translated and made available in Spanish. These documents can also be posted on the City’s website in a format that will allow translation into other languages as needed. Lastly, the retained consultant will contact groups such as the CT Puerto Rican Forum, the Hispanic Professional Network, ESOL providers, and various religious organizations to determine if additional customized outreach would be appropriate. Since Spanish is the dominant alternate language in the City, most language assistance efforts will be available in that language. Assistance in other languages is available if needed.