

Language Assistance Plan for
Limited English Proficient Populations
Deliberative Draft

June 2024

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1 INTRODUCTION

The following document serves as the Title VI Language Assistance Plan (LAP) for Limited English Proficient (LEP) Populations for Capital Metro Transportation Authority (CapMetro) and demonstrates the Agency's commitment to provide meaningful access to all individuals accessing services provided by the Agency. The plan is intended for managers and staff who interact directly or indirectly with LEP individuals. Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for Limited English Proficient people. As a sub-recipient of Federal funds, CapMetro must "take reasonable steps to ensure meaningful access to their programs and activities by LEP persons."¹

On August 11, 2000, President William Jefferson Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" that requires Federal agencies and recipients of Federal funds to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those needed services so that LEP persons can have meaningful access to them. Further guidance was provided in 2012 with the release of the Federal Transit Administration's (FTA) circular FTA C 4702.1B that further codified the FTA's objective to "promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency."²

As a means of ensuring this access, the FTA Office of Civil Rights has created a handbook³ for public transportation agencies that provides step-by-step instructions for conducting the required LEP needs assessment and developing a LAP. The LAP becomes a blueprint for ensuring that language does not present a barrier to access to the agency's programs and activities.

To develop the LAP necessary to comply with the guidance, an individualized agency assessment is required that balances the following four factors:

1. Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
2. Factor 2: The frequency with which LEP individuals come in contact with the program;
3. Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
4. Factor 4: The resources available to the recipient and costs for language access services.

To ensure compliance with federal guidance, CapMetro undertook an assessment with the goal that all reasonable efforts should be made to ensure that customers are not denied access to their services due to a limited ability to speak, read, write and understand English. CapMetro believes in the rights of all residents

¹ Federal Register Volume 70, Number 239 (Wednesday, December 14, 2005)

² FTA Circular 4702.1B- TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, October 1, 2012.

³ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers. The Federal Transit Administration Office of Civil Rights, April 13, 2007

within its community, and furthermore supports the overriding goal of providing meaningful access to its services to LEP persons. Given the diverse nature of the service area, eliminating the barrier to persons with limited English-speaking ability will have a positive impact not only on LEP individuals themselves, but also on the impact that CapMetro services have on the community.

Agency Background

In January 1985, voters approved the creation of CapMetro as the entity to provide mass transportation service to the greater Austin metropolitan area by agreeing to fund part of the organization with a one percent sales tax levied by members of its service area. The CapMetro service area is located in Travis and Williamson Counties and includes the cities of Austin, Jonestown, Lago Vista, Leander, Manor, Point Venture, San Leanna, Volente, the Anderson Mill area in Williamson County and Precinct 2 (an unincorporated area in north Travis County). The Cities of Round Rock, Pflugerville and Georgetown do not pay the one percent sales tax and currently contract for CapMetro service.

CapMetro services 549 square miles and a population of over 1,000,000. The regional transit system carried on average 23 million passengers per year from 2019 to 2023 and provides services that include bus, commuter rail system, and paratransit services⁴. CapMetro provides the following services:

- Bus service that includes frequent service with a limited number of stops and faster travel times, commuter rail service to and from downtown, and a shuttle system that provides access to the University of Texas campus.
- Americans with Disabilities Act (ADA) paratransit service (MetroAccess) for those who are unable to use bus and rail services.
- On-demand shared ride service (Pickup) that can accommodate customers in a wheelchair.
- Vanpool service (Metro Rideshare) for a group of 4 or more people who regularly travel together in a rideshare vehicle for the purpose of commuting to and from work.
- Fixed-route bus service, non-emergency medical transportation, and other services of varying frequency to riders who live outside of the CapMetro service area that covers a 7,200 square mile area surrounding Austin. CapMetro partners with Capital Area Rural Transportation System (CARTS) to support these services.
- Guaranteed Ride Home that provides registered customers with a taxi ride home in the event of an unexpected emergency from work.
- Bike rental and secure bike parking for bicycles (MetroBike) is designed for those trips that are too far to walk but too short to drive.

CapMetro operates 71 fixed bus routes and 13 high-frequency routes (2 rapid & 11 local) with a requirement of approximately 300 vehicles during peak service. The fixed route system includes: 416 Buses, 55 Rapid vehicles, 49 pickup vehicles, 10 train diesel electric, 94 vanpools, 181 paratransit vehicles, and 75 MetroBike stations. CapMetro also operates at 2,500 bus stops, 26 park & rides/transit centers, 10 commuter rail stations along 32 miles of track between Leander and downtown Austin, 162 freight lines between Giddings and Llano, and 26 rapid station pairs along each of the two rapid corridors (North Lamar to South Congress (Route 801) & from the Domain to the Westgate Transit Center (Route 803))⁴.

⁴ Fast Facts on CapMetro website at <https://www.capmetro.org/facts>

Methodology and Recommendations

The development of the LAP and associated Four Factor Analysis included the following components:

1. Research of peer agencies Data analysis;
2. Survey participation from Community Based Organizations (CBO);
3. Survey participation from Frontline Staff (i.e., Contracted Service Providers, Customer Service, Planning, and other staff that encountered customers) surveys; and,
4. General plan findings that include the Four Factor Findings and Top Languages and Safe Harbor languages.

Based on the Four Factor Findings, the following are categories of recommendations that would improve the level of service that CapMetro provides to its LEP customers and that can be implemented over time as budget and staff permits:

1. Internal awareness and public outreach strategy and training;
2. Materials and Documents review to ensure clarity;
3. Translation and Interpretation tools and protocols for employees and contracted service providers; and,
4. Employees, including training or incentives to empower employees to provide assistance.

2 FOUR FACTOR ANALYSIS OVERVIEW

The cornerstone of the LAP is the Four Factor Analysis that serves as a needs assessment for developing language assistance measures for those with a limited ability to read, write, speak or understand English. These LEP populations are those who reported to the U.S. Census that they speak English “less than very well,” “not well,” or “not at all.” It’s important to note that LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (trip planning needs, origin and destination needs) in English.

The FTA circular FTA C 4702.1B provides guidance to recipients on how to ensure that they provide meaningful access to persons who are LEP. The guidance notes that recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis can help CapMetro determine if it communicates effectively with LEP persons and will inform the development of the LAP.

The Four Factor Analysis is an individualized agency assessment that balances the following four factors: 1) determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a CapMetro program, activity or service; 2) the frequency with which LEP Populations come in contact with CapMetro’s programs, activities and services; 3) the nature and importance of the program, activity, or service provided by the recipient to people’s lives; and 4) the resources available to CapMetro and costs associated with language access services. This section describes the step-by-step instructions for conducting the required LEP needs assessment according to the FTA’s handbook as it applies to CapMetro.

2.1 DATA SOURCES AND USE

A variety of data sources were consulted for each of the steps in the Four Factor Analysis. This section presents a description of each of the data sources and what they were used for in the analysis.

Data that were consulted to determine the most prevalent languages spoken in the service area, as well as those that may benefit from language assistance for the Factor 1 analysis included:

1. American Community Survey (ACS) 2022 one-year sample languages of people that speak English less than “Very Well” for Travis County, Table B16001;
2. ACS 2015 five-year sample of languages of people that speak English less than “very well” for Williamson County, Table B16001;
3. ACS 2022 one-year sample of LEP Households, Table S1602;
4. Austin Independent School District English Language Learner Data (Bilingual and English as a Second Language Programs and Demographic Summary Report 2024, Austin Independent School District)
5. CapMetro Customer Service Information; and,
6. Origin and Destination Survey 2023, Figure 7 and Figure 8.

Because the service area includes both portions of Travis and Williamson County, the data includes different data years by county, as the most recent available data for Williamson County is from 2015 and the most recent available data for Travis County is 2022. Each county is displayed independently so that the differences can be compared. Had 2022 data been available for both counties, a cumulative display could be presented. However, the data is separated for accuracy.

The data that were consulted for Factors Two and Three (the frequency with which LEP Populations come in contact with CapMetro’s programs activities and services, and the nature and importance of the program, activity, or service provided by the recipient to people's lives) included:

1. Frontline survey data;
2. Language Line telephone data;
3. CBO survey data;
4. ACS 2022 one-year sample of commuting characteristics for Travis and Williamson counties, Table S0802; and,
5. Origin and Destination survey data.

Data that were consulted for the Factor 4 analysis to determine the resources available to CapMetro and costs associated with language access services included:

1. Department budgets for translation and interpreting expenses;
2. Language Line telephone data costs; and,
3. Document translation services costs.

2.2 FACTOR 1 OVERVIEW

Factor 1 includes determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a CapMetro program, activity or service.

The first step in the LAP development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from language assistance. This process includes examining the agency’s prior experience with LEP populations and using census and other available data to identify

concentrations of LEP persons in the service area, including those that qualify under the “Safe Harbor Languages” definition.

Safe Harbor languages are defined by FTA Circular 4702.1B as languages spoken by at least 1,000 individuals with Limited English Proficiency within the service area, stating, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

To determine Safe Harbor languages in the CapMetro service area, the most recent available ACS data was used from Travis County and Williamson County as described above. While the data is not as contemporary as desired, it represents the most recent data available with the granularity necessary to review the specific languages for consideration.

The 2024 Austin Independent School District’s Language Learner data also provided corroborating data to support the findings.

2.2.1 DATA ANALYSIS

Linguistic Isolation

The first data reviewed related to the percentage of limited English-speaking households within the two counties in which no member 14 years or older (1) speaks only English or (2) speaks a non-English language and speaks English “very well.” In other words, all members 14 years old and older have at least some difficulty with English.⁵ Previous Census Bureau data products have referred to these households as “linguistically isolated.”

About 5% of all Travis County households would be considered LEP households, while about 3% of Williamson County households would fall into that category (see **Table 1: Linguistic Isolation for Households in Travis and Williamson Counties**). Similar differences in the two counties reveal that of the total Spanish-speaking households in Travis County, about 17% of those are LEP households, or linguistically isolate. This compares to about 10% of the Williamson County Spanish-speaking households.

What is notable is that the percentage of households that speak Asian and Pacific Island languages and are LEP are also about 18% of the total in Travis County. However, in Williamson County, the percentage of Asian language speaking households is almost double that of Spanish speaking households at almost 13%.

While this data presents the broad language categories of those LEP households, it is necessary to review other census data tables to determine the languages of the LEP population. The most current ACS data was reviewed for this analysis, which includes Table B16001, that presents the population’s ability to speak English.

⁵ ACS 2019 one-year sample Table S1602 Table Notes

Table 1: Linguistic Isolation for Households in Travis and Williamson Counties

	Travis County, Texas			Williamson County, Texas		
	Total Households	Limited English-speaking households	Percent limited English-speaking households	Total Households	Limited English-speaking households	Percent limited English-speaking households
All households	586,136	29,212	5.0%	258,095	8,751	3.4%
Households speaking --						
Spanish	124,392	20,925	16.8%	43,138	4,096	9.5%
Other Indo-European languages	24,834	2,120	8.50%	13,580	1,444	10.6%
Asian and Pacific Island languages	29,145	5,126	17.6%	18,140	2,385	13.1%
Other languages	8,400	1,041	12.4%	4,456	826	18.5%

Source: ACS, 2022 one-year sample Table S1602.

ACS Safe Harbor Languages

The Safe Harbor language determination began with a review of the 2022 ACS one-year sample data, Table B16001 for Travis County and the 2015 ACS five-year sample data, and Table B16001 for Williamson County. As previously mentioned, it was necessary to consult two different sample years for the analysis, as the most current data for Williamson County was 2015. As a result, these two counties are presented independently, as shown in **Table 2: Travis County LEP Population (ACS 2022 1-Year Sample)** and **Table 3: Williamson County LEP Population (20222015 ACS 5-Year Sample)** below. However, comparisons for languages that may have been under the 1,000 or the 5% threshold in one county were compared to the same language in the other county to see if the threshold could be reached. This data, below, is slightly different than the “Linguistic Isolation” table, above, as that data considers only those 14 years of age and older.

Seventeen unique Safe Harbor languages meeting the 1,000 or 5% threshold were identified using the 2022 and 2015 ACS data:

1. Spanish
2. Punjabi
3. Telugu
4. Chinese
5. Korean
6. Vietnamese
7. Arabic
8. French
9. German

10. Italian
11. Russian
12. Hebrew
13. Hindi
14. Urdu
15. Gujarati
16. Tagalog
17. Tamil

English-only is still spoken by the majority of the population in the service area, with about 70% in Travis County and 79 % in Williamson County. Spanish, by a large margin, continues to be the most prevalent LEP language in the service area, at 29% of the LEP population in Travis County and 24% of the LEP population in Williamson County. However, while Spanish is the most prevalent LEP population, this only accounts for about 8% of the entire population in Travis County and 5% in Williamson County.

Several other language groups also met the threshold but were in groups of languages rather than in discrete, unique languages. For example, over 1,000 residents indicated they spoke English less than “very well” in the Nepali, Marathi or other Indic languages (languages of India). However, that group includes greater than 10 common languages, including Hindi. As a result, while specific languages within the group are not included in the Safe Harbor list, there may a need to investigate whether there are unmet needs within this or other of these language groups that may result in some languages being included for written translations. This will be further discussed in Factors 2 and 3.

One language, Punjabi, was included as a Safe Harbor language even through it did not meet the 1,000 or 5% threshold due to the close proximity to meeting this threshold. At 382 respondents who indicated they spoke English less than “very well,” it was included. Should new data be available in the next LAP update, it can be reviewed for relevance at that time.

Table 2: Travis County LEP Population (ACS 2022 1-Year Sample) presents the Travis County LEP population and **Table 3: Williamson County LEP Population (2015 ACS 5-Year Sample)** presents the Williamson County LEP population.

Table 2: Travis County LEP Population (ACS 2022 1-Year Sample)

Travis County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	1,253,905		
Speak only English	884,089	70.50% %	
Spanish:	257,494		
Speak English "very well"	157,697		
Speak English less than "very well"	99,797	7.95%	29.02%
Punjabi:	382		
Speak English "very well"	382		
Speak English less than "very well"	0	0 %	0.27%
Nepali, Marathi, or other Indic languages:	4,183		
Speak English "very well"	3,103		
Speak English less than "very well"	1,080	0.08%	0.31%

Other Indo-European languages:	2,261		
Speak English "very well"	1,904		
Speak English less than "very well"	357	0.03%	0.31%
Telugu:	5,943		
Speak English "very well"	5,227		
Speak English less than "very well"	716	0.05%	0.32%
Chinese (incl. Mandarin, Cantonese):	15,641		
Speak English "very well"	11,570		
Speak English less than "very well"	4,701	0.37%	1.09%
Korean:	4,281		
Speak English "very well"	2,513		
Speak English less than "very well"	1,768	0.14%	0.43%
Vietnamese:	10,602		
Speak English "very well"	5,397		
Speak English less than "very well"	5,207	0.42%	1.34%
Arabic:	3,282		
Speak English "very well"	2,427		
Arabic Speak English less than "very well"	2,427	0.07%	0.63%
Yoruba, Twi, Igbo, or other languages of Western Africa:	8,025		
Speak English "very well"	6,960		
Speak English less than "very well"	1,065	0.08%	0.28%
Hindi:	9,214		
Speak English "very well"	7,777		
Speak English less than "very well"	1,437	0.11%	0.39%
French (incl. Cajun):	5,500		
Speak English "very well"	3,753		
Speak English less than "very well"	1,747	0.14%	0.47%
Russian:	3,945		
Speak English "very well"	2,460		
Speak English less than "very well"	1,485	0.12%	0.40%
Tamil:	3,682		
Speak English "very well"	2,802		
Speak English less than "very well"	880	0.07%	0.24%
German:	3,522		
Speak English "very well"	3,167		
Speak English less than "very well"	355	0.03%	0.10%
Tagalog (incl. Filipino):	3,028		
Speak English "very well"	2,674		
Speak English less than "very well"	354	0.02%	0.10%
Other Languages of Asia:	2,526		
Speaks English "very well"	1,1315		
Speaks English less than "very well"	1,211	0.10%	0.33%
Persian (incl. Farsi, Dari):	2,524		
Speak English "very well"	1,661		
Speak English less than "very well"	863	0.07%	0.23%
Thai, Lao, or other Tai-Kadai languages:	2,472		
Speaks English "very well"	1,258		
Speak English less than "very well"	1,214	0.010%	0.33%
Malayalam, Kannada, or other Dravidian languages:	2,396		

	Speaks English "very well"	1,848		
	Speaks English less than "very well"	548	0.04%	0.15%
Other Indo-European languages:		2,261		
	Speaks English "very well"	1,904		
	Speaks English less than "very well:	357	0.03%	0.10%
Urdu:		2,083		
	Speaks English "very well"	1,758		
	Speaks English less than "very well:	325	0.03%	0.09%
Gujarati:		1,894		
	Speaks English "very well"	1,651		
	Speaks English less than "very well:	243	0.02%	0.07%
Hebrew:		1,570		
	Speak English "very well"	1,498		
	Speak English less than "very well"	72	0.0%	0.02%
Italian		1,468		
	Speaks English "very well"	1,166		
	Speaks English less than "very well:	302	0.02%	0.08%
Amharic, Somali, or other Afro-Asiatic languages:		1,436		
	Speak English "very well"	1,033		
	Speak English less than "very well"	403	0.03%	0.11%
Swahili or other languages of Central, Eastern, and Southern Africa:		1,281		
	Speak English "very well"	825		
	Speak English less than "very well"	456	0.04%	0.12%
Polish:		1,009		
	Speaks English "very well"	815		
	Speaks English less than "very well:	194	0.02%	0.05%

Source: ACS, 2022 one-year sample Table B16001.

Table 3: Williamson County LEP Population (2015 ACS 5-Year Sample)

Williamson County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	440,120		
Speak only English	349,018	79.3%	
Spanish or Spanish Creole:	64,037		
	Speak English "very well"	42,227	
	Speak English less than "very well"	21,810	5.0%
Chinese:	3,226		
	Speak English "very well"	1,858	
	Speak English less than "very well"	1,368	0.3%
Korean:	1,398		
	Speak English "very well"	626	
	Speak English less than "very well"	772	0.2%
Vietnamese:	2,411		

	Speak English "very well"	1,203		
	Speak English less than "very well"	1,208	0.3%	1.3%
Hindi:		1,894		
	Speaks English "very well"	1,636		
	Speaks English less than "very well"	258	0.06%	0.3%
German:		1,592		
	Speaks English "very well"	1,422		
	Speaks English less than "very well"	170	0.04%	0.2%
Urdu:		1,589		
	Speaks English "very well"	1,157		
	Speaks English less than "very well"	432	0.10%	0.5%
French:		1,326		
	Speaks English "very well"	1,074		
	Speaks English less than "very well"	252	0.06%	0.3%
Gujarati:		1,209		
	Speaks English "very well"	693		
	Speaks English less than "very well"	516	0.12%	0.6%
Tagalog:		1,187		
	Speaks English "very well"	966		
	Speaks English less than "very well"	221	0.05%	0.2%
Arabic:		577		
	Speak English "very well"	414		
	Speak English less than "very well"	163	0.0%	0

Source: ACS, 2015 one-year sample Table B16001.

According to the guidelines set forward by the FTA, the LEP analysis should also review alternate and local sources of data to assist in Factor 1 findings. To provide further understanding of the languages that may require language assistance, the Austin Independent School District data on bilingual and English language learners was reviewed. The English Learner survey does not provide the most useful data for the LEP analysis, as it is collected among students and not the population as a whole. However, it provides another means of cross-checking census data analyses. As anticipated, Spanish remains the top language spoken by language-learners at 87% of the language learners. While this list does not present any unique observations, it does provide more clarity on several findings:

- 1) Mandarin is the Chinese language most spoken by language learners, which is not specified in the ACS data.
- 2) Several of the languages coincide with the ACS data and corroborate the findings, including: Spanish, Arabic, Vietnamese, Korean, and Telugu.
- 3) Several other languages are not represented in the ACS data but were further evaluated to determine if they should be considered languages requiring written translations, and following review were determined to be add, which including Burmese and Pashto.

Table 4: Austin Independent School District Language Learner Data 2024 provides a breakdown of the primary languages of the Austin Independent School District English Learners reported for the school district.

Table 4: Austin Independent School District Language Learner Data 2024

2024 Austin Independent School District English Learner Data				
Number	Languages	Number of Learners	% of LEP	Rank
1	Spanish	20611	86.64%	1
2	Pashto	509	2.14%	2
3	Vietnamese	345	1.45%	3
4	Arabic	301	1.27%	4
5	Chinese, Mandarin	196	0.82%	5
6	Dari	174	0.73%	6
7	Portuguese	119	0.50%	7
8	Russian	89	0.37%	8
9	Korean	83	0.35%	9
10	French	81	0.34%	10
11	Tegulu	72	0.30%	11
12	Burmese	69	0.29%	12
13	Hindi	64	0.27%	13
14	Kinyarwanda	64	0.27%	14
15	Tamil	56	0.24%	15
16	Urdu	53	0.22%	16
17	Q'eqchi	50	0.21%	17
18	Farsi	47	0.20%	18
19	Japanese	41	0.17%	19
20	Nepali	37	0.16%	20

Bilingual and English as a Second Language Programs and Demographic Summary Report 2024, Austin Independent School District

Using a compound analysis of the three data sources, we find that all of the most prevalent languages are represented in the data. **Table 5: Composite of LEP Languages** presents the ranking of the three data sets that were used to help identify the safe harbor languages. Based on Factor 2 and 3, additional languages may be added to reflect the better understanding of the service area’s language needs.

Table 4: Composite of LEP Languages

Language	Travis County ACS Ranking	Williamson County ACS Ranking	AISD Learner Ranking
Spanish	1	1	1
Vietnamese	2	2	3
Chinese	3	3	5
Arabic	4	NA	4
French	5	7	10
Korean	6	4	9
Russian	7	NA	8
Hindi	8	7	13
Thai (Burmese), Lao, Or Other Tai-Kadai	9	NA	12
Other Languages of Asia	10	NA	NA

Telugu	11	NA	NA
Other Indo-European Languages	12	NA	NA
Nepali, Marathi or other Indic Languages	13	NA	20
Yoruba, Twi, Igbo, or other languages of Western Africa	14	NA	NA
Punjabi	15	NA	NA
Tamil	16	NA	15
Persian(Farsi, Dari)	17	NA	18
Malayalam, Kannada, or other Dravidian languages	18	NA	NA
Amharic, Somali, or other Afro-Asiatic Languages	19	NA	NA
Swahili or other languages of Central, Eastern, and Southern Africa:	20	NA	NA
Burmese	NA	NA	12

Sources: ACS, 2022 one-year sample Table B16001; Source: ACS, 2015 five-year sample Table B16001; and Bilingual and English as a Second Language Programs and Demographic Summary Report 2024, Austin Independent School District.

Past Practice

In the past several years, the Community Advancement Network (CAN) in Austin has provided guidance to CapMetro on ways to enhance their language assistance measures to refugee and immigrant populations in the area. CAN is a partnership of government, non-profit, private and faith-based organizations who work together to enhance the social, health, educational and economic well-being of Central Texas. CAN provides a collaborative forum to enhance awareness of issues, strengthen partnerships, connect efforts across issue areas, and facilitate development of collaborative strategies.

CAN alerted CapMetro staff to the language assistance needs of several immigrant and refugee populations that have been underrepresented in census data, but whose language assistance needs may represent a barrier to using CapMetro’s service. The languages include French, which is used by a number of countries including Haiti and a variety of African counties, Burmese which is spoken in Myanmar, and Pashto which is spoken in Afghanistan and parts of Pakistan. CapMetro has provided targeted translations for these languages.

As a result of this past practice, French, Burmese and Pashto were added to the list of Safe Harbor languages.

2.2.2 FACTOR 1 FINDINGS

As a result of the Factor 1 analysis, the following languages are currently included in the language assistance plan:

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area
- Safe Harbor languages:
 - i. Vietnamese,
 - ii. Chinese (Mandarin),
 - iii. Korean,
 - iv. Arabic,

- v. Telugu,
- vi. Punjabi,
- vii. French,
- viii. Myanmar (Burmese), and
- ix. Pashto (Afghani).

2.3 Factor 2 Overview

Factor 2 includes the frequency with which LEP Populations come in contact with CapMetro’s programs activities and services. This factor can also influence the languages that are included in the LAP, as some language groups may require language assistance even though they are not identified by data.

Assessing the frequency with which LEP populations come in contact with CapMetro’s programs, activities and service helps the agency determine which languages need to be considered for language services. Generally, “the more frequent the contact, the more likely enhanced language services will be needed.”⁶ Strategies that help serve an LEP person on a one-time basis will be very different than those may that serve LEP persons on a daily basis. This analysis provides more clarity on the languages encountered and can help refine the languages requiring language assistance. This can also include adding languages for potential language assistance based on the agency employee’s interaction with specific language populations.

For purposes of estimating the frequency of contact with LEP individuals, CapMetro programs and services were reviewed, and frontline employees that have direct connection with LEP populations were surveyed. Surveys with CBOs were also reviewed for relevance. Other data sources were also consulted including ACS data and the CapMetro Origin and Destination Survey (2023).

CapMetro Services and Programs

CapMetro provides a variety of services and programs that were reviewed to better understand the populations that CapMetro may serve. In addition to bus and light rail transit service, the agency also offers a number of customer-service related programs that assist the community to access their services. This includes, trip-planning, providing information on how to purchase tickets or ride transit, ADA paratransit trip-scheduling, Pickup trip scheduling, lost and found, MetroBike scheduling, planning and marketing their services and general management of the system. **Table 6: CapMetro Programs and Services** provides an overview of the broad categories of services that CapMetro provides, along with the activities that may be relevant to LEP populations.

⁶ Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

Table 5: CapMetro Programs and Services

Program	Description of Relevant Activities
General Administration, Planning and Marketing Activities	Includes outreach to communities on new projects or programs, communication with community on changes to service, important decision-making, safety and security of system, general administration and system management
Fixed Route Bus and Rail Service	Bus and rail transit service to bus stops and stations within the service area.
Customer Service Activities	Trip Planning, wayfinding, information on fares, schedules and service disruptions, lost and found and other essential information.
MetroAccess	Service provision of demand-responsive ADA paratransit service. Trip scheduling of paratransit trips.
Pickup	App or Phone based demand responsive rideshare service in select neighborhoods
CapMetro Vanpool	Vanpool subscription service for a group of 4 or more, managed by Enterprise
CapMetro Bikeshare	Public bikeshare and secure bike parking for personal bicycles.
Guaranteed Ride Home	Provides registered Express, Flyer, Rail and Vanpool customers with a taxi ride home from work in the event of an emergency
Park & Rides	CapMetro maintained parking lots and transit stations to help connect riders to transit lines.
UT Shuttles	Bus service connecting the University of Texas campus and residential areas.
Late Night Routes	Provides a transit option for riders in central Austin between 12 - 3 a.m.
CARTS	The Capital Area Rural Transportation System provides transit to rural communities outside CapMetro's service area.

Source: CapMetro, 2023.

CapMetro On-site Language Assistance Services

The majority of the agency-wide language access services are provided in one of two ways: Staff-derived translations or interpretations, or the telephone Language Line service.

CapMetro contracts with Language Line phone service for interpreting assistance that can be used by Metro employees that need interpreters for languages for which no CapMetro staff is available to provide interpreting. Currently, there are multiple CapMetro Customer Service and Marketing staff that speak Spanish, which can provide direct customer communication if they are available. There are no dedicated staff for this function, as staff provides interpreting as part of their general duties. When CapMetro staff is assisting other calls or is not available, Language Line services provides interpretation.

Customer Service employees are trained how to handle the Language Line transactions, which require that the customers be placed on hold, then added to a three-way call between the customer, the Customer Service staff and the language line interpreters. If the Customer Service staff can recognize the language, Spanish for example, the Customer Service employee can request that language from Language Line operators prior to adding the customer to the call. For languages that are not recognized, Language Line staff speak directly with the customer to identify the language.

Both fixed route and paratransit customer service staff use Language Line service. While 65% of ADA trips booked per day are handled by customer service, there are times when Language Line services are required; when Spanish-speaking staff are not available, or when staff does not speak the language requested. The ADA customer service database of riders includes a note related to languages, so even languages that are

not common can be addressed in an effective and efficient manner. Spanish speaking customers can also book trips using the automated system. Paratransit eligibility is typically handled by service representatives. However, contractors can provide functional assessments and the contractors are required to have at least one Spanish speaker to address language access.

Marketing and Planning typically provide language assistance when conducting public meetings, including holding meetings in Spanish or having Spanish/English simultaneous interpreting. Many outreach campaigns also include Spanish translations for targeted materials for service changes along with information documents such as the Destinations Schedules Book and MetroAccess Rider Guide. CapMetro Planning also includes both meetings in Spanish, as well as translated outreach materials in other languages intended to help the community understand the contemplated capital projects and the public's role in decision-making. These efforts include advertising the meetings in foreign language newspapers and social media posts that can be translated within the app.

Information campaigns can also include videos aimed at improving the rider's understanding of the service or program that have been translated into Spanish. There are a number of embedded videos in Spanish on the website, in addition to videos on YouTube that provide Spanish subtitles or voiceover on a variety of subjects, including safety and other issues. There are also YouTube videos in English that provide Spanish subtitles on basic riding attributes (e.g. fare payment methods).

Spanish translations also are provided on CapMetro bus stop signs, and within the Ticket Vending machines so that Spanish speaking riders can purchase tickets in their preferred language. Real time information signs located at stops and stations also include Spanish translations, as do the automated announcements on-board vehicles and at stations.

CapMetro Website

While CapMetro primarily operates fixed route bus and rail service, and the federally required complementary paratransit, they also offer a number of other services that may have unique language access needs that should be considered. As a result, a review of the web-based forms and informational materials posted on the CapMetro website was undertaken to help establish which documents would need to have appropriate translations.

The CapMetro website uses Google Translate for a variety of languages that have historically been requested. Google Translate provides cost effective methods of addressing the immediate needs of LEP populations that speak lightly used languages. It can also be used as a method of translating text in a rough manner that can then be corrected by native speakers, thereby saving time on translations.

Translation of language on CapMetro's website has been addressed with the addition of a Google Translate bar with translatable languages at the bottom of the web page, requiring users to scroll to the bottom to select the language. A notice to provide Free Language Assistance in Safe Harbor languages will be included on the website.

Additionally, some programs and some functions of the website have pdf fact sheets or participation guidelines that cannot be translated using the Google Translate function and would take multiple steps to translate with other third-party applications. One example is the "Report a Problem" and "Customer Contact Form", which does not translate even after the user has selected a language. This is especially problematic, as customers may wish to report a Title VI complaint, but would be unable to unless they had additional

assistance. CapMetro will continue to review alternatives to address issues with translation of documents and other content.

Another example is the MetroBike Shelter program, whose participation form does not translate using Google Translate. Similar issues with the Guaranteed Ride Home program exist in which pdfs related to how to register are not translated. As the agency moves ahead with additional ground-breaking services, ensuring that all website applications and forms can be translated using Google Transit will help ensure that LEP populations have access to all of the CapMetro services.

Frontline Staff Consultation

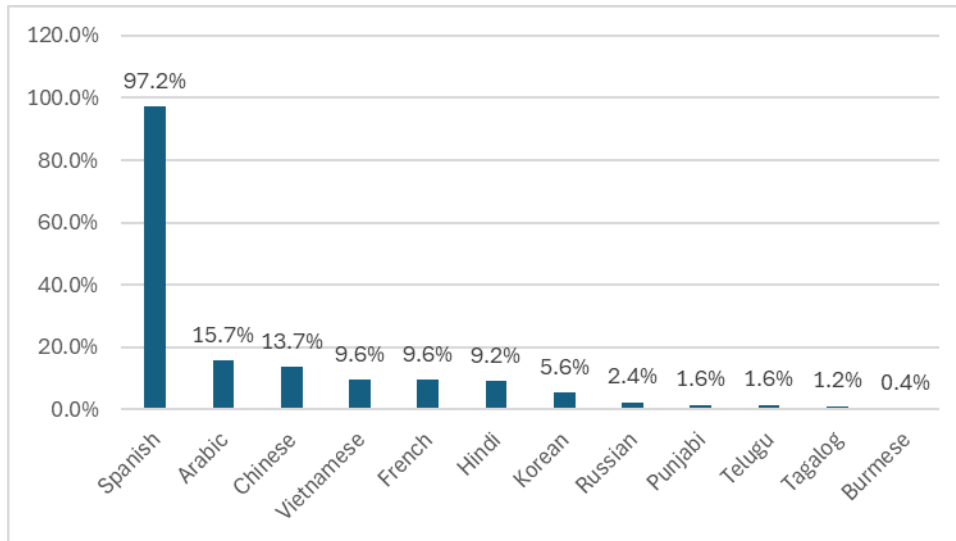
To better understand the languages that are most encountered by Frontline Staff (i.e., Contracted Service Providers, Customer Service, Planning, and other staff that encountered customers), surveys were conducted, which provided some broad understanding of the frequency of contact. The survey asked questions on methods that could improve CapMetro's outreach and communication to LEP communities.

The employee survey was posted online via SurveyMonkey.com to ensure that all employees would be able to participate. CapMetro publicized and distributed the survey to Frontline Staff. Frontline Staff received the internal survey through an email and had verbal reminders during their team meetings. Contracted service providers received the internal survey via email, distributed via operator mailboxes, social media platforms, and via text. Promotional material was also available on the Timepoint TV. The full survey results are included in the in Appendix A: LEP Public Involvement Summary.

Approximately 260 surveys were conducted, representing about 10% of the employees surveyed. However, the departments having the most direct communication with the public had much better response rates, which included Keolis.

The survey results found that Spanish was the predominant language most often heard when interacting with the customers or members of the public. This corresponds to the ACS data and on-board survey data discussed in Factor 1. Other languages from Factor 1 are also heard in significant numbers, including Arabic, Chinese, Vietnamese, French, Hindi, Korean, Punjabi, Telugu, Tagalog, and Burmese. **Figure 1: Languages Most Often Heard** provides the survey results for the languages heard most often by frontline customers.

Figure 1: Languages Most Often Heard

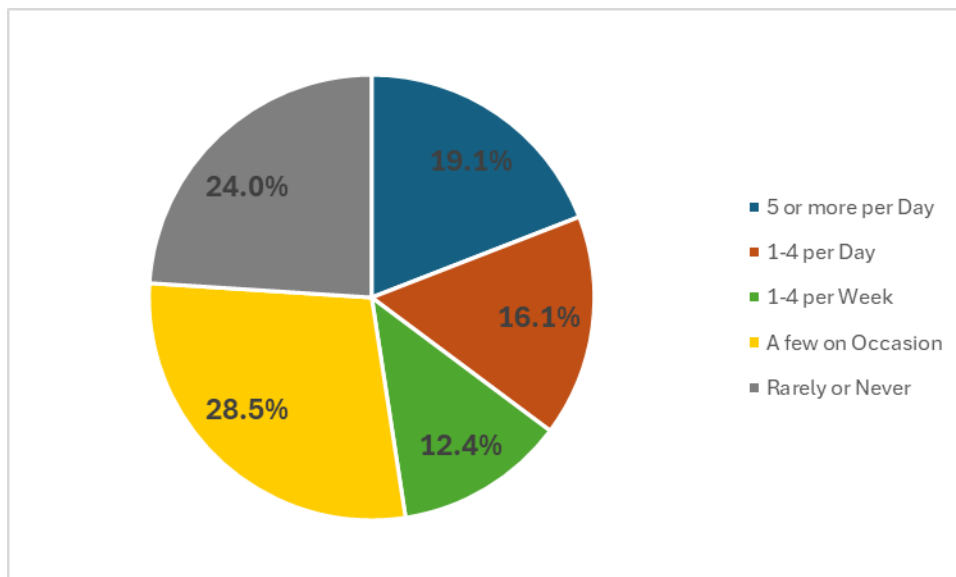


Note: Does not add to 100%, as respondents could choose as many as applied.
 Source: Language Assistance Plan Agency Survey Results, 2024.

About 35% of the survey respondents indicate that they encounter LEP customers fairly frequently (between 1-4 per day, and 5 or more per day). The survey results show that (24%) of respondents rarely or never encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in in English. About 12% indicate that they encounter LEP customers about 1-4 per week.

Figure 2: Frequency of LEP Customer Encounters presents the frequency of contact with LEP customers.

Figure 2: Frequency of LEP Customer Encounters



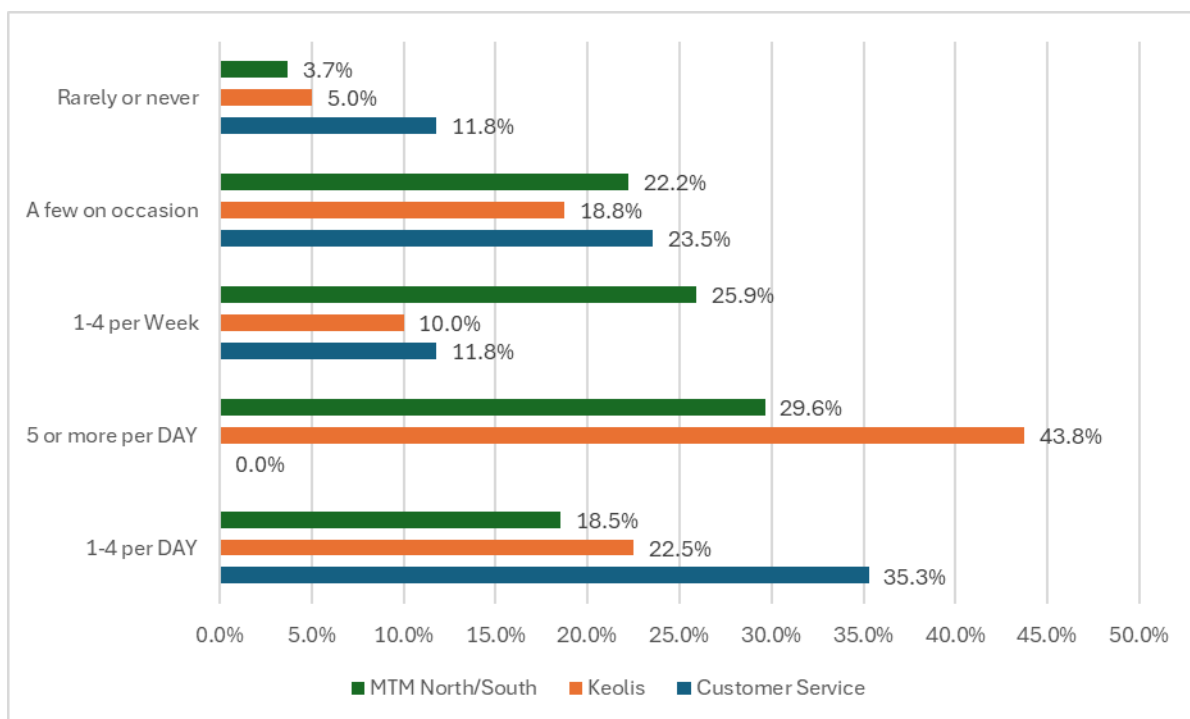
Source: Language Assistance Plan Agency Survey Results, 2024.

Keolis, MTM, and CapMetro Customer Service are the respondents who have the most public-facing interaction on a daily basis. To best serve the purpose of this survey, it was important to see if there was

commonality in their experience. No survey responses were received from Herzog. Only 5% of Keolis respondents Service staff indicated that they have little to no interaction with LEP individuals, 14.3% of Customer Service staff indicated that they have no LEP interactions, and 3.7% of MTM respondents indicated that they have little to no interaction with LEP individuals.

Based on the survey results 43.8% of the Keolis respondents interact with customers and/or members of the public who request language assistance 5 or more per day, 0% of the Customer Service respondents interact with customers and/or members of the public who request language assistance 5 or more per day, & 29.6% of MTM respondents interact with customers and/or members of the public who request language assistance 5 or more per day. Respondents listed Spanish as the language most often heard by customers and/or members of the public, followed by Arabic, Chinese, and then Vietnamese. 22.5% of the Keolis respondents encounter LEP customers and/or members of the public who request language assistance 1-4 times per day, 35.3% of Customer Service respondents encounter LEP customers and/or members of the public who request language assistance 1-4 times per day, and 18.5% of MTM respondents encounter LEP customers and/or members of the public who request language assistance 1-4 times per day. **Figure 3: Customer Service, Keolis & MTM Operators' Frequency of LEP Encounters**, presents the Keolis bus operators', MTM, and Customer Service representative's frequency of contact.

Figure 3: Customer Service, Keolis, & MTM Operators' Frequency of LEP Encounters

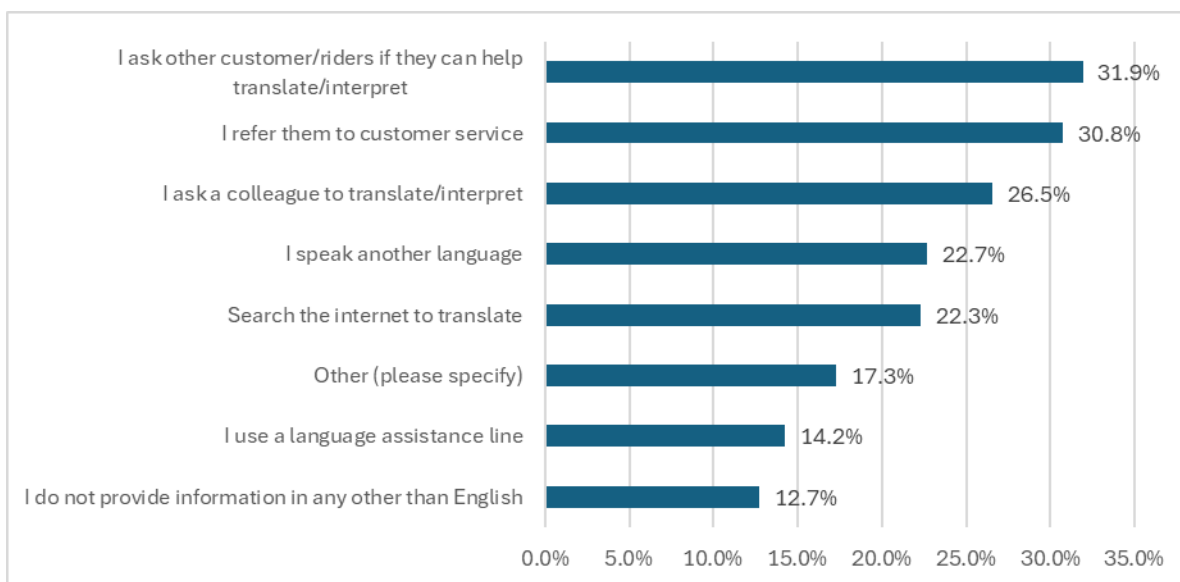


Source: Language Assistance Plan Agency Survey Results, 2024.

The employee survey also provided insight into how the agency handles requests for language assistance, which can help refine how CapMetro can improve their language assistance measures. When asked about how they currently provide information to customers who do not communicate well in English, the vast majority of respondents indicate that they provide some level of direction so that customers can be helped. Only 12.7% indicated that they do not provide information in anything other than English, although these respondents could have also asked other riders for help or other methods to provide assistance. **Figure 4:**

Methods of Providing Information to LEP Customers provides the survey responses for how employees provide information to LEP customers.

Figure 4: Methods of Providing Information to LEP Customers



Note: Does not add to 100%, as respondents could choose as many as applied.
 Source: Language Assistance Plan Agency Survey Results, 2024.

Community Based Organization Consultation

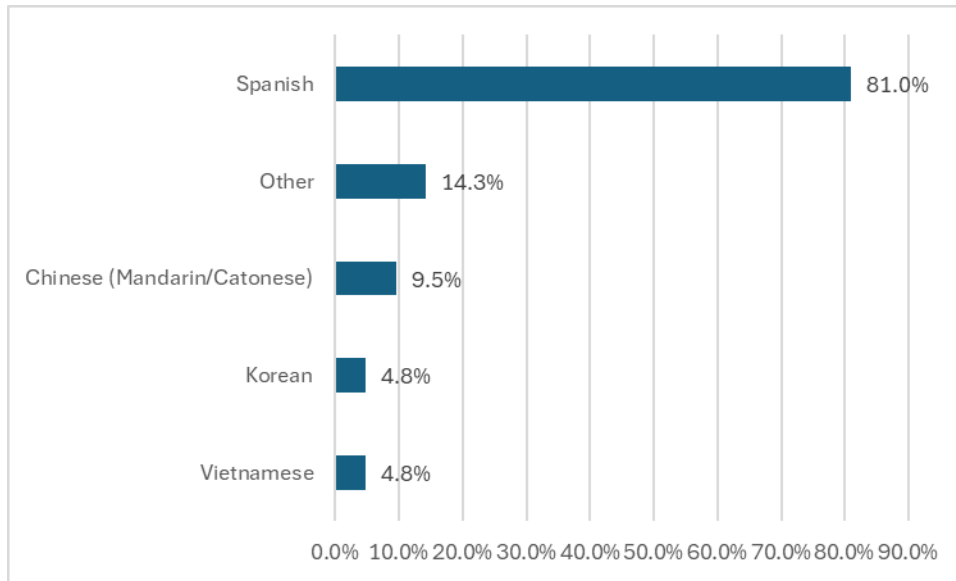
Feedback from employees was not the only feedback obtained as CapMetro sought to update its Language Assistance Plan. Via an online survey, up to 400 CBOs maintained in CapMetro’s database were asked to speak for the communities they represent and offer their insights about the needs of community members with LEP and how CapMetro could better meet those needs. See **Appendix A: LEP Public Involvement Summary** for the CBO’s survey questions.

CBOs were also consulted so that we could understand how their constituents both used CapMetro services, the languages their constituents speak and what types of language access services would be useful. Due to the high number of CBOs, it was not feasible to speak to LEP populations in person through focus groups. As a result, we relied on CBOs to represent their clients’ needs.

The survey was designed to include people representing non-profit organizations, such as those providing social services, immigration or legal information as well as other governmental agencies and educational and business organizations. In total, 24 representatives of 24 different CBOs completed the survey.

When asked which languages that the CBOs typically translate to provide information to their community, the overwhelming response was Spanish at 81%, followed by Chinese, Korean, and Vietnamese. Other responses included Braille. This corresponds to the Austin Independent School District English Learner data reviewed in Factor 1. **Figure 5: Translated Languages by CBOs** below, provides the full CBO responses.

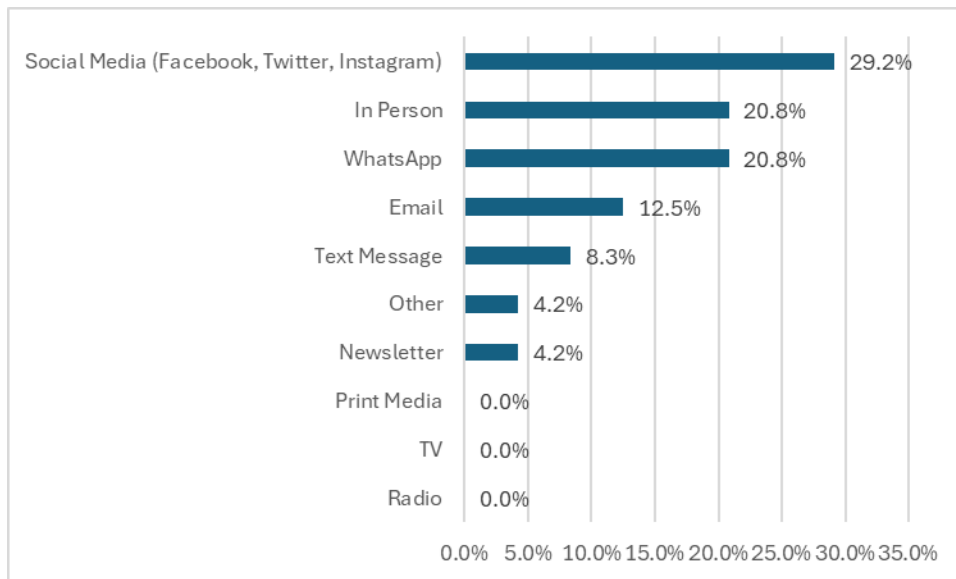
Figure 5: Translated Languages by CBOs



Source: Community Based Organizations Survey Results, 2024.

The CBO survey also provided insight into how their clients wanted to receive communications. As anticipated, the most common response was Social Media at 29%, followed by In Person at 21%. Those who responded "other" indicated website. Due to the popularity of online methods (social media, WhatsApp, text) the historical methods of communication that transit agencies have used (print, radio, or TV) may not reach the LEP populations. **Figure 6: Preferred Method of Communication for LEP Clients** presents the preferred method of communication for LEP clients.

Figure 6: Preferred Method of Communication for LEP Clients



Source: Community Based Organizations Survey Results, 2024.

Language Line Data

Language Line call data for October 2022-September 2023 was reviewed to understand the languages that were requested within the last year and the frequency that the service was used. Additional data will be reviewed in Factor 4, as the costs and resources to provide this service will be considered. The Language Line data includes general customer service calls, trip planning for fixed route bus and paratransit trip scheduling. **Table 7: Language Line Calls October 1, 2022 to September 30, 2023** presents the Language Line usage. . As expected, Spanish remains the predominant language, followed by Swahili and Farsi; I. Further follow up with the Paratransit department has revealed that the calls in Swahili relate to one customer who uses the Language Line services regularly to schedule their trip.

Five languages were not represented in any significant concentrations in any of the other data reviewed: Rundi, Kinyarwanda, and Portuguese. For these several customers, Language Line may be the most efficient way to provide language assistance.

Table 7: Language Line Calls October 1, 2022 to September 30, 2023

Language	Minutes	Calls	Average Length of Call	% Total (Minutes)	Sum of Connect Time (sec)	Average of Connect Time (sec) ²
SPANISH	30,200	3,978	7.6	96.4%	39,717	9.98
SWAHILI	443	15	29.5	1.4%	240	16.00
FARSI	154	9	17.1	0.5%	144	16.00
ARABIC	136	9	15.1	0.4%	76	8.44
KOREAN	90	6	15.0	0.3%	341	56.83
MANDARIN	72	5	14.4	0.2%	215	43.00
KINYARWANDA	62	4	15.5	0.2%	290	72.50
FRENCH	61	7	8.7	0.2%	16	2.29
VIETNAMESE	43	3	14.3	0.1%	58	19.33
PORTUGUESE	28	6	4.7	0.1%	22	3.67
URDU	24	1	24.0	0.1%	3	3.00
RUSSIAN	9	1	9.0	0.0%	18	18.00
RUNDI	5	2	2.5	0.0%	68	34.00
PORTUGUESE BRAZILIAN	5	1	5.0	0.0%	128	128.00
DARI	2	1	2.0	0.0%	2	2.00
Total	31,334	4,048	7.7	100.0%	41,338	10.21

Source: Language Line Services, Inc. Invoices; October 1, 2022 to September 30, 2023

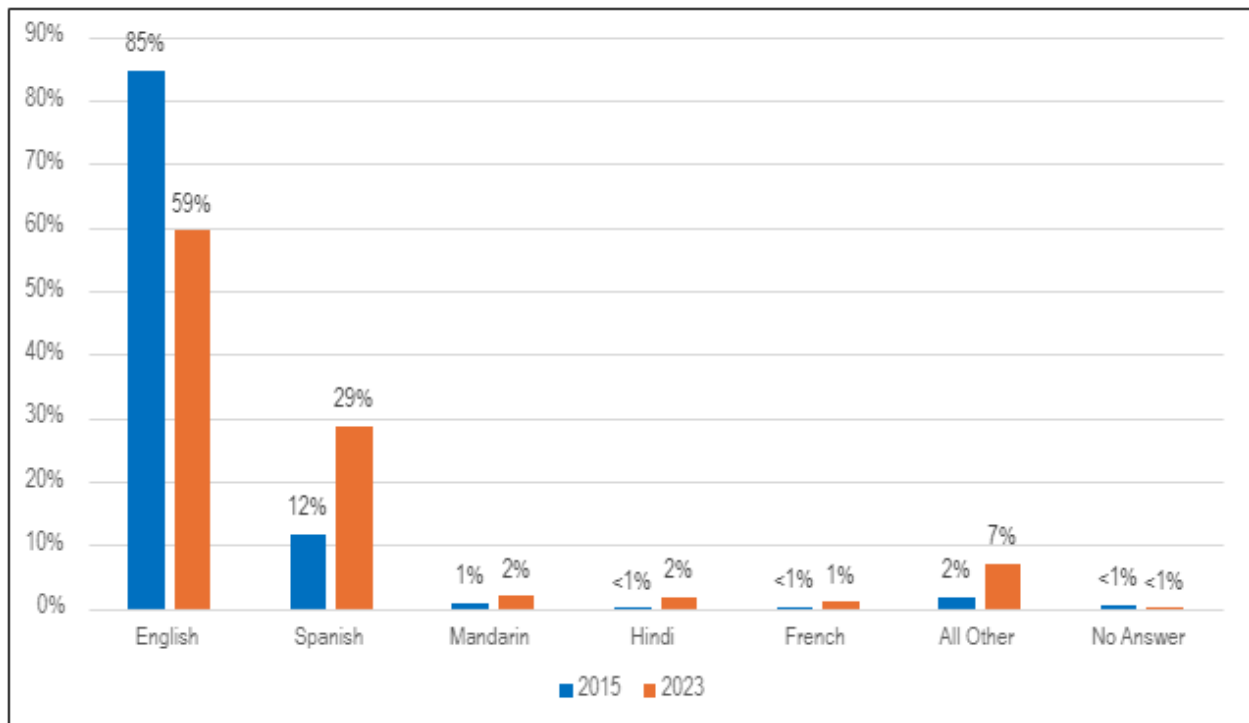
Origin and Destination Survey

The Origin Destination Survey conducted in 2023 provides a unique view of the ridership with regard to language and other characteristics that are useful to the Four Factor Analysis. Approximately 25,126 surveys were collected via intercept in the spring of 2023. The questionnaire was developed to determine riders' origins, destinations, fare payment and other information to develop models of travel patterns as well as profiles of the riders.

Question 27 of the survey asked riders to select the language they preferred to speak in the home. While not a surrogate for LEP status, it does provide a better understanding of the ridership of the system compared to the general countywide data contained in the ACS data.

Figure 7: Preferred Home Language 2015 and 2023 provides a comparison between 2015 and 2023 survey results, showing that approximately 29 % of the rider population prefer to speak Spanish in the home, followed by about 2% of Mandarin. Spanish is up a few percentage points from 2015, which may signal that Spanish language needs may be growing.

Figure 7: Preferred Home Language 2015 and 2023

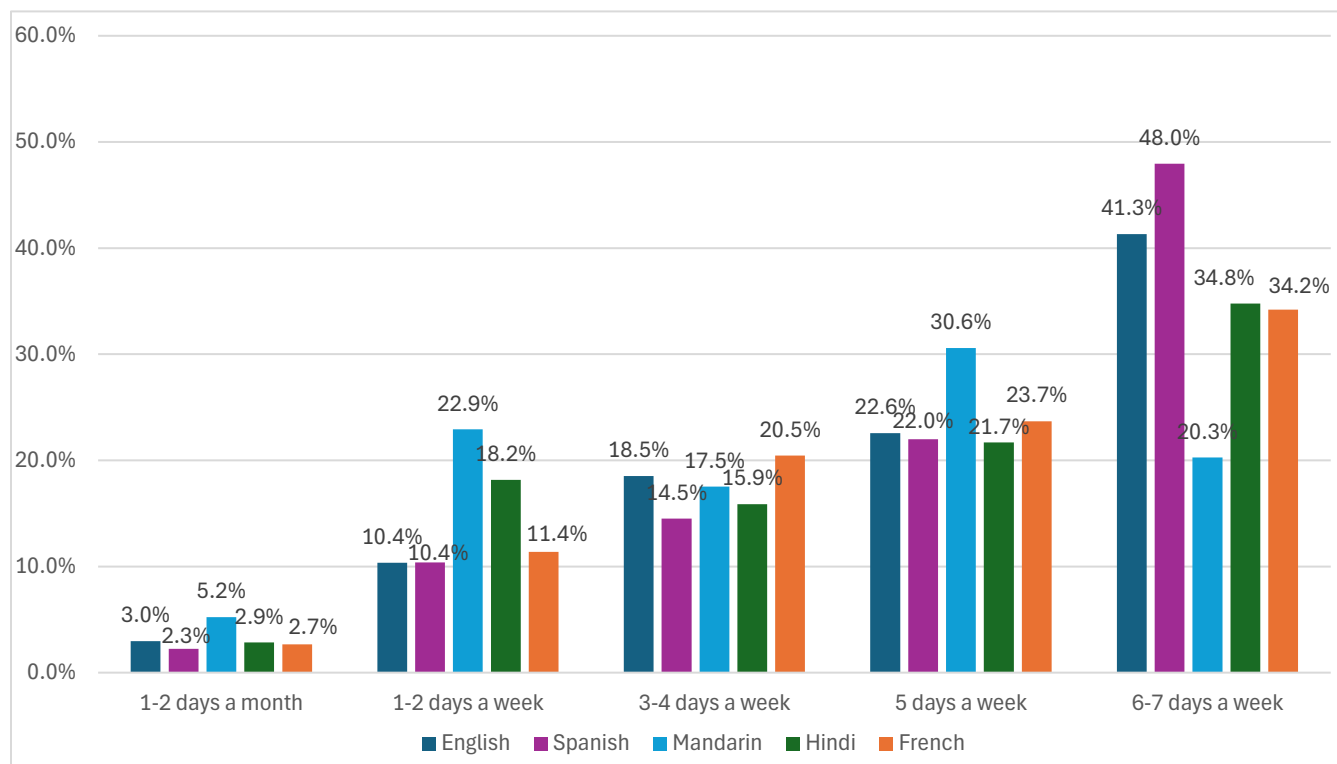


Source: CapMetro Origin and Destination Survey Findings 2023

The Origin and Destination Survey also provided a snapshot of transit use among those who prefer to speak other language at home (see **Figure 8: Frequency of Transit Use by Preferred Language**). Question 16 asked how often users rode the system. This response was cross tabulated with those who prefer to speak another language at home. While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with 48% indicating that they use the system 6-7 days a week. Over 30% of Hindi and French speaking riders also indicate they use the system 6-7 days per week and 30% of the Mandarin speaking population indicate they use the service at least 5 days a week. This helps provide a better

understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.@

Figure 8: Frequency of Transit Use by Preferred Language



Source: CapMetro Origin and Destination Survey Findings 2023

2.3.1 FACTOR 2 FINDINGS

Contact with people who do not speak English very well was assessed through the Factor 2 analysis, which confirms that the LEP community frequently uses CapMetro services, and that CapMetro employees often cross paths with persons needing language assistance. About eight in ten of all employees who responded to the survey have some level of contact with the public. More than a third of them also encounter people who do not speak English very well on a daily basis.

Asked what people with LEP are typically seeking, employees most often point to bus or other connections (61%), schedules (48%), fares (38%), routes/wayfinding (36%), service changes/detours (35%), and ticket purchasing instructions (31%).

The languages encountered by CapMetro employees and contractors mirror those identified in the Factor 1 analysis: 97% say Spanish is one of the top languages spoken by people who do not speak English very well. All other languages rank between 2% and 15%, with several lightly spoken languages reaching only 1%.

CBO outreach also helped assess contact between the LEP population and CapMetro, with about 29% indicating that their LEP clients sought information from CapMetro at least monthly.

2.4 FACTOR 3 OVERVIEW

Factor 3 includes the nature and importance of the program, activity, or service provided by the recipient to people's lives. "The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."⁷

While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with more than 48% indicating that they use the system 6-7 days a week according to the Origin and Destination survey described in Factor 2. Over 30% of Mandarin speaking riders also indicate they use the system 5 days per week. This helps provide a better understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.

Several data sources were consulted in the development of this task, including ACS data, Employee Survey Data, and CBO survey data.

CapMetro Services

While CapMetro's services are predominantly fixed route bus service, there are a number of other services that must be considered when developing the Language Assistance Plan to ensure that language is not a barrier to participation. This includes a thorough understanding of the programs and activities that CapMetro operates, which includes fixed route services, MetroAccess ADA Paratransit, Pickup demand responsive services, Metrobike, Vanpool, and the Guaranteed Ride Home program.

ACS Data

To understand the importance of public transit to the general population, ACS data was reviewed for LEP worker populations as well as for all workers over the age of 16. While this does not fully address the role that CapMetro's service play in overall mobility, it does present a snapshot of those commuters who rely on public transit within the two counties to access their jobs. As presented in the **Table 8: Travis and Williamson County Transit Use** below, approximately 25.8% of the LEP population in Travis County use public transportation to commute to work, compared to almost 2% of the general population.

Table 6: Travis and Williamson County Transit Use

	Travis County Public Transit Use Percentage	Williamson County Public Transit Use Percentage
All Workers 16 years or over	1.8%	0.2%
Speak English Less Than Very Well	25.8%	8.3%

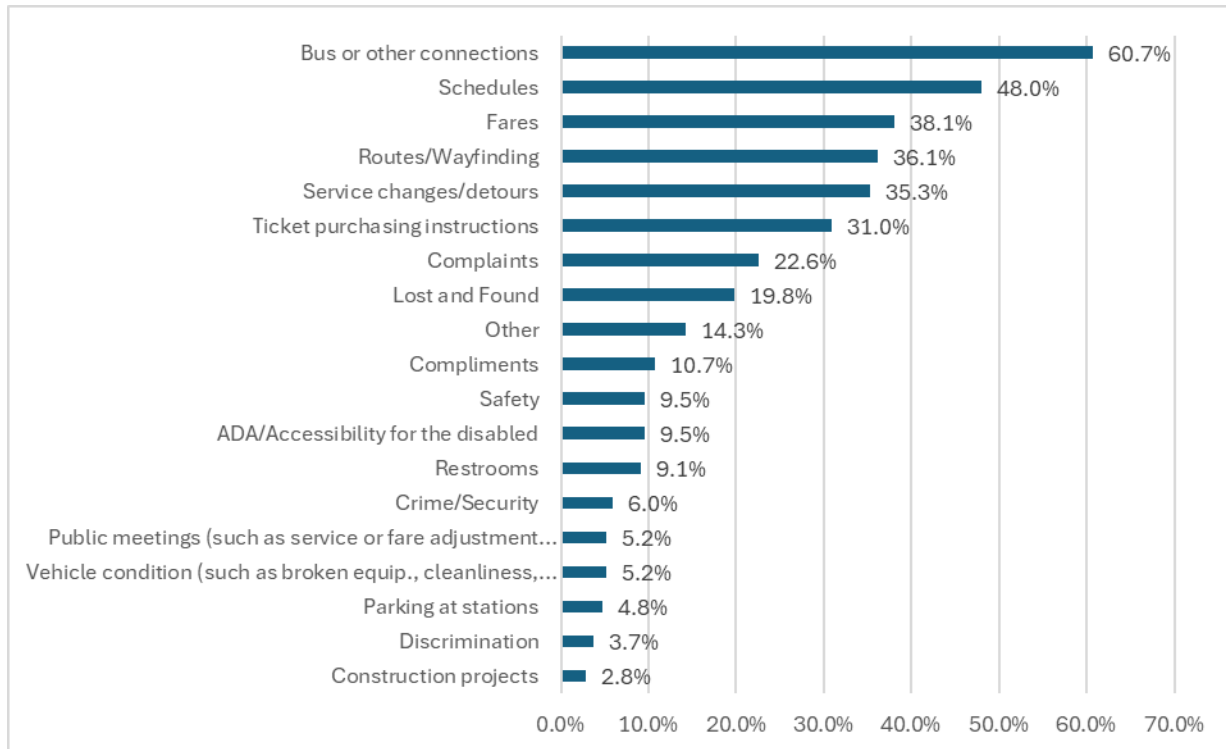
Source: ACS, 2022 one-year sample Table S0802

⁷ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

Employee Survey

Employees were asked what information was being sought by the LEP population which provides more clarity on how LEP riders may be interacting with the agency (see **Figure 9: Information Sought by LEP Customers**). Almost 60% of the respondents indicated that those who do not speak English very well are typically seeking information about schedules/routes/wayfinding followed by information on fares and ticket purchasing. This signals that customers calling into the service were actually using the services and were likely to need service-related language assistance. (see **Appendix A: LEP Public Involvement Summary** for the Agency Survey Questions).

Figure 9: Information Sought by LEP Customers

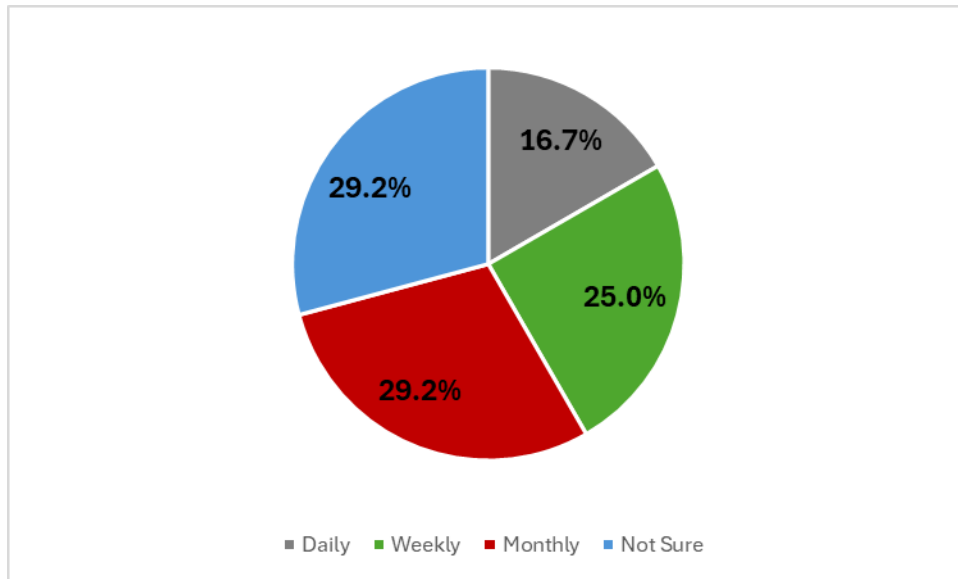


Source: Language Assistance Plan Agency Survey Results, 2024.

CBO Survey Results

The CBOs also provided information about their clients use of the CapMetro services that helps explain how important the services may be for them. Over 29% responded that their clients sought information about CapMetro’s services at least monthly or not sure, with 25% seeking information weekly, and 17% seeking information daily (see **Figure 10: Frequency of Seeking Information**).

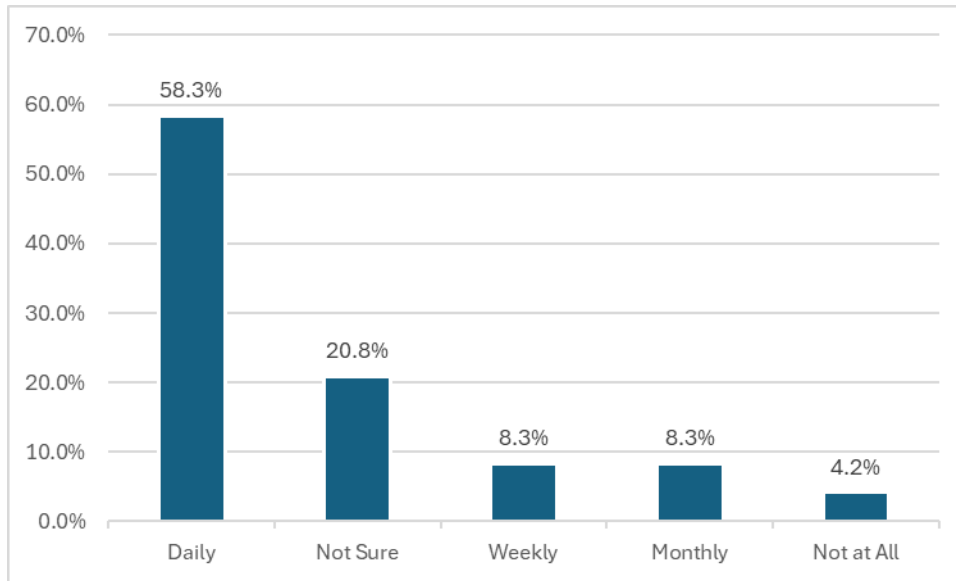
Figure 10: Frequency of Seeking Information



Source: Community Based Organizations Survey Results, 2024.

Even more crucial to our understanding of the LEP populations that the CBOs serve was how often their clients use CapMetro Service for general mobility (see **Figure 11: Frequency of Use of CapMetro Services**). 58% indicate that their clients use the service daily, and 8.3% indicate at least weekly and monthly. This signals that the CapMetro services are important to the LEP community that they serve and may represent the primary means of mobility.

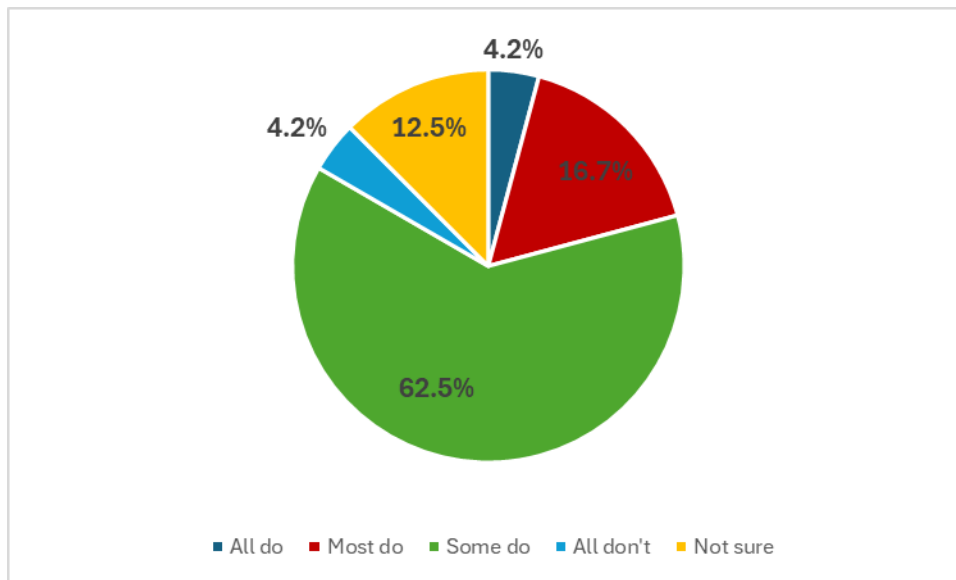
Figure 11: Frequency of Use of CapMetro Services.



Source: Community Based Organizations Survey Results, 2024.

CBOs also provided insight on auto availability and how important transit services might be to their community presented in **Figure 12: Auto Availability of CBO Clients**. Over 21% indicate that autos are mostly or not at all available to their clients. This is contrasted with 79% indicating that most or some of their clients do have an auto available. This may mean that most indicate that their clients used CapMetro services daily, they may also could have used a car for the trip.

Figure 12: Auto Availability of CBO Clients



Source: Community Based Organizations Survey Results, 2024.

2.4.1 FACTOR 3 FINDINGS

Transit service is arguably an important public service for many riders. However, to LEP populations, CapMetro is a vital service that provides both commuting options as well as general mobility. When asked, 30% of the CBO respondents indicated that most of their clients do not have a car available for their use. As the research underscores, CapMetro service is a vital means of transportation for those who do not speak English very well. Employees and CBO leaders agree there is a need to ensure CapMetro is able to communicate with those who do not speak English very well and that the LEP community is able to successfully navigate using the system without knowing English.

Providing critical information in languages most commonly used by the LEP community ensures that LEP riders can access the services and programs that CapMetro provides. Frequent connection with CBOs serving these populations, with LEP riders themselves, and with the agency's own employees will provide feedback on CapMetro's success in continuing to ensure all have equal access to the services and programs that CapMetro provides.

2.5 FACTOR 4 SUMMARY

The final step in the four-factor analysis is designed to weigh the demand for language assistance against current and projected financial and personnel resources. The DOT Guidance says, "A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns."

Annual costs associated with the current measures to provide services and information in other languages for the last fiscal years are estimated below. CapMetro does not have a specific line item to capture the budgeted costs and expenditures that can be easily tracked. Language services are not specifically called out in departmental budgets, but rather are seen as a necessary effort within the greater department's operation. Additionally, translation or interpreting associated with the functional assessments of disabled individuals that are seeking ADA paratransit eligibility undertaken by a contractor are also included in that contractor's budget. As such, these amounts are not the absolute costs, as some language service expenses are either included in other contractors' budgets or are included in line items such as "Other Services."

Additionally, no cost estimates exist for the interpreting assistance that are provided by existing staff who speak other languages and provide ad hoc interpreting services such as the Customer Service representatives that provide Spanish interpreting on wayfinding, schedules and other customer requests. While Spanish interpreting is not the Customer Service representative's only function in the agency, it does represent a significant portion of their job and should be considered in the overall effort that CapMetro expends to provide language assistance. Further, the translation costs below do not take into consideration language services provided through Capital Projects contractors, which are internalized with the total contract costs and may be independently funded through grants. The greatest expense to the agency currently is associated with the provision of interpreting services through the third-party contract with Language Line services, indicated below. **Table 9: Estimated Translation Costs** and **Table 10: Language Line Costs** below, highlights the magnitude of costs associated with Spanish language services that were provided by the service in comparison to the other languages that are served.

Table 7: Estimated Translation Costs

Expenses	FY 2023
Total Agency Expenses	\$358,756,636
Language Line Services	\$18,230.42
Marketing/Communications	\$5,629.98
Total	\$23,860.40
% for Translations	0.01%

Source, CapMetro 2023

Table 10: Language Line Costs October 1, 2022 -September 30, 2023

Language	Sum of Charges
SPANISH	\$17,516.00
SWAHILI	\$279.09
FARSI	\$97.02
ARABIC	\$85.68
KOREAN	\$56.70
MANDARIN	\$45.36
KINYARWANDA	\$39.06
FRENCH	\$38.43
VIETNAMESE	\$27.09
PORTUGUESE	\$17.64
URDU	\$15.12
RUSSIAN	\$5.67
PORTUGUESE BRAZILIAN	\$3.15
RUNDI	\$3.15
DARI	\$1.26
Total	\$18,230.42

Source: Language Line Services, Inc. Invoices; October 1, 2022 to September 30, 2023

2.5.1 FACTOR 4 FINDINGS

CapMetro understands that reducing barriers to services and benefits of CapMetro to the extent resources are available will reap symbiotic benefits for the LEP populations as well as the agency. With more LEP individuals using CapMetro, revenue may increase as well, likely making more funds available for increased language assistance programs. CapMetro commits to devoting resources – monetary and staff time – to

enhance LEP persons' use of the CapMetro programs and services. Insofar as it is practical, ensuring that critical information is available in languages most commonly spoken within the CapMetro service area is important to providing access to CapMetro's services for LEP populations.

It may be impossible to determine the true costs of language services as many costs are unaccounted for or are included in line items that are hard to separate. Additionally, staff who currently speak another language and provide ad hoc language assistance are not accounted for in the agency's total costs. However, while there are some costs that are included in other budgets within the agency's operation, the agency has a relatively small translation budget associated with language services to LEP populations.

Having a separate line item for language services within the agency would help quantify the costs associated with additional assistance outside of providing staff-related interpreting. This way, costs can be tracked in the departments that have on-going expenses related to language services and planning for larger scale efforts could be more easily estimated, such as those associated with service or fare changes. Additionally, contracts that include outreach or scoping efforts should ensure that language services costs are budgeted and tracked through the life of the contract. This can be especially useful, as grant funds used for capital projects can help offset agency language services costs, particularly if grant funding is anticipated for projects included in the Project Connect Vision Plan.

2.6 FOUR FACTOR FINDINGS AND STRATEGIES

The Four-Factor analysis provides clear support for CapMetro's approach to universal access to its services and system regardless of English language proficiency and language spoken. Among the highlights of this analysis are:

- **Factor One:** Over 9% of the population in the service area do not speak English very well and are considered to have Limited English Proficiency. One language—Spanish—remains the predominant LEP language in both counties, amounting to 8% of the population in Travis County and 5% in Williamson County. Seventeen languages are included as Safe Harbor languages including languages that were added for translations due to community and staff input. The languages are: **Spanish, Punjabi, Chinese, Korean, Vietnamese, Arabic, French, German, Italian, Russian, Hebrew, Hindi, Urdu, Gujarati, Telugu, Tagalog, Tamil**
- **Factor Two:** The LEP community frequently accesses CapMetro services and information, and CapMetro employees often cross paths with persons needing language assistance. About 20% of all surveyed employees encounter people who do not speak English very well on a daily basis, while almost 90% of Keolis Bus Operators, MTM, and Customer Service staff regularly encounter LEP populations. Additionally, almost 71% of the CBOs responded that their clients frequently sought information for CapMetro about their services and programs.
- **Factor Three:** CapMetro's services are important to the LEP community. The LEP population either regularly uses CapMetro, or uses it at least sometimes, according to the CBOs. Census data also shows that LEP populations use transit about 5 times more than non-LEP populations in Travis County. CBOs also indicated that about 1/3 of their LEP clients do not have a car available for their trip and must rely on CapMetro for their general mobility.
- **Factor Four:** The analysis shows that CapMetro plans for the myriad activities that they currently undertake to ensure that people who do not speak English very well are able to access the system as

easily as the general population. While CapMetro only spends a little over 1/10th of the operating budget on language services, this does not include the hidden costs associated with staff providing on-site and ad hoc interpreting services. Recommended changes will help CapMetro plan into the future to monitor and budget their activities to ensure they are cost effective and help those with the greatest need.

3 LANGUAGE ASSISTANCE PLAN OVERVIEW

The Department of Transportation (DOT) LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

This plan represents a continuing approach to providing language assistance. While some language assistance measures are in place, other methods of providing language assistance are being implemented over time to ensure continued compliance with federal requirements. This plan also includes recommendations that would assist CapMetro to reach best industry standards for providing language assistance for those needing to access CapMetro programs and services.

3.1 IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

The Four Factor analysis considered a number of data sets to determine the languages that would require “Safe Harbor” consideration, in addition to languages predominantly used by CapMetro riders. These data included Census data (American Community Survey 5-year sample 2015 for Williamson County and 2022 1-year sample for Travis County), the Austin Independent School District English Learners data 2024 and the CapMetro 2023 Origin and Destination Survey. A little over 10% of the population in Travis County and 6% of the population in Williamson County speak English less than “Very Well” and would be considered the LEP population.

Based on the Four Factor analyses, the most frequently encountered languages broken into two groups:

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area; and,
- Safe Harbor and additional languages: Punjabi, Telugu, Chinese (Mandarin), Korean, Vietnamese, Arabic, French, German, Italian, Russian, Hebrew, Hindi, Udu, Gujarati, Tagalog, Tamil.

3.2 PROVIDING LANGUAGE ASSISTANCE MEASURES

CapMetro is committed to providing meaningful access to information and services to its LEP customers. CapMetro uses various methods to accomplish this goal. Along with enabling persons who do not speak English very well to navigate the system with the same ease as the general population, it is necessary to provide a meaningful opportunity for LEP persons to participate in the public comment process for planning activities and major capital projects. Specific methods pertaining to outreach will be discussed in CapMetro’s Public Participation Plan.

Currently, the CapMetro primary language tools include the following:

- Providing Notice to Beneficiaries and Title VI Complaint procedures and forms in all Safe Harbor Languages;
- Providing Google Translate on the CapMetro website, allowing translations for most content;
- Providing bilingual customer service and marketing staff to provide on-site Spanish interpreting in a variety of settings;
- Making Language Line services available for any staff, including Customer Service staff, to address language assistance needs for any language;

- Holding public meetings in Spanish or with simultaneous English/Spanish translations;
- Offering interpreters by request for public meetings, public hearings or board meetings;
- Posting public meeting notices in foreign language newspapers to reach LEP populations;
- Providing Spanish translations and pictograms on board vehicles, on Ticket Vending Machines, at bus stops and at stations;
- Producing Spanish language video content;
- Creating Spanish translations for some informational brochures and marketing materials; and,
- Tapping into CBO assistance in outreach to LEP populations and language services.

The following are recommendations that would improve the level of service that CapMetro provides to its LEP customers and that can be implemented over time as budget and staff permits. Contained in **Appendix B: Language Assistance Plan Recommendations** is a listing of all recommended activities that are either being implemented or are ones that CapMetro desires to undertake to fully support its Language Assistance Plan and corresponding Public Participation Plan. These activities are organized into four categories:

1. General, including such things as internal awareness and public outreach strategy;
2. Materials and Documents;
3. Translation and Interpretation Tools and Protocols; and,
4. Employees, including training or incentives to empower employees to provide language assistance.

General Title VI and LEP Awareness

Title VI and LEP awareness are the cornerstone of the entire Title VI program and provide further understanding within the agency. The following will be considered and monitored to improve the practice:

- ***Title VI Awareness Training:*** integrate Title VI awareness into all activities of the agency.
- ***Public Engagement Needs and strategies:*** draft a handbook with protocols and procedures for all departments that interact with the public including incorporating language assistance measures.
- ***Project Charter:*** develop a protocol to ensure that Title VI and/or LAP issues are acknowledged and addressed by each department's project manager, including a form outlining the LEP strategy that is submitted to the Title VI office for approval.
- ***Demographic analysis of new project areas:*** consider the attributes of the new projects' geography.
- ***Eliminating English-only informational campaigns:*** include "Free Language Assistance" text box at a minimum to ensure participation of LEP populations.
- ***Develop or enhance relationships with Community Based Organization:*** continue to expand the CBO database and engage CBOs to improve communication methods.
- ***Contract compliance:*** ensure that contract languages include requirements to provide public information that complies with Title VI LEP guidelines.

Materials and Documents

- **Title VI Public Notice, Complaint Form and Procedures** (Vital Document): notice should be in all Safe Harbor languages on the website and posted on-board vehicles, Board room, General Office lobby, Transit Store, stations, or other public areas.
- **Notice of Free Language Assistance** (Vital Document): notice of free language assistance should be located on mast head of website and included in all printed and digital materials; this should also be posted with the Title VI information in the Board room, at the General Office lobby, Transit Store, stations, or any location where riders may congregate.
- **Legal Notices** (Vital Document); translations of legal documents should be provided upon request.
- **Registration Forms** (Vital Document): make sure that all registration forms on the website can be translated using online tools (Google Translate or others) and for printed materials, forms should be translated into Spanish with “Free Language Assistance” printed at the bottom of all forms and should be translated into the other Safe Harbor languages upon request.
- **Fare and Service Change Information** (Vital Document): translate into Spanish with “Free Language Assistance” text box printed on all documents.
- **Safety and Security Information**: use pictographs as much as practicable
- **TVMS, fareboxes, bus stops and onboard equipment**: translate into Spanish as needed and use pictographs onboard vehicles when applicable. Translate bus/train/station announcements into Spanish and other languages as budget permits.
- **General Promotional Materials**: Translate into Spanish as budget permits or as required by issue. Print “Free Language Assistance” on all promotional materials.
- **Construction, Detour, Stop Move, and Other Courtesy Notices**: translate into Spanish when feasible, and other languages as determined by analysis of location.
- **Website Materials**: make sure that all content (including navigation buttons) is in a form that can be translated using online tools; upload documents in original form and not scanned so documents can be translated. Use pictograms as necessary instead of printed text. Develop a web page on the CapMetro website where vital documents can be found in Safe Harbor languages.
- **Rider Guides and Materials**: develop rider guides or other materials in Spanish and other languages as funding permits; incorporate illustration and pictograms as feasible; produce how to ride videos with translations, create “how to ride” curriculum for ESL schools in the area.

Translation Tools and Protocols

- **Language Line Service**; promote the use of service via “Free Language Assistance” text block, including on the website, in all printed and digital material; investigate options to improve language recognition on phone tree when engaging calls.
- **Line Item for Translation and Interpretation**; use budget codes to monitor and plan for translation and interpreting expenses, including grant-funded capital projects that can be used to help fund necessary translation and interpreting assistance.
- **Public Hearing Protocol**: provide Spanish interpreter for all public hearings and offer other interpreters for Safe Harbor languages with advanced notice.
- **Board Meeting Protocol**: provide requested interpreters with a 72-hour notice for all Safe Harbor languages.

- **Community Meetings Protocol;** provide Spanish interpreters for at least one meeting with in the outreach subject matter; offer interpretation or translation of materials in advance of the meetings.
- **Simultaneous Interpretation Equipment:** consider simultaneous interpreting equipment to offer greater flexibility for language services.
- **"Language ID Chart:** create and distribute language identification charts to all employees (and operators' pouches) with Language Line phone and account numbers included for remote or emergency situations. Consider adding QR code that directs employees to Language Line.
- **Language Manual:** create language manual that includes common phrases used by riders in other languages that can be phonetically spelled out.
- **Digital Tools or Language Technology;** help employees take initiative to use new technology to provide language assistance for users; provide training on new apps and technology.
- **Mobile Apps;** ensure that new CapMetro sponsored apps allow for translation and interpreting into Safe Harbor languages.
- **Website Administration and Management:** move Google Translate to the top of the webpage and add all languages to the Google Translate function; Add "Free Language Assistance" in all Safe Harbor languages; Remove pictures with text that cannot be translated; Add Google Analytics to determine how LEP users interact with the website.

Employees

- **New Employees** (and contractors): Include ability to speak another language as a desired qualification in hiring.
- **Bilingual Employees:** Identify jobs where bilingual ability is required or desired; Investigate the ability to pay a shift differential for employees who speak another language and whose job requires customer contact.
- **Employee and Contractor Training:** hold Title VI and LEP training for all new hires (both agency and contractors), including operator refresher training; conduct training for planning and marketing staff to integrate consideration of Title VI protected populations (including LEP) into planning.
- **Training for Title VI-Related Complaints for Employees and Contractors:** Expand diversity training for operators on the need to accommodate LEP populations to avoid Title VI-related complaints.
- **"I Speak" Cards:** Distribute "I Speak" cards to operators or other employees; Consider adding QR code that directs users to Language Line.
- **Employee Tuition Assistance:** Promote the availability of tuition-reimbursement for all employees who learn the primary languages in the CapMetro service area.
- **Employee Shift Differential:** Consider offering monetary shift differential for positions that require frontline contact with LEP populations for those who speak a Safe Harbor language fluently.

3.3 TRAINING STAFF

Training staff on the protocols to provide language assistance and Title VI in general helps to ensure that employees understand the guidance and consider the needs of LEP individuals in the course of doing their job. Currently, only transit operators receive general Title VI training, which does not specifically describe how drivers are to provide language assistance if requested. Customer Service staff are instructed on how to use the Language Line service but not on more general Title VI requirements and general language assistance measures. Other employees are not given formal Title VI training, nor are they given specific LEP training to help them understand the agency's role in language assistance.

It is recommended that both general Title VI training and specific LAP training occur within the following framework:

- ***New Employee Orientation (Title VI)***: all new employees should be provided with an overview of the agency's Title VI responsibilities, including general information about language assistance measures that the agency provides.
- ***LEP Training***: All frontline employees (and contractors) should attend LEP-related training, with specific emphasis on elements under their job description at least upon orientation. Frontline employee classifications will be selected based on their likelihood to come in contact with the public or be in departments that have broad community engagement activities. This will likely include Customer Service staff, bus and rail operators, Marketing and Communication staff, ADA paratransit staff and contractors, Planning and Capital Projects; however, there may be other positions that would qualify and should undertake the training.

The training should be targeted to help the employees understand how to provide the language assistance measures that CapMetro offers. This could include new tools, existing or new technology that is available, or methods to provide language assistance to ensure competency. This should also be job-specific so that participants will come away from the training with real world understanding of how to provide language assistance given CapMetro's tools.

- ***Refresher Training (Title VI)***: Transit operators should attend Title VI training with an additional emphasis on providing language assistance as part of their normal refresher training series to address any questions that they may have regarding either encounters with LEP populations or how to provide language assistance. Training on technology or tools that are available to operators should be included.

Training can be accomplished using methods such as video learning, PowerPoint presentations, or small group learning so that the task associated with staff training does not become onerous to the agency. Videos on the subject can be produced in a cost-effective way that can be used in new employee orientation, contractor training or refresher training. This would be especially helpful when demonstrating new technology that may be available for language assistance.

3.4 PROVIDING NOTICE TO LEP PERSONS OF LANGUAGE ASSISTANCE MEASURES

As the most far-reaching and important aspect of language assistance, providing notice to the public on the available language assistance is crucial. Consequently, ensuring that informing the public of how to seek language assistance plays a substantial role in the LAP.

Web-based information has taken center stage, especially during the height time of COVID in 2020, with most documentation about service disruptions, COVID protocols or other crucial information. As a result, changes to the website are being undertaken to ensure that notices of free language assistance can be front and center in the users' CapMetro website experience. To ensure that notification of language assistance is undertaken with a comprehensive view, there are a number of recommendations that are being made to improve this practice.

One easy and effective method to provide notification of language assistance measures is to produce a text box with all the Safe Harbor languages that states “Free Language Assistance”, and the customer service number that can be connected to Language Line. The text box can then be used on all printed materials and in the digital realm such as the example, below.

Free language assistance | Asistencia gratis en su idioma | Libreng tulong para sa wika | 免費語言幫助
 Hỗ trợ giúp thông dịch miễn phí | 무료 언어 지원 | शुल्क भाषा समर्थन | бесплатная языковая помощь

The establishment of vital documents also helps CapMetro communicate the language assistance measures and translations that should occur given the importance of the documents. **Table 11: Vital Documents Guidance** lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. As has happened in the past, CapMetro may provide a summary of a vital document and/or notice of free language assistance for the “Safe Harbor” languages, rather than a word-for-word translation of each of the vital documents.

CapMetro should not limit itself to these guidelines, intending to translate documents into more languages as circumstances dictate and resources allow. As necessary, CapMetro may also rely on pictographs to communicate information regardless of language spoken.

Table 9: Vital Documents Guidance

Document	Languages	Vital Document?
Title VI Public Notice	All Safe Harbor Languages	Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages	Yes
Notice of Free Language Assistance	All Safe Harbor Languages	Yes
General Promotional Materials (such as FAQs or other materials that provide direction on how to access services and public meeting notices)	Spanish and Safe Harbor Languages as funding permits	Depends on content
Public Hearing Notices	Spanish, with written notice translated in Safe Harbor languages upon request	Yes
“Participation” or “Intake” forms (such as Americans with Disabilities Act (ADA) Determination letter and appeal forms, and incentive forms)	Spanish, with written notice in multiple languages that information will be translated upon request into all safe harbor languages	Yes

Ridership and/or Customer Satisfaction Surveys	Spanish, with written notice in multiple languages that information will be translated upon request into all safe harbor languages	Yes
Legal Notices, construction notices, or environmental findings notices	Spanish, with written notice in multiple languages that information will be translated upon request into all safe harbor languages	Depends on content

Source: CapMetro, 2024.

3.5 MONITORING AND UPDATING THE PLAN

Monitoring the LAP is an important element of keeping the plan not only up to date but relevant to the population being served. New immigrant populations with languages that were not originally identified may require additional consideration in the LAP.

Additionally, new technology changes our understanding of the best methods to use in establishing a comprehensive approach to language assistance. For example, smart phones were not as prevalent in prior years, and translation applications were not as commonplace. Social media applications like Facebook Live, YouTube live are more recent advancements to public engagement that have changed the landscape of communication. We have also seen LEP populations move away from receiving information in more historically standard formats (print, radio, TV) and opt for more text-based communications. All of these changes would not have been considered without a comprehensive review of the plan.

While a review of the LAP every three years to coincide with the Title VI update is standard, it is also important to monitor the language assistance measures periodically, along with how well the outreach activities are engaging LEP populations, so that if mid-course corrections are needed, they can be accomplished within the framework of the overall language assistance plan. Keeping track of subtle changes in how LEP populations are engaging in outreach activities may also help understand new methods of assistance.

An annual review of the plan would ensure that methods of outreach and communication consider small and large changes associated with the languages being requested for language assistance or to address changes in the most effective means of communicating.

This includes providing an opportunity for staff to provide feedback on the plan and the language assistance measures that may not be as effective. Informal “brown bag” sessions can provide an inviting forum that may encourage staff to become LEP experts and problem solvers for this serious concern. Community members may also play a role in the continual monitoring of the language assistance measures, as the broader community can often understand the issue in ways that the agency may not.

Informal focus groups can also be employed to help identify what language skills employees might have, how they might be able to employ them, and what activities they might best enjoy or be good at. These focus groups could include the general staff as well as job-specific staff as a way to further the LAP practice without significant cost.

Additionally, while the LAP provides guidance for how to approach LEP considerations in establishing new outreach campaigns, staff needs to be responsive to the community’s needs in providing language assistance. This may include a targeted outreach approach that reviews demographic changes in the area to anticipate language assistance needs.

Appendix A: LEP Public Involvement Summary

Table of Contents:

Language Assistance Plan

- Internal Survey
 - Development
 - Distribution
 - Results
- External Survey
 - Development
 - Distribution
 - Results

Language Assistance Plan Public Engagement Summary

CapMetro used a community-based public involvement strategy to obtain input from stakeholders to inform the development of the Language Assistance Plan by communicating with community-based organizations.

Internal Survey

Survey Development

CapMetro and the Title VI project team developed an internal survey in order to better understand the communication needs of CapMetro’s riders who have a limited English proficiency. Questions and answer categories were designed to reflect surveys used by other transit agencies, making changes that provided choices that reflect CapMetro services. The intent of question selection was to gather valuable on the communication needs of riders and identify what staff needs to feel equipped with helpful language assistance tools. The goal is that answers to the questions will inform the team to develop recommendations for the language assistance plan update.

Survey Distribution

The survey was posted on online via SurveyMonkey.com. CapMetro publicized and distributed the survey to selected CapMetro staff and contracted service providers. CapMetro staff received the internal survey through an email and had verbal reminders during their team meeting. Contracted service providers received the internal survey via email and through various media platform, and via Timepoint TV. The survey was open from Monday, April 15– Wednesday, April 24, 2024.

Survey Results

CapMetro developed an internal survey, for public-facing employees and contractors. A total of 267 responses were received during the survey period. The internal employee and contractor survey aimed to identify:

1. The languages they interacted regularly with.

2. The frequency of encounters with individuals who speak each language.
3. How they provide information to LEP customers seeking assistance.
4. Methods for how CapMetro can best reach LEP communities in Central Texas (etc. in writing, verbally, or through an interpreter).

The survey found that respondents reported that Spanish is the language most often heard when interacting with customers or members of the public. Second language most often heard is Arabic, third is Chinese, and a tie for fourth is Vietnamese and French. Other languages that staff heard were Hindi, Korean, Russian, Punjabi, Telugu, Tagalog, and Burmese. See **Figure 13: Internal Survey Results** for responses received from selected CapMetro staff and contracted service providers.

External Survey

Survey Development

CapMetro and the Title VI project team developed a survey that targeted up to 500 Community-Based Organizations (CBO) to collect feedback on the communication needs of CapMetro's riders who have a limited English proficiency. The intent of question selection was to gather valuable data on the communication needs of riders and identify what staff needs to feel equipped with helpful language assistance tools. The goal is that answers to the questions will inform the team to develop recommendations for the language assistance plan update. The survey was brief, optimized for accessibility, translatable to English and Spanish, available for other translations upon request, and mobile-friendly. CapMetro distributed emails to CBOs to promote the survey.

Survey Distribution

The survey was posted online via SurveyMonkey.com. CapMetro publicized and distributed the CBO survey to CBOs that serve people who speak different languages via email communication. The survey was open from Monday, April 15 – Wednesday, April 24, 2024.

Survey Results

CapMetro developed an external survey for the CBOs. A total of 24 responses were received during the survey period. The public surveys aimed to identify:

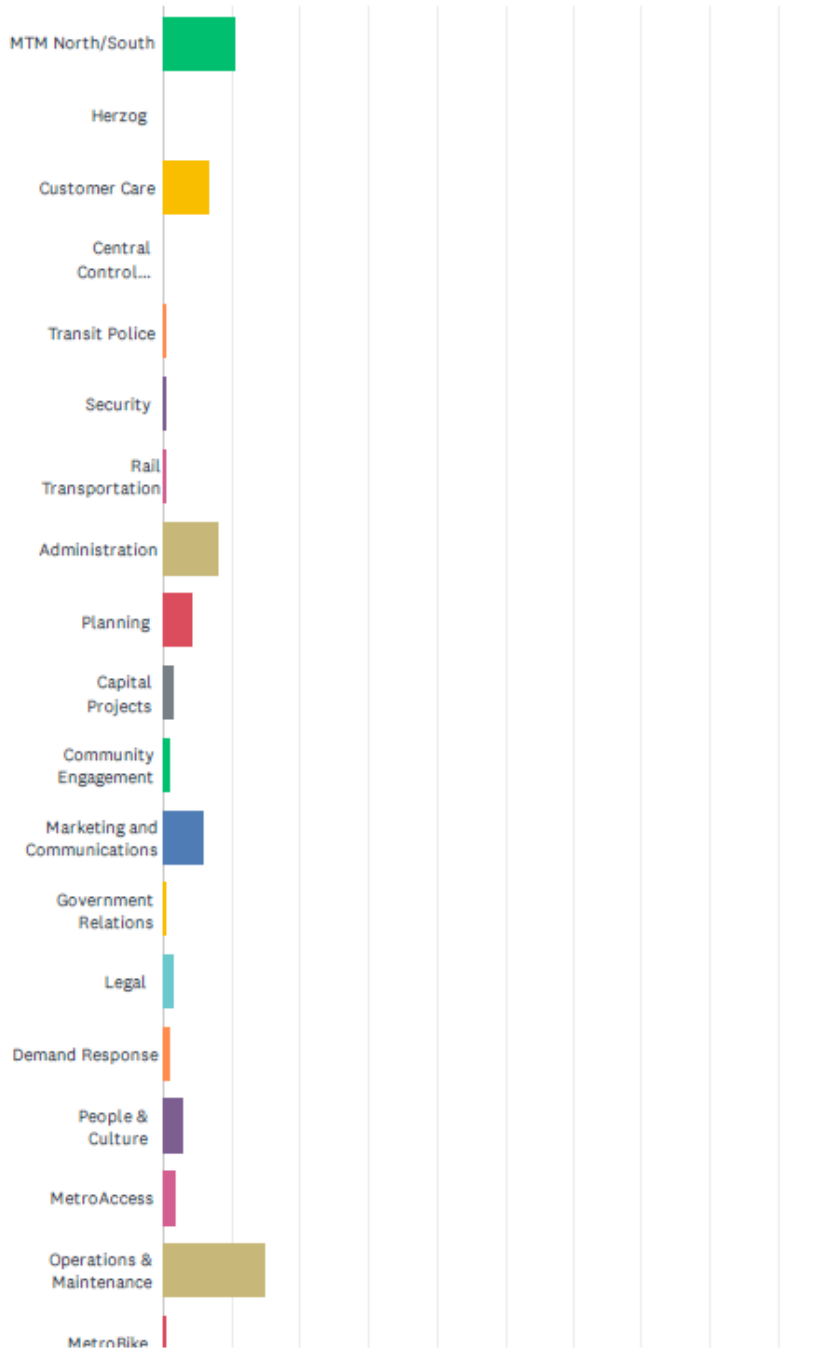
- The languages they translate the most for their community.
- The preferred method of communication their community uses to receive information.
- The frequency in which their community uses CapMetro services.
- The auto availability of their community.

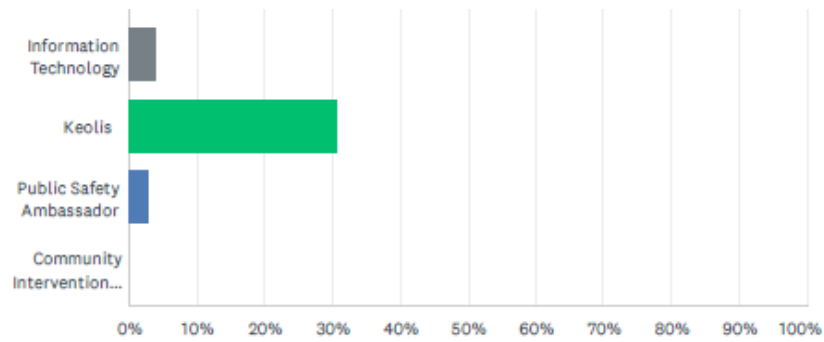
The survey found that respondents reported that Spanish is the language most often translated when interacting with their community members. Second language most often translated is Chinese, and tied for third is Korean and Vietnamese. See **Figure 14: External Survey Results** for responses received from CBOs.

Figure 13: Internal Survey Results

Q1 Which organization/department do you work in?

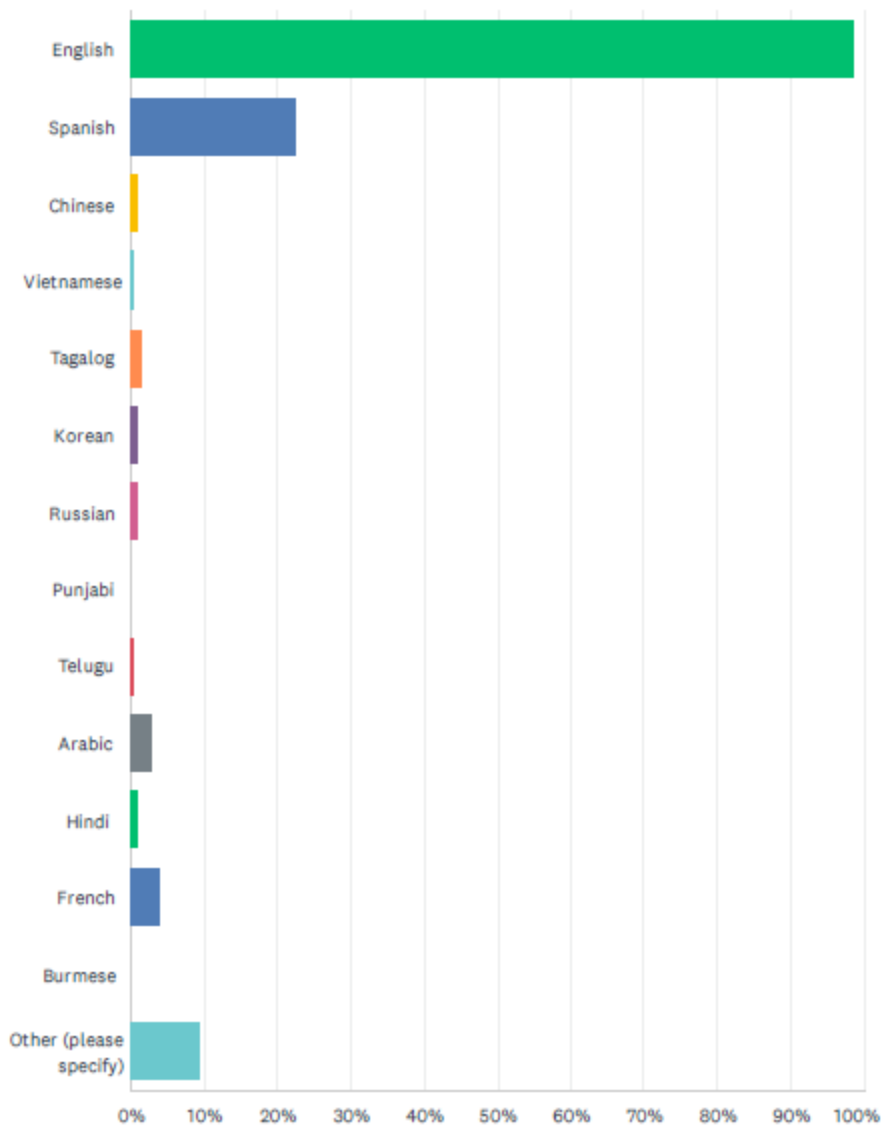
Answered: 260 Skipped: 7





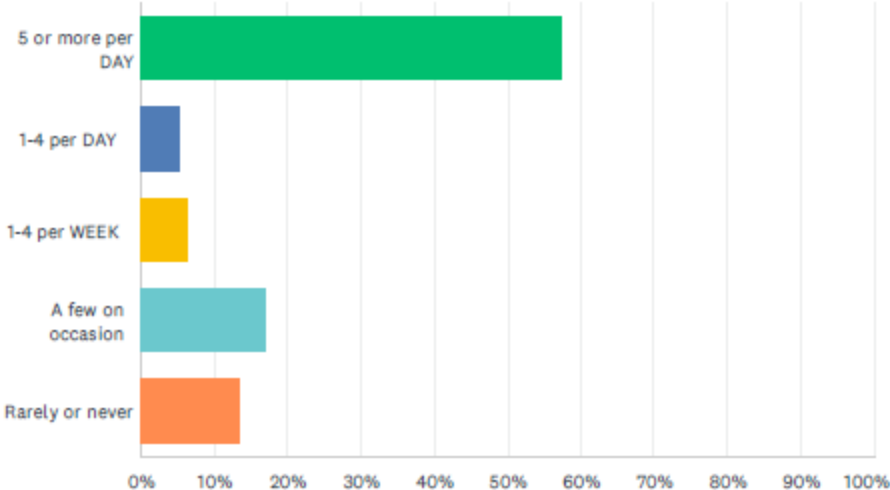
Q2 Which languages do you speak? Please select the language(s).

Answered: 267 Skipped: 0



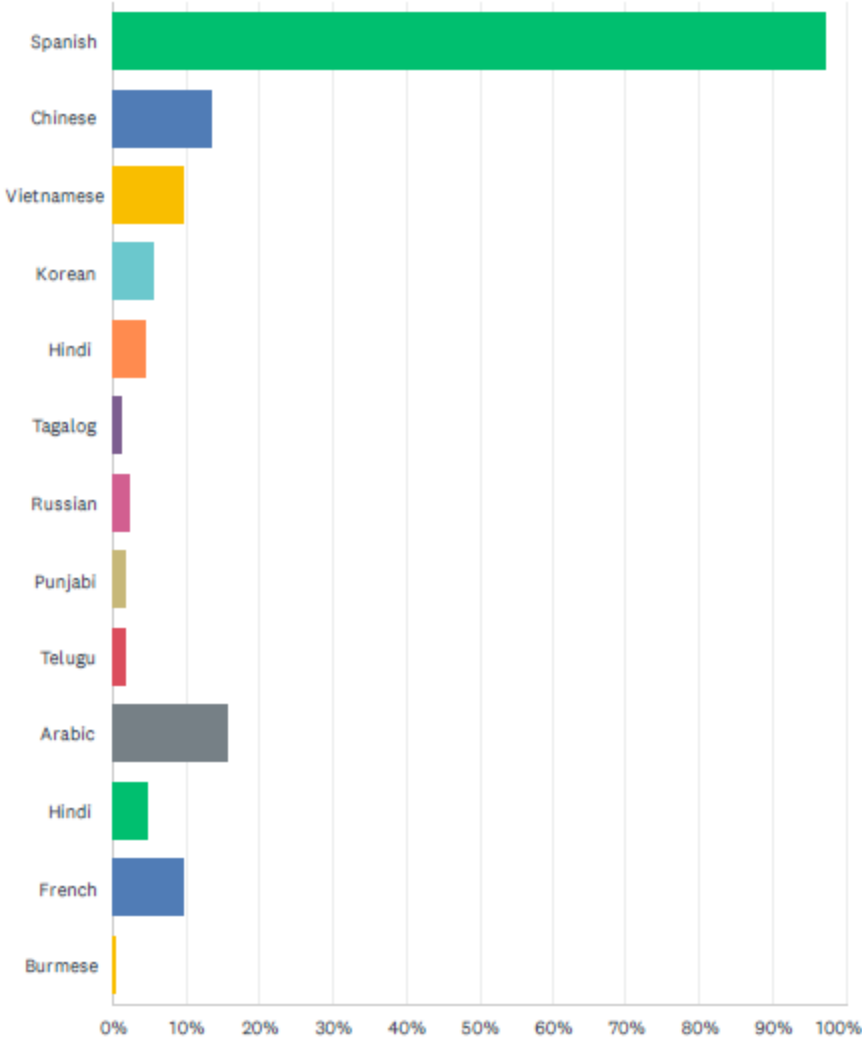
Q3 How many customers and/or members of the public do you interact with? Please select one.

Answered: 263 Skipped: 4



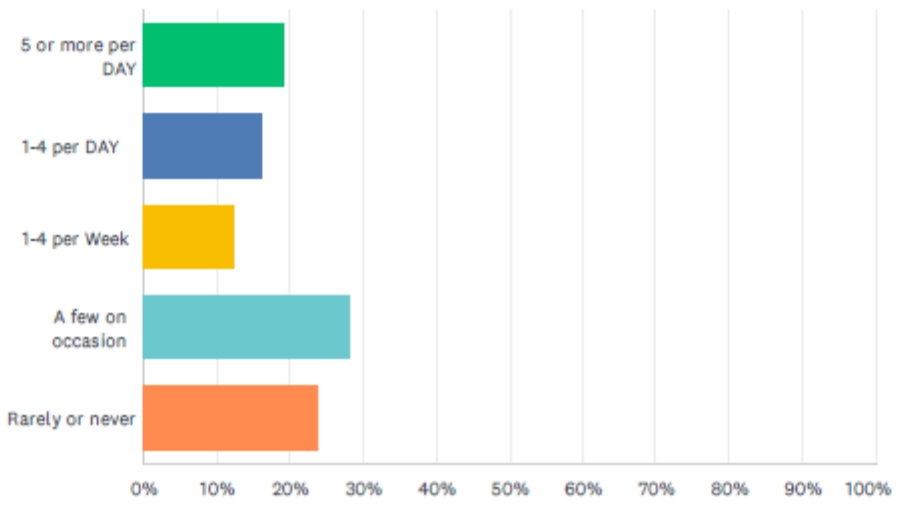
Q4 Besides English, what are the languages you hear most often by customers and/or members of the public you encounter? Please select all that apply.

Answered: 249 Skipped: 18



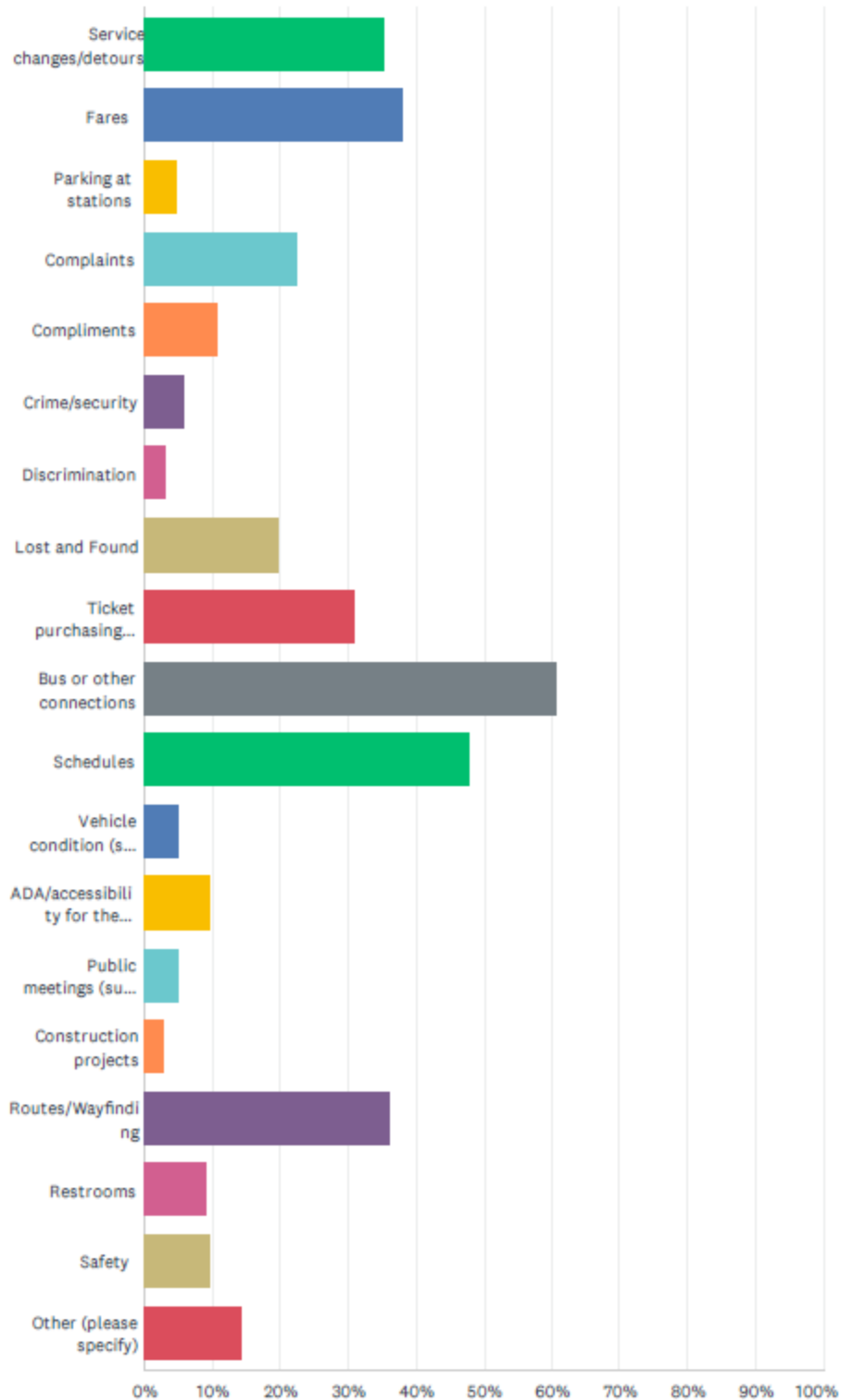
Q5 How often do you usually encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English? Please select one.

Answered: 267 Skipped: 0



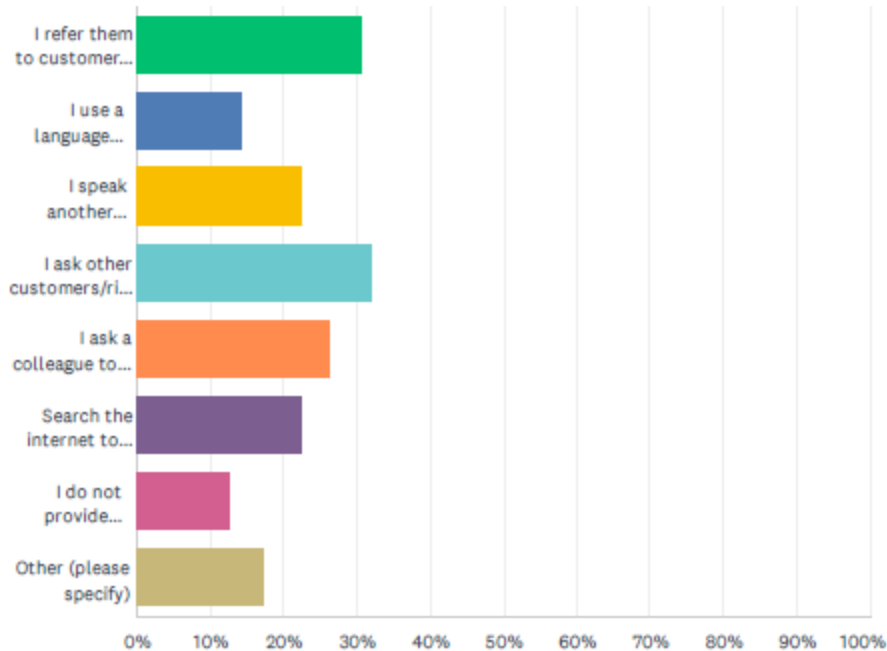
Q6 What information are those customers and/or members of the public usually seeking? Please select all that apply.

Answered: 252 Skipped: 15



Q7 How are you currently providing information to riders/customers of the public who are seeking assistance and are unable to communicate well in English? Please select all that apply.

Answered: 260 Skipped: 7



Q8 Are there any resources you need to help you assist you in communicating with customers? Please use the space below for suggestions to improve CapMetro's communication or for any comments you may have. If you have a specific language in mind, please include it.

Answered: 99 Skipped: 168

Question #8 offered a text field to capture additional information CapMetro staff and contracted service providers wanted to share on how CapMetro could support their community. The following information was shared:

- More diversity at Customer Service,
- Overhead announcements in different languages,
- Provide video communication in multiple languages,
- Communicate better that kids K-12 grade ride for free,
- Allowed to use personal phones to assist customers when translating,
- Provide translation tutorials,
- Offer basic language classes,
- Provide basic standard responses to customers in different languages,
- Offer reimbursement for classes taken to learn another language,
- Provide a language communicator box similar to a phone,

- Provide a pamphlet with the usual answers to usual questions received,
- Posting translation helpline information near or on buses where riders can call prior to boarding buses,
- Host community events or workshops to educate customers on using CapMetro services effectively,
- Provide accessible channels for customers to provide feedback, suggestions, or report issues, and
- Utilize social media platforms to engage with customers, answer questions, and provide updates about services.

Figure 14: External Survey Results (ENGLISH SURVEY)

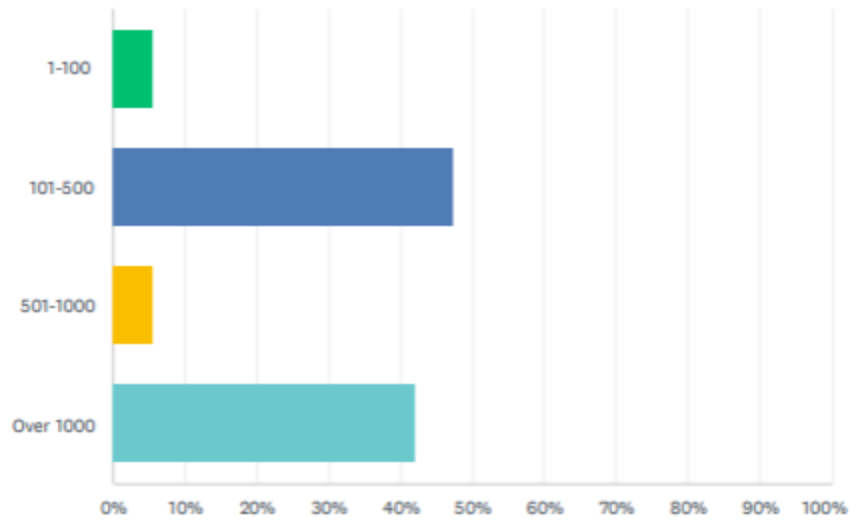
Q1 Your Organization Name

Question #1 offered a text field to capture their organization. Organizations or entities that responded included the following:

- Personal Attendant Coalition of Texas,
- El Concilio Mexican American landowners de East Austin,
- City of Manor,
- Con Mi Madre,
- Austin Free-Net,
- Real Estate Council of Austin,
- ESB MACC,
- Allison Elementary – Austin ISD,
- Mobile Blessings From the Heart,
- Travis Association for the Blind,
- Transit Forward,
- Round Rock Arts,
- Mt. Zion Baptist Church,
- Emma S. Barrientos Mexican American Cultural Center,
- ADAP of Texas/Personal Attendant Coalition of TX
- Carver Public Library,
- Greater Austin Asian Chamber of Commerce
- Blackshear Elementary, and
- Chariot.

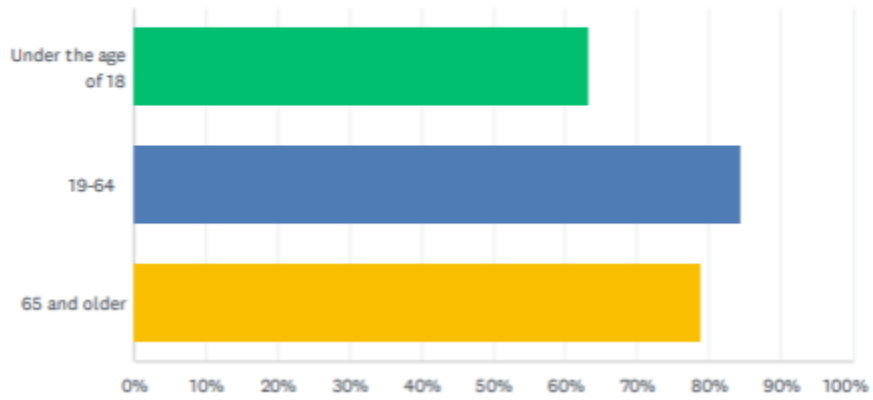
Q2 How many people are served by your organization?

Answered: 19 Skipped: 0



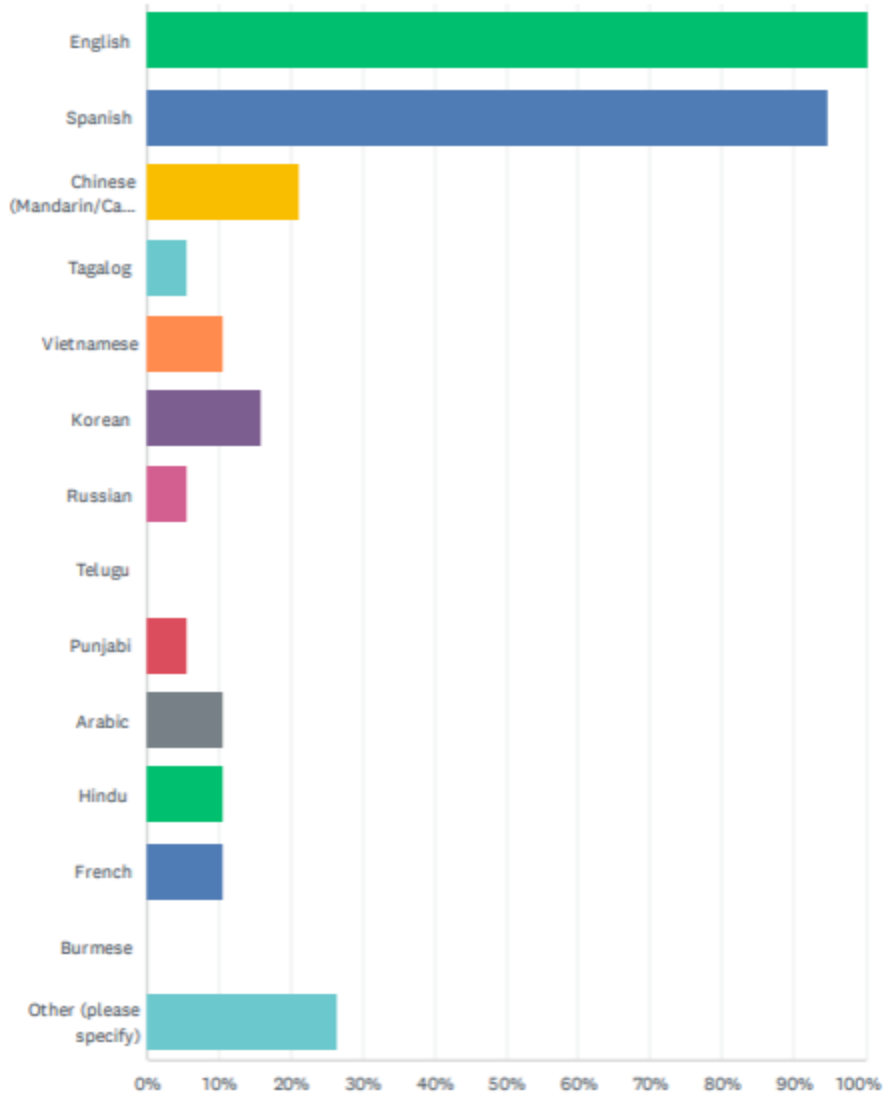
Q3 What age groups do you serve? (Please check all that apply)

Answered: 19 Skipped: 0



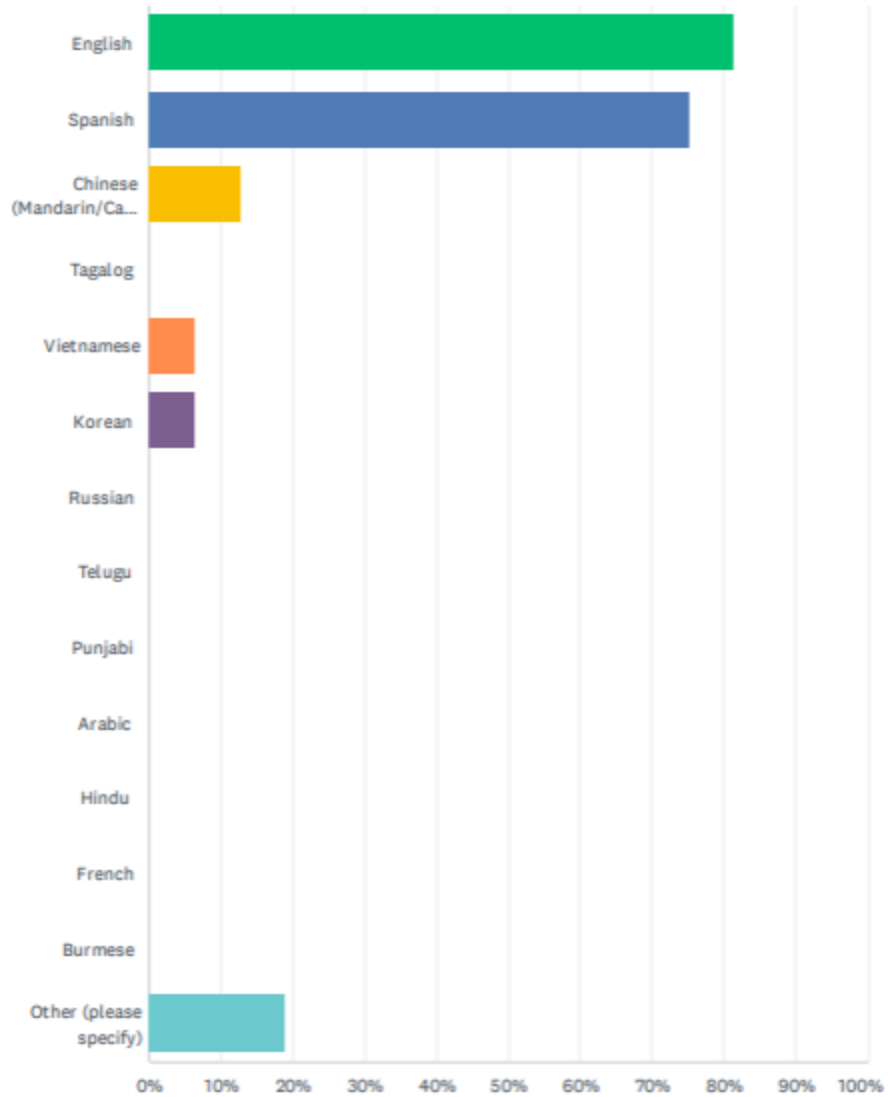
Q4 What are the five primary languages spoken by the population you serve? (Please select up to 5)

Answered: 19 Skipped: 0



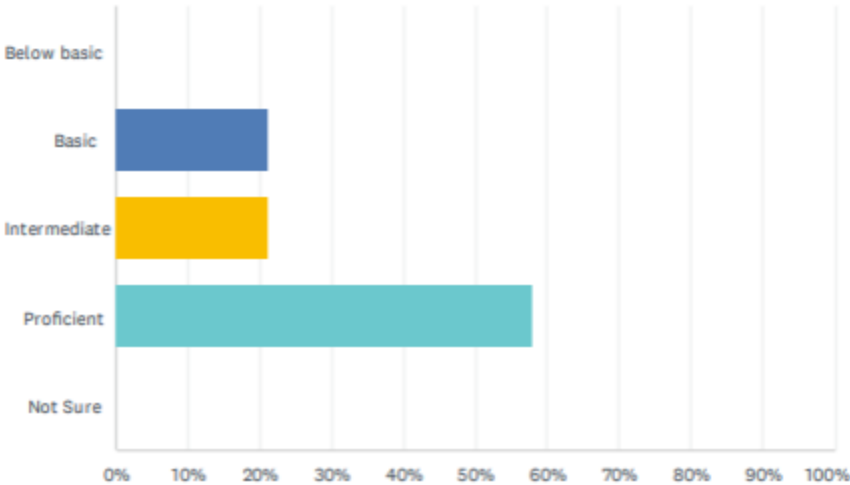
Q5 Which languages do you typically translate to provide information to your community?

Answered: 16 Skipped: 3



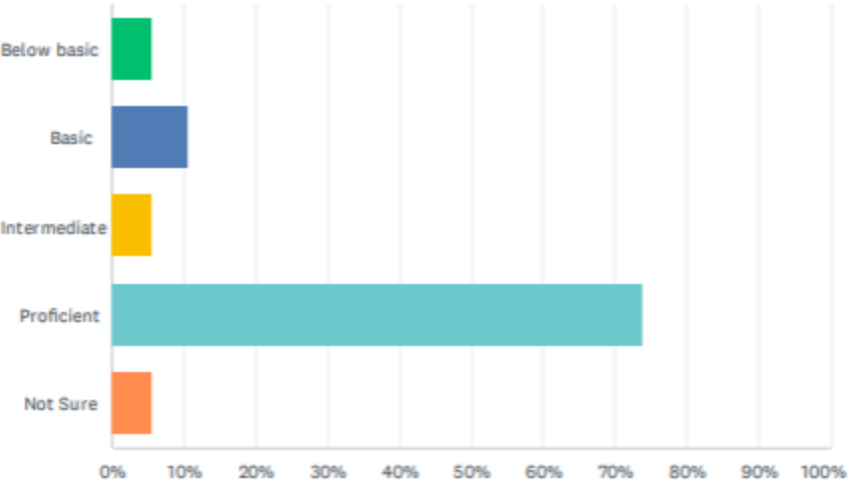
Q6 How well do your clients or constituents speak English?

Answered: 19 Skipped: 0



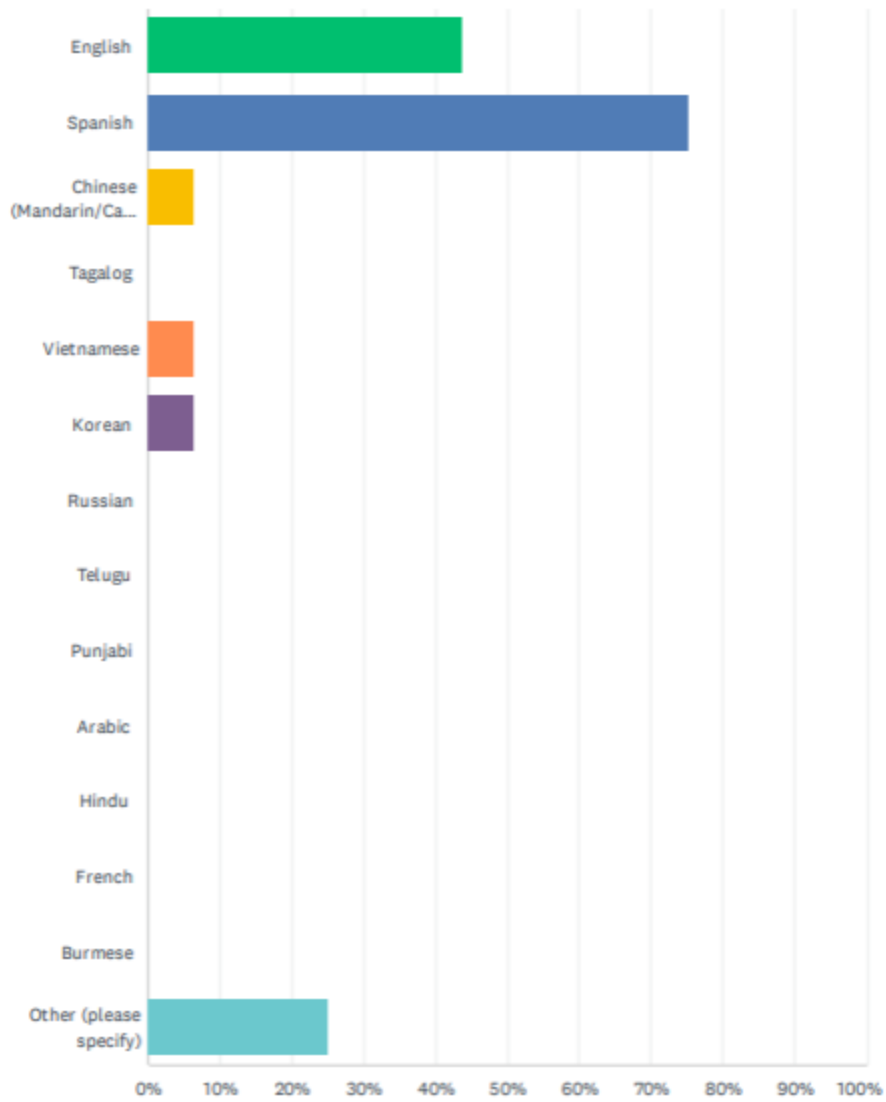
Q7 In general, how well does your community read in their native language?

Answered: 19 Skipped: 0



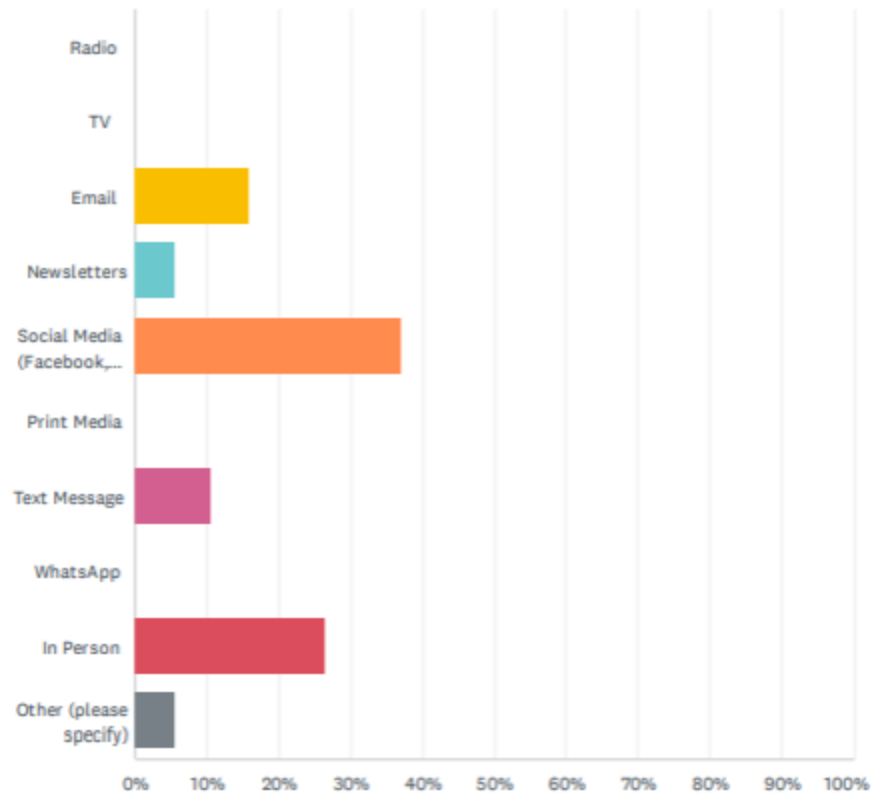
Q8 Which languages do you use interpreters for when hosting live or virtual events with your community?

Answered: 16 Skipped: 3



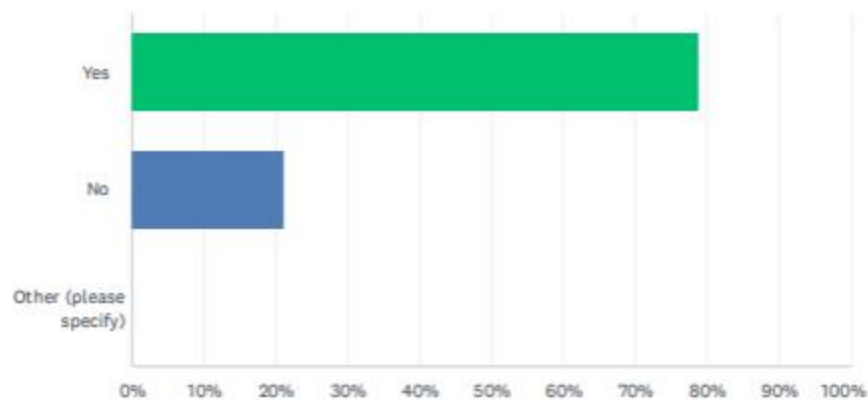
Q9 What is the preferred method of communication for your community?

Answered: 19 Skipped: 0



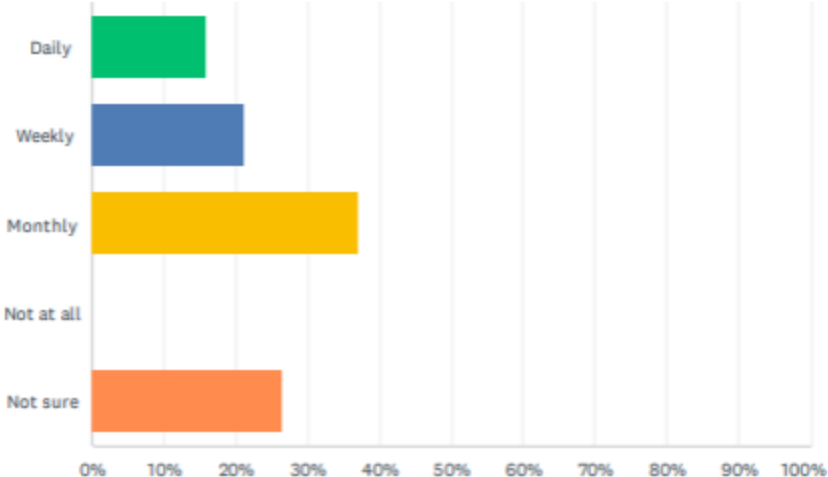
Q10 Has anyone your organization works with inquired about how to access public transportation or expressed a need for public transportation service?

Answered: 19 Skipped: 0



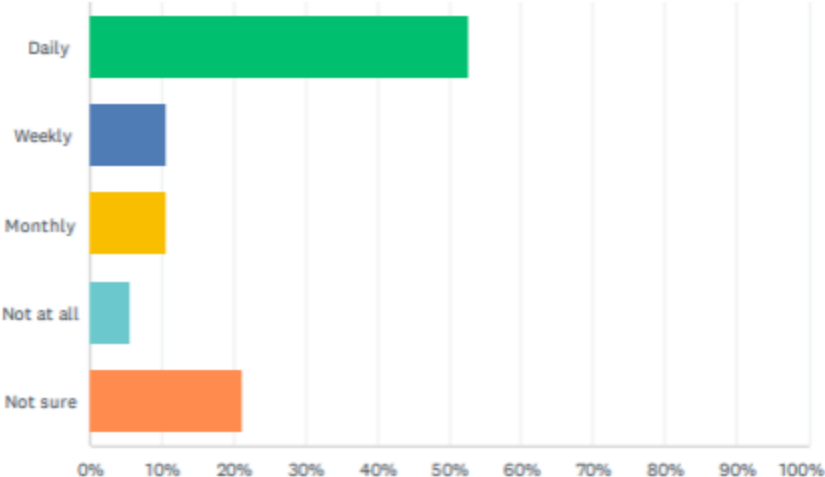
Q11 How often do the people your organization works with seek information about CapMetro services or programs?

Answered: 19 Skipped: 0



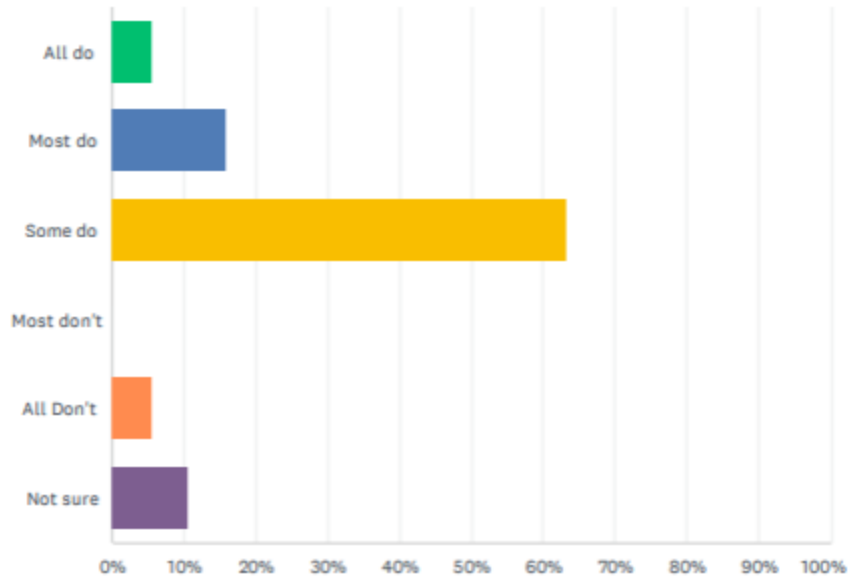
Q12 How much do the people your organization works with use CapMetro services to get around?

Answered: 19 Skipped: 0



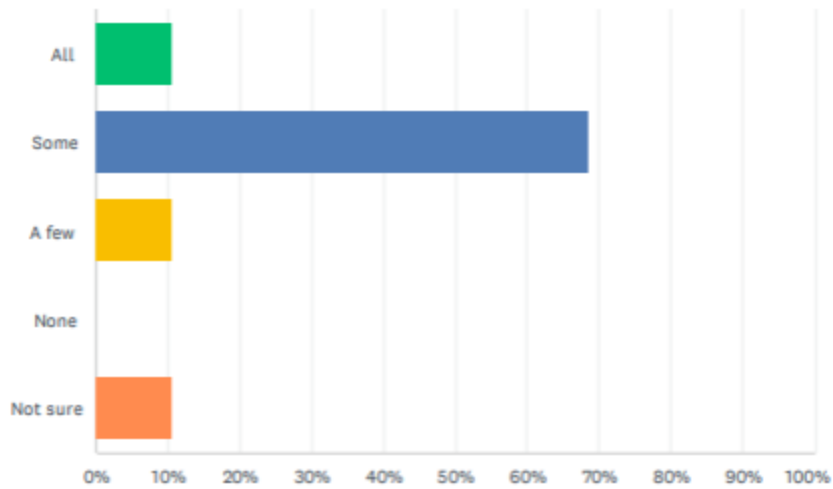
Q13 Do the people your organization works with have a vehicle available to them?

Answered: 19 Skipped: 0



Q14 Is CapMetro a primary mode of transportation for the community your organization serves?

Answered: 19 Skipped: 0



Q15 Do the people your organization works with have any language barriers or communication issues when using CapMetro services? Please be as specific as possible.

Answered: 16 Skipped: 3

Question #15 offered a text field to capture additional information the CBOs wanted to share on language barriers or communication issues when using CapMetro services. The following information was shared by CBOs:

- Drivers not bilingual, especially in Spanish,
- CapMetro isn't designed for other languages, and
- Providing communication for those that have speech disability or hard of hearing that require ASL.

Q16 Is there anything CapMetro can do to communicate better with the community you serve? Please be as specific as possible.

Answered: 16 Skipped: 3

Question #16 offered a text field to capture additional information the CBOs wanted to share on how CapMetro could support their community. The following information was shared by CBOs:

- Bilingual apps for drivers,
 - Present at nonprofit events,
 - Offer in-person learning sessions and resources in all languages,
 - Have a bus stop at cultural centers,
 - Make bus brochures more user friendly for native Spanish speakers and in other languages,
 - Connecting the CBO media platforms to promote more awareness of services/changes (i.e., bus and train delays or routes cancelled)
 - Quarterly emails with updates on services or changes,
 - Have interpretations available for bus drivers or have interpreters available at selected bus stops, and
4. Audio descriptions & less words and more pictures.

Figure 15: External Survey Results (SPANISH SURVEY)

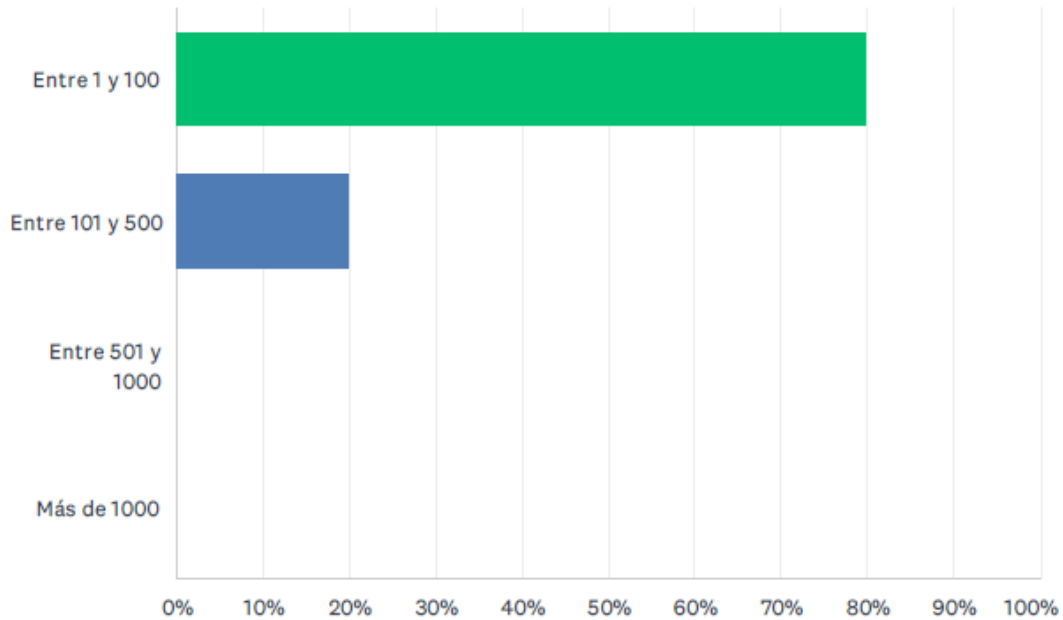
Q1 Nombre de su organización

Answered: 4 Skipped: 1

Question #1 offered a text field to capture their organization. Only one organization responded, which included the following: Gava

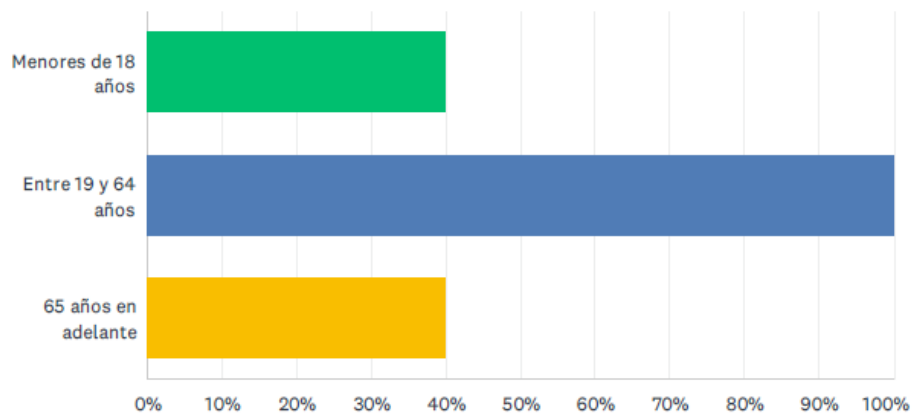
Q2 ¿Cuántas personas reciben servicios de su organización?

Answered: 5 Skipped: 0



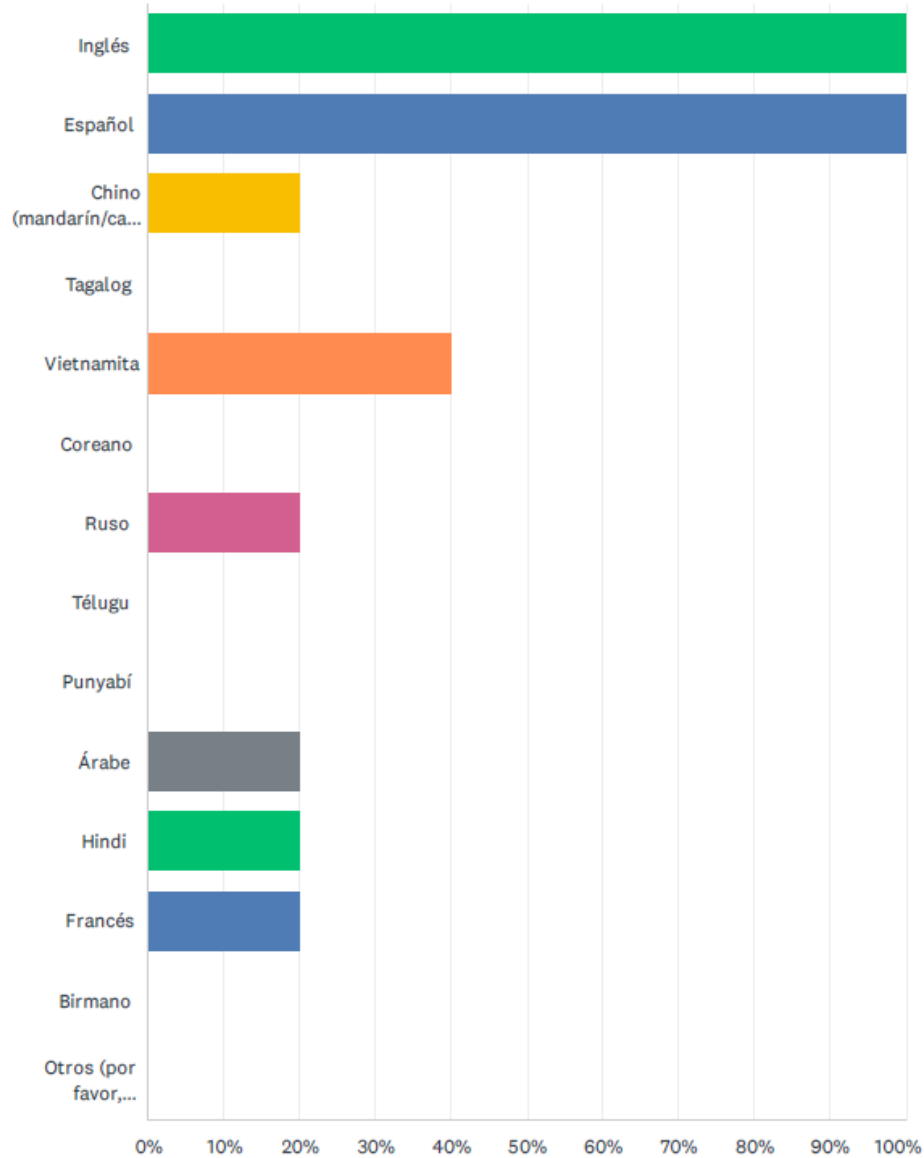
Q3 ¿A qué grupos de edad se dirigen sus servicios? (Marque todas las opciones que correspondan)

Answered: 5 Skipped: 0



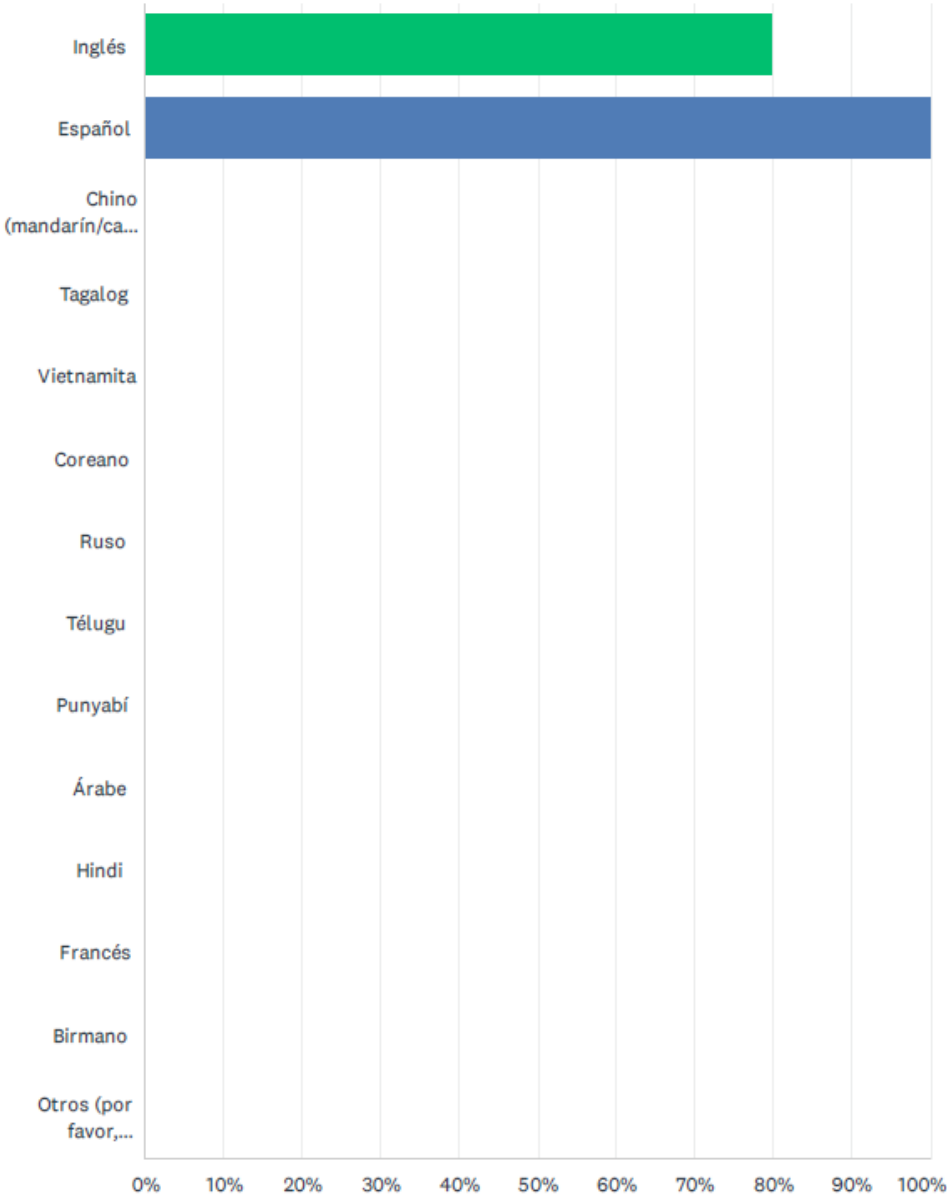
Q4 ¿Cuáles son los cinco idiomas más hablados entre la población a la que brindan servicios? (Seleccione 5 como máximo)

Answered: 5 Skipped: 0



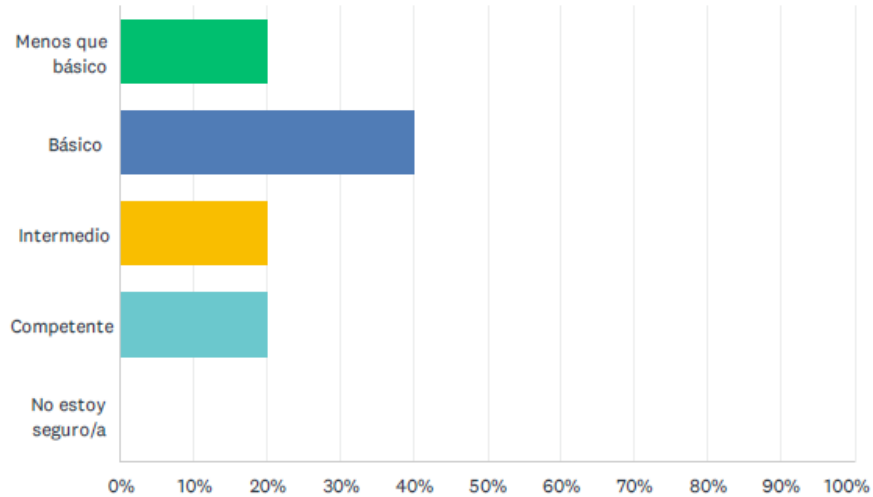
Q5 ¿A qué idiomas suele traducir la información para su comunidad?

Answered: 5 Skipped: 0



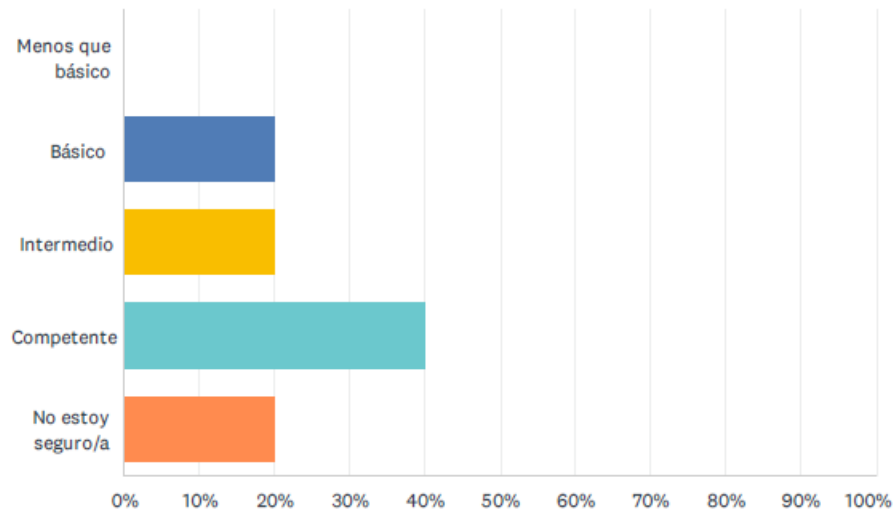
Q6 ¿Qué nivel de dominio del inglés tienen sus clientes o constituyentes?
(Por favor, especifique el nivel)

Answered: 5 Skipped: 0



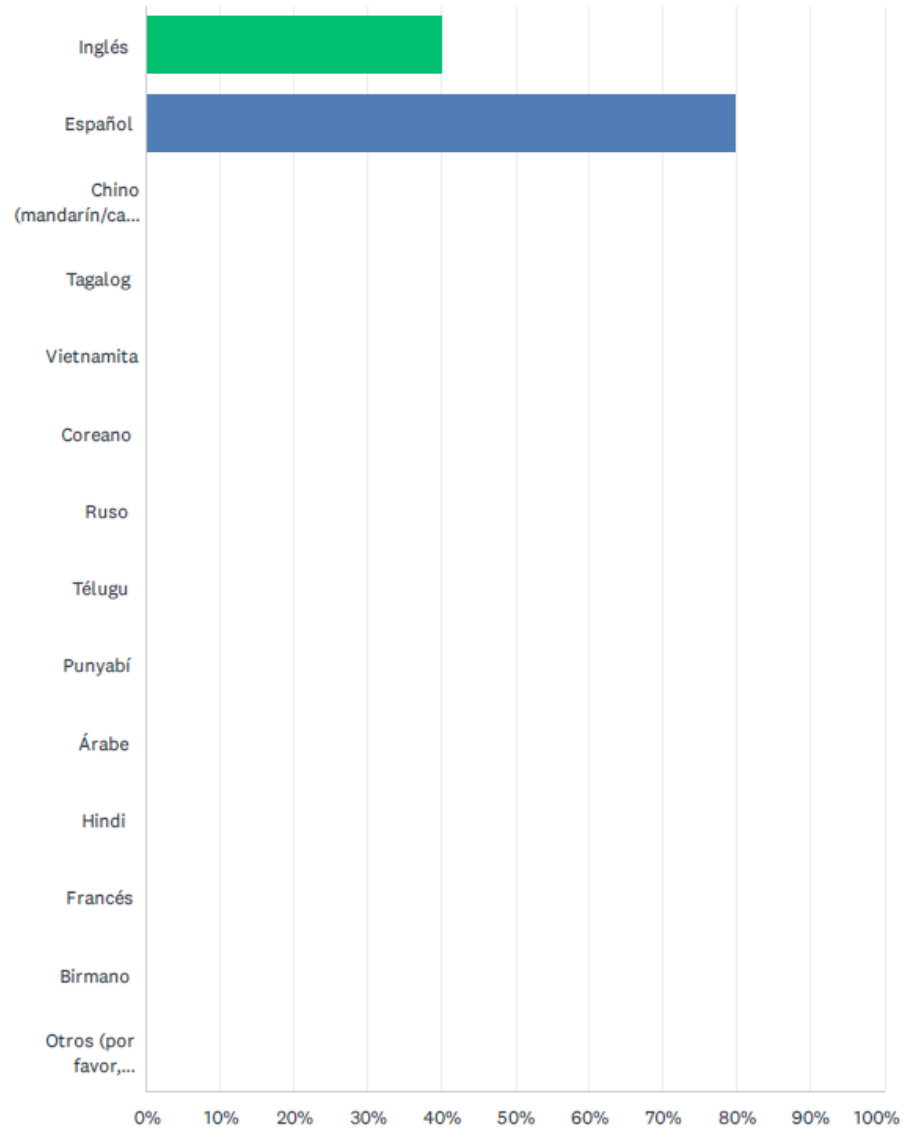
Q7 ¿Qué nivel de comprensión lectora tiene su comunidad en su lengua materna? (Por favor, especifique el nivel)

Answered: 5 Skipped: 0



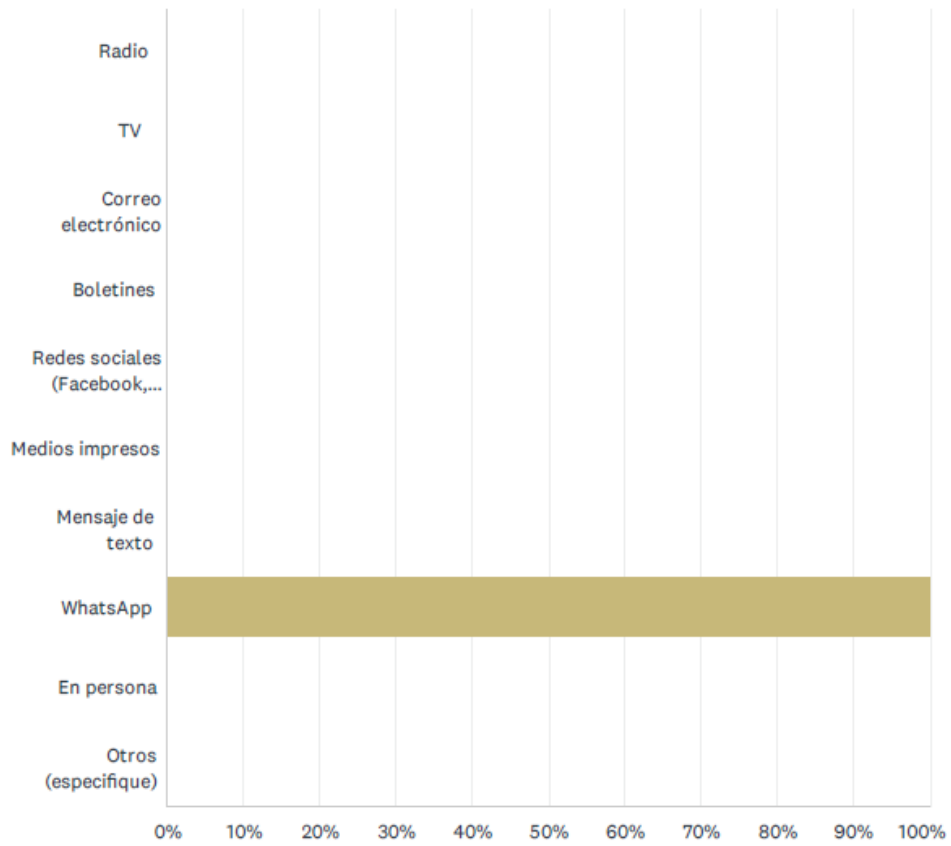
Q8 ¿En qué idiomas utiliza intérpretes para sus eventos o virtuales con la comunidad?

Answered: 5 Skipped: 0



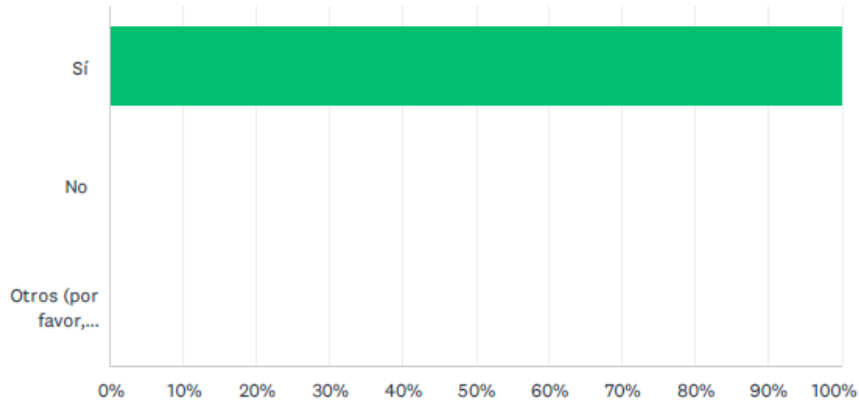
Q9 ¿Cuál es el método de comunicación preferido para su comunidad?

Answered: 5 Skipped: 0



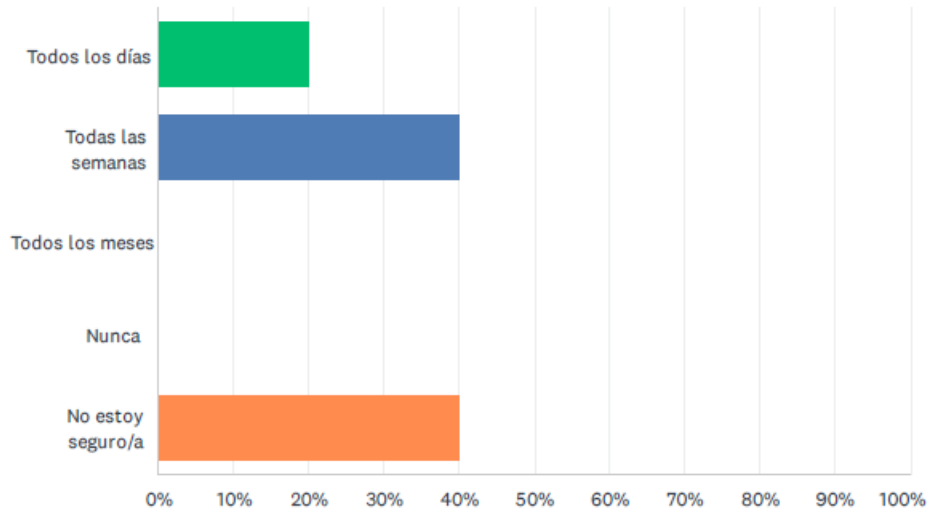
Q10 ¿Alguna persona con quien su organización trabaja ha preguntado sobre cómo acceder al transporte público o ha expresado la necesidad de recibir servicios de transporte público?

Answered: 5 Skipped: 0



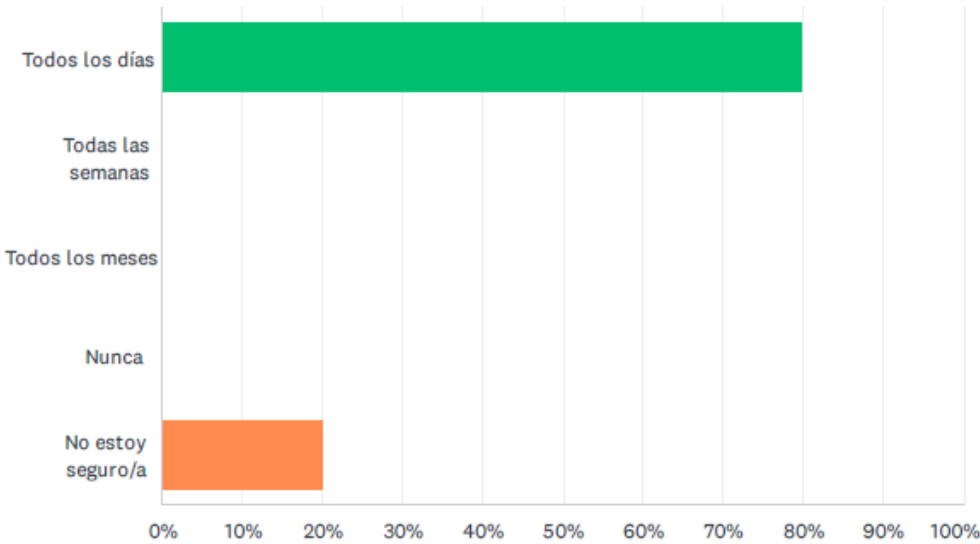
Q11 ¿Con qué frecuencia es que las personas con quienes su organización trabaja buscan información sobre servicios o programas de CapMetro?

Answered: 5 Skipped: 0



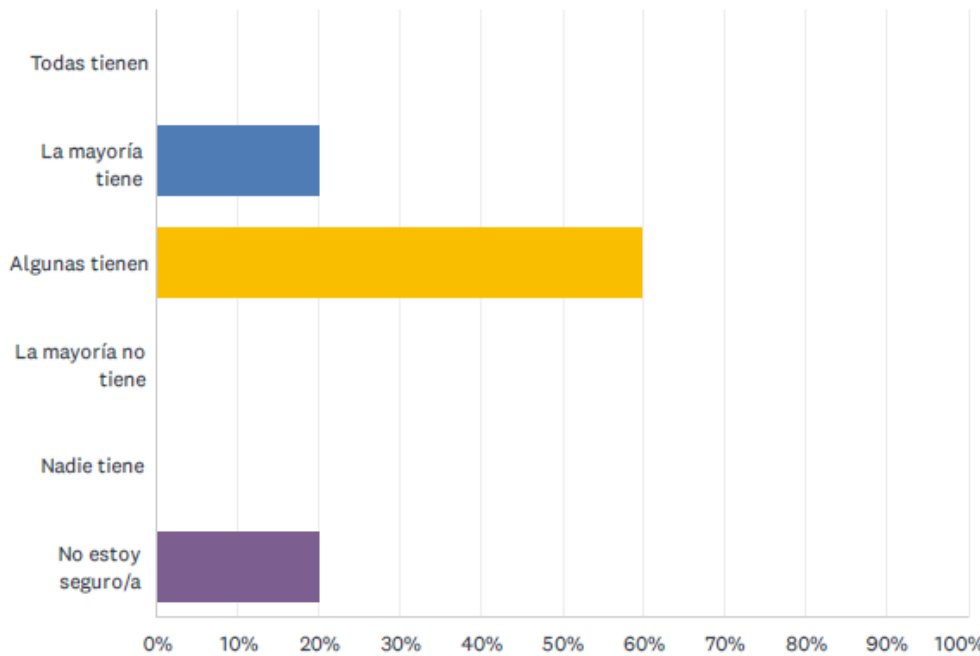
Q12 ¿Con qué frecuencia es que las personas con quienes su organización trabaja usan servicios de CapMetro para desplazarse?

Answered: 5 Skipped: 0



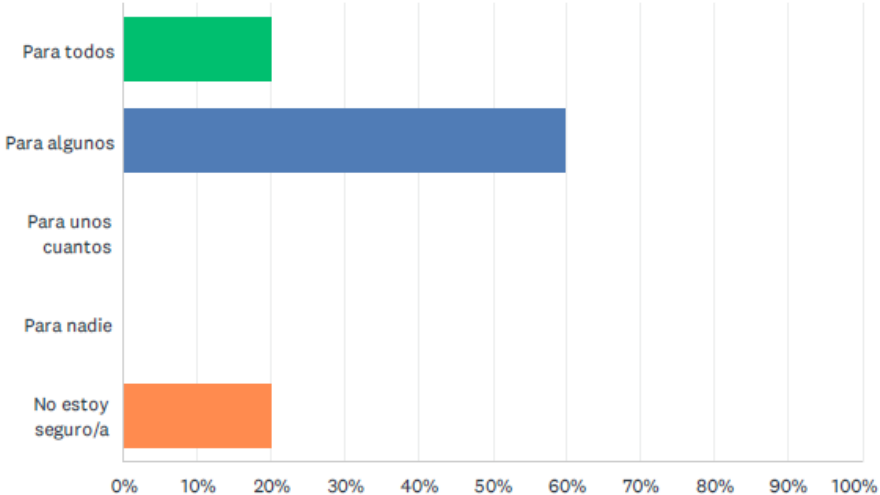
Q13 Las personas con quienes su organización trabaja, ¿tienen un vehículo disponible?

Answered: 5 Skipped: 0



Q14 ¿Es CapMetro uno de los principales medios de transporte utilizados por la comunidad a la que su organización atiende?

Answered: 5 Skipped: 0



Q15 ¿Las personas con las que trabaja su organización enfrentan barreras lingüísticas o dificultades de comunicación al utilizar los servicios de CapMetro? Por favor, especifique.

Answered: 3 Skipped: 2

Question #15 offered a text field to capture additional information the CBOs wanted to share on language barriers or communication issues when using CapMetro services. The following information was shared by CBOs:

- Don't know,
- Speaking,
- Hearing, and
- Vision.

Q16 ¿Hay algo que CapMetro pueda hacer para comunicarse mejor con la comunidad a la que usted brinda servicios? Sea lo más específico/a posible.

Answered: 2 Skipped: 3

Question #16 offered a text field to capture additional information the CBOs wanted to share on how CapMetro could support their community. The following information was shared by CBOs:

- CapMetro is a very good service for the community, and
- Yes, give the information in English and Spanish simultaneously,
- and offer it on paper since some are not