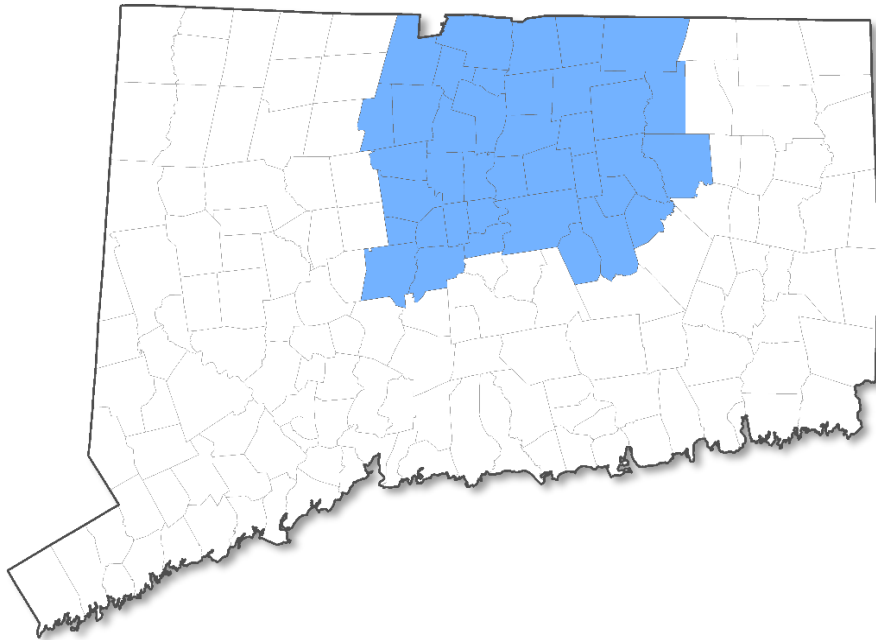


Language Assistance Plan

Prepared by the
Capitol Region Council of Governments



CRCOG CAPITOL REGION
COUNCIL OF GOVERNMENTS
Working together for a better region.

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July 2019

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INTRODUCTION

It is the policy of the Capitol Region Council of Governments (CRCOG), as the Metropolitan Planning Organization (MPO) for the Metro Hartford Region, that persons with Limited English Proficiency (LEP) are neither discriminated against nor denied meaningful access to the programs, activities, and services provided by the MPO. CRCOG has developed this Language Assistance Plan to ensure that staff employs appropriate strategies to assess needs for language services, to implement language services that provide meaningful access to the MPO's transportation-planning process, and to publish information regarding these services.

Title VI of the Civil Rights Act of 1964 prohibits discrimination by federal agencies and recipients and subrecipients of their financial assistance on the basis of national origin, which is signified by LEP. Further, Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (2000), directs federal agencies, as well as recipients of federal financial assistance, to provide meaningful language access for LEP persons to agency services.

To fulfill these responsibilities, CRCOG's Language Assistance Plan includes the following:

- A Four Factor Analysis
- Details of Available Language Assistance
- A Process for Monitoring and Updating the Language Assistance Plan
- Information on Relevant CRCOG Staff Training

FOUR FACTOR ANALYSIS

Under guidance from the United States Department of Transportation (USDOT), recipients of federal funds must take reasonable steps to ensure meaningful access to their programs and activities by persons with Limited-English Proficiency (LEP). The starting point for this effort is a Four Factor Analysis that includes the following considerations:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- (2) The frequency with which LEP individuals come in contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program to people's lives; and
- (4) The resources available to the grantee/recipient and costs.

CRCOG is committed to making its programs accessible to LEP populations within the Capitol Region, and as such has conducted a Four Factor Analysis to better understand the needs and opportunities related to outreach to LEP populations within the Region.

FACTOR 1. LEP POPULATIONS

Of the 924,815 persons residing in the Capitol Region who are five-years of age or older, 78,037 (8.44%) are identified as LEP.¹ The languages with LEP populations of at least 1,000 persons who speak English "less than very well" are summarized in Figure 1 and shown geographically in Figure 2.

¹ 2011-2015, 5-year estimate ACS data.

Figure 1: Summary of LEP Populations

Language	# of LEP	% of LEP	% of Total Population
Spanish	39,336	50.41%	4.25%
Polish	7,867	10.08%	0.85%
Chinese	2,912	3.73%	0.31%
Portuguese or Portuguese Creole	2,726	3.49%	0.29%
Italian	2,606	3.33%	0.28%
French	2,342	3.00%	0.25%
Vietnamese	1,660	2.13%	0.18%
Russian	1,441	1.85%	0.16%
Hindi	1,278	1.64%	0.14%
Gujarati	1,084	1.39%	0.12%
Arabic	1,054	1.35%	0.11%
Korean	1,050	1.35%	0.11%

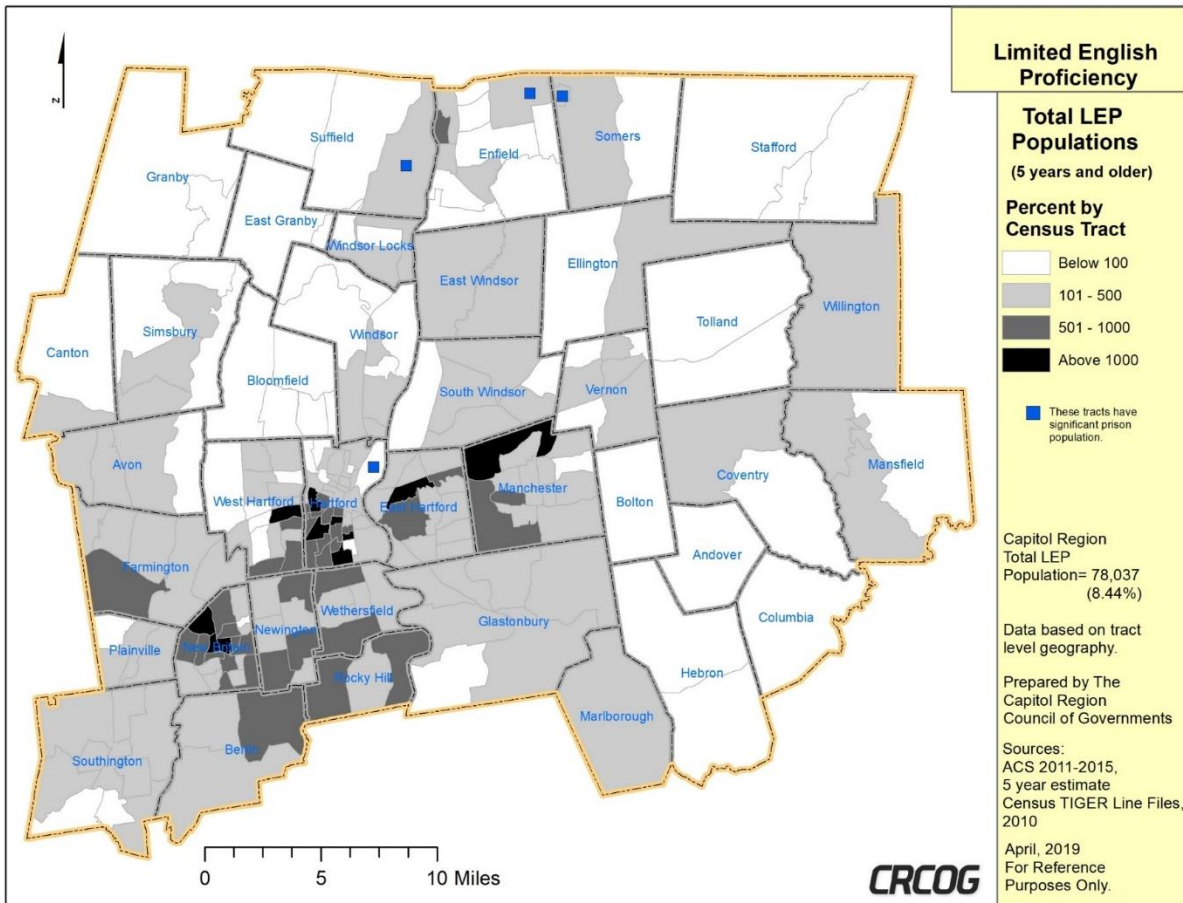


Figure 2: Map of CRCOG LEP Populations

FACTOR 2. LEP CONTACT FREQUENCY

It is expected that contact with LEP persons will occur via meeting attendance, office visits, phone calls, printed materials, and website interaction. Meeting agendas include notices in English, Spanish, and Polish that translation and interpretation services are available upon request. For corridor studies, public outreach announcements and handouts, as well as Final Report summaries, are translated as deemed necessary for a given study area. CRCOG has also implemented the standard that as core transportation documents are updated, executive summaries of these documents are translated into Spanish and Polish.

Figure 1 demonstrates that in addition to Spanish and Polish there are ten additional languages that meet USDOT's Safe Harbor threshold of at least 1,000 individuals. While it would be cost-prohibitive to translate all of CRCOG's core documents into twelve languages, CRCOG assesses language access needs on a per project basis. This analysis identifies the LEP populations that are most likely to be affected by the project and which outreach, translation, and/or interpretation measures are necessary to ensure equal access to all impacted individuals. CRCOG's Title VI Website (<http://crcog.org/title-vi/>) will also be updated in FY2020 to include a statement in each of the Safe Harbor languages that document translation and/or interpretation services are available upon request.

CRCOG staff monitor the frequency with which LEP persons come into contact with CRCOG's transportation program. In the past three years, there have been no requests for translation services or interpretation services at Transportation Committee meetings or public meetings related to corridor studies or core document updates. During this time, one phone call was received from a Spanish-speaking individual looking for information on transit services, and one Spanish survey was completed in-person with the assistance of a translator at a public outreach event that was held at a bus stop as part of CRCOG's Comprehensive Transit Service Analysis.

FACTOR 3. NATURE AND IMPORTANCE OF PROGRAMS

As the Metropolitan Planning Organization (MPO) for the Metro Hartford area, CRCOG uses federal funds to plan for future transportation improvements and projects. It is important for LEP persons to have equal ability to participate in the planning process of these efforts, particularly through attendance at public meetings or submissions during comment periods. Such involvement will help to ensure that these populations receive their fair share of benefits from CRCOG's transportation program and are not disproportionately impacted by transportation improvements and projects that are supported by CRCOG.

FACTOR 4. AVAILABLE RESOURCES

CRCOG has various resources available to enable staff to engage LEP persons in the agency's transportation planning program. These resources include the following:

- Staff. CRCOG currently has one full-time staff member who is fluent in Polish, and one part-time staff member who is fluent in Spanish.
- Language Line. All CRCOG staff have been trained on using Language Line, an interpreter services provider that is accessible via phone. CRCOG is charged a per-minute fee for use of this service. The front desk features an "I speak" card in 20 languages so that LEP individuals can identify the translation services that they require.

- *Website Translation.* CRCOG’s website features a Google Translate widget, which allows content to be viewed in many different languages, including all of CRCOG’s Safe Harbor Languages identified in Figure 1.
- *Non-English Media and Stakeholders.* CRCOG maintains a list of non-English media outlets and coordinates the translation and publishing of meeting announcements as needed. CRCOG also partners with local community groups to coordinate public outreach with traditionally underserved populations, including LEP individuals.
- *Consultants.* When consultants are used for corridor studies or the development of core transportation plans, the scope of services for each effort identifies the associated translation and LEP outreach needs. During its qualifications-based selection process, CRCOG ensures that the selected consultant team has the necessary translation and/or interpretation skills.
- *Professional Services.* CRCOG utilizes professional services when internally-prepared documents need to be translated. CRCOG includes estimates for these efforts within its budget. In its FY2020-2021 Unified Planning Work Program (UPWP), CRCOG identified funding to translate numerous items. For example, while CRCOG’s existing Title VI documents and MPO Brochure are already available in English and Spanish, CRCOG also has plans to make them available in Polish. CRCOG will also be developing a pamphlet that summarizes its core documents – UPWP, Transportation Improvement Program, and Metropolitan Transportation Plan – in English, Spanish, and Polish. CRCOG’s Title VI Website (<http://crcog.org/title-vi/>) will also be updated to include a statement in each of CRCOG’s Safe Harbor languages that document translation and/or interpretation services are available upon request.

Costs for translation and interpretation vary based on service type and scope. Funding for necessary services are assessed and incorporated into budgets both on the Transportation Department and project / corridor study levels.

AVAILABLE LANGUAGE ASSISTANCE

ORAL LANGUAGE ASSISTANCE

Notices for all CRCOG meetings related to the agency’s transportation program include a statement in English, Spanish, and Polish that translation services are available upon request. CRCOG’s Title VI Website (<http://crcog.org/title-vi/>) will be updated in FY2020 to include a statement in each of CRCOG’s twelve Safe Harbor languages that interpretation services are available upon request. CRCOG currently has one full-time staff member who is fluent in Polish, and one part-time staff member who is fluent in Spanish. All CRCOG staff have been trained on using Language Line, an interpreter services provider that is accessible via phone. An “I speak” card featuring 20 languages allows LEP individuals to identify the translation services they require. This card is available at CRCOG’s front desk and will be available at CRCOG public meetings.

WRITTEN LANGUAGE ASSISTANCE

While CRCOG documents have been translated into Spanish and/or Polish, CRCOG’s Unified Planning Work Program (UPWP) for FY2020-2021 includes funding for additional translation

efforts. For example, while CRCOG's MPO Brochure and Title VI documents are available in English and Spanish, CRCOG intends to make them available in Polish as well. CRCOG will also be developing a pamphlet that summarizes its core documents – UPWP, Transportation Improvement Program, and Metropolitan Transportation Plan – in English, Spanish, and Polish. By the end of FY2021, CRCOG's following vital documents will be available in English, Spanish, and Polish:

- Core Document (UPWP, TIP, MTP) Pamphlet
- Language Assistance Plan
- Metropolitan Transportation Plan Executive Summary (complete in April 2019)
- MPO Brochure
- Title VI Notice
- Title VI Complaint Process
- Title VI Complaint Form

Figure 1 demonstrates that in addition to Spanish and Polish there are ten additional languages within the Capitol Region that meet USDOT's Safe Harbor threshold of at least 1,000 individuals. While it would be cost-prohibitive to translate all of CRCOG's core documents into twelve languages, CRCOG's Title VI Website (<http://crcog.org/title-vi/>) will be updated in FY2020 to include a statement in each of these languages that document translation is available upon request.

At the onset of each corridor study, CRCOG conducts an Environmental Justice (EJ) and LEP Analysis. This analysis is used to identify minority, low-income, and LEP populations within a study area. Based on the populations identified, recommendations for a tailored public outreach program for the study are identified. Outreach strategies can include, but are not limited to, coordination with established neighborhood groups; presentations at regularly scheduled meetings of community groups; use of small, informal meetings or focus groups; informational tables at community events; document translation; and/or interpretation services. CRCOG presents the EJ and LEP Analysis at the first Technical Advisory Committee meeting of the study to ensure that the analysis accurately reflects what local representatives see in their communities. Outreach materials for corridor studies are prepared on an as-needed basis in accordance with the EJ and LEP Analysis for that effort. Examples of translated materials prepared by CRCOG include handouts, newsletters, meeting flyers and advertisements, and Executive Summary documents.

CRCOG WEBSITE

In order to accommodate website translation needs, the CRCOG website hosts Google Translate, a browser-based tool that translates website content into more than one hundred languages, including all safe harbor languages within the CRCOG Region. In order to meet accessibility requirements for individuals with low or no vision, documents are posted on the website as PDF files and in HTML, which allows them to be read aloud by a screen reader and enables the use of Google Translate.

MONITORING AND UPDATING THE PLAN

CRCOG staff has developed the *Atlas of Title VI and Environmental Justice Populations in the Capitol Region*, a series of maps showing concentrations of minority, LEP, low-income, and zero-vehicle household populations within the CRCOG Region. This document is used as an

informational guide for CRCOG’s transportation planning processes in order to help identify the type of public outreach and language support needed for planning activities such as corridor studies, document preparation, and project development. The Atlas is updated regularly using the most recently available data, with the most recent version of the Atlas being produced in June 2019. CRCOG’s Language Assistance Plan will be reviewed and updated as needed on the same schedule as the Atlas, with the next update anticipated for Summer 2022.

STAFF TRAINING

CRCOG Transportation Staff attends trainings on Title VI and Environmental Justice as such opportunities are available. Figure 3 summarizes the most recent three years of relevant CRCOG staff trainings and supplemental webinars, conferences, and forums.

Figure 3: CRCOG Staff Title VI/EJ Training (2016-2019)

Training		
November 7, 2016	CTDOT “Title VI Training”	3 staff members
February 2017	CRCOG training on Language Line services	All staff
September 12-13, 2017	FHWA “Fundamentals of Environmental Justice” (NHI #142042)	2 staff members
December 20, 2018	CRCOG memo regarding available language assistance services	All staff
February 2019	CTDOT “Title VI Training Module for Subrecipients of FHWA Funds”	11 staff members
Webinars/Conferences/Forums		
January 28, 2016	DCP Cross-Cultural Communication Symposium: The Role of Ethnic and Traditional Media in Public Outreach and Advocacy	2 staff members
March 8-10, 2016	USDOT Civil Rights Virtual Symposium	2 staff members
May 18, 2016	“Moving Environmental Justice Forward in Transportation Planning and Project Development” webinar	1 staff member
June 21, 2017	DCP Cross-Cultural Communication Symposium: Telling Your Story	2 staff members
October 16, 2017	CACT Statewide Transportation Expo, sessions on Title VI and LEP	1 staff member
March 13-14, 2018	USDOT Civil Rights Virtual Symposium	2 staff members
January 30, 2019	FHWA “Addressing Changing Demographics in Environmental Justice Analysis, State of the Practice” webinar	1 staff member
March 8, 2019	“Equitable Public Engagement: Participatory Budgeting for Transportation Funds” webinar	1 staff member
June 6, 2019	DCP Cross-Cultural Communication Symposium: Moving from Empathy to Action	2 staff members

CONCLUSION

CRCOG has made, and will continue to make, its transportation planning program accessible to all residents of the Capitol Region, including those individuals with Limited-English Proficiency. CRCOG recognizes the importance of its efforts to the lives of LEP individuals and will continue to identify ways to ensure that these populations have access to CRCOG's work and have the opportunity to meaningfully engage in the planning for the Region's transportation system.