

Reducing Language Barriers

Guidelines on making CRCOG transportation programs more accessible to those who don't speak English well

Approved by CRCOG Policy Board on May 25, 2005

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Introduction

Over 50,000 Capitol Region residents have difficulty speaking, reading, or understanding English. These non-English speaking residents are all users of our region's transportation system, and many are frequent users of our public transit services. However, while they have a vested interest in decisions being made about the future of our transportation system, their inability to communicate in English makes it difficult for them to have effective input into the transportation planning process at Capitol Region Council of Governments (CRCOG). As an agency, we have an obligation to give all our residents the opportunity to participate if they so choose. While CRCOG's public involvement program is quite extensive and generally very effective, it has not been particularly effective at involving non-English speaking populations.

Purpose of Report

The purpose of this report is to identify more effective methods of involving non-English speaking persons in our programs. This means we must first identify the number and types of non-English speaking groups in the region. Once we know the types, sizes, and geographic distributions of these groups, we must then identify methods for reducing the language barriers that are preventing these groups from participating in our programs. After reviewing the various methods available, we want to select the best methods and develop a strategy for using them in the most effective manner.

This report will be the basis for developing policies and programs to help CRCOG engage communities that have difficulty communicating in English. The policies will address issues such as how, when, and where to provide meeting notices in alternate languages, where translation services might be needed, and when documents will be translated to ensure meaningful access to everyone. Specific programs may also be undertaken to more directly reach out to non-English speaking residents under special circumstances.

The report is organized as follows:

Chapter 1 - Introduction to concept of LEP (Limited English Proficiency)

- Chapter 2 - An analysis of the types and distribution of non-English speaking residents in the CRCOG Region.
- Chapter 3 - A review of practices & policies of other area agencies regarding communication in other languages.
- Chapter 4 - Development of recommendations on how to adjust CRCOG policies on public involvement and communications to increase participation of non-English speaking residents.

Relationship to CRCOG's Environmental Justice Program

In 2002, CRCOG was awarded an Environmental Justice and Title VI Challenge Grant to address environmental justice and social equity issues in its transportation planning program. An outcome of the challenge grant was the Environmental Justice Action Plan that outlined steps for making CRCOG transportation planning programs more accessible to low-income and minority populations. These steps have expanded CRCOG's outreach efforts and have included the publication of some meeting notices in Spanish. But, the Environmental Justice Action Plan stopped short of a full consideration of how to make our programs more accessible to non-English speaking persons.

This report will help us take outreach one-step further. Our public involvement procedures will be reviewed again and revised to address language barriers, which have traditionally kept some residents and ethnic groups from participating in the transportation planning process. CRCOG recognizes the importance of including these individuals and groups in its transportation planning process, and is committed to making outreach to non-English speaking individuals a substantial focus of its environmental justice plans.

Limited English Proficiency (LEP) & Federal Regulations

Limited English Proficiency (LEP) is the term used in federal regulations to define persons who have difficulty speaking English. Federal regulations provide a very specific definition on who is classified as having *limited English proficiency*, and they also provide guidance on how those persons are to be given access to federally funded programs such as CRCOG's transportation program. The section below explains the federal regulations, definitions, and guidance.

On August 11, 2000, President Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". The Executive Order requires Federal agencies, or those receiving 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 services so LEP individuals can have meaningful access to them. It is expected that agency

plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires Federal agencies to work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Limited-English-Proficient (LEP) Persons: Federal regulations define “LEP” persons as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities.

Linguistic Isolation: Federal regulations define a “linguistically isolated” household as a household in which no person 14 years old and over speaks only English, and no person 14 years and over who speaks a language other than English speaks English “Very Well.”

In other words, a household in which all members 14 years old and over speak a non-English language and also have difficulty with English (speak English less than “Very Well”) is “linguistically isolated.” All the members of a linguistically isolated household are tabulated as linguistically isolated, including members under 14 years old who may speak English well.

SIMPLE DEFINITIONS

Linguistic Isolation =
Households in which all members 14 and older have difficulty with English.

Difficulty with English =
someone who speaks English less than “very well.”

Non-English Speaking Populations in the Region

This chapter reviews the number and distribution of residents in the Capitol Region who speak a language other than English. This information on non-English speaking residents is needed to develop rational policies regarding which language groups to focus public outreach efforts on, and where to focus those efforts. The data and analysis presented in this chapter provides the foundation for policy recommendations to be presented in chapter 4.

Non-English Speaking Persons: 132,955

The 2000 Census identified over 38 different non-English languages spoken by 132,955 residents of the Capitol Region.¹ Most of the 38 languages are spoken by relatively few residents, but a few such as Spanish, French, and Polish are spoken by several thousand residents or more. The full tabulation of these non-English speakers is provided in Table 1 at the end of this chapter.

The largest language group is Spanish. Over 65,000 of the non-English speaking population speaks Spanish. As shown in the

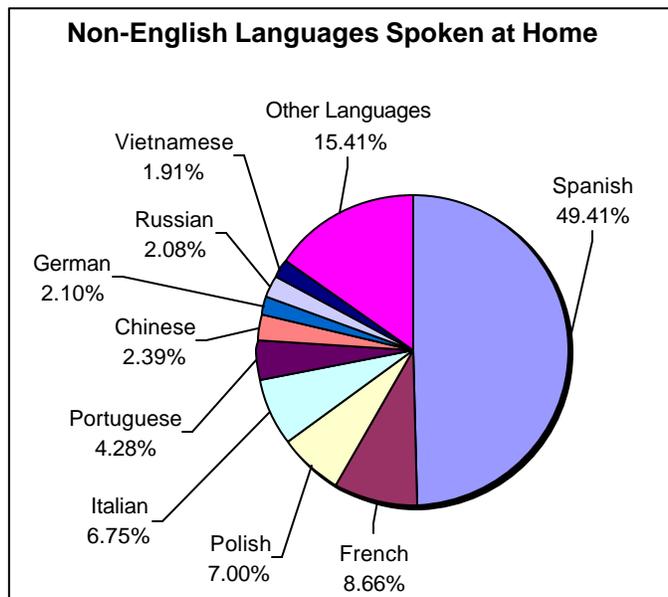


chart to the right, this is nearly half of all the non-English speakers. The next largest group is French, and at 11,500 persons it is less than one-fifth the size of the Spanish group. Likewise, Polish, as the third largest group (9,300 persons) is about one-seventh the size of the Spanish group. The next two groups are Italian with 8,980 persons, and Portuguese with 5,697 persons. All other groups consist of less than 5,000 residents.

Preliminary Conclusions. Based on this information, it appears that the language group that most warrants special consideration in CRCOG's public involvement programs is the Spanish-speaking

¹ The U.S. Census defines language spoken as the language spoken by the individual in his or her home

community. At 65,000 residents, they constitute 9.7 percent of the entire region's population (age 5 and older).

The other language groups larger than 5,000 residents (French, Polish, Italian, and Portuguese) might also warrant consideration in the public involvement programs. However, these are comparatively small groups, and might warrant

LEP: *Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.*

less effort than that given to the Spanish-speaking group. Further analysis is needed before a final conclusion can be reached. Specifically, we need to examine additional Census data that reveals how many of these non-English speaking persons are actually bi-lingual and capable of speaking English as well as their native language. This information is provided in the next section.

Persons with Limited English Proficiency: 52,331

The 132,955 non-English speakers identified in the section above are persons who choose to speak their native language when at home. However, their preference for their native language does not mean they cannot speak English. Many are bi-lingual and can communicate in English when they are outside their home. These bi-lingual residents are not the primary focus of this report. *The chief concern of this report is to communicate more effectively with those residents who cannot communicate in English.* These are the individuals that the Census defines as having 'Limited English Proficiency' or LEP. This section examines the data on persons with limited English proficiency.

There are 52,331 persons in the region who have limited or no ability to communicate in English. These persons are classified as LEP and constitute 39 percent of all non-English language speakers.

Of the 52,331 residents classified as LEP, over 26,800 or **51 percent are Spanish speakers.** Once again, it appears that Spanish speakers are the largest group by a very wide margin. However, it is not possible to say for certain how wide that margin is. Unlike the previously reported data on all non-English speaking residents (including bi-lingual persons), the Census data

Limited English Proficiency by Foreign Group
(persons years & older)

	Total Speakers	Speakers with LEP	% LEP
Spanish	65,698	26,802	40.80%
Indo-European <i>(except Spanish)</i>	53,352	19,061	35.73%
Asian & Pacific Island	10,655	5,683	53.34%
Other	3,250	785	24.15%
TOTAL	132,955	52,331	39.36%

on residents who cannot speak English (LEP) is limited. The Census does not report the number of

LEP persons for each individual language. The data on LEP persons is reported only by major language group.

The second largest group of LEP classified persons is the group that includes all Indo-European languages. Indo-European languages include most European languages as well as many from the Indian subcontinent. Thus, it includes French, Polish, Italian, and Portuguese, which are of interest in this report because they constitute the largest number of non-English speakers in the region after Spanish. While we cannot say for certain what proportion of these four language groups are classified as LEP, we do know that 35.7 percent of the entire Indo-European group is classified as LEP. This is a lower proportion than the Spanish-speaking group, which is at 40.8 percent. It is reasonable to assume that the LEP percentage for French, Polish, Italian, and Portuguese does not differ greatly from the larger group average of 35.7 percent. It is also very unlikely to exceed the LEP percentage for Spanish (40.8 %) by very much. Therefore, it is very likely that the Spanish LEP group exceeds the size of any other language LEP group by the same large margin we found for all non-English speakers (previous section). That is, there are probably at least five times as many persons in the Spanish LEP group as in any other language LEP group.

Preliminary Conclusions. It appears that our previous conclusion regarding the importance of Spanish warranting special consideration in CRCOG's public involvement programs is reinforced by the data on persons with Limited English Proficiency. Once again, the size of the Spanish LEP group far exceeds any other LEP group.

Geographic Distribution of Spanish Speakers

Distribution of All Spanish-Speaking Persons. The distribution of Spanish speakers is shown in Map 1 at the end of the chapter. The map shows a tightly clustered distribution centered on Hartford, but with extensions into the adjacent and more urbanized suburbs. The most notable suburban populations of Spanish speakers are found in southern Windsor, southeastern West Hartford, and a large portion of East Hartford. The East Hartford cluster also extends into Manchester. Outside this cluster in the region's urban core, there are a few scattered clusters with concentrations generally in the 5-10 percent range.

The greatest number and highest densities of Spanish speakers are in Hartford. Hartford is home to 62 percent (41,025) of the region's Spanish speakers. Within Hartford, the greatest concentrations are found in the southern part of the city where in some neighborhoods the proportion of Spanish speakers can exceed 60 percent of the entire population. However, as can be seen in Map 1, there is also a large population of Spanish speakers in the northern half of the city.

Although there are clusters of Spanish speakers in the adjacent suburbs, the percentages are generally much lower than in Hartford. Most of the suburban areas highlighted in Map 1 are neighborhoods with Spanish-speaking populations in the 5 – 20 percent range. A few exceptions exist in East Hartford, West Hartford, and Windsor where concentrations reach between 20 and 40 percent.

Distribution of Spanish-Speaking LEP Persons. The distribution of Spanish speakers with Limited English Proficiency is illustrated in Map 2 at the end of the chapter. The map of Spanish LEP residents is very similar to the map of all Spanish speakers – except that the pattern is more distinct. There is a tighter cluster centered on Hartford, and very few clusters outside Hartford, East Hartford, and West Hartford. In fact, if you ignore the lowest category of 5-10 percent, all the affected neighborhoods (with the exception of one in the very southeast corner of West Hartford) are in Hartford and East Hartford.

Geographic Distribution of Other Language Groups

The distributions of other non-English language populations are provided in Maps 3 – 6. It is important to remember that sizes of the language groups shown in Maps 3-6 are dramatically smaller than the Spanish language group (one-fifth the size or smaller). Since the sizes of the groups are much smaller, we have used a different method for mapping the distributions. Rather than showing the percentage of the population that speaks the language, we have displayed the total number in the Census tract that speaks the language. If we had prepared maps based on percentage, we would have largely blank maps since the percentages are generally very small for any language other than Spanish. By mapping the number of persons rather than the percentage, we are able to identify where there might be small pockets of other language speakers. Knowing where these small pockets are located can be helpful in designing public involvement programs for projects that are located near any such pockets.

Maps 3-6 show the location of small pockets of other significant language groups that exist in the region. Only languages with 5,000 or more speakers are mapped. They are presented in order of size:

- Map 3 French 11,510 persons
- Map 4 Polish 9,302
- Map 5 Italian 8,980
- Map 6 Portuguese 5,697

French – 11,510 persons. The French-speaking population is widely dispersed throughout the region, and there are no significant concentrations. As Map 3 shows, there are no Census tracts with more than 200 French speakers.

Polish - 9,302 persons. The map of Polish-speaking residents displays a much more concentrated distribution. This population appears to be clustered in the southwestern quadrant of the region. However, it must be remembered that the concentrations are still at fairly low levels. The red colors indicate tracts where there are 200-400 Polish speakers living. By comparison most Census tracts contain 3000-5000 persons. The only tract with more than 400 Polish residents is adjacent to New Britain, which has a large Polish community.

Italian – 8,980 persons. The Italian-speaking population also has a fairly concentrated distribution. There is a significant cluster in the south end of Hartford and to the south of Hartford in Wethersfield and Rocky Hill.

Portuguese – 5,697 persons. With only 5,697 persons, the Portuguese-speaking population is the smallest reviewed in this report. The small size is also evident on Map 6, which shows a distribution that is more limited than the other languages. Although there are a few tracts with 100-200 Portuguese speakers south of Hartford, the primary concentration is a small cluster in the southwest area of Hartford that extends into the southeast section of West Hartford.

No LEP Information. A limitation of Maps 3-6 is that they show all persons whose primary language is the particular language displayed on the map. As stated previously, many of these alternate language speakers are bi-lingual and can communicate very well in English. Unfortunately, for the language groups in Maps 3-6, the Census does not report the data on the number of persons who cannot speak English (LEP persons). We do know that the average LEP percentage for all language groups combined is 35 percent.

Despite the limitations of Maps 3-6, they are still helpful tools. They provide a general indication of which areas of the region might contain significant populations of non-English speakers (other than Spanish). This information can be considered whenever we propose a new study or project that will affect any of these areas where there are small clusters on non-English speakers.

Conclusion

The preceding analysis shows that Spanish speakers are the most critical LEP group in the Region. They far outnumber any other language group and they are concentrated in Hartford and a few adjacent suburbs with a few clusters also found in other communities in the region. Given that there

are over 26,000 Spanish-speaking LEP residents in our region, CRCOG policies should provide for special outreach efforts for this group. They live, work, and go to school in our communities, but many do not have the skills to read, speak or write English sufficiently to communicate outside of their neighborhoods. These neighborhoods, commonly referred to as “safe zones”, allow LEP individuals to go about their daily routine without having to communicate in English.

CRCOG takes seriously the special challenges faced by the limited English proficient (LEP) citizens of the Region and will focus on Spanish speakers as we try to reach out and provide access to our programs and activities. Furthermore, given the high concentration of Spanish speakers in Hartford and the adjacent sections of West Hartford and East Hartford, our policies should reflect the need to use Spanish language communications in this area.

In addition, the other foreign languages in the Region will be given consideration when projects affect their neighborhoods. These pockets of different languages throughout the Region will be reviewed on an individual basis as projects develop in these areas.

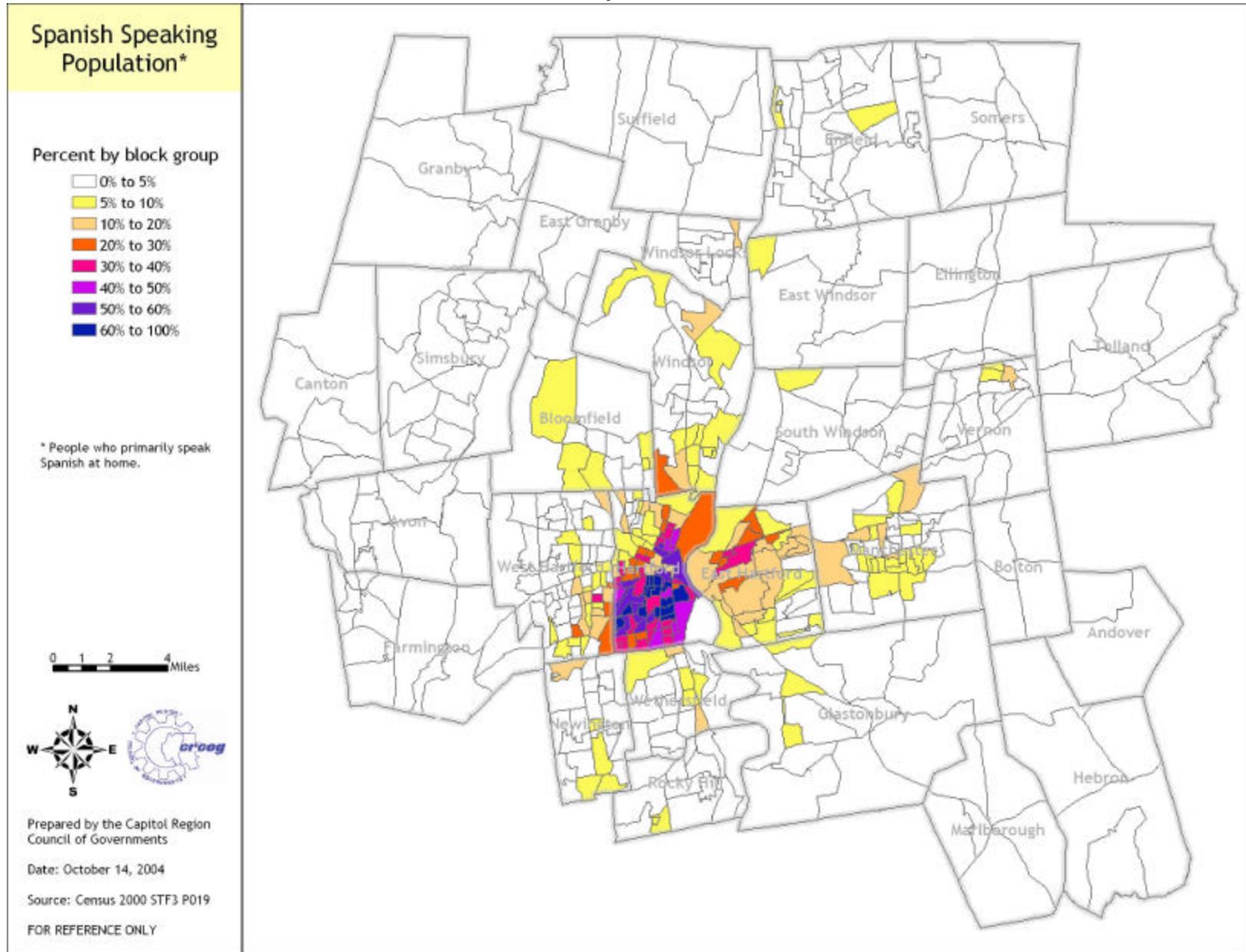
Table 1

Non-English Speaking Language Groups by Population Size
Persons 5 years & older, 2000 Census, Capitol Region

LANGUAGE	TOTAL	PCT
Only English	541,877	80.30%
Spanish or Spanish Creole	65,698	9.74%
French or French Creole	11,510	1.71%
Polish	9,302	1.38%
Italian	8,980	1.33%
Portuguese or Portuguese Creole	5,697	0.84%
Chinese	3,177	0.47%
German	2,797	0.41%
Russian	2,771	0.41%
Vietnamese	2,541	0.38%
Other Indo-European	2,235	0.33%
Greek	1,645	0.24%
Other Indic	1,582	0.23%
African	1,346	0.20%
Other Asian	1,196	0.18%
Gujarathi	1,103	0.16%
Other Slavic	1,066	0.16%
Korean	1,022	0.15%
Tagalog	967	0.14%
Serbo-Croatian	951	0.14%
Hindi	877	0.13%
Arabic	871	0.13%
Urdu	815	0.12%
Laotian	660	0.10%
Scandinavian	519	0.08%
Japanese	507	0.08%
Yiddish	482	0.07%
Hebrew	418	0.06%
Armenian	410	0.06%
Hungarian	333	0.05%
Persian	317	0.05%
Other West Germanic	293	0.04%
Other Pacific Island	224	0.03%
Other and Unspecified	224	0.03%
Thai	143	0.02%
Monto Khmer Cambodian	124	0.02%
Miao Hmong	94	0.01%
Other Native North American	51	0.01%
Navajo	7	0.00%
Total	674,832	100.00%
Total non-English language speakers	132,955	19.70%

Source: Census2000 STF3 PCT10 (Age by Language Spoken at Home for the Population 5 Years and Over)

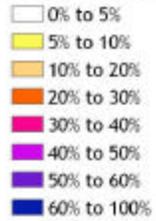
Map 1



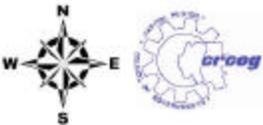
Map 2

Spanish Speaking LEP Population*

Percent by block group



* Limited English Proficiency for Spanish speakers consists of people who speak Spanish at home and speak English well, not well, or not at all.

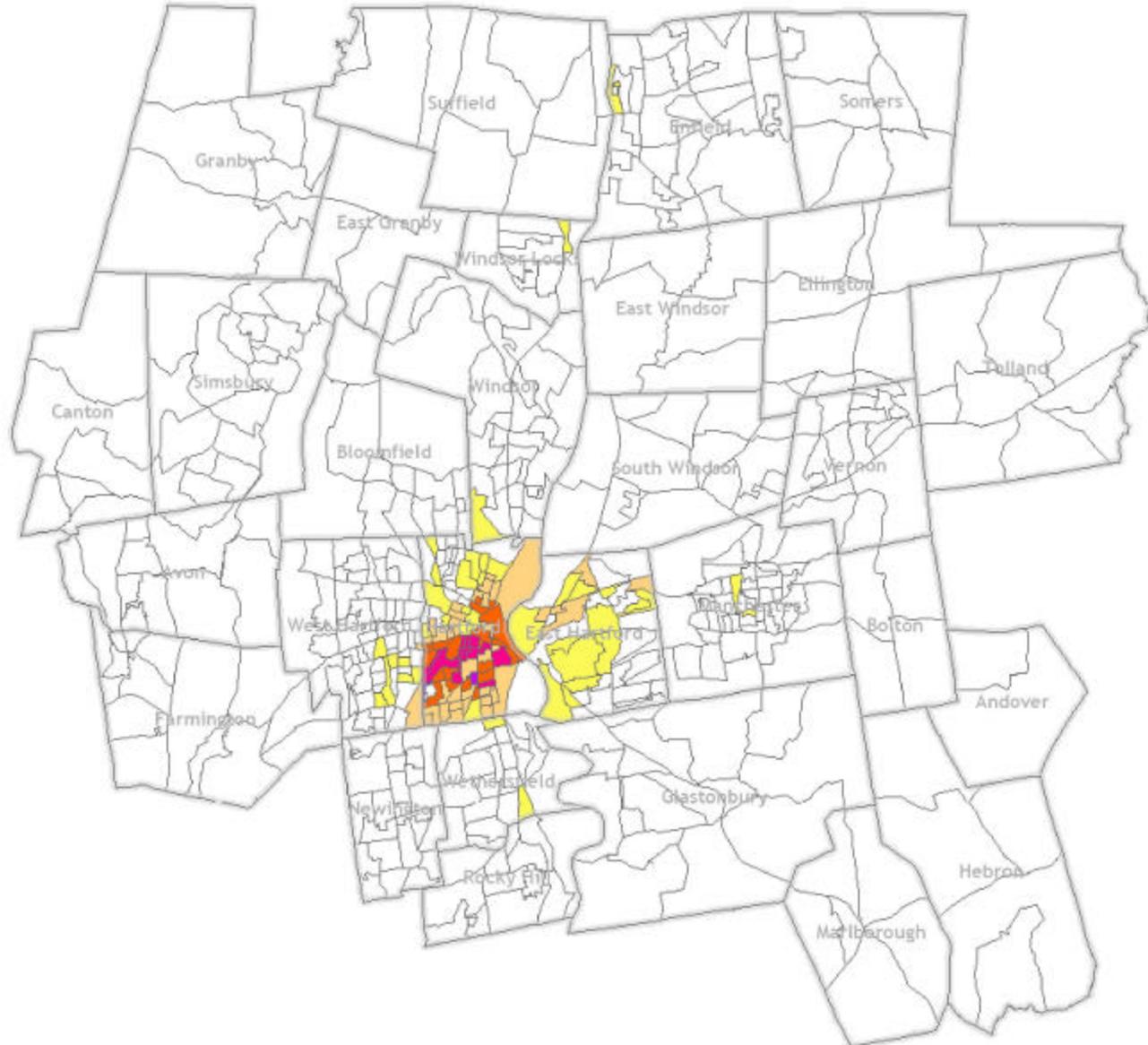


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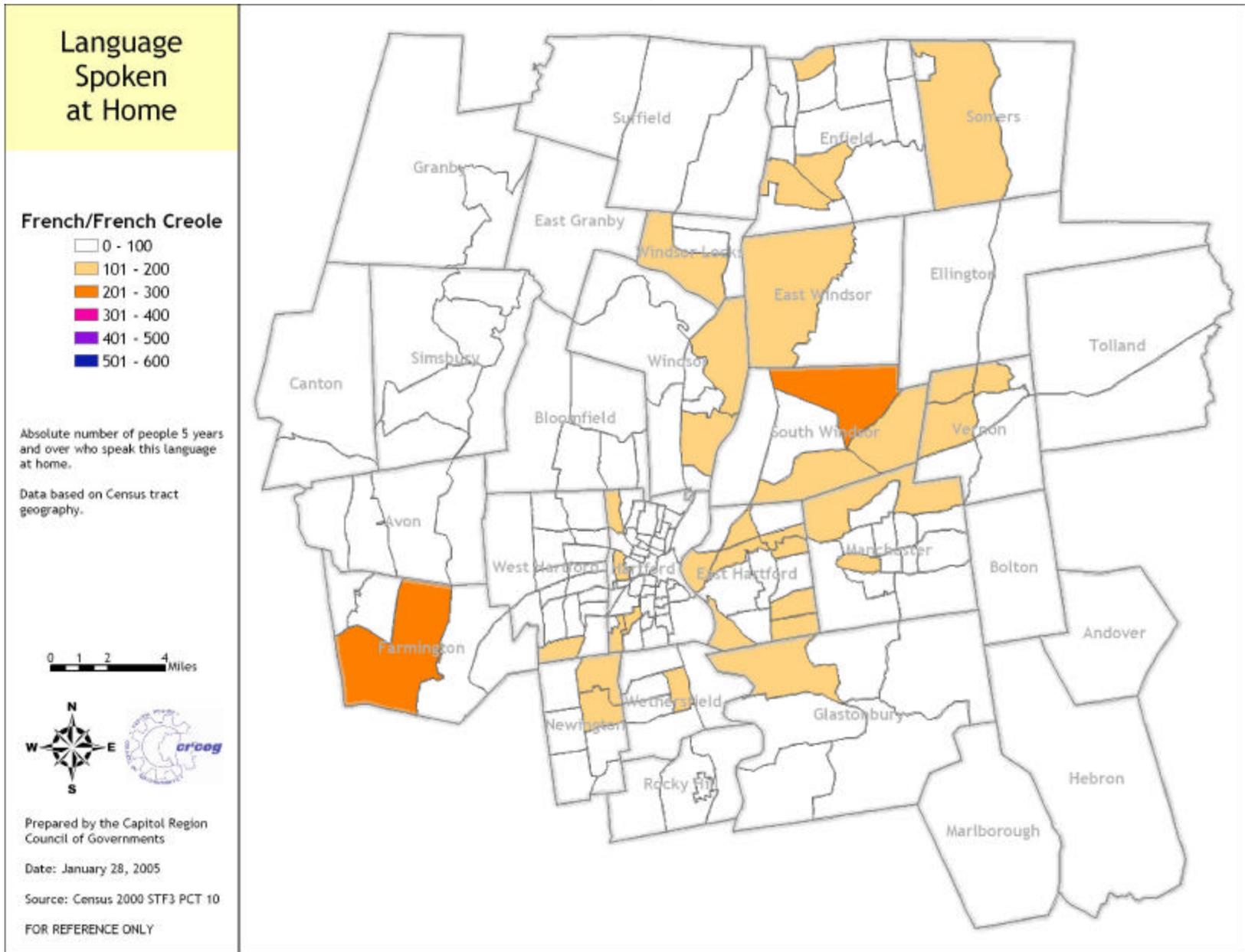
Date: October 14, 2004

Source: Census 2000 STF3 P019

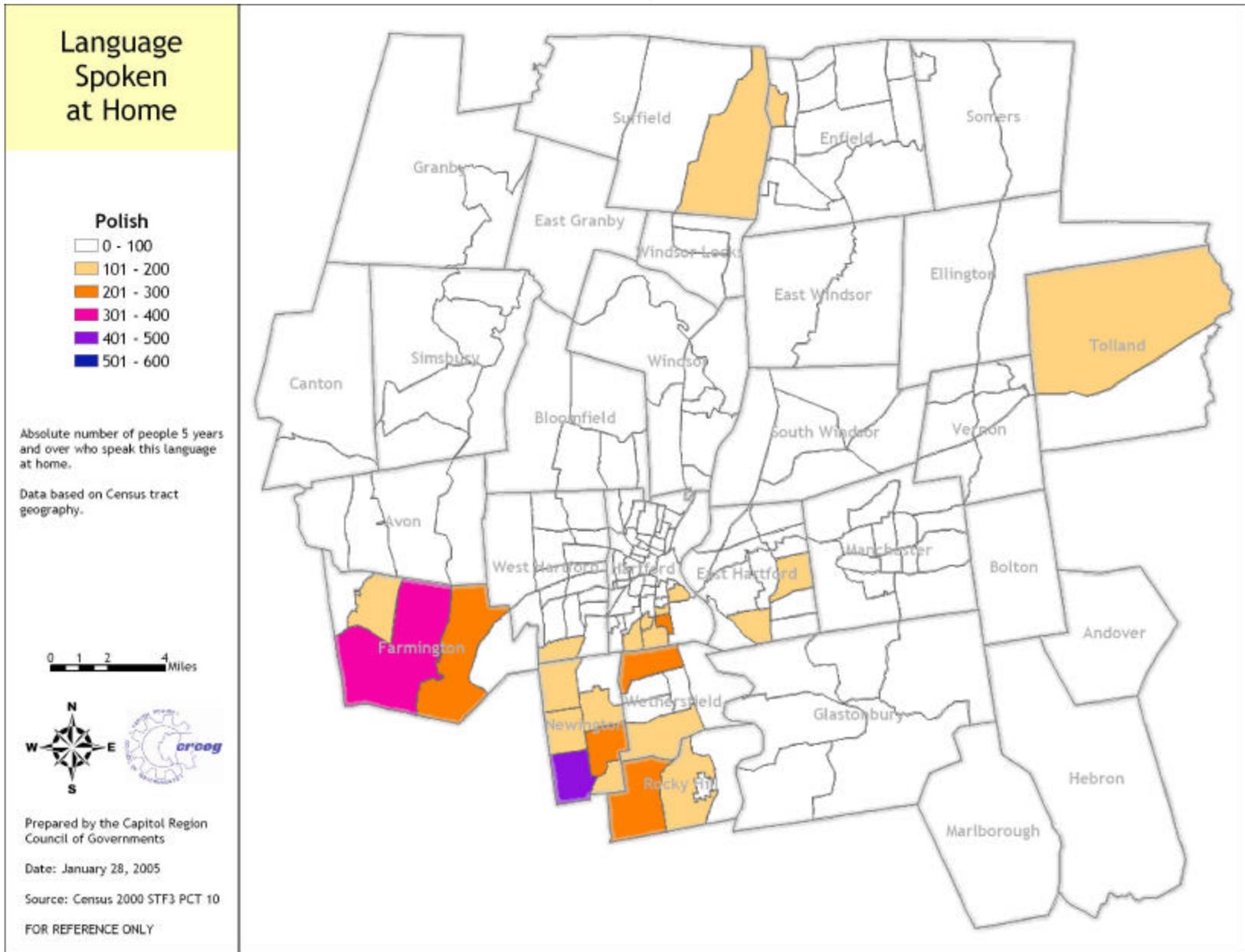
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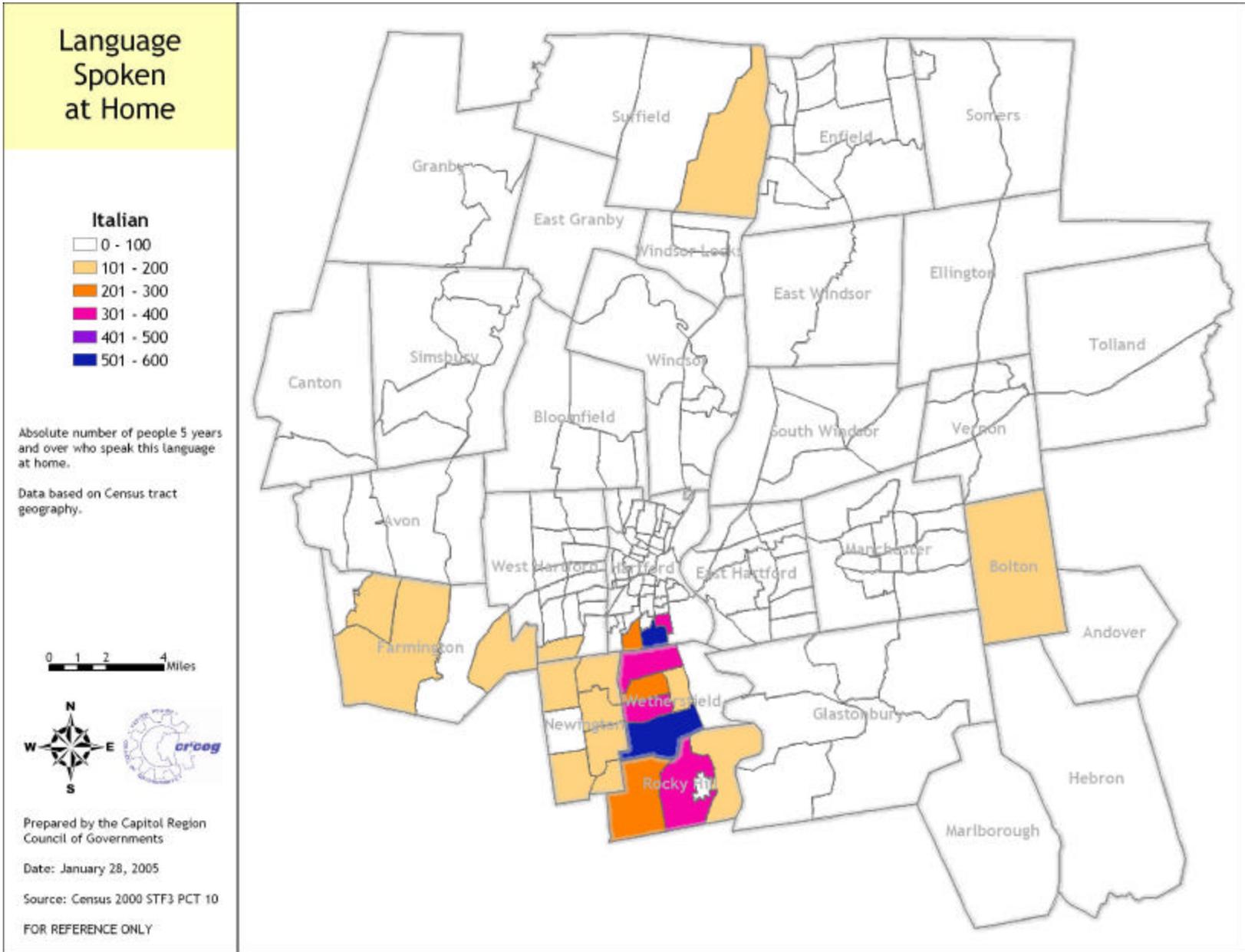
Map 3



Map 4



Map 5



Map 6

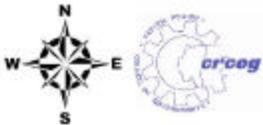
Language Spoken at Home

Portuguese/Creole

- 0 - 100
- 101 - 200
- 201 - 300
- 301 - 400
- 401 - 500
- 501 - 600

Absolute number of people 5 years and over who speak this language at home.

Data based on Census tract geography.

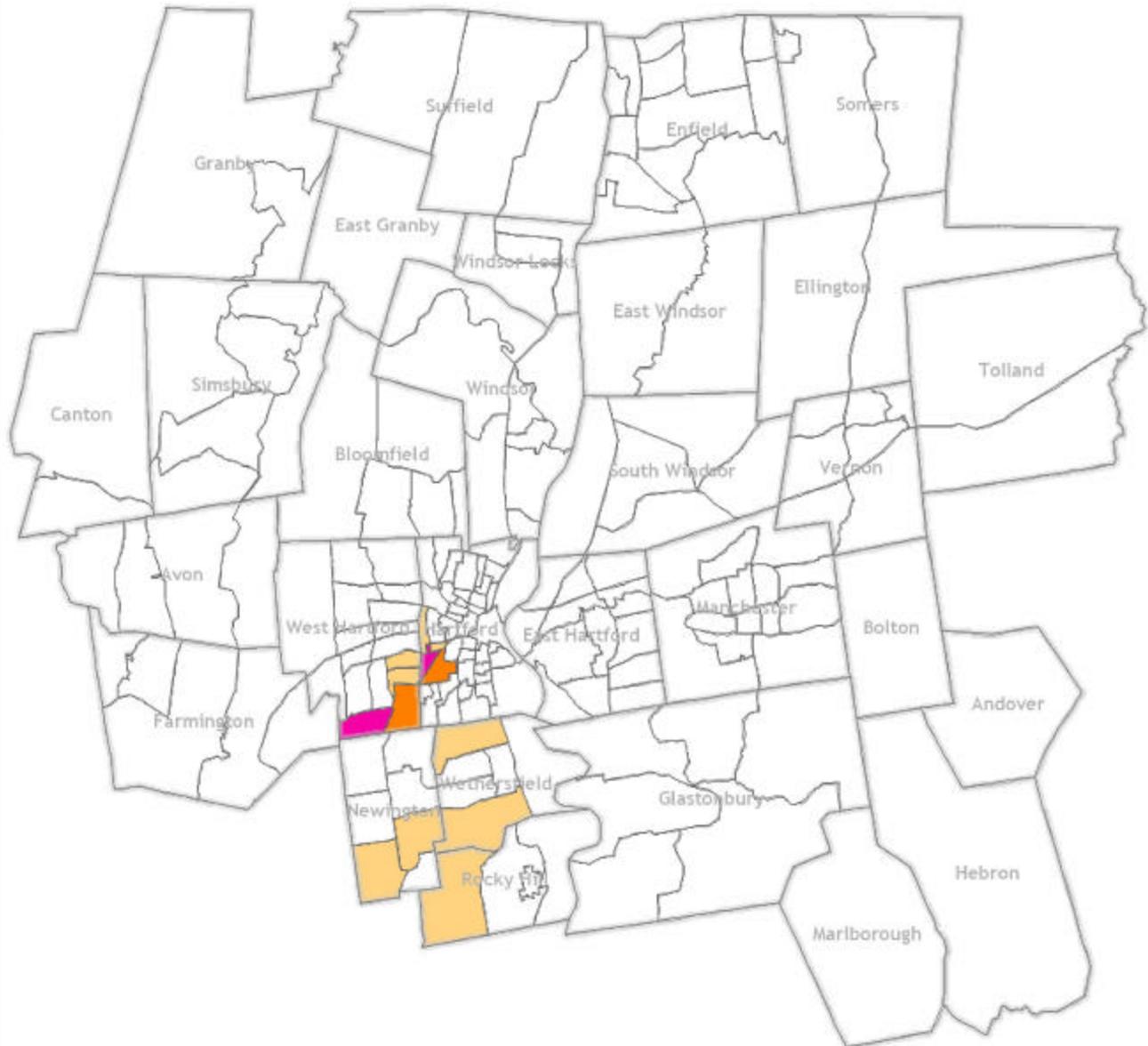


Prepared by the Capitol Region Council of Governments

Date: January 28, 2005

Source: Census 2000 STF3 PCT 10

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Policies & Practices

CRCOG contacted other area agencies to learn how they engage their non-English speaking clients. The intent was to identify policies and practices that were effective at involving or providing access to non-English speaking individuals. We found that none of the agencies had a formal written policy on how to engage individuals in other languages. However, some did have effective programs and practices for communicating with non-English speaking individuals. A summary of the practices of three agencies is provided below.

CT Transit

CT Transit is the primary public transit provider for the region. They operate over 30 local and 12 express bus routes using a fleet of about 230 buses. Approximately 50,000 passengers are served each weekday.

Focus on Spanish. CT Transit does not have a formal written policy regarding communications with non-English speaking persons. However, they recognized a need to develop their abilities to communicate in Spanish, and now have substantial Spanish communication capabilities and programs. This focus on Spanish is based on their own estimate that 30 percent of their customers are of Spanish decent.

CT Transit has developed the staff resources to support an extensive Spanish communications program. Many existing staff members are fluent in Spanish and are used to provide Spanish language support in CT Transit's customer service center, in the preparation of printed materials such as bus schedules and advertisements, and for translation services at public meetings. Each of these is discussed below.

Customer Service Center. A critical function at CT Transit is to handle the numerous questions they get from customers regarding bus service. Since they provide a service that generates many inquiries from the general public, and since a large percentage of their customers are of Spanish decent, it is important to communicate effectively with customers in English or Spanish. CT Transit accomplishes this function through its Customer Service Center. The Service Center is staffed 12

hours a day and representatives talk directly to customers who call in. Inquires from Spanish-speaking customers are handled easily and routinely since about half of the representatives are bilingual.

Printed Materials. It is CT Transit's long-standing practice to print many of their informational materials in Spanish. Some examples of these materials are system maps, service and fare change flyers, public hearing and meeting notices, and interior bus notices. The decision to produce these materials in Spanish was based on information received from on-board bus surveys and Census data for the Hartford area. Their next goal is to translate timetables and the CT Transit website into Spanish.

Public Meetings. CRCOG has partnered with CT Transit for meetings where non-English speaking individuals were specifically invited to attend. Since CT Transit staff has the ability to translate Spanish, this affords the opportunity for Spanish-speaking persons to understand the presentation and participate in the discussion. Working in partnership with CT Transit will allow successful delivery of services and participation in our programs and activities.

Hartford Board of Education

Focus on Spanish. The Hartford school system has 33 schools and 24,479 students. 57 percent of the students come from a home where English is not the dominant language spoken. Hispanic students make up 53 percent of the Hartford school enrollment. With 13,017 Hispanic students, the school system focuses their alternate language efforts on programs to assist Spanish-speaking students.

Dual Language Program. The Hartford Board of Education provides a successful program for non-English speakers called the Dual Language (Two-Way) Program. All students in a Dual Language Program are provided the opportunity to acquire a second language. This program teams up a Spanish-speaking student with an English-speaking student, and the curriculum is taught in both English and Spanish, alternating weeks. Dual Language Programs create an additive bilingual environment for all students since the first language is maintained while the second language is acquired. In this model, all students have the opportunity to be both first language models and second language learners. This new program is currently offered at six Hartford public schools.

ESL Program. The Hartford school system also provides ESL (English as a Second Language) instructors to assist all non-English speakers, but with a 53% Hispanic enrollment, their focus is also

on developing programs to assist the Spanish-speaking student. Thirteen of the district's 33 schools offer a bi-lingual program and every school in the district has an ESL instructor.

The Hartford Board of Education has chosen to focus on Spanish to satisfy the needs of its LEP students and has created a program to help increase the English skills of those students.

Capitol Workforce Partners

Capitol Workforce Partners, established under the federal Workforce Investment Act (WIA), coordinates comprehensive programs provided through contracted private and public partner organizations. These programs develop a skilled, educated and vital workforce to support the economic growth of the 37 municipalities in their region. CRCOG oversees Workforce Partners, and appoints representatives from business, education, labor, and public groups to serve as members of its board of directors. These directors have the responsibility of creating and implementing their strategic plan.

English Training for Clients. Workforce Partners does not have a formal policy to assist LEP individuals in their service area; however, they target services to LEP individuals through the CT Works centers. Their strategic plan mentions ESL (English as a Second Language) as a basic need of many job seekers. With this understanding of the importance of reaching non-English speaking individuals, their programs and activities have been set up to provide ESL training through the CT Works One Stop Centers.

Language Assistance Targeted to Specific Centers. Capitol Workforce Partners targets its services for non-English speaking individuals on a center by center basis. Since they have CT Works centers in several cities and towns, they tailor their language assistance programs to the populations groups served by each specific center.

Hartford Center – Spanish Focus. In the Hartford area, the focus is on Spanish. Due to the large Hispanic population in the Hartford area, the CT Works center in Hartford offers special programs to serve Spanish-speaking individuals. The training programs are intended to increase English skills and job marketability. Much of the training is provided by the Capitol Region Education Council (CREC), through an agreement with this regional education agency.

The greeter at the Hartford office is bilingual and can help Spanish-speaking clients who stop by the office without appointments. Two caseworkers also speak Spanish and can be seen by appointment.

New Britain Center – Polish Focus. New Britain is outside the Capitol Region, but the language assistance program offered at the New Britain center illustrates how language assistance programs can be tailored to different populations as needed. The focus in New Britain is on Polish since there is a large Polish community in that city.

In New Britain, the Workforce Partners collaborate with both the Capitol Region Education Council and the Polish American Foundation of Connecticut (PAFC) to address the employment needs of non-native speakers of English in the greater New Britain area. As a result of that collaborative effort, the PAFC and CT Works provided employment and training services to over 360 greater New Britain residents within the past 12 months and of that number, 96 have completed ESL classes or employment-skills training, and another 65 have found jobs. In addition, the CT Works Center has hired a Polish-speaking greeter who provides bi-lingual services in the Career Resource Center.

Conclusions

Focus on Spanish. The focus of the language assistance programs offered by the three agencies interviewed is Spanish. All three agencies found a need to develop special programs to communicate with Spanish-speaking residents in the Capitol Region. This reinforces the findings from the data analysis in the preceding chapter – that Spanish-speakers are by far the largest group of non-English speakers in the region. More importantly, the experience of these agencies shows that the language assistance programs will be well used and can make a difference in the lives of the individuals assisted.

Focus on Outreach Programs. Of the three agencies reviewed, two (Workforce Partners and Hartford Board of Education) are directly involved in the education or training of clients and developed language assistance programs to support that training mission. Since CRCOG has no training mission, the types of language assistance programs we need are more comparable to those of CT Transit. We need to improve our outreach efforts to contact the Hispanic community and to inform them of our programs and meetings, and then we need to be able to communicate with them when we succeed in attracting them to our meetings. In fact, our first successful efforts to engage the Hispanic community were meetings conducted jointly with CT Transit.

CT Transit as a Model & Resource. CT Transit's programs offer a good model on which to base future CRCOG programs. Their needs are similar, we share a common interest group – transit users, and their programs are effective. In addition to modeling our programs after CT Transit, we might consider using CT Transit as a resource for translation and interpretation services since they have developed substantial expertise in these areas.

Recommendations

This chapter provides a set of recommended guidelines for making CRCOG's transportation planning program more accessible to non-English speaking residents. It gives guidance on issues such as how, when, and where CRCOG should provide meeting notices in alternate languages, where translation services might be needed, and when documents will be translated to ensure that residents who cannot speak English are afforded opportunities to participate in our programs.

To succeed in engaging non-English speaking communities in our planning programs, CRCOG will have to commit effort and funding to items such as document translation, interpreter services for public meetings, and alternate language capabilities for the phone system. Since funding for these services is limited, we need to both target our efforts to services most needed and seek opportunities for collaboration with other organizations such as CT Transit, the Puerto Rican Forum, and the Hispanic Professional Network.

Focus on Spanish

The evaluations done in chapter 2 and chapter 3 both lead to the conclusion that Spanish should be the focus of any new CRCOG program developed to engage more non-English speaking residents. Spanish speakers are the dominant non-English speaking group and dominant LEP group in the region. Spanish speakers compose about half of all non-English speakers and a similar proportion of all LEP individuals. The next largest language group is only one-fifth the size of the Spanish group.

Given the overwhelming size of the Spanish language group, two sets of outreach guidelines were developed – one for engaging the Spanish-speaking community and a second for engaging other non-English speaking communities. Since Spanish is our primary focus group, the guidelines are more detailed and suggest a much higher level of effort. Most importantly, they suggest that some services be routinely provided and at a 'regional' level. By contrast, the guidelines for other language groups suggest a lower level of effort and are generally restricted to projects or studies that directly affect the neighborhoods with high concentrations of the language group in questions. The two sets of guidelines are presented below.

Guidelines for Outreach in Spanish

The Spanish language guidelines are presented in Table 2. For each major CRCOG program or activity, the table identifies appropriate actions for engaging the Spanish-speaking community. It identifies which documents should be translated into Spanish, which communications should be in Spanish, and which activities might require interpreter services.

The highlights of the guidelines are:

- **General.** The guidelines are based on the premise that the large size and geographic extent of the Spanish-speaking community creates a need to routinely conduct some of CRCOG's most basic public communications in Spanish. This will assure that our primary planning functions such as the preparation of the Regional Transportation Plan and the Transportation Improvement Program (TIP) are accessible to the Hispanic community.
- **Meeting notices.** Notices should be published in Spanish for most major activities including regionwide programs and plans such as the TIP and the Regional Transportation Plan. For regularly scheduled committee meetings such as the Transportation Committee and Policy Board, the notices need not be in Spanish, but a note should be added to the notice in Spanish that persons can request that interpreter services be made available for the meeting.
- **Newsletters, Brochures, etc.** Basic CRCOG brochures such as the one explaining the TIP and the one explaining the Metropolitan Planning Organization (MPO) planning process should be printed in Spanish as well as English.
- **Reports.** While it is impractical at this time to do Spanish translations of major CRCOG reports, it is recommended that Spanish-language summaries be prepared. Reports suggested for Spanish-language summaries are the Regional Transportation Plan, transit studies, and corridor study reports if the corridor affects a Spanish-language target area. The Regional Plan warrants inclusion because it is the single most important report prepared by CRCOG's transportation program. Transit reports warrant inclusion because Hispanic residents constitute 30 percent of the existing transit users (CT Transit estimate). Corridor study reports warrant inclusion only if they affect neighborhoods that have a high proportion of Hispanic residents, in which case the Hispanic residents have a vested interest in the study.

Table 2 – Guidelines for Outreach in Spanish

CRCOG Program or Activity	Publication or Communication Option:				
	Meeting notices	Newsletters, brochures, ...	Reports	Interpreter services for meetings	Web/Phones/Other
Regional Transportation Plan	Spanish notice with note to call in advance for interpreter services at meeting	-----	Summary in Spanish	If requested in advance	<p><u>Web.</u> All written materials referenced in other cells in this table should also be posted to the web.</p> <p><u>Web.</u> Add special section on CRCOG’s Spanish language assistance options.</p> <p><u>Phone.</u> Spanish-language message on automated phone system.</p> <p><u>Phone.</u> Contract with other agency to handle Spanish language phone calls. If demand warrants dedicate special phone line to Spanish language inquires.</p>
Transportation Improvement Program (TIP)	Spanish notice with note to call in advance for interpreter services at meeting	TIP brochure in Spanish	-----	If requested in advance	
Corridor studies	-----	-----	-----	-----	
Corridor studies in primary target areas*	Spanish notice & statement that interpreter will be at meeting	Spanish	Summary in Spanish	Normally have interpreter present at public meetings	
Corridor studies in secondary target areas*	Spanish notice with note to call in advance for interpreter services at meeting	Upon request	Summary in Spanish upon request	If requested in advance	
Transit studies	Spanish notice & statement that interpreter will be at meeting		Summary in Spanish	Normally have interpreter present at public meetings	
Bus Users Forum	Spanish notice & statement that interpreter will be at meeting	-----	-----	Normally have interpreter present at public meetings	
Transportation Committee	Add note in Spanish to call in advance for interpreter services at meeting	MPO brochure in Spanish	-----	If requested in advance	
Policy Board	Add note in Spanish to call in advance for interpreter services at meeting	-----	-----	If requested in advance	

* see text for definition of primary and secondary “target area”

- **Interpreter Services.** Interpreter services can be expensive, so the guidelines suggest two levels of response.
 - *On Request Basis.* For many meetings, such as routine CRCOG committee meetings, there will rarely be a need to provide interpreter services. However, we should be prepared to provide these services when needed. Furthermore, we need to notify Spanish-speaking residents that interpreter services will be provided if they request them. Therefore, a note should be added to the notice of every major CRCOG meeting that interpreter services are available upon request. The note should be in Spanish.
 - *Standard Procedure.* For certain types of meetings, we should provide Spanish interpreter service as the normal or standard operating procedure. These include the Bus Users Forum, public meetings conducted for transit studies, and for public meetings conducted for corridor studies affecting neighborhoods with large Hispanic populations. This would apply to any other meeting for which we anticipate a high level of interest from the Hispanic community.
- **CRCOG Website.** The web site should be made accessible to the Spanish-speaking community. A section should be added to explain all of CRCOG Spanish-language policies and options. All Spanish-language documents prepared by CRCOG should also be posted on the web.
- **Phone Services.** CRCOG's phone system needs to be made accessible to Spanish speakers. Options for doing so include providing a Spanish language message on the automated phone system, and/or contracting with another agency to handle Spanish language phone calls.

Spanish-Language Target Areas. The guidelines refer to Spanish language target areas, which are simply neighborhoods where Spanish-speaking residents compose a significant proportion of the population. It is suggested that two target areas be considered: a primary target area and a secondary target area.

Primary Target Area (over 20% LEP) – The primary target area includes those neighborhoods with a high proportion of Spanish-speaking LEP residents. When corridor studies are conducted in these areas, communications would automatically be provided in Spanish as well as English.

We suggest that the threshold for defining this primary target area be set at 20 percent and be based on Map 2 (page 12). Any block group where the proportion of the population that is classified as Spanish LEP equals or exceeds 20 percent is part of the primary target area. This percentage should be re-evaluated as experience with these guidelines is gained. The 20-percent level could be adjusted up or down based on experience and as evidence of the level of demand for services dictates.

Secondary Target Area (5-20% LEP) - The secondary target area includes those areas where the Spanish-speaking LEP population composes between 5 and 20 percent of the block group population. When corridor studies are conducted in these areas, meeting notices would be provided in Spanish, but all other communications would be provided in Spanish only if requested.

Guidelines for Outreach in Languages other than Spanish

The guidelines for engaging other non-English speaking communities in CRCOG programs are provided in Table 3. The proposed level of effort is greatly reduced from the outreach in Spanish and is focused exclusively on special studies or projects that affect non-English target areas.

Target Areas. Since the LEP data for these other languages (French, Polish, Italian, and Portuguese) is not available from the Census, CRCOG will define target areas on a case-by-case basis. Maps 3-6 (chapter 2) will be reviewed at the start of each new study to determine if any of the neighborhoods within the study area warrants treatment as a target area. Review of the language maps will be supplemented by discussions with local officials or others knowledgeable about the areas in question.

Closing Comment

We do not profess to have the right answers for engaging non-English speaking communities in our various planning programs and activities. We expect that these guidelines will need to be adjusted as we gain experience and learn from our successes and failures. However, we are committed to removing as many language barriers as possible and making our programs accessible for those who want to participate in our process.

CRCOG efforts in this regard will be consistent with Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" dated August 11, 2000, and other related guidance from the Federal Highway Administration and Federal Transit Administration.

Table 3 – Guidelines for Outreach in Languages other than Spanish

CRCOG Program or Activity	Publication or Communication Option:				Web/Phones/Other
	Meeting notices	Newsletters, brochures, ...	Reports	Interpreter services for meetings	
Regional Transportation Plan	-----	-----	-----	-----	<u>Web.</u> All written materials referenced in other cells in this table should also be posted to the web.
Transportation Improvement Program (TIP)	-----	-----	-----	-----	
Corridor studies	-----	-----	-----	-----	
Corridor studies in Non-English target areas*	Publish in alternate language Add note to call in advance for interpreter services at meeting	If requested in advance	If requested in advance	If requested in advance. Optional: Hire interpreter for first meeting to gauge interest. If not needed, discontinue unless requested in advance	
Transit studies	-----	-----	-----	-----	
Bus Users Forum	-----	-----	-----	-----	
Transportation Committee	-----	-----	-----	-----	
Policy Board	-----	-----	-----	-----	

* see text for definition of “target area”

Opportunities for Public Comment

Federal regulations require a minimum 30-day period for public comment prior to the adoption of an MPO transportation planning document, and a 45-day period for public comment prior to the adoption or amendment of a public involvement policy. Since this document is to provide input to CRCOG's public involvement policy, a 45-day comment period was observed.

Opportunities for public comment included public comment forums at the March 21 Transportation Committee (with the availability of a Spanish interpreter), at a special meeting on April 18, during the regularly scheduled Transportation Committee meeting on April 18, and at the May 25 Policy Board meeting. Written or telephone comments were accepted until the May 25 Policy Board meeting, although the public was urged to submit those comments by April 17, to allow full consideration by both the Transportation Committee and the Policy Board.

A notice of the opportunities for comment was sent to the town clerks in the Region on February 23, 2005. This notice and the documents themselves were also posted on the CRCOG website the same day. A legal notice was published in the Hartford Courant and in the Hartford News (in both English and Spanish) on March 9. A news release was distributed on March 15 to 56 members of the media and to the four area cable access channels. The notice was posted on the Hispanic Professional Network requesting commentary and linking to the document on CRCOG's website. A flyer announcing opportunities to comment were emailed to the Environmental Justice mailing list. All opportunities for comment were posted on the CRCOG website.

The document was discussed and endorsed for public comment at the February 3, 2005 meeting of the Capitol Region Environmental Justice Advisory Board.

One telephoned comment was received. Most of the comments received in that telephone call have been incorporated into this final draft, as shown in the table on the next page.

The CRCOG Transportation Committee endorsed this Reducing Language Barriers discussion paper on April 18, 2005 and the CRCOG Policy Board approved the document on May 25, 2005. The recommendations in this document were incorporated into the CRCOG Public Involvement Policy also on May 25, 2005.

Response to Comments on CRCOG's Reducing Language Barriers Report

Comment	Action
Title page – say “who don’t speak English” or “who have Limited English Proficiency (LEP)” in the second line. Saying “who have difficulty speaking in English” has a negative connotation like a learning disorder.	Changed to “who don’t speak English well.” We wanted to avoid the government jargon of “limited English proficiency” and at the same time be clear that we are reaching out even to those who may speak some English.
Instead of using Spanish Language Guidelines – Spanish Outreach Guidelines Or Initiatives OR LEP Outreach Guidelines Or Initiatives. What is described in table 2 is not what I think of when I read Spanish Language Guidelines.	Changed to “Guidelines for Outreach in Spanish.” Other table was changed to “Guidelines for Outreach in Languages Other than Spanish” to be comparable.
Page 22 opening statement – instead of “appropriate options” use something that speaks to commitment. Options leaves me feeling like you may do this or your may not.	Changed to “appropriate actions.”
Bold items on page 22 – GENERAL; MEETING NOTICES; NEWSLETTERS, BROCHURES, Etc.; and REPORTS.	Done: formatting continued onto page 23, as well.
Spell out TIP and MPO in Table 2 and elsewhere as necessary. If these are not spelled out in the report, add a page describing/explaining all the acronyms	Done: spelled out on first mention and in the Tables.