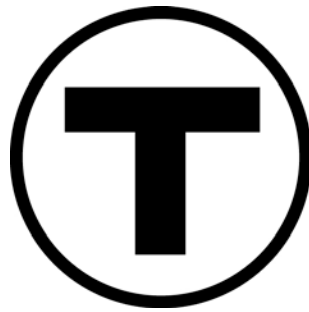


**MASSACHUSETTS BAY TRANSPORTATION
AUTHORITY**



**FOUR FACTOR ANALYSIS UPDATE: ASSESSMENT OF MBTA
PROGRAM NEEDS FOR SERVING PEOPLE WITH LIMITED
ENGLISH PROFICIENCY**

AUGUST 2011

INTRODUCTION

The United States Department of Transportation (USDOT) has published guidance for recipients of its funding, including the Massachusetts Bay Transportation Authority (MBTA), concerning a needs assessment of agency services to Limited English Proficient (LEP) populations. This needs assessment is based on an analysis of the following four factors, which are from USDOT guidelines:

1. The number and proportion of LEP persons served or encountered in the eligible service population by a program, activity, or service of the MBTA

The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.

2. The frequency with which LEP individuals come in contact with the program, activity, or service

The greater the frequency with which LEP individuals from different language groups come into contact with the MBTA's program, activity, or service, the more likely enhanced language services will be needed.

3. The importance to LEP persons of the program, activity, or service provided by the MBTA

The more important the activity, information, service, or program, or the greater the possible consequences of the contact with the LEP individuals, the more likely language services are needed. Importance is based on whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual.

4. The resources available to the MBTA and costs of providing the program, activity, or service

The level of resources and the costs imposed by an LEP policy may have an impact on the extent to which meaningful access can be provided for LEP persons. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits.

The following document presents a summary of each of the four factors.

SUMMARY FOUR-FACTOR ANALYSIS

Factor 1: The number and proportion of LEP persons served

Data from the 2005-2009 five-year American Community Survey (ACS) public use microdata sample (PUMS) was used to analyze the number of LEP persons in the MBTA commuter rail service area (n=208,308) and the urban fixed-route service area (n=138,445).¹ These numbers of LEP persons represent 4.8% and 5.9% of the total populations of the commuter rail and urban fixed-route areas, respectively. The largest proportion of LEP persons in both service areas speak Spanish at home (40.7% in the commuter rail service area and 38.0% in the urban fixed-route service area). LEP populations meeting the DOT definition of LEP² “safe harbor” thresholds (5% or 1,000 individuals, whichever is less) include speakers of:

Commuter Rail Service Area

- Spanish (84,797)
- Portuguese (36,516)
- Chinese (21,793)
- Vietnamese (11,894)
- French (incl. Creole, Patois) (11,651)
- Russian (6,732)
- Cambodian (5,741)
- Italian (4,804)
- Greek (2,893)
- Arabic (2,558)
- Albanian (2,369)
- Korean (2,312)
- Polish (1,515)
- Gujarati (1,246)

Urban Fixed-Route Service Area

- Spanish (52,598)
- Portuguese (22,731)
- Chinese (18,784)
- French (incl. Creole, Patois) (8,363)
- Vietnamese (8,042)
- Russian (6,112)
- Italian (3,772)
- Greek (2,035)
- Arabic (1,724)
- Albanian (1,656)
- Korean (1,611)
- Cambodian (1,546)

Figures 1 and 2 present the percentage of LEP persons that each of the top five languages represents for both service areas.

¹ The 2005-2009 ACS PUMS is an aggregation of five one-year PUMS files, each a 1% sample of housing units and group quarters drawn from the overall ACS sample. This dataset allows the language spoken at home to be cross-tabulated with LEP status. However, data from the ACS can only be associated with geographic units called public use microdata areas (PUMAs). There are only 52 PUMAs in all of Massachusetts, and each has a minimum population of 100,000. Therefore, it is not possible to cross-tabulate the language spoken at home with LEP status below this geographic level, such as by census tract or town. While it is possible to associate PUMA boundaries with those of the two MBTA service areas, these boundaries do not exactly match. Statistics for PUMAs that lie partly within a service area were factored based on the percentage of the 2010 Census population of the PUMA that resided within the service area.

² The number of LEP persons can be defined as those that speak English “less than well” based on a 4-point scale: “very well,” “well,” “not well,” and “not at all.”

Figure 1
Commuter Rail Service Area
Top Five LEP Language Groups and Percentage of Total LEP Persons

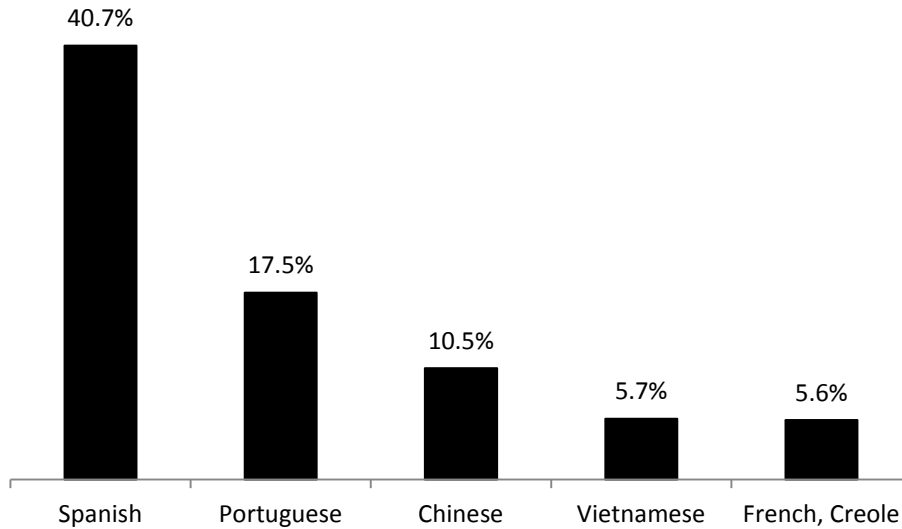
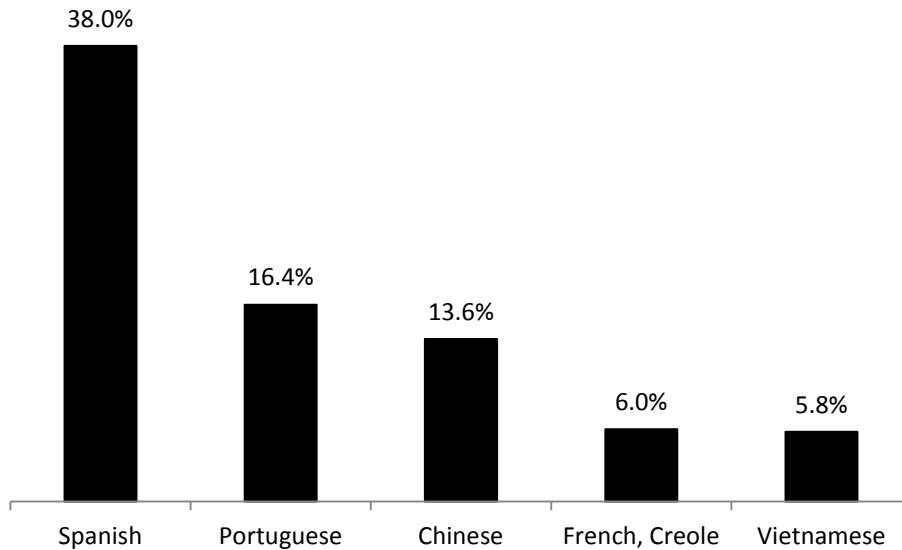


Figure 2
Urban Fixed-Route Service Area
Top Five LEP Language Groups and Percentage of Total LEP Persons



The following figures present data from the 2000 U.S. Census by census tract for the commuter rail service area and the urban fixed-route service area.³ Figures 3 and 11 present the distribution of all population regardless of language spoken at home. These figures essentially depict population density across the respective service areas and show the greatest densities occurring

³ Data are from the 2000 Census long form.

in the urban areas. Figures 4 and 12 present the percentage of LEP persons by census tract. As with population density, the greatest percentages of individuals who speak English less than well primarily occur in urban areas. Figures 5 through 9 and 13 through 17 present the distributions of individuals for whom the primary language spoken at home is Spanish, Portuguese, French or Creole, Chinese, and Vietnamese, respectively, overlaid on the LEP percentages presented in Figures 4 and 12. These are the five languages, after English, which are most reported as being spoken at home.⁴

From the figures, it is apparent that some languages are spoken primarily in and around Boston while others are spoken outside of Boston. Spanish speakers, for example, have a large population in Boston but also in Lawrence and Worcester, while most Chinese speakers are located in and around Boston. Finally, Figures 10 and 18 present the combined distribution of individuals speaking languages at home other than English or the top five languages identified in Figures 5 through 9 and 13 through 17. The number of these individuals is also identified for each city or town by the language spoken.

Qualitative analysis was also used to help to identify the geographic areas where LEP persons are likely to use the MBTA. This included interviews conducted with Boston Region MPO staff, many of whom have spent years counting and surveying MBTA riders. These interviews indicated that:

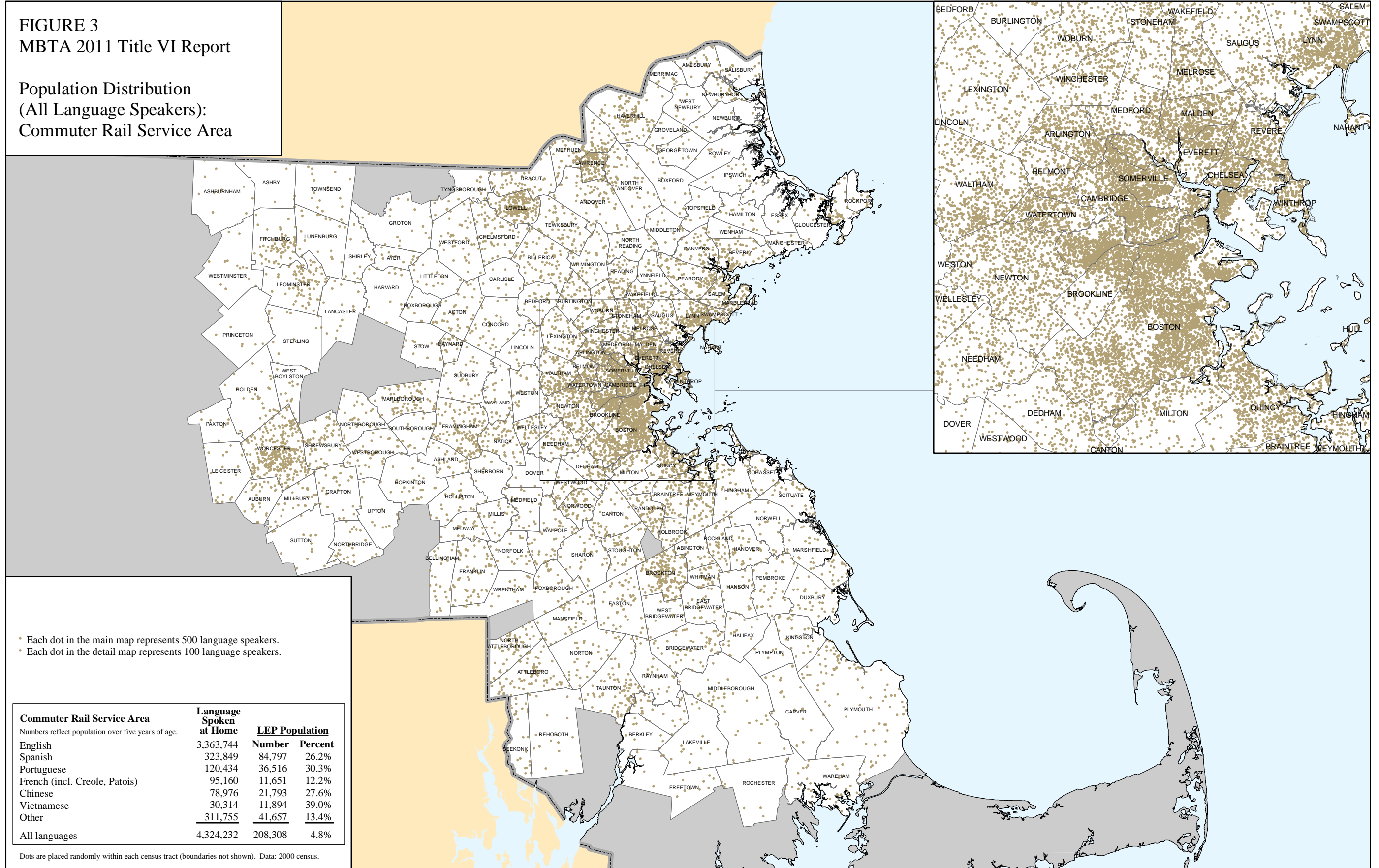
- There exists a correlation between concentrations of individuals who speak a foreign language at home and the number of LEP persons who speak that language. Therefore, while Figures 5 through 9 and 13 through 17 do not directly link language spoken at home and LEP status, they do indicate the areas and languages where LEP persons are likely to use the MBTA.
- However, while there are some concentrations of LEP persons who use certain bus routes or rapid transit stations, these riders travel throughout much of system.

In conclusion, given the large size and dispersed nature of the Spanish-speaking population, the MBTA will promote systemwide improvements in accommodating Spanish-speaking LEP persons. Other languages that are more geographically segregated will first be addressed by accommodating LEP persons in the areas where they live and most often interact with MBTA staff.

⁴ Note that the 2000 Census dataset does not permit the cross-tabulation of the language spoken at home with LEP status at the census-tract geographic level. Instead, in Figures 5 through 9 and 13 through 17, data are presented separately, by census tract for the language spoken at home and the percent of LEP persons (individuals who are not proficient in English).

FIGURE 3
MBTA 2011 Title VI Report

**Population Distribution
 (All Language Speakers):
 Commuter Rail Service Area**



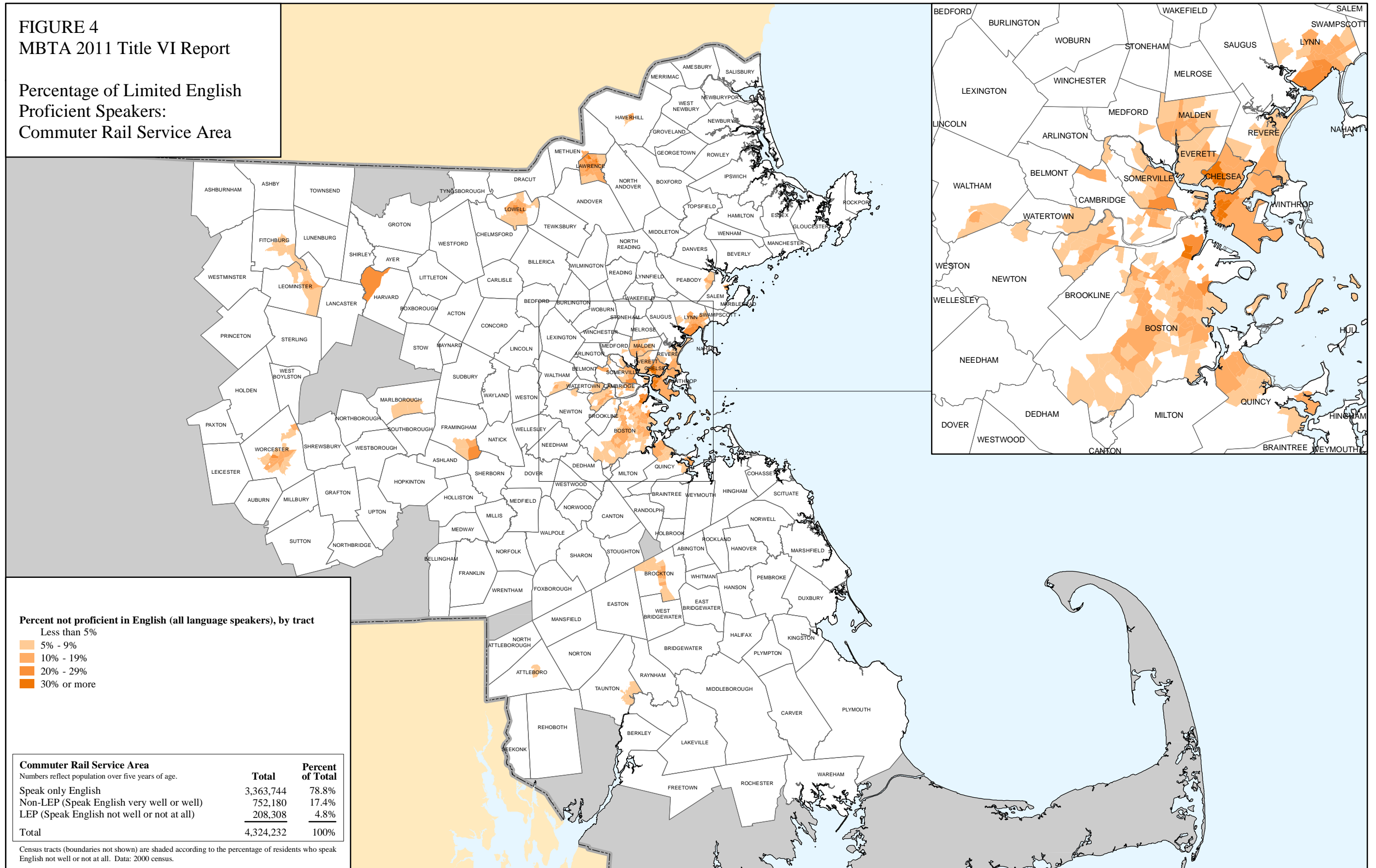
- Each dot in the main map represents 500 language speakers.
- Each dot in the detail map represents 100 language speakers.

Commuter Rail Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	3,363,744	84,797	26.2%
Spanish	323,849	36,516	30.3%
Portuguese	120,434	11,651	12.2%
French (incl. Creole, Patois)	95,160	21,793	27.6%
Chinese	78,976	11,894	39.0%
Vietnamese	30,314	41,657	13.4%
Other	311,755		
All languages	4,324,232	208,308	4.8%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

FIGURE 4
MBTA 2011 Title VI Report

**Percentage of Limited English Proficient Speakers:
 Commuter Rail Service Area**



Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- 30% or more

Commuter Rail Service Area		
Numbers reflect population over five years of age.		
	Total	Percent of Total
Speak only English	3,363,744	78.8%
Non-LEP (Speak English very well or well)	752,180	17.4%
LEP (Speak English not well or not at all)	208,308	4.8%
Total	4,324,232	100%

Census tracts (boundaries not shown) are shaded according to the percentage of residents who speak English not well or not at all. Data: 2000 census.

FIGURE 5
MBTA 2011 Title VI Report

**Population Distribution of
 Those Speaking Spanish at Home:
 Commuter Rail Service Area**

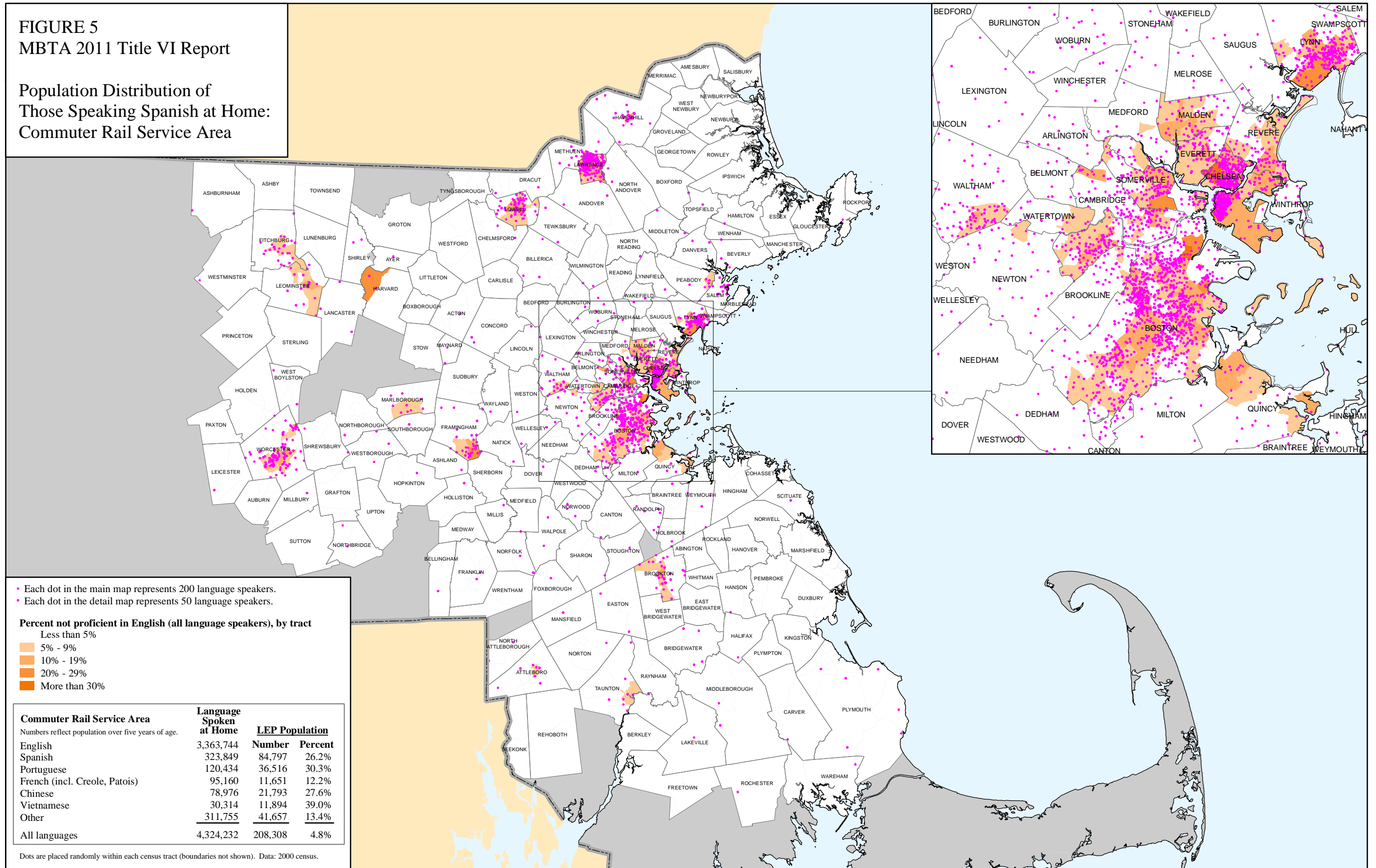


FIGURE 6
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Portuguese at Home: Commuter Rail Service Area

- Each dot in the main map represents 200 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Commuter Rail Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	3,363,744	84,797	26.2%
Spanish	323,849	36,516	30.3%
Portuguese	120,434	11,651	12.2%
French (incl. Creole, Patois)	95,160	21,793	27.6%
Chinese	78,976	11,894	39.0%
Vietnamese	30,314	41,657	13.4%
Other	311,755		
All languages	4,324,232	208,308	4.8%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

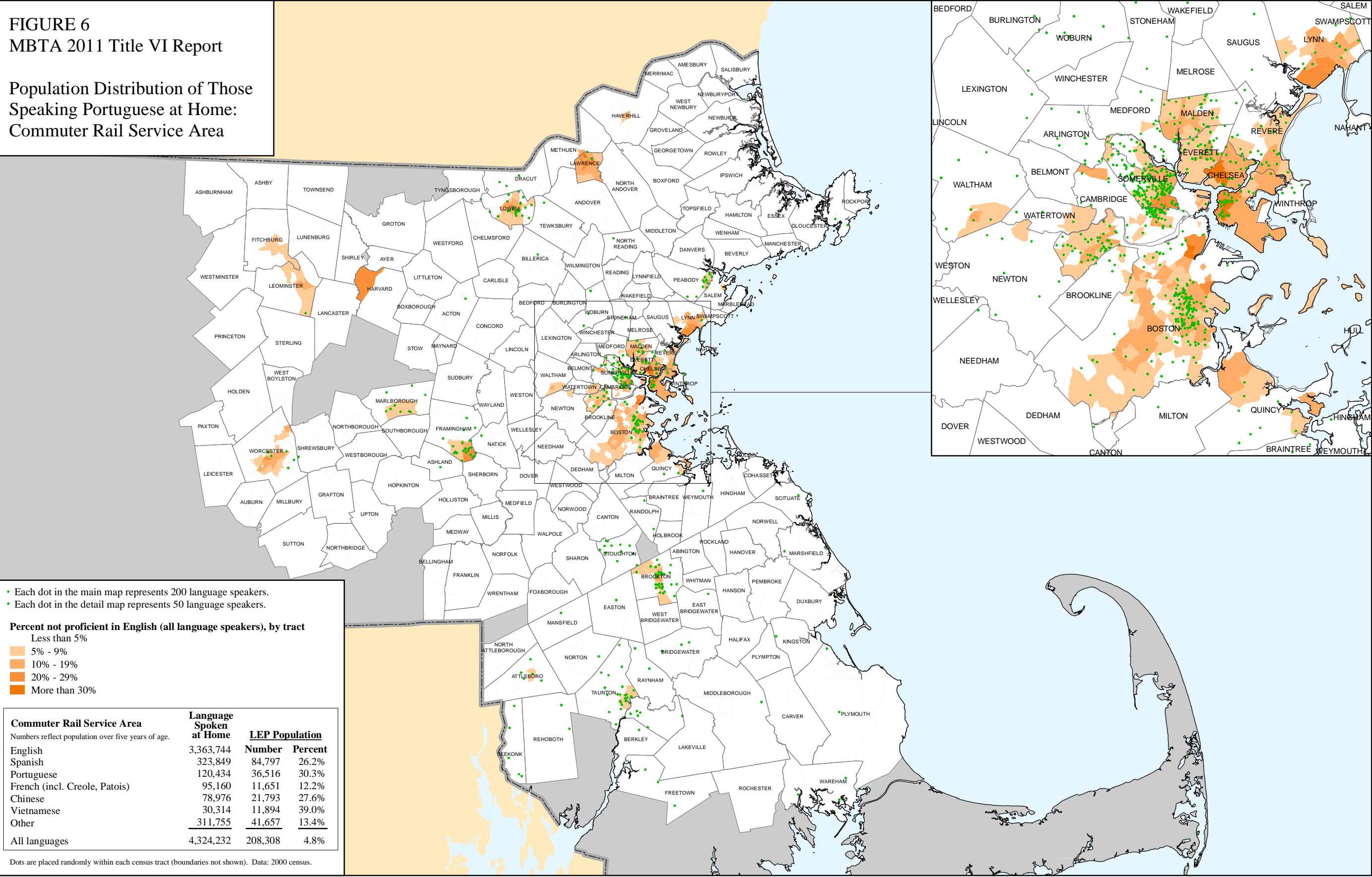


FIGURE 7
MBTA 2011 Title VI Report

Population Distribution of Those Speaking French/Creole/Patois at Home: Commuter Rail Service Area

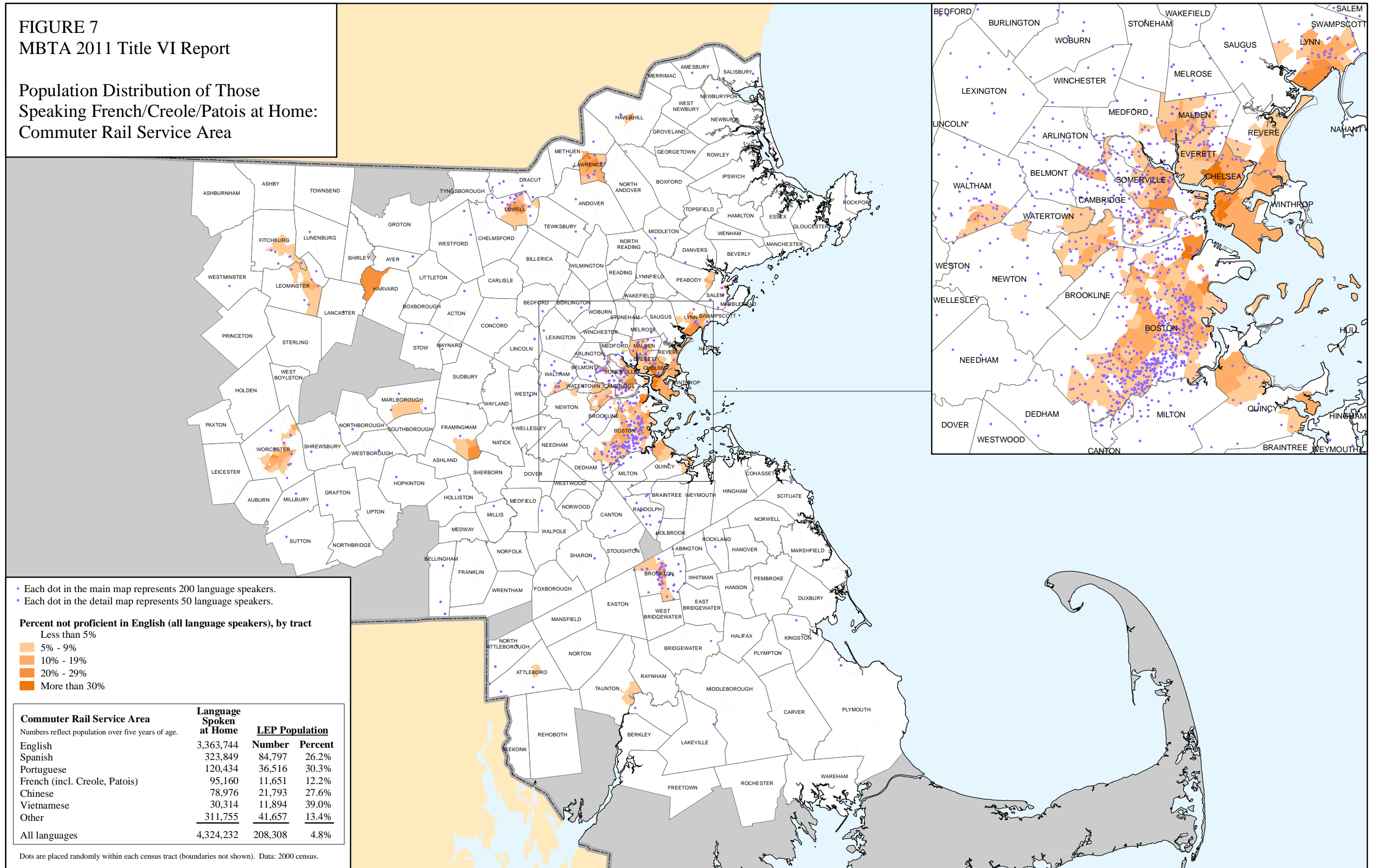


FIGURE 8
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Chinese at Home: Commuter Rail Service Area

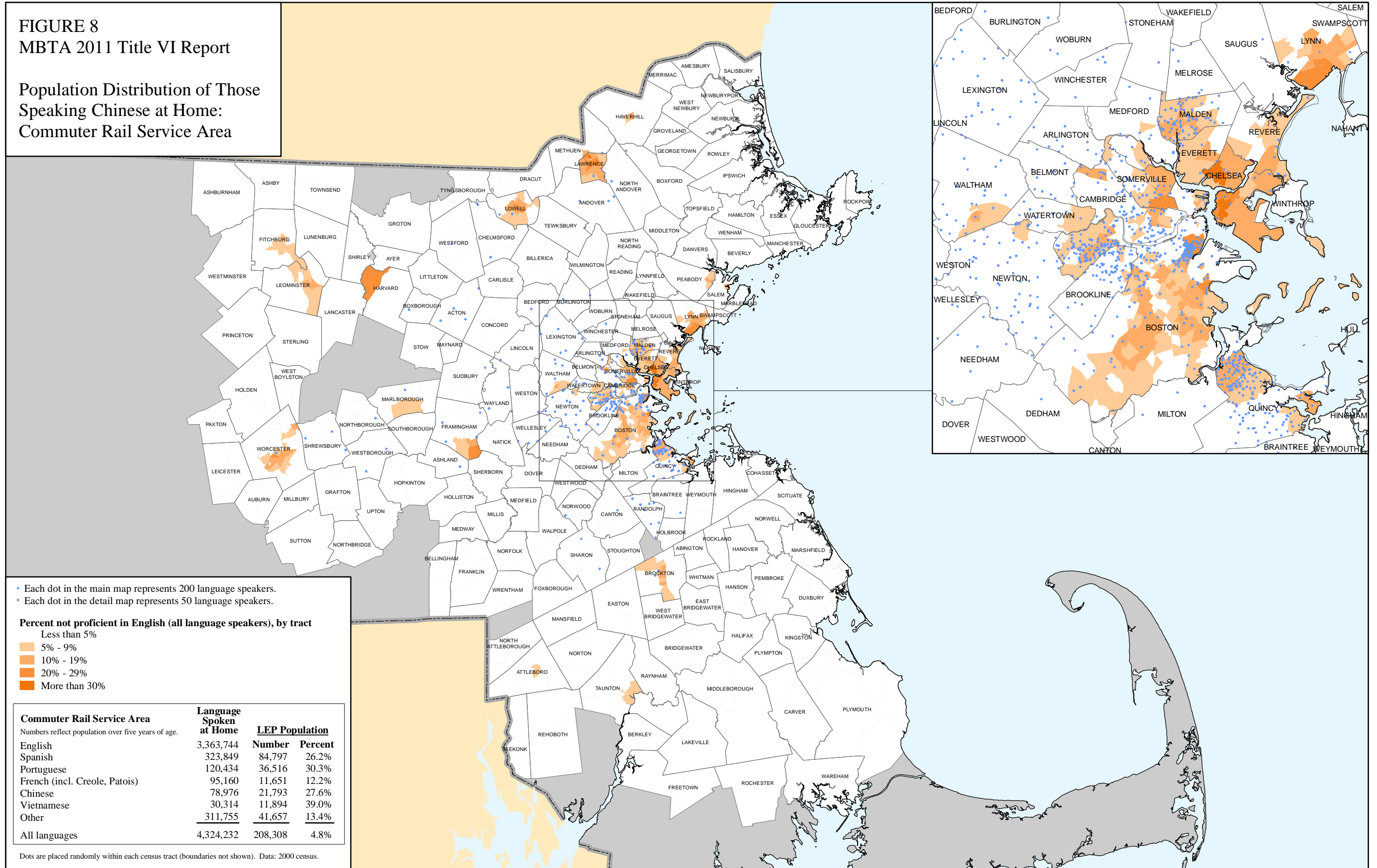


FIGURE 9
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Vietnamese at Home: Commuter Rail Service Area

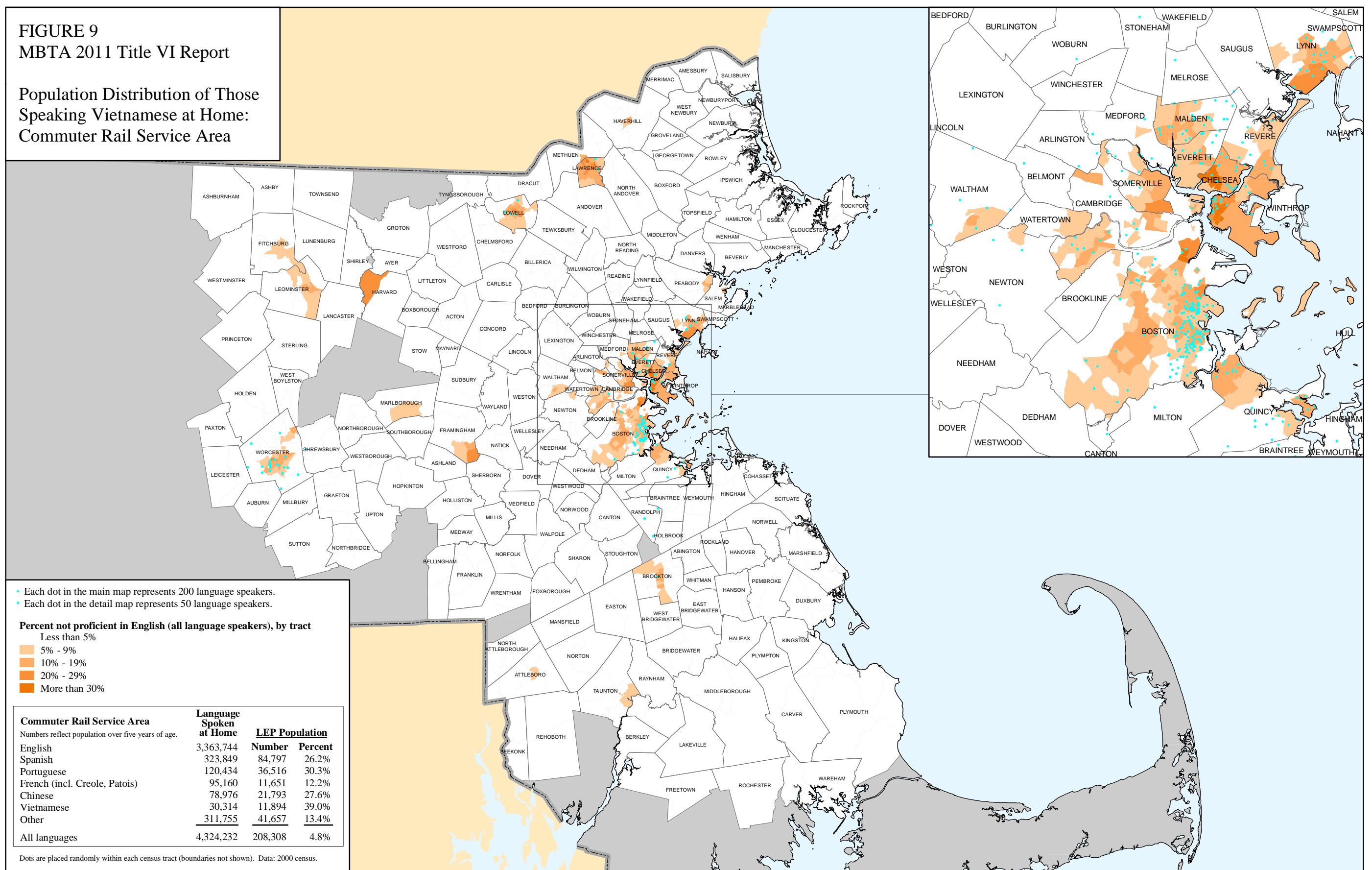
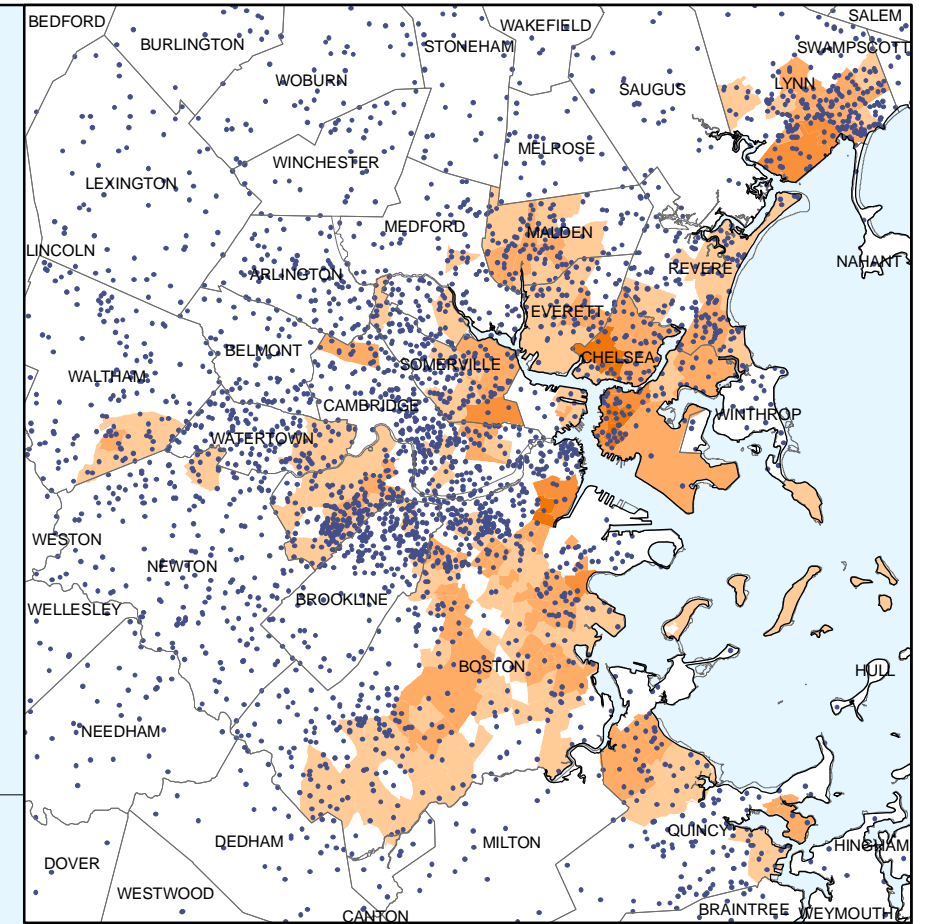
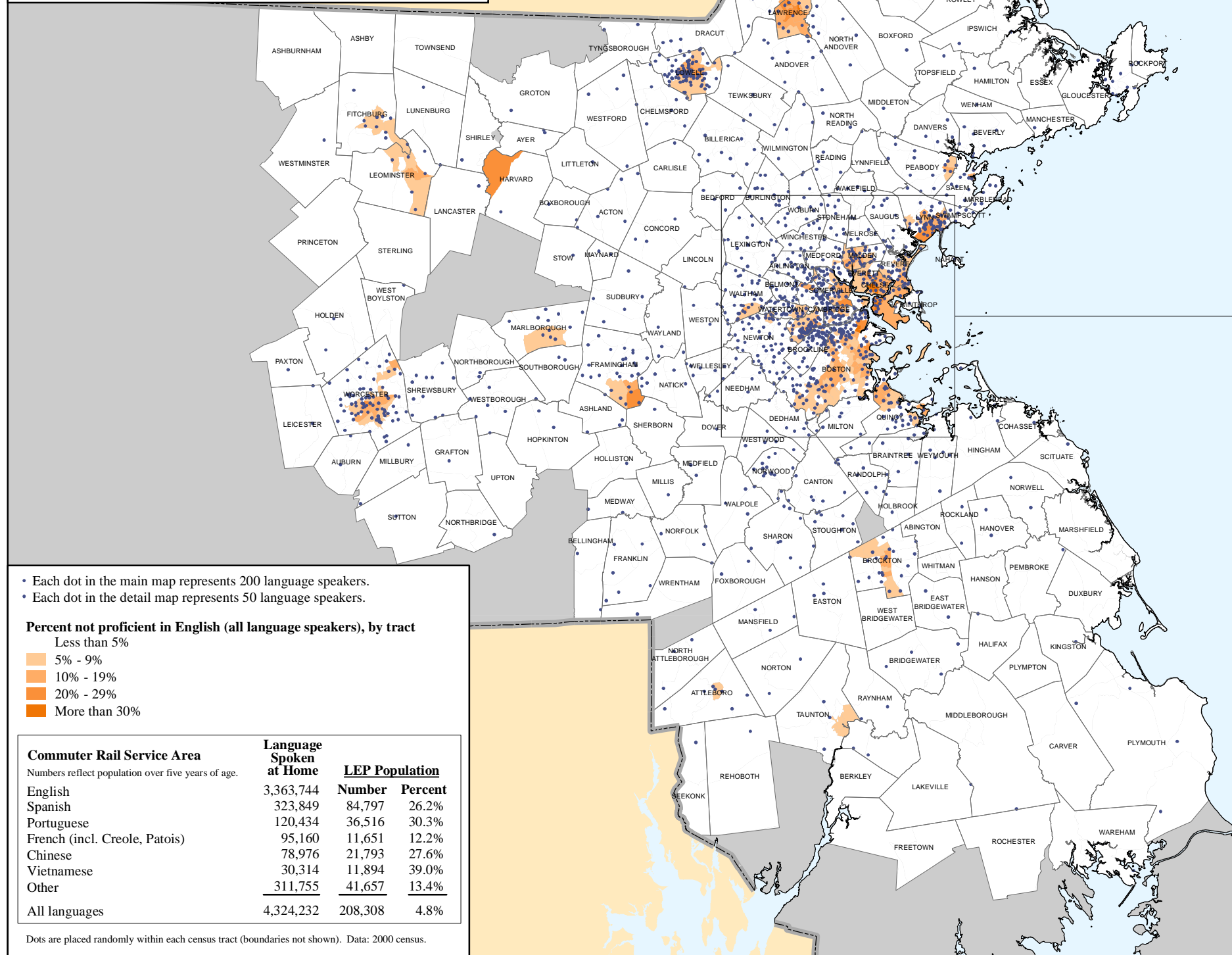


FIGURE 10
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Languages at Home Other Than the Top Six: Commuter Rail Service Area



- Each dot in the main map represents 200 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Commuter Rail Service Area		Language Spoken at Home		LEP Population	
		Number	Percent		
English	3,363,744	84,797	26.2%		
Spanish	323,849	36,516	30.3%		
Portuguese	120,434	11,651	12.2%		
French (incl. Creole, Patois)	95,160	21,793	27.6%		
Chinese	78,976	30,314	39.0%		
Vietnamese	30,314	41,657	13.4%		
Other	311,755				
All languages	4,324,232	208,308	4.8%		

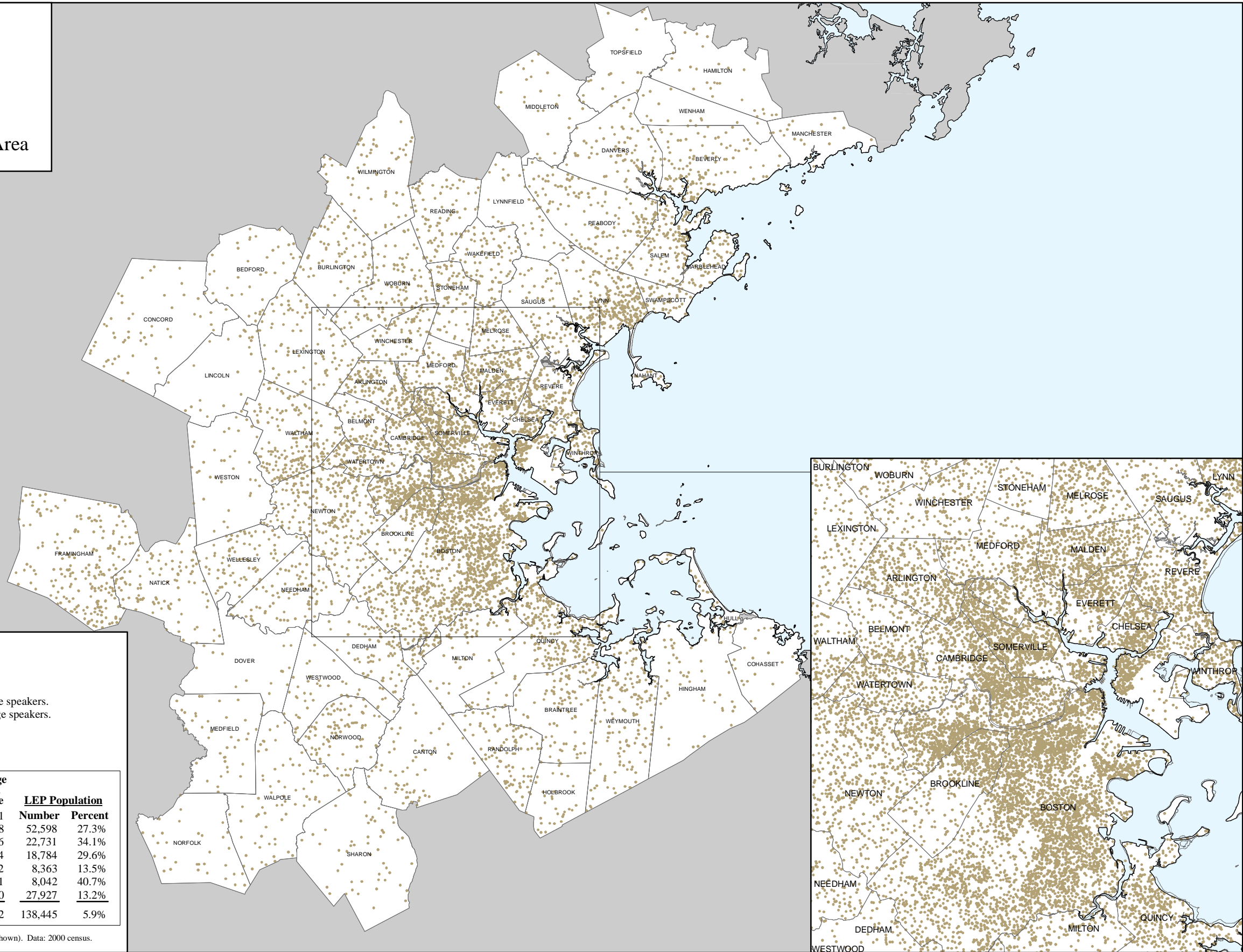
Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

Towns with Languages, Other than the Top Six in the Service Area, Spoken at Home by More than 1,000 Speakers in the Town

Town	Language	Number of Speakers	Percent of All Non-Top-Six Languages in the Town	Town	Language	Number of Speakers	Percent of All Non-Top-Six Languages in the Town
Boston	Italian	6,768	16%	Lynn	Cambodian	3,700	34%
	Russian	5,903	14%		Russian	2,060	19%
	Greek	3,167	7%	Greek	1,444	13%	
	Arabic	2,997	7%	Malden	Italian	1,418	25%
Brookline	German	2,368	6%	Medford	Italian	3,098	54%
	Japanese	2,014	5%	Newton	Russian	2,936	29%
	Polish	1,905	4%	Peabody	Italian	1,762	17%
	Korean	1,635	4%	Saugus	Greek	1,159	43%
	Russian	2,399	26%	Somerville	Italian	1,135	54%
Cambridge	Hebrew	1,117	12%	Revere	Italian	1,786	26%
	Japanese	1,056	11%	Quincy	Italian	3,017	45%
Everett	Italian	1,907	60%	Waltham	Cambodian	1,118	17%
Lowell	Cambodian	9,343	54%	Watertown	Italian	1,038	15%
	Laotian	1,521	9%	Worcester	Italian	1,188	18%
	Greek	1,341	8%		Armenian	2,192	36%
					Polish	2,189	14%

FIGURE 11
MBTA 2011 Title VI Report

**Population Distribution
 (All Language Speakers):
 Urban Fixed-Route Service Area**



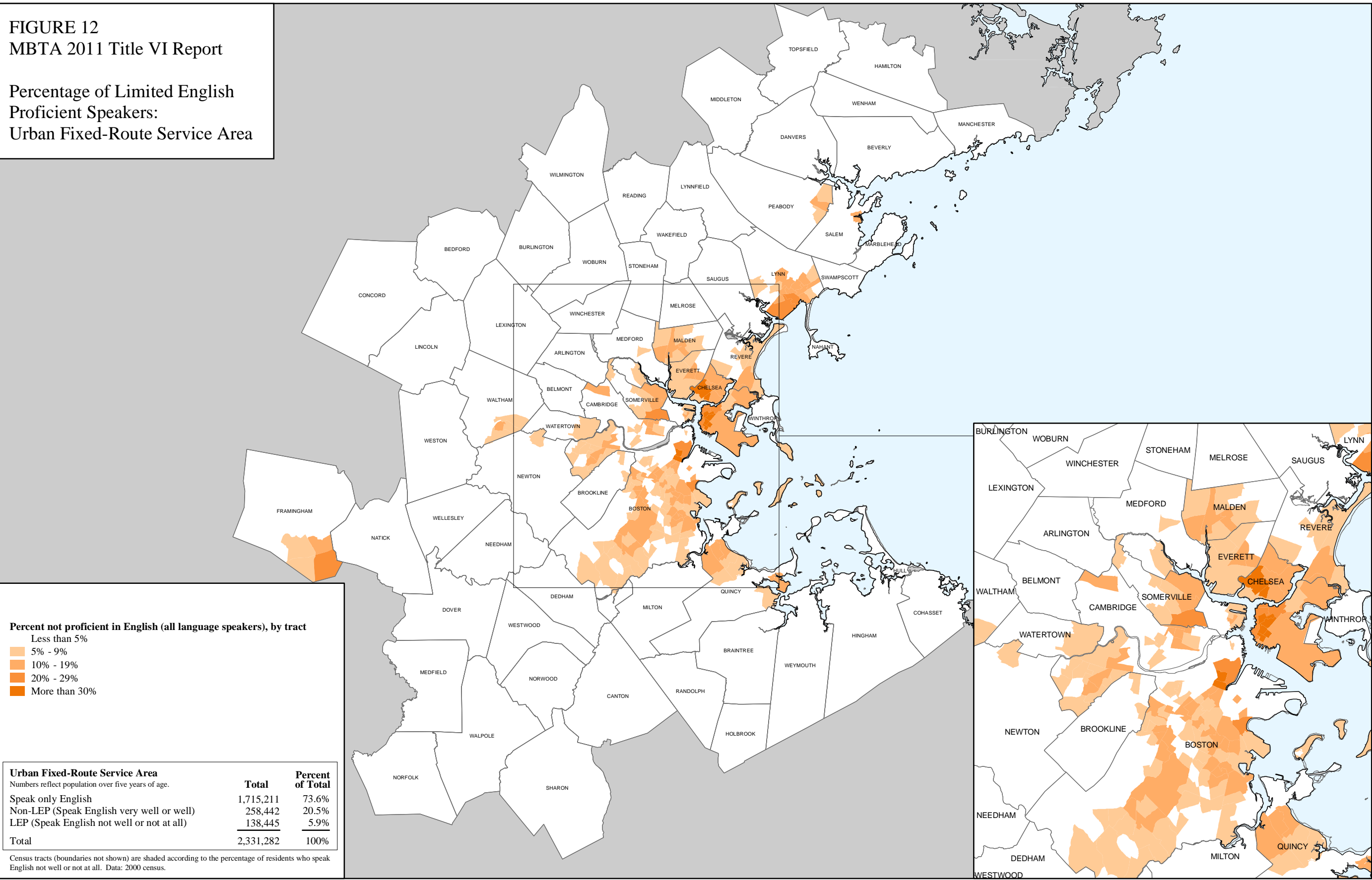
- Each dot in the main map represents 300 language speakers.
- Each dot in the detail map represents 100 language speakers.

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	63,444	8,363	13.5%
French (incl. Creole, Patois)	61,932	8,042	40.7%
Vietnamese	19,781	27,927	13.2%
Other	212,150		
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

FIGURE 12
MBTA 2011 Title VI Report

**Percentage of Limited English Proficient Speakers:
 Urban Fixed-Route Service Area**



Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area		
Numbers reflect population over five years of age.		
	Total	Percent of Total
Speak only English	1,715,211	73.6%
Non-LEP (Speak English very well or well)	258,442	20.5%
LEP (Speak English not well or not at all)	138,445	5.9%
Total	2,331,282	100%

Census tracts (boundaries not shown) are shaded according to the percentage of residents who speak English not well or not at all. Data: 2000 census.

FIGURE 13
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Spanish at Home: Urban Fixed-Route Service Area

• Each dot in the main map represents 100 language speakers.
 • Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	61,932	8,363	13.5%
French (incl. Creole, Patois)	19,781	8,042	40.7%
Vietnamese	212,150	27,927	13.2%
Other	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

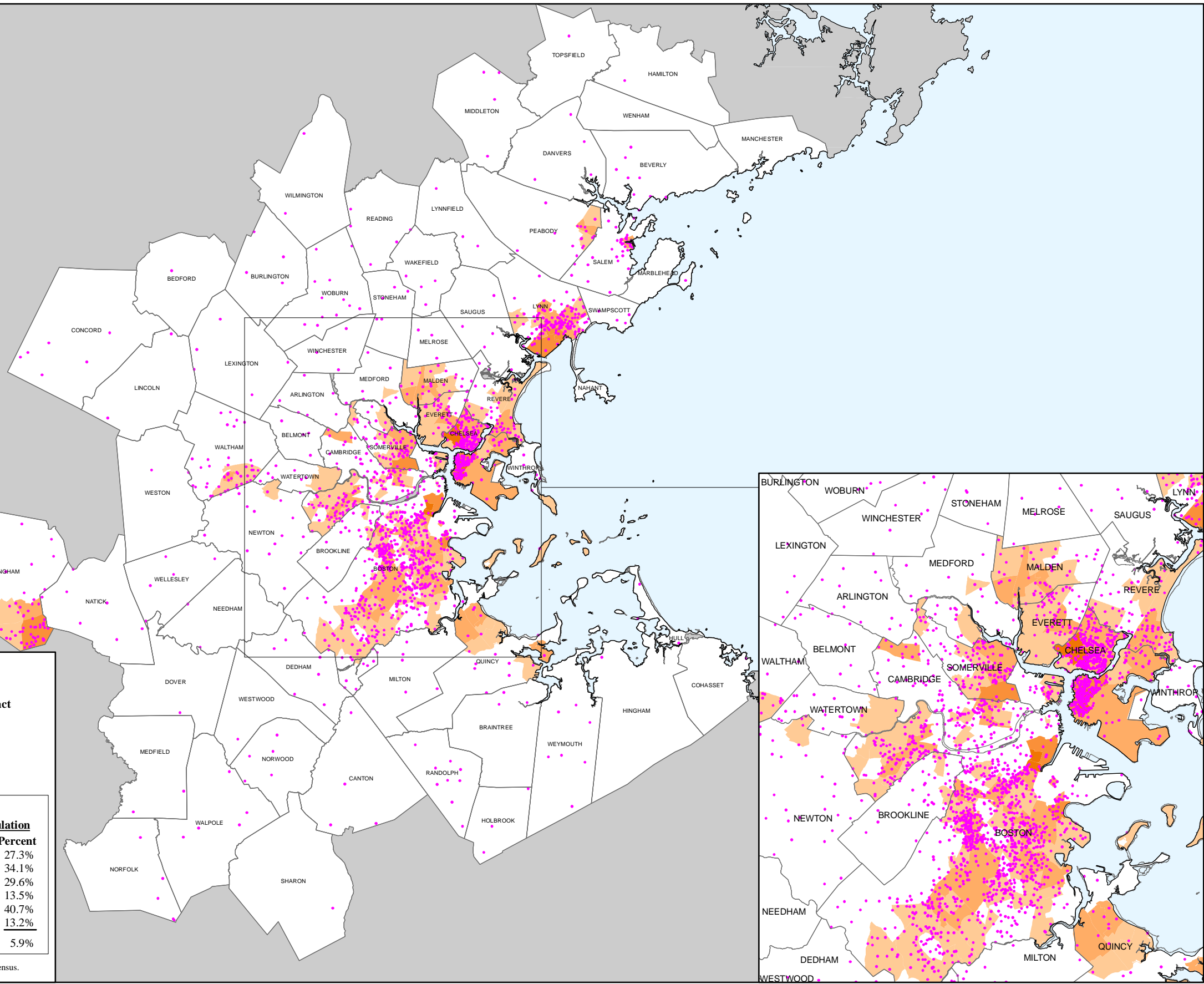


FIGURE 14
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Portuguese at Home: Urban Fixed-Route Service Area

- Each dot in the main map represents 100 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	61,932	8,363	13.5%
French (incl. Creole, Patois)	19,781	8,042	40.7%
Vietnamese	212,150	27,927	13.2%
Other			
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

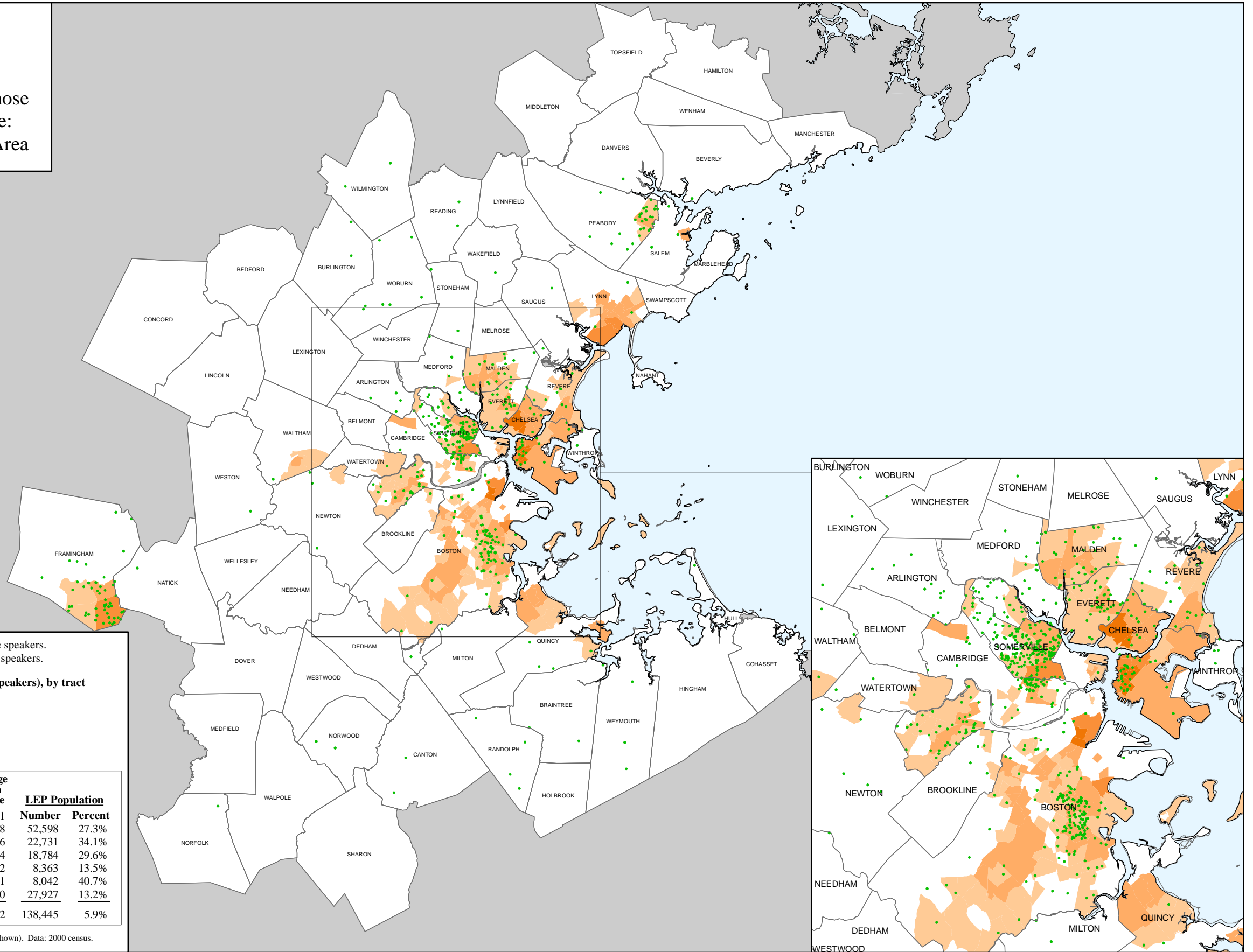


FIGURE 15
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Chinese at Home: Urban Fixed-Route Service Area

- Each dot in the main map represents 100 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	8,363	13.5%
Chinese	63,444	8,042	40.7%
French (incl. Creole, Patois)	61,932	27,927	13.2%
Vietnamese	19,781		
Other	212,150		
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

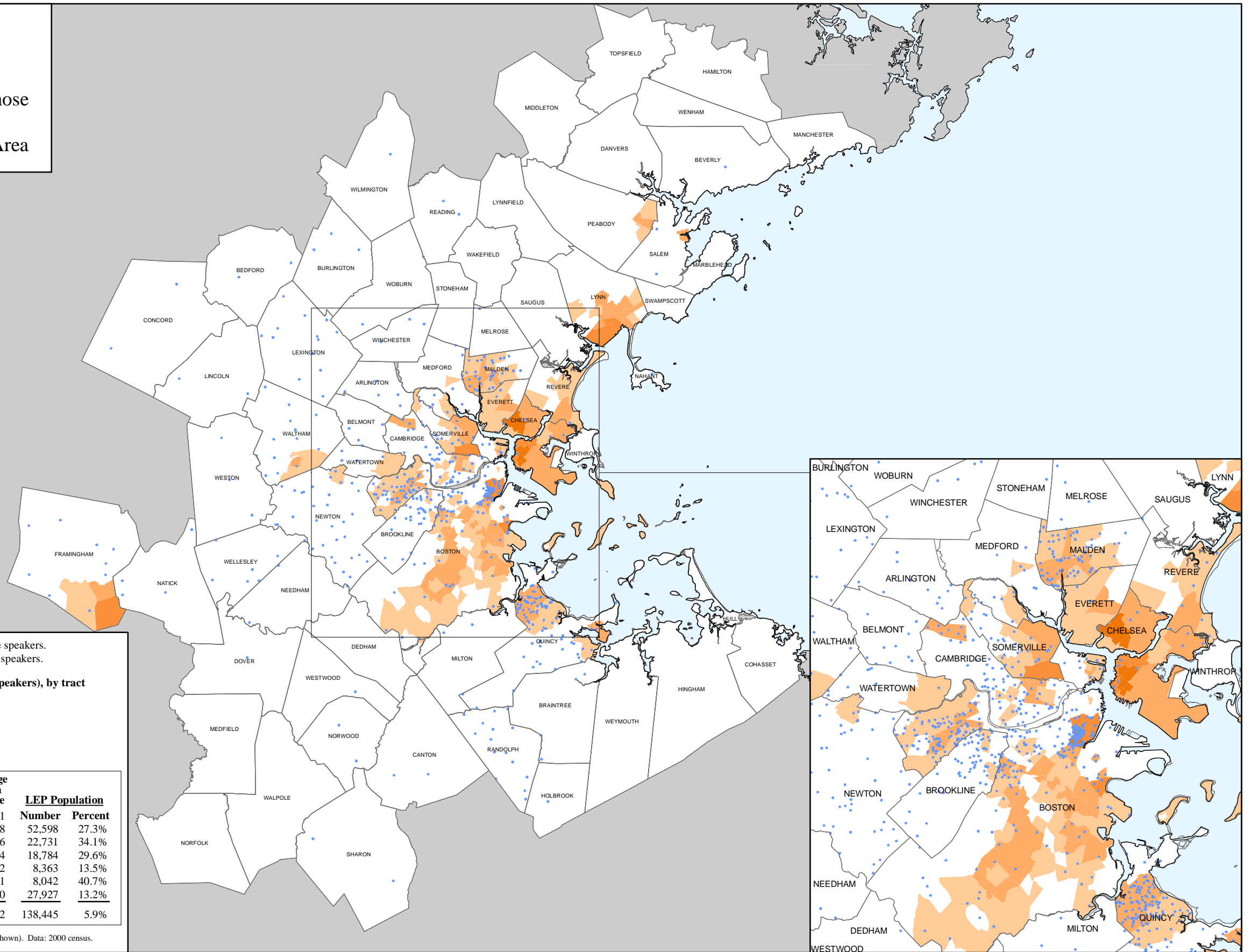


FIGURE 16
MBTA 2011 Title VI Report

Population Distribution of Those Speaking French/Creole/Patois at Home: Urban Fixed-Route Service Area

- Each dot in the main map represents 100 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	61,932	8,363	13.5%
French (incl. Creole, Patois)	19,781	8,042	40.7%
Vietnamese	212,150	27,927	13.2%
Other			
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

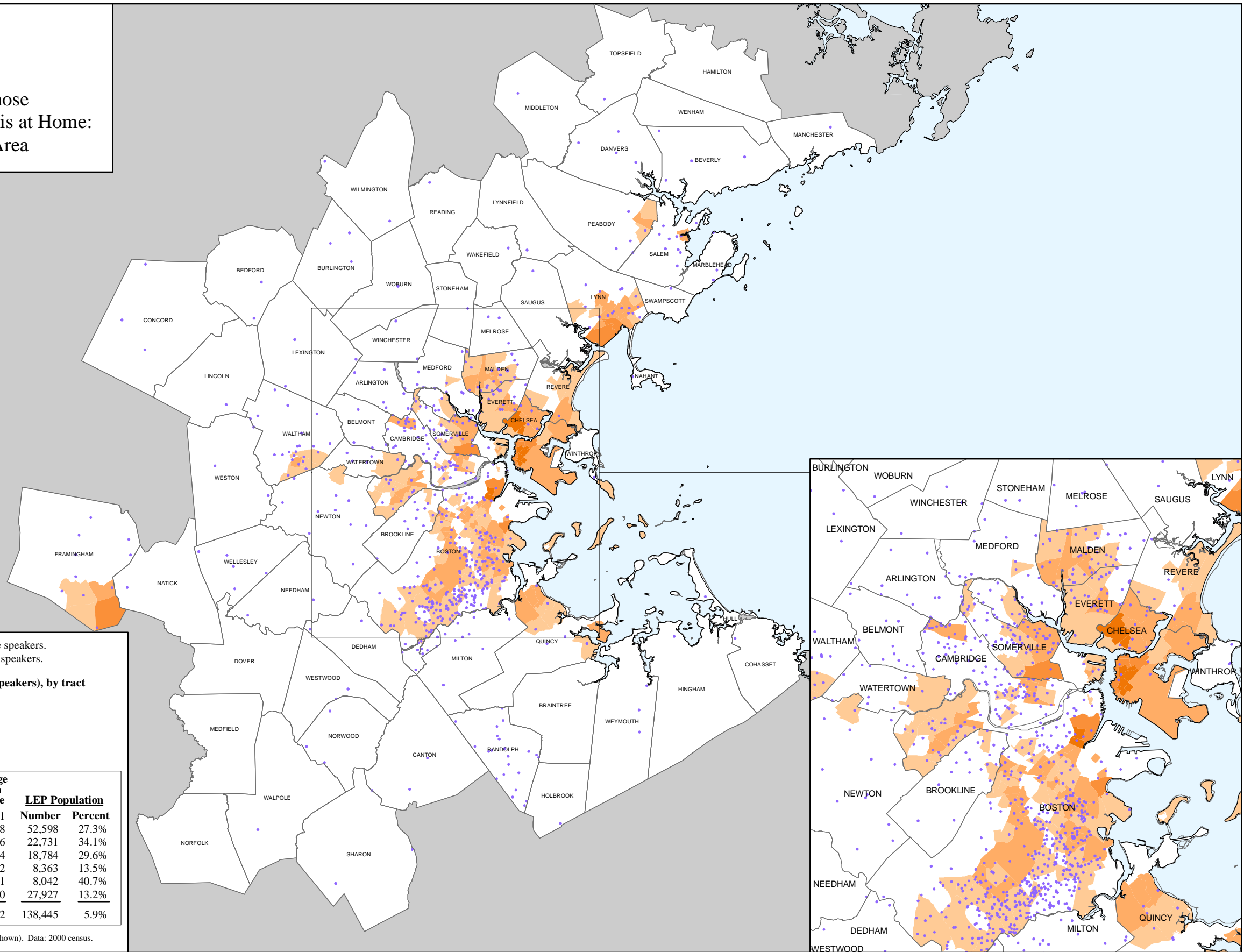


FIGURE 17
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Vietnamese at Home: Urban Fixed-Route Service Area

- Each dot in the main map represents 100 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

- Less than 5%
- 5% - 9%
- 10% - 19%
- 20% - 29%
- More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	63,444	8,363	13.5%
French (incl. Creole, Patois)	61,932	8,042	40.7%
Vietnamese	19,781	27,927	13.2%
Other	212,150		
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

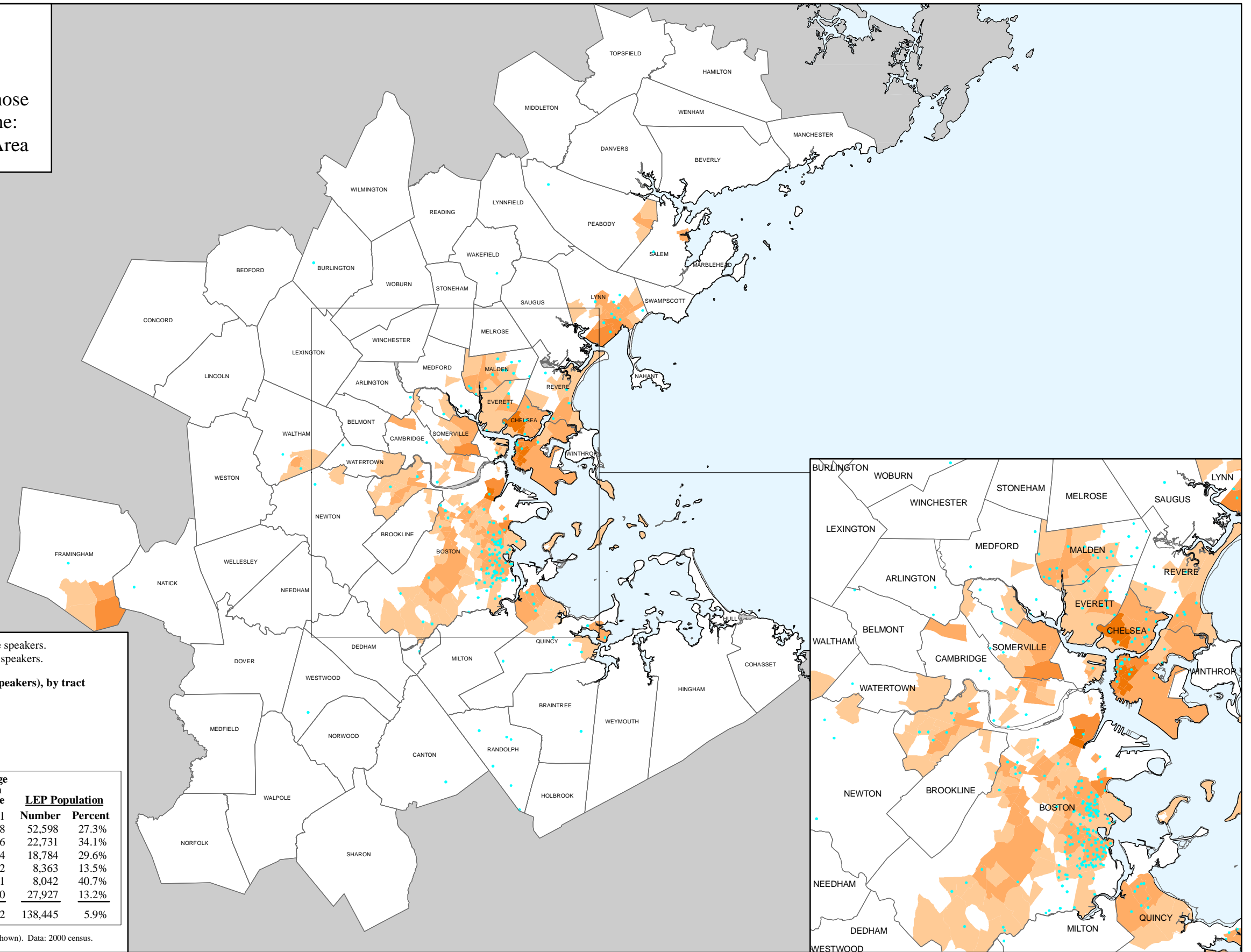
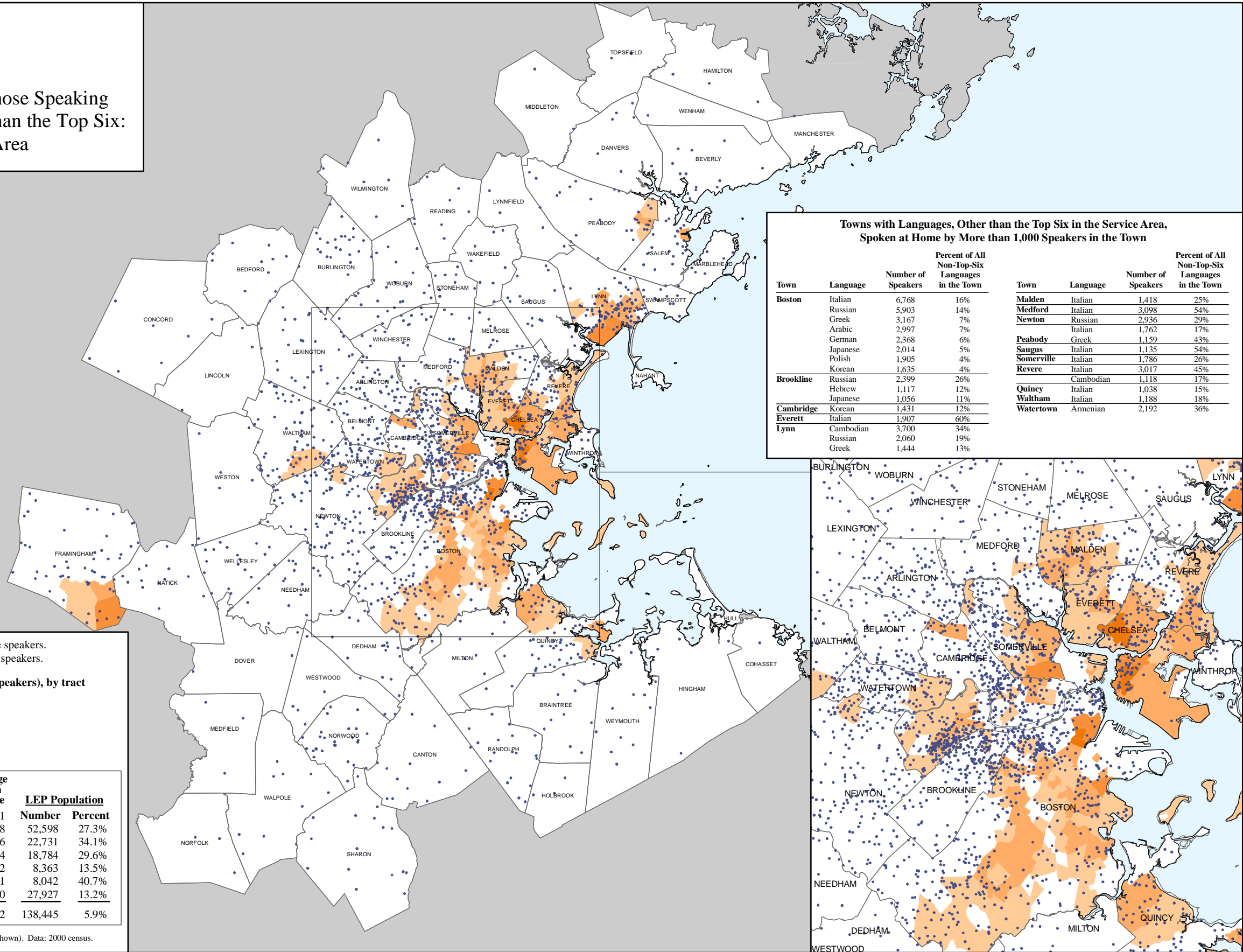


FIGURE 18
MBTA 2011 Title VI Report

Population Distribution of Those Speaking Languages at Home Other Than the Top Six: Urban Fixed-Route Service Area



Towns with Languages, Other than the Top Six in the Service Area, Spoken at Home by More than 1,000 Speakers in the Town

Town	Language	Number of Speakers	Percent of All Non-Top-Six Languages in the Town
Boston	Italian	6,768	16%
	Russian	5,903	14%
	Greek	3,167	7%
	Arabic	2,997	7%
	German	2,368	6%
	Japanese	2,014	5%
Brookline	Polish	1,905	4%
	Korean	1,635	4%
	Russian	2,399	26%
Cambridge	Hebrew	1,117	12%
	Japanese	1,056	11%
	Korean	1,431	12%
Everett	Italian	1,907	60%
	Cambodian	3,700	34%
Lynn	Russian	2,060	19%
	Greek	1,444	13%
Malden	Italian	1,418	25%
Medford	Italian	3,098	54%
Newton	Russian	2,936	29%
	Italian	1,762	17%
Peabody	Greek	1,159	43%
Saugus	Italian	1,135	54%
Somerville	Italian	1,786	26%
	Italian	3,017	45%
Revere	Italian	1,118	17%
	Cambodian	1,118	17%
Quincy	Italian	1,038	15%
Waltham	Italian	1,188	18%
Watertown	Armenian	2,192	36%

- Each dot in the main map represents 100 language speakers.
- Each dot in the detail map represents 50 language speakers.

Percent not proficient in English (all language speakers), by tract

Less than 5%
5% - 9%
10% - 19%
20% - 29%
More than 30%

Urban Fixed-Route Service Area	Language Spoken at Home	LEP Population	
Numbers reflect population over five years of age.			
		Number	Percent
English	1,715,211	52,598	27.3%
Spanish	192,798	22,731	34.1%
Portuguese	66,626	18,784	29.6%
Chinese	63,444	8,363	13.5%
French (incl. Creole, Patois)	61,932	8,042	40.7%
Vietnamese	19,781	27,927	13.2%
Other	212,150		
All languages	2,331,282	138,445	5.9%

Dots are placed randomly within each census tract (boundaries not shown). Data: 2000 census.

Factor 2: The frequency of contact

To conduct Factor 2, the MBTA concentrated on an internal audit of LEP contact information generated by agency personnel, technological systems, and survey research. In the context of Factor 2, “relevant programs, activities, and services provided” were defined as “ridership, fares, and customer information”; that is, facilitation of riding on the system, paying fares, and obtaining information.

In the context of daily MBTA operations, the language of customers is only regularly recorded in three instances where it is necessary for an LEP person to be able to ride the MBTA, pay a fare, or obtain information.

- **Call Center Data:** The Customer Communications Center at the MBTA provides translation services. The majority of translation calls to the center are requests for Spanish translation services, at approximately 900 calls per month (approximately 1.3% of all calls). Requests for other language translation services, including Haitian French Creole, Cape Verdean Creole, Cantonese, Mandarin, and Italian, average approximately five calls or less per week.
- **Web Translation Requests:** The MBTA website can be viewed in 14 languages other than English. From July 1, 2010, to June 30, 2011, Spanish was the most frequently requested translation, followed by Chinese and simplified Chinese, Portuguese, Italian, and French. Out of more than 75 million total page views, translation requests totaled 27,930, or 0.037%. Table 1 presents the number of translation requests by language.

Table 1: MBTA Website Translation Requests by Language

Language	Requests 7/1/2010-6/30/2011	Percent of Total Page Views
Spanish	12,333	0.016%
Chinese and Simplified Chinese	5,412	0.007%
French	4,309	0.006%
Portuguese	2,099	0.003%
Italian	985	0.001%
German	905	0.001%
Japanese	642	0.001%
Russian	488	0.001%
Korean	382	0.001%
Arabic	212	<0.001%
Greek	66	<0.001%
Swedish	52	<0.001%
Dutch	45	<0.001%
Total Translation Requests	27,930	0.037%
Total Page Views	75,095,845	

- **Paratransit (The RIDE) Records:** According to paratransit contractors, less than 1% of all paratransit riders need translation assistance.

MBTA bus operators and customer service agents (CSAs) are often the first contact LEP persons will have with the MBTA. To gain operator and CSA input on the subject of communicating with LEP customers, a survey (n=131) of bus operators and CSAs was therefore conducted to:

1. Find out how often bus operators and CSAs encountered LEP customers
2. Learn how operators and CSAs communicated with LEP passengers
3. Find ways to enhance those communication events

Results from the surveys indicated:

- 98% of bus operators and CSAs reported having at least one encounter with an LEP customer, and 81% reported “often” encountering LEP customers
- To communicate with LEP passengers, bus operators and CSAs used gestures or informal sign language, pointed at maps, or asked other passenger for assistance with interpreting. When communication is difficult, LEP passengers are sometimes waved through and therefore given a free trip. At other times, how to take advantage of the discounted CharlieCard fare is not explained and LEP passengers end up paying the higher CharlieTicket fare. A significant number of bus operators and CSAs do speak Spanish and are able to assist Spanish-speaking LEP passengers themselves.
- Bus operators and CSAs said that they would be helped by practical foreign language materials for use in the field, such as cards that contain basic information and/or useful phrases in different languages. Such cards would be particularly useful for describing the fare structure, the difference between CharlieCards and CharlieTickets, and how to use the fare vending machines, faregates, validators, and bus fareboxes. Training was also mentioned as a way to provide assistance in learning second languages and a common approach on how to communicate with LEP customers. Finally, certain bus routes and stations were identified where better signage could assist LEP customers.

In conclusion, while they are a small percentage of all riders, customers who request translation services, particularly in Spanish, do represent a sizeable number. The MBTA will continue to make efforts to promptly fulfill translation requests at the Customer Communications Center. The MBTA will also continue to upgrade website translation software as improved software becomes available.

Surveys with bus operators and CSAs indicated the need for an effective training program to help front-line employees work effectively with LEP customers. Bus operators and CSAs expressed an interest in training initiatives that could include multi-cultural awareness, how to work with non-English speaking passengers, language lessons, and opportunities to help design language materials for use in the field. In addition, better signage on bus routes and at stations that serve large numbers of tourists, travelers, and sports fans could reduce the need for bus operators or CSAs to personally assist LEP customers.

Factor 3: The importance to LEP persons of MBTA programs, activities, and services

To address Factor 3, the MBTA performed a quantitative analysis and used interviews with Boston Region MPO staff, surveys of bus operators and CSAs, and responses to an email sent to the MBTA's Rider Oversight Committee (ROC) to find out what issues LEP customers encountered when they rode the MBTA. In the context of Factor 3, the agency's "most critical services" were defined as "fare and tickets, routes and schedules, and safety and security." These areas were chosen because language barriers in these areas could limit a person's ability to gain the full benefit from MBTA services or, in some cases, place a person in physical danger.

Results from the quantitative analysis and various solicitations of opinions indicated that:

- MBTA programs and services were very important to LEP persons. 2005-2009 ACS PUMS data indicate that 25% of all LEP persons in the commuter rail service area and 28% in the urban fixed-route service area are transit dependent, as indicated by their residence in households that own no private vehicles. Table 2 presents the percentage of LEP persons that are transit dependent by language.⁵

Table 2: Percentage of LEP Persons That Are Transit Dependent

Language	Service Area	
	Commuter Rail	Urban Fixed-Route
Spanish	30.9%	32.4%
Portuguese	14.0%	17.4%
French (incl. Creole, Patois)	18.4%	21.8%
Chinese	30.7%	33.6%
Vietnamese	19.4%	22.8%
Other	23.0%	29.8%

- LEP customers experience many of the same frustrations as those of other MBTA riders, particularly with regard to the fare structure and using the CharlieCard. LEP customers experience specific difficulties, however, when they are refused assistance, though a minority of survey responses from bus operators and CSAs indicated this attitude. LEP customers particularly face difficulties when something unusual happens and there is only an audio announcement, such as when a bus or train goes express or there is a bus replacement service. This situation could potentially endanger LEP customers in the event of an emergency announcement.
- Many LEP customers tend to rely on traveling companions, such as family members or friends, to use the MBTA.

In conclusion, it is apparent that the MBTA is an important service for LEP persons, many of whom are transit dependent. LEP customers often face specific difficulties in using the MBTA, particularly in the event of audio announcements, when their lack of English proficiency prohibits them from understanding passenger instructions related to service being disrupted or an emergency. Finally, while LEP customers tend to rely on family and friends to help them

⁵ Data is from the 2005-2009 five-year American Community Survey (ACS) public use microdata sample (PUMS).

navigate the MBTA, it is important for the MBTA to maintain and increase its relationships within the LEP communities in order to inform LEP persons of the agency's multilingual services and to solicit suggestions for improving those services.

Factor 4: The resources available to MBTA and costs in Implementing LEP Program

Inventory of MBTA resources available to departments in meeting needs of LEP customers include:

- MBTA website provides machine translation service of content through Google Translate. Site highlights Spanish, Chinese, Portuguese, Italian and French but more than 60 other languages are available at www.mbta.com. The site is designed so that customers can easily navigate to a web translation by clicking the language access instruction key located on the lower left of each page of the MBTA site. In addition to schedule and service information, the site includes travel advisory, safety and security information and policy notices.
- MBTA Customer Communications & Marketing Department has trained bilingual staff manning the Customer Care call center and available to provide translation services for customers and for translation of flyers/notices. Currently (summer 2011), 14 of the 27 Call Center staff speak more than 1 language. Staff resources include fluency in Spanish, Haitian French Creole, Cape Verdean Creole and Cantonese/Mandarin.
- Customer Relations Department has professional service contracts in place available for verbal translation for MBTA public meetings and translation of printed material/information handouts. A listing and cost schedule for outside translation services is attached.
- The MBTA has employee training programs in place for new hires and existing employees that includes training modules on Title VI responsibilities, LEP policies and procedures as well as Anti-Discrimination and Harassment Prevention.
- The MBTA interacts with a number of community organizations in its service activities, community relations and planning efforts. Many of these community organizations directly serve LEP households and have working knowledge of neighborhood conditions and specific needs. They can be important resources in communicating with LEP individuals and engaging minority/low income groups in MBTA policy-making & planning initiatives.

Schedule of Translation Services

Vendor	Services	Routine Services	Expedited Service
Baystate Interpreters, Inc.	Interpretation Services	\$75.00 per hr.	\$80.00 per hr.
Baystate Interpreters, Inc.	Translation Services	\$.30 per word	\$.30 per word.
Baystate Interpreters, Inc.	Telephonic Interpretation Services	\$.025 per min.	\$.025 per min.
Baystate Interpreters, Inc.	Simultaneous Interpretation Services	\$80.00 per hr.	\$80.00 Per hr.
Baystate Interpreters, Inc.	Voice Over Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Interpretation Services	\$65/hr.	\$65/hr.
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Translation Services	\$0.40/word	\$0.50/word
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Telephonic Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Simultaneous Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Voice Over Services	\$65/hour	\$65/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Interpretation Services	\$85.00/hour	\$85.00/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Translation Services	\$0.35/word	\$0.40/word
Catholic Charitable Bureau of the Archdiocese of Boston	Telephonic Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Simultaneous Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Voice Over Services	N/A	N/A
Central MA Area Health Education Center	Interpretation Services	\$60.00/hr	\$70.00/hr
Central MA Area Health Education Center	Translation Services	\$0.44/word	\$0.52/word
Central MA Area Health Education Center	Telephonic Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Simultaneous Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Voice Over Services	N/A	N/A
Centro Latino, Inc.	Interpretation Services	\$75.00 per hour	\$85.00 per hour
Centro Latino, Inc.	Translation Services	\$0.40 per word	\$0.50 per word
Centro Latino, Inc.	Telephonic Interpretation Services	N/A	N/A
Centro Latino, Inc.	Simultaneous Interpretation Services	N/A	N/A
Centro Latino, Inc.	Voice Over Services	N/A	N/A
CETRA, Inc.	Interpretation Services	\$102/hour	\$153/hour
CETRA, Inc.	Translation Services	\$0.24/word	\$0.36/word
CETRA, Inc.	Telephonic Interpretation Services	n/a	n/a
CETRA, Inc.	Simultaneous Interpretation Services	\$114/hour for interp	\$171/hour for interpre
CETRA, Inc.	Voice Over Services	\$139.50/hour	\$209.25
Corporate Translation Services, Inc.	Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Translation Services	\$0.45	*Per word rate + 15%
Corporate Translation Services, Inc.	Telephonic Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Voice Over Services	n/a	n/a
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Interpretation Services	\$85.00 Per Hour	\$95.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Translation Services	\$0.50 Per Word	\$0.70 Per Word
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Telephonic Interpretation Services	\$1.15 Per Minute	\$1.15 Per Minute
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Simultaneous Interpretation Services	\$175.00 Per Hour	\$185.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Voice Over Services	N/A	N/A
Eduardo Berinstein Translations LLC	Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Translation Services *	\$.30/word	\$.35/word
Eduardo Berinstein Translations LLC	Telephonic Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Simultaneous Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Voice Over Services *	\$100/hour	\$150/hour
GlobalVision International, Inc.	Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Translation Services	*\$75/hr, ~*18c - ~*24c/word	*\$100/hr, ~*24c/word
GlobalVision International, Inc.	Telephonic Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Simultaneous Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Voice Over Services **	\$1000 for first 5min	\$1300 for first 5min, \$
Interpreters and Translators, Inc.	Interpretation Services	<u>\$90.00/per hour</u>	<u>\$90.00/per hour</u>
Interpreters and Translators, Inc.	Translation Services	<u>.29/per word</u>	<u>.38/per word</u>
Interpreters and Translators, Inc.	Telephonic Interpretation Services	<u>\$2.00/per minute</u>	<u>\$2.00/per minute</u>
Interpreters and Translators, Inc.	Simultaneous Interpretation Services	n/a	n/a
Interpreters and Translators, Inc.	Voice Over Services	n/a	n/a
Interpreters Associates, Inc.	Interpretation Services	75.00/hr 2 hr min	95.00/hr 2 hr min
Interpreters Associates, Inc.	Translation Services	0.50/word	0.95/word
Interpreters Associates, Inc.	Telephonic Interpretation Services	n/a	n/a
Interpreters Associates, Inc.	Simultaneous Interpretation Services	150.00/pp	190.00/pp
Interpreters Associates, Inc.	Voice Over Services	n/a	n/a
JTG, inc.	Interpretation Services	n/a	n/a
JTG, inc.	Translation Services	\$75/hour or 0.28/wc	20% surcharge for pr
JTG, inc.	Telephonic Interpretation Services	n/a	n/a
JTG, inc.	Simultaneous Interpretation Services	n/a	n/a
JTG, inc.	Voice Over Services	n/a	n/a

Schedule of Translation Services

Language Bridge, LLC	Interpretation Services	\$75 per hour	\$75 per hour
Language Bridge, LLC	Translation Services	\$0.35 per word	\$0.45 per word
Language Bridge, LLC	Telephonic Interpretation Services	n/a	n/a
Language Bridge, LLC	Simultaneous Interpretation Services	n/a	n/a
Language Bridge, LLC	Voice Over Services	n/a	n/a
Language Connections		Incorrect	
Language Line Services, Inc.	Interpretation Services	n/a	n/a
Language Line Services, Inc.	Translation Services	\$0.35/word	\$0.40/word
Language Line Services, Inc.	Telephonic Interpretation Services	\$0.79/minute	\$0.79/minute
Language Line Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Language Line Services, Inc.	Voice Over Services	\$150/hour	\$150/hour
LONE STAR INTERPRETERS LLC	Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Translation Services	\$0.12/word	\$0.14/word
LONE STAR INTERPRETERS LLC	Telephonic Interpretation Services	\$0.63/min	\$0.63/min
LONE STAR INTERPRETERS LLC	Simultaneous Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Voice Over Services	\$12/prompt	\$14/prompt
Mario R. Martinez	Interpretation Services	N/A	N/A
Mario R. Martinez	Translation Services		0.058
Mario R. Martinez	Telephonic Interpretation Services	N/A	N/A
Mario R. Martinez	Simultaneous Interpretation Services	N/A	N/A
Mario R. Martinez	Voice Over Services	N/A	N/A
Patricio Endara	Interpretation Services	\$55.00 per hour	\$60.00 per hour
Patricio Endara	Translation Services	\$0.23 per word	\$0.30 per word
Patricio Endara	Telephonic Interpretation Services	\$1.00 per minute	\$1.25 per minute
Patricio Endara	Simultaneous Interpretation Services	N/A	N/A
Patricio Endara	Voice Over Services	N/A	N/A
Qwest Communications Corporation	Interpretation Services	N/A	N/A
Qwest Communications Corporation	Translation Services	N/A	N/A
Qwest Communications Corporation	Telephonic Interpretation Services	\$ 0.95 per minute	\$ 0.95 per minute – a
Qwest Communications Corporation	Simultaneous Interpretation Services	N/A	N/A
Qwest Communications Corporation	Voice Over Services	N/A	N/A
Rapport International, LLC	Interpretation Services	\$150 per hour	\$185 per hour
Rapport International, LLC	Translation Services	.34 per word	.38 per word
Rapport International, LLC	Telephonic Interpretation Services	\$2 per minute	\$2 per minute
Rapport International, LLC	Simultaneous Interpretation Services	N/A	N/A
Rapport International, LLC	Voice Over Services	N/A	N/A
TransFluenci, LLC	Interpretation Services	\$75 per hour	\$75 per hour
TransFluenci, LLC	Translation Services	<u>.28 per word</u>	<u>.28 per word</u>
TransFluenci, LLC	Telephonic Interpretation Services	N/A	N/A
TransFluenci, LLC	Simultaneous Interpretation Services	N/A	N/A
TransFluenci, LLC	Voice Over Services	N/A	N/A
WorldWide Interpreters, Inc		Incorrect	

**MASSACHUSETTS BAY TRANSPORTATION
AUTHORITY**



**LANGUAGE
ASSISTANCE PLAN:**

**PROVIDING ACCESS TO
PROGRAMS & SERVICES
FOR PEOPLE WITH
LIMITED ENGLISH
PROFICIENCY**

Rev. April 2012

The MBTA has developed policy and procedure to meet the requirements under Title VI of the Civil Rights Act of 1964, specifically as it pertains to improving access to services for persons with Limited English Proficiency (LEP). The purpose of the MBTA's Title VI Program is to ensure that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

I. Identification of LEP individuals for whom language assistance may be needed

The MBTA has followed FTA guidance in completing a Four-Factor analysis to document the number and geographic distribution of potential LEP customers within the MBTA 175-community service area.

Data from the 2005-2009 five-year American Community Survey (ACS) public use microdata sample (PUMS) indicated the number of LEP persons in the MBTA commuter rail service area is 208,308 and 138,445 in the urban fixed-route service area. LEP persons represent 4.8% and 5.9% of the total populations of the commuter rail and urban fixed-route areas, respectively. The largest proportion of LEP persons in both service areas speak Spanish at home (40.7% in the commuter rail service area and 38.0% in the urban fixed-route service area).

For the 175-community commuter rail service area and the 65-community urban fixed route service area, The MBTA has found that LEP populations meeting the DOT definition of LEP¹ "safe harbor" thresholds (5% or 1,000 individuals, whichever is less) include speakers of:

Commuter Rail Service Area

- Spanish (84,797)
- Portuguese (36,516)
- Chinese (21,793)
- Vietnamese (11,894)
- French (incl. Creole, Patois) (11,651)
- Russian (6,732)
- Cambodian (5,741)
- Italian (4,804)
- Greek (2,893)
- Arabic (2,558)
- Albanian (2,369)
- Korean (2,312)
- Polish (1,515)
- Gujarati (1,246)

Urban Fixed-Route Service Area

- Spanish (52,598)
- Portuguese (22,731)
- Chinese (18,784)
- French (incl. Creole, Patois) (8,363)
- Vietnamese (8,042)
- Russian (6,112)
- Italian (3,772)
- Greek (2,035)
- Arabic (1,724)
- Albanian (1,656)
- Korean (1,611)
- Cambodian (1,546)

II. Language Assistance Measures

Language assistance services available at the MBTA to minimize barriers for transit service access to customers with limited proficiency in English include the following oral and written assistance:

- MBTA Customer Communications Center is the Authority's centralized customer information/feedback response service. The center currently is staffed by 27 employees, of whom 14 are bilingual. The Center on average receives approximately 900 Spanish callers per month. Language capabilities at the center in addition to English and Spanish are Haitian French Creole, Cape Verdean Creole and Cantonese/Mandarin. In addition to providing telephone interpreter services, the Center's staff is available to provide translation or flyers and notices for MBTA departments. Departments can request translation assistance at 617-222-3200
- Subway Station announcements—Service and safety information is provided in Spanish orally and visually via LED signs at stations ;
- Safety and security information including wayfinding is provided at stations with use of universal symbols;
- Automated fare kiosks provide fare media and information in Spanish and Chinese in addition to English;
- The MBTA website employs Google translator service providing trip planning, schedules and information on how to use the MBTA system in multiple languages. Current site language capabilities are Spanish, Chinese, Portuguese, Italian, French, Arabic, Dutch, German, Greek, Japanese, Russian and Swedish.
- Major service change and fare change information is distributed in multiple languages including Spanish, Portuguese, Chinese, Haitian Creole, Cape Verdean Creole and Vietnamese.
- MBTA Transit Police, in fulfilling a policy of quick and courteous response to all persons on a 24-hour basis, has contracted with an on-call vendor Language Line Services to provide interpreter services. All officers, including Transit Police dispatchers, have 24-hour access to the service which provides immediate translation service in more than 170 languages.
- In addition, MBTA Transit Police has a number of police officers able to communicate in multiple languages. At present, 16 officers on staff are able to speak Spanish. Other language capacities within the department are Italian, French, Haitian Creole, Vietnamese, Portuguese, Chinese (Toisanese), Cantonese and American Sign Language.

- Brochures and notices of Title VI rights and complaints procedures are translated in multiple languages.
- MassDOT has instituted employee development/education program of MassDOT University for which MBTA personnel are invited to participate. A pilot language education training was offered beginning the Fall of 2011 using Rosetta Stone software and laptop computers. The program was oversubscribed with participants selected by lottery. It is expected that the language training program will continue given the level of interest. The program offers language training modules for Spanish, Portuguese and Chinese/Mandarin.
- Service diversion notices are posted in Spanish and other languages, as appropriate.
- Oral translation and translated materials are offered at community public meetings as appropriate.
- MBTA departments may obtain work orders with private vendors providing translation services. A listing of translation firms and applicable rates has been compiled by MBTA/MassDOT Community Affairs Office and is attached. Generally, arrangements for translator services should be made at least 5 business days prior to an event/meeting.
- MBTA through MassDOT Community Affairs provides outreach including notice and press information using local media. Among the prominent media publications serving minority and non-English communities are *El Mundo*, *El Planeta*, *Mattapan Reporter*, *Haitian Reporter*, *Sampan*, and *The Banner*.
- MBTA Office of Civil Rights and Diversity (ODCR) provides technical assistance and guidance for all departments on Title VI issues including language assistance in serving LEP customers. Information and general assistance is available through ODCR at 617-222-3305.

VITAL MATERIALS FOR TRANSLATION

For the purpose of this Language Assistance Plan, vital materials are defined as information or documents that are critical for accessing MBTA services, programs and activities. These are priorities for translation and distribution. Vital documents are:

- communications affecting health and safety;
- security announcements and signage;
- emergency related public announcements;

- materials regarding Title VI Rights and complaint procedures;
- basic critical customer information on how to use and access the MBTA system such as ticket/pass purchase instruction;
- information and notices affecting a rider's ability to access and use the system safely and effectively (e.g. major station changes, renovations, permanent major changes in fares, service or service routes).

OTHER MATERIALS

Other materials considered non-vital may be translated by MBTA Departments if Four Factor analysis indicates the appropriateness of such action. Examples of non-vital materials are:

- planning studies and reports;
- budget reports including capital investment program
- general advertisements;
- general announcements; and
- publications of Authority policies and procedures.

III. Training Programs for MBTA Personnel

The following provides a summary outline of the human resource training programs that the MBTA has in place. All include reference to the Authority's Title VI obligations including providing accessible service to customers non-proficient in English. Each Title VI element of the training extended to employees is facilitated with the overall goal to inform, support and provide the necessary information, tools and guidance in understanding and appreciating the Title VI requirements.

a. New Hire Orientation

MBTA Human Resources provides orientation training for all new MBTA employees. Included within the orientation is presentation by the Office of Diversity and Civil Rights of Authority's policies and obligations to promote fairness, diversity and inclusion for all employees and customers in ensuring compliance with Federal and State civil rights laws and regulations.

This Title VI element of this presentation by ODCR focuses primarily on providing information regarding responsibilities including the need to provide appropriate language services so that none of the MBTA customers face barriers to transit service access. New hires are trained pertaining to the importance of being

professional, sensitive and responsive in treating all customers with equal respect irrespective of language capacity.

b. Anti-Discrimination and Harassment Prevention (ADHP)

The recently introduced Anti-Discrimination and Harassment Prevention training focuses on civil rights, and MBTA policies. The goal of the training is, to understand supervisors' responsibilities and employees' rights and responsibilities and customers' rights under the laws and MBTA's policies and to develop skills and best practices for focusing on legitimate reasons for all employment decisions, and accountability regarding the same; to review best practices for maintaining excellence in customer service; and to learn when to seek assistance and/or partner with ODCR and or other appropriate representatives at the MBTA.

This mandatory training is offered in separate sessions for supervisors and non-supervisory employees. Managers and supervisors are required to take the training every two years; all front-line employees must complete the one-day training every three years. Training includes discussion of workplace scenario including interactions with customers unable to speak English.

c. Training of Customer Service Representatives

The objective of this training is to help Customer Service Representatives (CSRs) raise their awareness of the policies and procedures regarding Title VI requirements. CSRs are employees who operate the MBTA's call center.

This training provides CSRs with the necessary awareness and best practice skills for providing excellent customer services. Representatives will learn the LEP policies and procedures in working with customers with limited English language skills. Employees are also taught how to identify violations that might fall within the Title VI jurisdiction. In addition, this training will raise their understanding and sensitivity to their responsibilities in helping to provide meaningful access to information and services to all customers.

d. Training Area Supervisors and Superintendents

The purpose of this training is to provide an understanding to supervisors of Title VI, LEP and Anti-Discrimination and Harassment Prevention laws. Supervisors will learn about customer rights under the laws, regulations and MBTA policies and procedures.

This training provides practical tips and tools for supervisors to develop Best Practice skills in areas of Title VI LEP and Anti-Discrimination and Harassment Prevention. Participants will gain hands-on-skills on How to recognize and Handle Caution Areas and the Rules for Maintaining a Discrimination Free Work and awareness of LEP Customer Environment.

e. “How Can I Help You Today” Customer Service Training

All front line Operations employees, including MBCR crew members and ticketing agents operating the MBTA commuter rail system, are required to complete customer service training. The one-day training program provided by the MBTA Human Resources Department includes module on confronting stereotypes and employee obligations in regards to Title VI, including tools and materials for communication with customers who have limited English proficiency.

All the training programs above include:

- 1) A summary of responsibilities under the LEP guidance;
- 2) A summary of the MBTA’s Language Assistance Plan;
- 3) A summary of the Four-Factor Analysis of language assistance need prepared by the MBTA (Number of LEP persons, frequency of contact, importance of program, and cost factor); and
- 4) A description of the language assistance services made available at the MBTA and how staff can access these services.

Media resources available to be used in MBTA training programs include:

- 1) LEP videos accessed on the FTA website including www.lep.gov
- 2) Links to policy information including webinars produced by the FTA Office of Civil Rights available at <http://www.fta.dot.gov/civilrights/12328.html>
- 3) Best practices in engaging LEP customers available at <http://www.fhwa.dot.gov/hep/lowlim>

IV. Providing Notices to LEP Persons

The MBTA incorporates multiple methods and media in communicating with its customers and the general public. These include:

- Public meetings and hearing notices
- Postings on www.mbta.com
- Postings on the Boston Region Metropolitan Planning Organization website and e-mail distribution;
- Distribution through community-based neighborhood organizations including those serving or representing minority and low-income groups. (Listing of these organizations is included in the MBTA Public Participation Plan)
- Customer Communications Center phone line;

- Transit Police dispatch phone line;
- Press releases including distribution to outlets serving minority/low-income neighborhoods (eg. El Mundo, Bay State Banner, El Planeta, Mattapan Reporter. Sampan, Haitian Reporter);
- Brochures available in multiple languages (English, Spanish, Chinese, Portuguese, Haitian Creole/French and Italian informing customers of Title VI rights and complaint process;
- Station audio/visual messages in Spanish.

V	Monitoring & Updating the Language Assistance Plan
---	--

The MBTA has designated the Office of Diversity and Civil Rights to provide oversight and coordination of the implementation of the LEP Policy & Procedure. ODCR directs the on-going monitoring and periodic assessment of the LEP Plan effectiveness with assistance of the interdepartment MBTA Title VI Working Group and technical assistance of planners at CTPS.

ODCR on an ongoing basis will review the effectiveness of the LEP plan using the following strategies:

- Solicit direct feedback from community-based organizations by distributing a questionnaire or holding focus group sessions on methods of communicating with LEP households;
- Assessment of demographic composition of the MBTA service areas using most current census or data collected from community organizations;
- Measurement of actual frequency of contact by LEP persons by collecting information from Customer Care Center, MBTA website translation and other front-line operations staff interviews;
- Partnership with other Boston region organizations and participation in regional forums and events focused on issues of diversity and social equity. Such regional collaborations include the MetroFuture planning workshops and task forces headed by the Metropolitan Area Planning Council .
- The MBTA will make changes to this Language Assistance Plan as needed, but at a minimum every three years. The three-year update will coincide with the MBTA's Title VI Program submittal to the Federal Transit Administration.

Vendor	Services	Routine Services	Expedited Service
Baystate Interpreters, Inc.	Interpretation Services	\$75.00 per hr.	\$80.00 per hr.
Baystate Interpreters, Inc.	Translation Services	\$.30 per word	\$.30 per word.
Baystate Interpreters, Inc.	Telephonic Interpretation Services	\$.025 per min.	\$.025 per min.
Baystate Interpreters, Inc.	Simultaneous Interpretation Services	\$80.00 per hr.	\$80.00 Per hr.
Baystate Interpreters, Inc.	Voice Over Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Interpretation Services	\$65/hr.	\$65/hr.
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Translation Services	\$0.40/word	\$0.50/word
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Telephonic Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Simultaneous Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Voice Over Services	\$65/hour	\$65/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Interpretation Services	\$85.00/hour	\$85.00/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Translation Services	\$0.35/word	\$0.40/word
Catholic Charitable Bureau of the Archdiocese of Boston	Telephonic Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Simultaneous Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Voice Over Services	N/A	N/A
Central MA Area Health Education Center	Interpretation Services	\$60.00/hr	\$70.00/hr
Central MA Area Health Education Center	Translation Services	\$0.44/word	\$0.52/word
Central MA Area Health Education Center	Telephonic Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Simultaneous Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Voice Over Services	N/A	N/A
Centro Latino, Inc.	Interpretation Services	\$75.00 per hour	\$85.00 per hour
Centro Latino, Inc.	Translation Services	\$0.40 per word	\$0.50 per word
Centro Latino, Inc.	Telephonic Interpretation Services	N/A	N/A
Centro Latino, Inc.	Simultaneous Interpretation Services	N/A	N/A
Centro Latino, Inc.	Voice Over Services	N/A	N/A
CETRA, Inc.	Interpretation Services	\$102/hour	\$153/hour
CETRA, Inc.	Translation Services	\$0.24/word	\$0.36/word
CETRA, Inc.	Telephonic Interpretation Services	n/a	n/a
CETRA, Inc.	Simultaneous Interpretation Services	\$114/hour for interp	\$171/hour for interpre
CETRA, Inc.	Voice Over Services	\$139.50/hour	\$209.25
Corporate Translation Services, Inc.	Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Translation Services	\$0.45	*Per word rate + 15%
Corporate Translation Services, Inc.	Telephonic Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Voice Over Services	n/a	n/a
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Interpretation Services	\$85.00 Per Hour	\$95.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Translation Services	\$0.50 Per Word	\$0.70 Per Word
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Telephonic Interpretation Services	\$1.15 Per Minute	\$1.15 Per Minute
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Simultaneous Interpretation Services	\$175.00 Per Hour	\$185.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Voice Over Services	N/A	N/A
Eduardo Berinstein Translations LLC	Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Translation Services *	\$.30/word	\$.35/word
Eduardo Berinstein Translations LLC	Telephonic Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Simultaneous Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Voice Over Services *	\$100/hour	\$150/hour
GlobalVision International, Inc.	Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Translation Services	*\$75/hr, ~*18c - ~*24c/word	*\$100/hr, ~*24c/word
GlobalVision International, Inc.	Telephonic Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Simultaneous Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Voice Over Services **	\$1000 for first 5min	\$1300 for first 5min, \$
Interpreters and Translators, Inc.	Interpretation Services	<u>\$90.00/per hour</u>	<u>\$90.00/per hour</u>
Interpreters and Translators, Inc.	Translation Services	<u>.29/per word</u>	<u>.38/per word</u>
Interpreters and Translators, Inc.	Telephonic Interpretation Services	<u>\$2.00/per minute</u>	<u>\$2.00/per minute</u>
Interpreters and Translators, Inc.	Simultaneous Interpretation Services	n/a	n/a
Interpreters and Translators, Inc.	Voice Over Services	n/a	n/a
Interpreters Associates, Inc.	Interpretation Services	75.00/hr 2 hr min	95.00/hr 2 hr min
Interpreters Associates, Inc.	Translation Services	0.50/word	0.95/word
Interpreters Associates, Inc.	Telephonic Interpretation Services	n/a	n/a
Interpreters Associates, Inc.	Simultaneous Interpretation Services	150.00/pp	190.00/pp
Interpreters Associates, Inc.	Voice Over Services	n/a	n/a
JTG, inc.	Interpretation Services	n/a	n/a
JTG, inc.	Translation Services	\$75/hour or 0.28/wc	20% surcharge for pr
JTG, inc.	Telephonic Interpretation Services	n/a	n/a
JTG, inc.	Simultaneous Interpretation Services	n/a	n/a
JTG, inc.	Voice Over Services	n/a	n/a

Language Bridge, LLC	Interpretation Services	\$75 per hour	\$75 per hour
Language Bridge, LLC	Translation Services	\$0.35 per word	\$0.45 per word
Language Bridge, LLC	Telephonic Interpretation Services	n/a	n/a
Language Bridge, LLC	Simultaneous Interpretation Services	n/a	n/a
Language Bridge, LLC	Voice Over Services	n/a	n/a
Language Connections		Incorrect	
Language Line Services, Inc.	Interpretation Services	n/a	n/a
Language Line Services, Inc.	Translation Services	\$0.35/word	\$0.40/word
Language Line Services, Inc.	Telephonic Interpretation Services	\$0.79/minute	\$0.79/minute
Language Line Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Language Line Services, Inc.	Voice Over Services	\$150/hour	\$150/hour
LONE STAR INTERPRETERS LLC	Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Translation Services	\$0.12/word	\$0.14/word
LONE STAR INTERPRETERS LLC	Telephonic Interpretation Services	\$0.63/min	\$0.63/min
LONE STAR INTERPRETERS LLC	Simultaneous Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Voice Over Services	\$12/prompt	\$14/prompt
Mario R. Martinez	Interpretation Services	N/A	N/A
Mario R. Martinez	Translation Services		0.058
Mario R. Martinez	Telephonic Interpretation Services	N/A	N/A
Mario R. Martinez	Simultaneous Interpretation Services	N/A	N/A
Mario R. Martinez	Voice Over Services	N/A	N/A
Patricio Endara	Interpretation Services	\$55.00 per hour	\$60.00 per hour
Patricio Endara	Translation Services	\$0.23 per word	\$0.30 per word
Patricio Endara	Telephonic Interpretation Services	\$1.00 per minute	\$1.25 per minute
Patricio Endara	Simultaneous Interpretation Services	N/A	N/A
Patricio Endara	Voice Over Services	N/A	N/A
Qwest Communications Corporation	Interpretation Services	N/A	N/A
Qwest Communications Corporation	Translation Services	N/A	N/A
Qwest Communications Corporation	Telephonic Interpretation Services	\$ 0.95 per minute	\$ 0.95 per minute – a
Qwest Communications Corporation	Simultaneous Interpretation Services	N/A	N/A
Qwest Communications Corporation	Voice Over Services	N/A	N/A
Rapport International, LLC	Interpretation Services	\$150 per hour	\$185 per hour
Rapport International, LLC	Translation Services	.34 per word	.38 per word
Rapport International, LLC	Telephonic Interpretation Services	\$2 per minute	\$2 per minute
Rapport International, LLC	Simultaneous Interpretation Services	N/A	N/A
Rapport International, LLC	Voice Over Services	N/A	N/A
TransFluenci, LLC	Interpretation Services	\$75 per hour	\$75 per hour
TransFluenci, LLC	Translation Services	<u>.28 per word</u>	<u>.28 per word</u>
TransFluenci, LLC	Telephonic Interpretation Services	N/A	N/A
TransFluenci, LLC	Simultaneous Interpretation Services	N/A	N/A
TransFluenci, LLC	Voice Over Services	N/A	N/A
WorldWide Interpreters, Inc		Incorrect	



Massachusetts Bay Transportation Authority

SUBJECT: LEP Policy and Procedure	AFFECTED PERSONNEL:	STATUS & DATE:
DOCUMENT #:	ISSUED BY: ODCR	SUPERCEDES:

1.0 PURPOSE

This document serves as the Policy and Procedure and Plan of Action for the Massachusetts Bay Transportation Authority (“MBTA”) or (“the Authority”) to provide services to individuals with limited English proficiency. The purpose is to provide a framework for the provision of timely and reasonable language assistance to persons whose primary language is not English, or to those who are limited in speaking, reading, writing or understanding the English language. It demonstrates the MBTA’s best efforts in providing excellent customer service and ensuring meaningful access to all its customers as we continue to build a premier world class transit system.

The MBTA’s LEP Policy and Procedure is in compliance with Title VI of the Civil Rights Act of 1964. It is also in accordance with Federal guidelines that require recipients of federal financial assistance to take adequate steps to ensure that persons with limited English proficiency receive appropriate language assistance. Additionally, it is a proactive way of meeting customer needs, and is consistent with the Authority’s objective to improve overall customer satisfaction.

2.0 DEFINITION OF TERMS

2.1.1 *Title VI of the Civil Rights Act of 1964* – was enacted as part of the landmark Civil Rights Act of 1964, which prohibits recipients of federal financial assistance from discriminating based on race, color or national origin by, among other things, failing to provide meaningful access to individuals who are limited English proficient.

2.1.2 *Individuals with Limited English Proficiency* - individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.

2.1.3. *Federal financial assistance* – any federal funds in the form of grants, loans or any other assistance that an agency receives towards any program, project, service or activity.

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 1 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

2.1.4. *Recipients* – all entities (such as the MBTA) that receive Federal financial assistance, either directly or indirectly, through a grant, contract or some other agreement.

2.1.5. *Meaningful access* – the obligation to provide meaningful access is fact-dependent. A person has meaningful access when he or she is able to obtain important communications and information without barriers in a timely and accurate way.

2.1.6. *Vital document* – whether or not a document is “vital” may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the person with LEP if the information in question is not provided accurately or in a timely manner. Vital documents could include, for example, information regarding critical change to service or material with potential for important health, safety and security consequences.

2.1.7. *Language assistance* – the MBTA may provide interpretation, translation and other language services to customers who are limited English proficient based on the need, activity or encounters. There is no “one size fits all solution” for providing assistance and assessments will be made on a case-by-case basis.

2.1.8. *Universal symbols* – pictorial symbols that are used internationally to guide passengers through transportation facilities and are cross-culturally recognized.

2.1.9. *Oral translation* – the act of translating spoken words from one language to another.

2.1.10. *Written translation* – the act of translating written words from one language to another.

2.1.11. *Interpretation* – the unrehearsed transmitting of a spoken or signed message from one language to another.

3.0 SCOPE

This policy establishes the framework and guidelines by which the Authority’s departments will meet the requirements of Title VI and related Federal regulations. It ensures effective communication by developing a comprehensive written language assistance program so that all customers including those who are not proficient in English can have meaningful access to the Authority’s programs and activities, as required under the regulations. The scope of the policy covers a range of language assistance programs including the translation of certain written materials, the provision of oral language assistance and interpretation, public

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 2 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

announcements and the provision of universal symbols and permanent signs in LEP languages for guidance.

4.0 RESPONSIBILITIES

The LEP policy and procedure is an authority-wide initiative requiring active participation and involvement from various departments within the MBTA including ODCR, Operations, Customer Support Services, Marketing, Public Affairs and others with responsibility for serving this community. ODCR is responsible for monitoring, reporting and overall coordination of the program and will collaborate with relevant departments to ensure effective and efficient implementation.

5.0 MEANINGFUL ACCESS POLICY

Federal standards require that any agency receiving federal funds must provide meaningful access to its services, programs and activities for customers who have limited English proficiency. A person has meaningful access when he or she is able to obtain important communications and information without barriers in a timely and accurate way. To ensure that the Authority is providing meaningful access, language assistance services will be offered as required.

5.0(A) Language Needs Assessment

The Authority will apply the following four factors to determine meaningful access and when assessing customer language needs:

1. The number and proportion of persons of limited English proficiency eligible or likely to be served or encountered by a program, activity, or services;
2. The frequency with which persons with limited English proficiency come into contact with the program or service;
3. The nature and importance of the program, activity, or service provided to people’s lives;
4. The resources available to the recipient.

The greater the number of persons with LEP, the greater the frequency they will have contact with services, and the greater the programs and activities, the more likely enhanced service will be needed.

5.0(B) Identification of Language Needs in Service Areas

The Authority, in collaboration with Central Transportation Planning Services (“CTPS”), evaluated MBTA customer neighborhoods, stations,

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 3 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

bus routes, and subway and commuter rail lines to identify language dominances, other than English, in those areas. Under the regulation criteria, the primary languages break down as follows for the Authority’s customers:

- Spanish 6.1%
- Chinese 2.1%
- Cape Verdean Creole/Portuguese 2.0%
- Italian 1.9%
- Haitian Creole/French 1.5%

For the purpose of this policy, Cape Verdean Creole and Haitian Creole are the preferred languages for translation. However, if translation and/or interpretation services for Cape Verdean Creole and Haitian Creole are not accessible, then the Authority may choose to authorize Portuguese and French as acceptable substitutes.

6.0 LANGUAGE ASSISTANCE

Communication with limited English proficient customers in a timely and accurate manner is critical when providing meaningful language assistance. As such, the MBTA will provide interpretation and translation services to assist with language assistance needs. This can be done by contracting with outside language service organizations; engaging qualified bilingual staff to assist; offer language training to essential employees to better prepare them to effectively communicate; community outreach efforts; distributing materials in the dominant LEP languages; and by screening customer feedback for language related issues and concerns.

6.1(A) Oral Translation/Interpretation Services

The Authority will make reasonable efforts to provide oral translation and interpreting services when necessary to facilitate MBTA projects and initiatives so as to accurately communicate important and relevant information to customers that have a limited ability to speak, write, read, and understand English.

Additionally, oral translation/interpretation services will be provided at public hearings and other pertinent events as necessary. Oral translation may include voice announcements, and interpretation services that will be provided for telephone conversations regarding critical matters involving safety, security, and emergency.

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 4 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

6.1(A)1 Procedure for Accessing Oral Translation/Interpretation Services

The MBTA has contracted with a language assistance firm to provide professional oral translation and interpretation services. Persons requesting translation services can make request in person, by telephone or fax, E-mail, or in writing. The authorization for translation services will be made by the Department requesting the services. The Office of Diversity and Civil Rights, Public Affairs, Marketing, and Customer Support Services Center may also be used to assist in processing requests made by other departments as well. The following are appropriate contacts based on the need for obtaining services or assistance:

- **ODCR (Government Compliance)** - general assistance and request for information (617) 222 3305;
- **Public Affairs** - assistance regarding public meetings and/or customer support (617) 222- 3304
- **Marketing** - assistance regarding marketing materials and/or printed communications (617) 222-5470;
- **CSS** - assistance regarding translation services for direct customer telephone contact, communications and complaints (617) 222-3200.

6.1(A)2 Interpreters for meetings/public hearings:

Upon request, staff from Marketing, ODCR or CSS will coordinate language requests between the MBTA and vendor. The firm will request the Authority’s language needs, the date, time, place and general purpose of the meeting or event. The MBTA’s requests for interpreters should be submitted at least 5 business days prior to public hearing/meeting.

6.1(A)3 Telephone Interpreter:

MBTA will contact the language assistance firm to request an interpreter for telephone communications as necessary. The firm will require that the Authority’s language needs be identified prior to being contacted. As an example, this can be achieved by MBTA staff utilizing “I Speak Calling Cards” printed in various languages for the customer to identify his or her spoken languages (i.e. “I speak Spanish”) translated in the Spanish language. The department requesting the services will be charged for the translations.

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 5 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

6.1(B) Written Translation Services

The Authority will make every effort to translate documents or use universal symbols and signs for its customers with limited English proficiency, and in doing so, the Authority will take into consideration the importance, benefits, costs, and feasibility of translating such materials.

6.1(B)1 Vital materials

For the purpose of this policy, vital materials are defined as information or documents that are critical for accessing MBTA services, programs and activities. Vital documents may include, but are not limited to:

- communications affecting health and safety;
- security announcements and signage;
- emergency related public announcements;
- public participation in the decision making processes involving the Authority;
- public meeting translations (advance notice will be given 48 ours before event);
- materials regarding Title VI Rights and complaint procedures;
- materials concerning major Authority-wide initiatives that affect customer services (e.g. AFC);
- information affecting a rider's ability to access and use the system safely and effectively (e.g. major station changes, renovations, permanent changes in service or service routes).

6.1(B)2 Non-vital materials

Less vital materials, that may not be subject to translation include, but are not limited to:

- train and bus schedules;
- information regarding schedules, trip-planning, inquiries, and customer feedback;
- paper and/or Charlie card tickets;
- general advertisements;
- general announcements; and,
- publications of internal major Authority policies and procedures.

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 6 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

6.1(B)3 Signage and Universal Symbols

A vital part of a well-functioning LEP compliance program includes having effective non-verbal communication such as signage, and electronic messaging and related methods for informing customers of Limited English Proficiency of basic communications. The Authority will assess, post and maintain signs in regularly encountered languages other than English in trains, buses, stations and other appropriate Authority property where deemed beneficial or necessary as an effective way of communicating frequently recurring messages necessary for customer safety and service.

The lack of space or feasibility of translated signage or electronic messaging may sometimes hinder where signs are placed. In some cases, universal symbols will be used as appropriate. Priority areas for signage and universal symbols may include, but are not limited to:

- Accessibility/Priority seating
- Do Not Enter
- Do Not Leave Bags Unattended
- Elevator/Escalator
- Emergency Brake
- Emergency Exit
- Danger
- No Smoking
- In Case of Emergency, Press Button
- Hazardous
- Stand Behind Yellow Line
- Third Rail

6.1(C) Procedure for Accessing Written Translation Services

As indicated on pages two and three, departments requiring assistance will initiate service request through ODCR, Marketing or CSS based on kind of assistance needed. The MBTA will send documentation to the language assistance firm for written translation services. The language assistance firm will review the request and submit a cost estimate for the requested services back to the MBTA. The department ordering the services will be charged for the translations.

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 7 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

After the MBTA approves the translation costs for the materials, the firm will then proceed with the translation and store materials as an electronic file that will be emailed back to the originating MBTA department.

6.1(D) How To Access MBTA Translation Services

To request services, based on need, departments may contact the Office of Diversity and Civil Rights (ODCR) at 617-222-3305, Marketing at 617-222-5470, Public Affairs at 617-222-3304 or Customer Support Services Center (CSS) at 617-222-2515.

7.0 TRAINING

The MBTA will train its workforce, especially its managers and employees who interact with the Authority’s customers and are responsible for implementation of program, to ensure that they are knowledgeable and aware of the MBTA’s Limited English Proficiency (LEP) Policy and Procedure. Trainings will be conducted in coordination through HR, ODCR, Marketing, and CSS. Other employee trainings will be implemented through the following:

- New hire orientation and policy training sessions for supervisors and other staff who are responsible for implementing LEP policy.
- Language courses will be encouraged and reimbursable under the MBTA’s Tuition Reimbursement program (these courses must be taken on employees’ own time.)
- Training and written information on the scope and nature of available language assistance services.

8.0 OUTREACH

The Authority through ODCR, Marketing, CSS, Public Affairs and other departments will ensure that its Limited English Proficiency (LEP) Program reaches out to communities, especially those with high levels of populations with Limited English Proficiency. This can be achieved by holding public meetings, written communications, and by inviting members of the community with Limited English Proficiency to identify needs, provide feedback, and to make suggestions on how the MBTA can improve its language services. Additional outreach efforts may include, but are not limited to:

- Title VI brochures
- Publication of notices in newspapers;
- Radio and TV stations that serve limited English proficiency groups; and

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 8 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			

- Discussions with community organizations regarding problems and solutions

9.0 MONITORING AND REPORTING

ODCR in conjunction with Customer Support Services Department (CSS), Public Affairs and Marketing will monitor, review and amend, if necessary, the MBTA's Limited English Proficiency (LEP) Policy & Procedure through consideration given to the following:

- Reports and observations from the Customer Support Services Department;
- Changes in demographics that trigger consideration of translation language;
- Analysis of staff requests for translations services, needs and costs; and
- FTA reviews of the Title VI Program and LEP Plan;
- Customer feedback
- ODCR in collaboration with other departments will include progress on implementation of the program in its Quarter GM and other reports.

10.0 POLICY DISTRIBUTION

This Limited English Proficiency (LEP) Policy and Procedure will be distributed to all MBTA supervisors and all departments. Additionally, the policy will be available at:

New hire orientation and training;
 Human Resources;
 Office of Diversity and Civil Rights (ODCR)
 Customer Support Services (CSS)
 Marketing

11.0 REFERENCE DOCUMENTATION

- 11.1 Circular FTA C4702.1A
- 11.2 Executive Order 13166
- 11.3 Title VI of the Civil Rights Act of 1964

<i>Updates of policies & SOPs are available at: http://mbtaportal</i>	SUBJECT:	STATUS & DATE:	ITD-FWP-7-12-007 Page 9 of 9
REVIEWED BY:	ITD	Legal	HR
DATE:			