

Language Assistance Plan

For
Washington Metropolitan Area
Transit Authority

October 2007

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EXECUTIVE SUMMARY

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency”. This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Washington Metropolitan Area Transit Authority (WMATA) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. WMATA has devoted significant resources to provide oral and written language assistance services to LEP individuals. In March 2007, WMATA initiated an effort to document current language assistance services and develop a Language Assistance Plan (LAP) that meets the requirements of the DOT LEP Guidance.

Key findings of the Language Assistance Plan include:

- More than 800,000 persons, 21 percent of the Washington region, are foreign born.
- Twenty-three percent of the region’s population speaks a language other than English at home, ten percent of which speak English less than “very well”.
- In the WMATA service area, Arlington, VA; Alexandria VA; Fairfax County, VA; and Montgomery County, MD have LEP populations exceeding ten percent.
- Of the languages spoken by the LEP population in the region, the following are most prevalent and appear to be growing:

<u>Language</u>	<u>Number of LEP Speakers</u>	<u>Percent of all LEP Speakers</u>
Spanish	215,581	52%
Korean	29,919	7%
Vietnamese	24,181	6%
Chinese	21,722	5%
French	12,705	3%
Arabic	8,197	2%
Amharic	7,377	2%

- Current data from public school districts in the WMATA service area primarily confirm the census data, but identify a few communities where concentrations of LEP persons have located since the 2000 Census.

WMATA has not maintained data to document the frequency of contact by LEP persons with its services, however there is some available data to estimate the frequency of contact:

- Less than one percent of all calls to WMATA’s Call Center or visits to WMATA websites involve use of language assistance services.
- Approximately ten percent of Pocket Guide downloads from the website are translated into languages other than English.
- Utilizing ridership data for Metrobus, Metrorail, and MetroAccess and applying proportions of general population riders in each jurisdiction to the proportion of LEP persons in those jurisdictions, the following estimates of LEP riders are:
 - Metrorail – 15,500 daily LEP riders, approximately five percent of all riders
 - Metrobus – 62,500 daily LEP riders, nearly 25 percent of all riders
 - Metro Access – 30 daily LEP riders, less than one percent of all riders

As shown above, a substantial majority of the LEP encounters with WMATA occur on Metrobus. Accordingly, WMATA resources for language assistance should be focused on Metrobus activities and the Spanish –speaking public. WMATA currently offers a number of language assistance services, including, but not limited to:

- LEP customers who call the Metro Service Call Center have direct access to Spanish-speaking customer service representatives and can be connected to a language line service that can communicate in over 85 languages.
- Metro Pocket Guides are available in the following eleven languages: Arabic, Chinese, English, French, German, Italian, Japanese, Korean, Portuguese, Spanish and Vietnamese. The Guides can be found at Metro offices, station kiosks, and can be downloaded from the WMATA website.
- WMATA has produced a “How to Ride Metro” video/DVD in English and four other languages: Spanish, Vietnamese, Korean, and Japanese.
- Bilingual Metro staff works directly with the Spanish media to provide Metro information to their readers, listeners, and viewers.
- Many Metrorail system-wide announcements are made in English and Spanish.
- All Metrobus timetables are produced in English/Spanish bilingual version and are available on the WMATA website.
- WMATA places Spanish language signage in selected Metrorail stations, as appropriate, for specific events and to announce construction or other situations important to customer safety.

To meet the needs of the substantial and growing LEP population in WMATA’s service area, it is recommended that the following additional strategies and actions be phased in over the next three years:

- Adopt standard operating procedures (SOPs) to be used by all WMATA frontline employees and contractors when encountering a LEP customer. The SOP may differ for Metrobus, Metrorail and MetroAccess.
- Expand and enhance the written translation services available on WMATA’s website to add the languages most frequently spoken by LEP persons in the service area.

- Provide written notification, in seven languages (Spanish, Korean, Vietnamese, Chinese, French, Arabic and Amharic), that language assistance services are available, upon request, free of charge.
- Distribute WMATA multilingual materials, such as the Metro Pocket Guide, bilingual bus schedules and “How to Ride Metro” videos/DVDs to community organizations that assist the LEP population.
- Post the LEP “How to Ride Metro” videos/DVDs on WMATA website.
- Develop and implement a program of “training” LEP community leaders so that they can “train” LEP persons in their communities on how to use WMATA services and how to obtain language assistance services.
- Increase WMATA’s internal bilingual capabilities by identifying and certifying bilingual employees to provide oral language assistance, as needed.
- WMATA should also continue its efforts to recruit and hire bilingual frontline employees by participating in community job fairs and advertising in publications and media that reach diverse populations.
- Expand the program for providing public announcements on Metrorail and Metrobus in LEP languages.
- Consider increased use of pictographs or other symbols throughout the Metro system to convey messages on how to use Metro and Metro safety information.
- Develop and implement frontline staff training and supervisory training on WMATA LEP policies and procedures.
- Enhance current mandatory training in customer service and diversity awareness to include cultural sensitivity to LEP persons.
- Solicit feedback from the LEP community, the National Capital Region Transportation Planning Board (TPB) Access For All (AFA) Committee’s Subcommittee on Transit Information for Limited English Proficiency (LEP), and WMATA’s Rider’s Advisory Council (RAC) in ongoing efforts to monitor and update the LAP.
- Establish a Language Access Plan (LAP) Committee and appoint a LAP Coordinator.
- Utilize bilingual Metro staff to monitor language assistance measures by using the website, contacting the call center and by posing as customers to identify continuing barriers faced by LEP persons.
- Provide frontline personnel with language training that will provide relevant words and phrases that would be useful in encounters with customers. Start with the most prevalent language spoken by LEP persons in the region.

Many of these new measures will be implemented initially in the three areas identified as ‘hot spots’ where there are high concentrations of LEP speakers – Baileys Crossroads, Virginia, Langley Park, Maryland, and Columbia Heights, District of Columbia.

A three-year implementation schedule, highlighting the most crucial language assistance measures, is attached.

I. BACKGROUND

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on Limited English Proficient (LEP) persons because such conduct constitutes national origin discrimination.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121, August 16, 2000 (*Appendix A*), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001 by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to Limited English Proficient users of Federal programs.

The U.S. DOT published revised guidance for its recipients on December 14, 2005 (*Appendix B*). This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on April 13, 2007 (*Appendix C*). Chapter IV part 4 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and subrecipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should 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.

Individuals who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or “LEP.” According to the 2000 U.S. Census, more than 10 million people reported that they do not speak English at all or do not speak English well. The number of persons reporting that they do not speak English at all or do not speak English well grew by 65 percent from 1990 to 2000. Among limited English speakers, Spanish is the language most frequently spoken, followed by Chinese (Cantonese or Mandarin), Vietnamese, and Korean.

Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency’s broader immigrant communities in two important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and linguistically isolated populations and ensuring that an agency’s transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

II. WMATA EFFORTS TO SERVE LEP PERSONS

The Washington Metropolitan Area Transit Authority (WMATA) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. Several of the language assistance services already provided by WMATA are:

- LEP customers who call the Metro Service Call Center have direct access to Spanish-speaking customer service representatives and can be connected to a language line service that can communicate in over 85 languages.
- Metro Pocket Guides are available in the following eleven languages: Arabic, Chinese, English, French, German, Italian, Japanese, Korean, Portuguese, Spanish and Vietnamese. The Guides can be found at Metro offices, station kiosks, and can be downloaded from the WMATA website.
- Bilingual Metro staff work directly with the Spanish media to provide Metro information to their readers, listeners and viewers
- Many Metrorail system-wide announcements are made in English and Spanish.
- All Metrobus timetables are produced in English/Spanish bilingual version and are available on the WMATA website.
- WMATA places Spanish language signage in selected Metrorail stations, as appropriate, for specific events and to announce construction or other situations important to customer safety.
- WMATA has produced “How to Ride Metro” videos/DVDs in English and four other languages: Spanish, Vietnamese, Korean, and Japanese.

Since 2001, WMATA has participated in the Access For All (AFA) Advisory Committee of the National Capital Region Transportation Planning Board (TPB). In 2002, a *Subcommittee on Transit Information for Limited English Proficiency (LEP) Customers* was created to develop a prioritized list of ways to improve language access for LEP groups in both the short and long term. WMATA has taken action in response to recommendations of the Subcommittee, including adding a Spanish greeting and option on the customer service line and the production of a video on how to use the Metro system in four languages - English, Spanish, Vietnamese, and Korean. The AFA Subcommittee reconvened in 2006 to identify continuing barriers for LEP persons in accessing transit.

In response to the recommendations of the AFA Subcommittee and as a result of recent actions by the FTA to request that Language Assistance Plans be included as part of FTA recipient’s Title VI Plan Updates, WMATA began to consider its options to develop such a plan in an expeditious manner. On March 13, 2007, WMATA awarded a contract to The DMP Group to develop a Language Assistance Plan that meets the requirements of the U.S. DOT LEP Guidance and the LEP portion of the FTA Title VI Circular. The DMP Group was already familiar with WMATA’s Title VI activities and had conducted LEP assessments on behalf of FTA for several transit systems. WMATA staff participated in this effort by making demographic data and internal documents available during the course of the study for use in the LEP analyses and by participating in meetings with community

groups representing LEP persons and with representatives of WMATA member jurisdictions responsible for meeting the needs of their LEP constituents.

The project involved the following major tasks:

- Task 1: Determine the Extent of WMATA's Obligation to Provide LEP Services
- Task 2: Determine the Appropriate "Mix" of Language Assistance Services
- Task 3: Develop an Effective Implementation Plan on Language Assistance for LEP Persons

This report documents the results of the three tasks and presents an Implementation Plan on Language Assistance for LEP Persons in accordance with FTA and DOT guidance.

The following persons were among those interviewed to obtain input on the contents of the WMATA Language Assistance Plan:

- Bruce Heppen, WMATA, Workforce Services
- Deborah Coram, WMATA, Workforce Services
- Kristin Haldeman, WMATA, Long Range Planning
- Jim Hamre, WMATA, Long Range Planning
- Joanna Ferreira, WMATA, Corporate Strategy and Communications
- Carol Kachadoorian, WMATA, Corporate Strategy and Communications
- Doug Karas, WMATA, Corporate Strategy and Communications
- Nick Shears, WMATA, Corporate Strategy and Communications
- Selene F. Dalton-Kumins, Access Services
- Ed Riley, CENF
- Wendy Klancher, TPB, Department of Transportation Planning
- Kim Propeack, CASA of Maryland
- Rosa Carillo, Multicultural Community Service
- Jennifer Deng-Pickett, DC Language Access Coalition
- Aryan Rodriguez, District of Columbia, Language Access Program, D.C. Office of Human Rights
- Beth Wong, Prince George's County Language Access
- Dr. Nguyen Dinh Thang, Boat People SOS
- Dr. Ahmed Osman, Sudanese American Community Development Organization
- Mr. Jesus Moreno, Hispanic Committee of Virginia

III. IDENTIFICATION OF LEP INDIVIDUALS IN WMATA SERVICE AREA WHO NEED LANGUAGE ASSISTANCE

DOT Guidance: “There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

An assessment of the number or proportion of LEP individuals eligible to be served or encountered by WMATA and the frequency of encounters with WMATA is an important first step, because the Language Assistance Plan should be developed to meet the specific need. The assessment involves four steps:

- Identify the proportion of LEP Persons in WMATA Service Area
- Determine the Frequency of Contact by LEP Persons with WMATA Services
- Determine the Nature and Importance of Transit
- Assess the Current Resources Available and the Costs to Provide Language Assistance Services

Number and Proportion of LEP Persons in the WMATA Service Area

The 2000 Census shows that the Washington, D.C. region includes more than 800,000 people who are foreign born. The 2000 Census also reports that 23 percent of the region’s population speaks a language other than English at home, ten percent of which speak English less than “very well”. Using census data, WMATA staff developed the following table, identifying the LEP speakers in the Washington Metropolitan Region. The Census Bureau defines the Washington Region as larger than the WMATA service area, therefore, this table includes jurisdictions that are not included in the WMATA service area.

The top five languages spoken by LEP persons in the region include Spanish or Spanish Creole, Korean, Vietnamese, Chinese and French.

LEP Speakers in the Washington Metropolitan Region	
<u>Language</u>	<u>Number of LEP Speakers</u>
Spanish or Spanish Creole	215,581
Korean	29,919
Vietnamese	24,181
Chinese	21,722
French	12,705
Persian/Farsi	10,246
Tagalog	8,197
Arabic	8,197
Amharic	7,377
Russian	5,738
Urdu	5,328
Kru, Ibo, Yoruba	4,508
German	4,098
Japanese	3,689
Portuguese	3,689
Italian	3,279
Hindi	2,869
Thai	2,869
French Creole	2,459
Greek	2,049
Mon-Khmer, Cambodian	2,049
Mandarin	2,049
Panjabi	1,639
Gujarathi	1,639
Cantonese	1,639
Bengali	1,639
Cushite	1,639
Polish	1,230
Turkish	1,230
Formosan	1,230
Laotian	1,230
Other (all languages below 1,000 LEP speakers)	13,935
TOTAL	409,849

Source: 2000 Census Bureau

Note: Includes jurisdictions not included in the WMATA service area.

In June 2004, using 2000 Census data broken out by jurisdiction, the Brookings Institution published “Polyglot Washington: Language Needs and Abilities in the Nation’s Capital”. This report, attached as *Appendix D*, describes the fast growth of LEP populations in the Washington metropolitan area between 1990 and 2000 and noted that more than half of the area’s LEP population is Spanish speaking. The report also noted the LEP population as a percent of total population for each of the following jurisdictions served by WMATA:

<u>WMATA Jurisdiction*</u>	<u>LEP Population</u>	<u>Percent of Total</u>
District of Columbia	38,236	7.1
Arlington County, VA	29,793	16.6
Alexandria City, VA	17,163	14.3
Fairfax County, VA	122,821	13.2
Montgomery County, MD	105,001	12.9
Prince George's County, MD	53,743	7.2
TOTAL	366,757	

* The Brookings Report does not specify LEP data for the cities of Falls Church or Fairfax, VA.

Using the categories of language contained in the 2000 Census, WMATA created maps to show the locations of LEP persons in the service area. These maps are presented as Figures 1-5.

- Figure 1 – Total LEP Populations
- Figure 2 – Spanish Speaking LEP Populations
- Figure 3 – Indo-European Speaking LEP Populations
- Figure 4 – Asian-Pacific Speaking LEP Populations
- Figure 5 – Other LEP Speaking Populations

Figure 1 – Map of Total LEP Populations in the WMATA Service Area

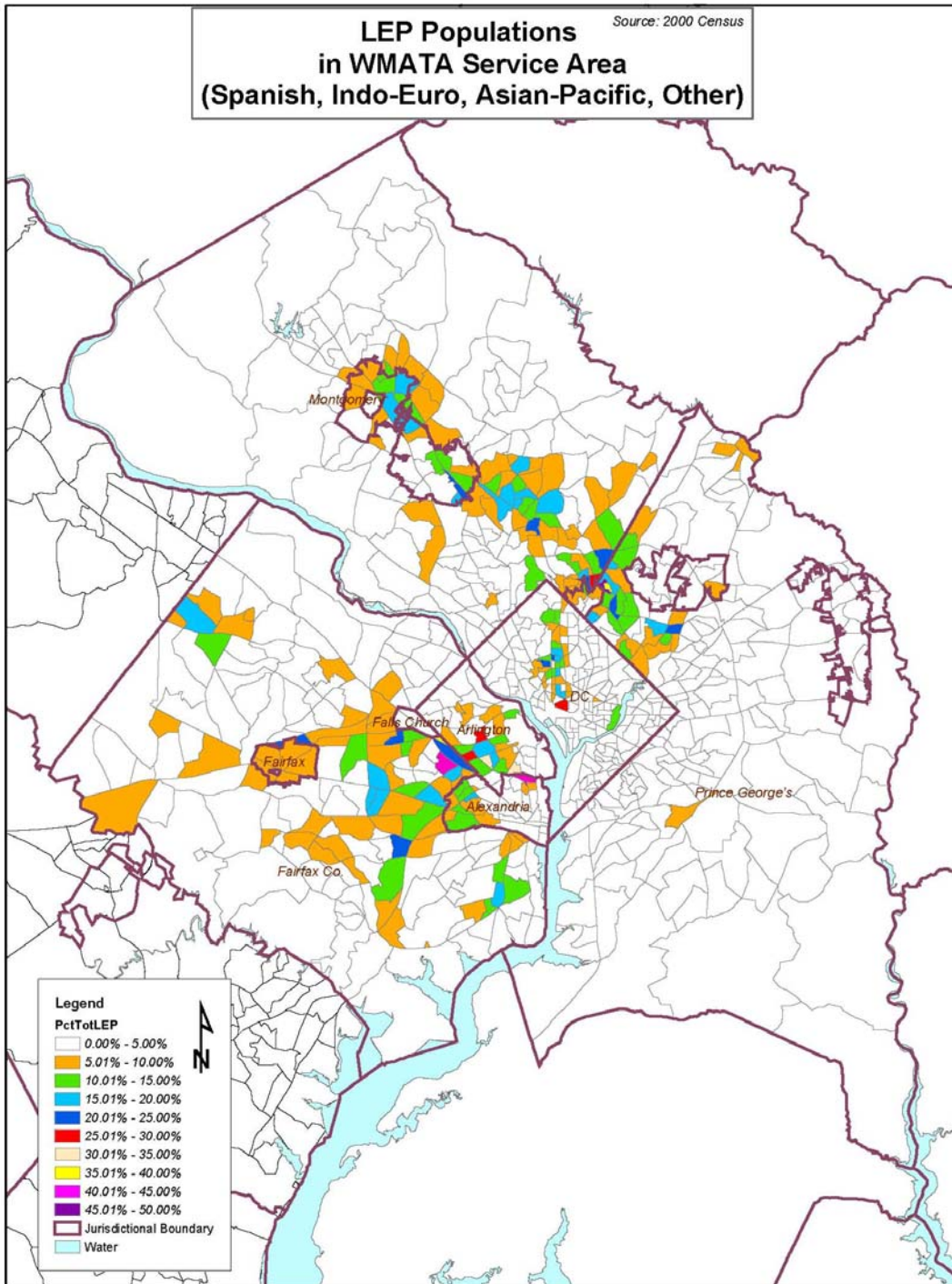


Figure 2 – Map of Spanish Speaking LEP Populations in the WMATA Service Area

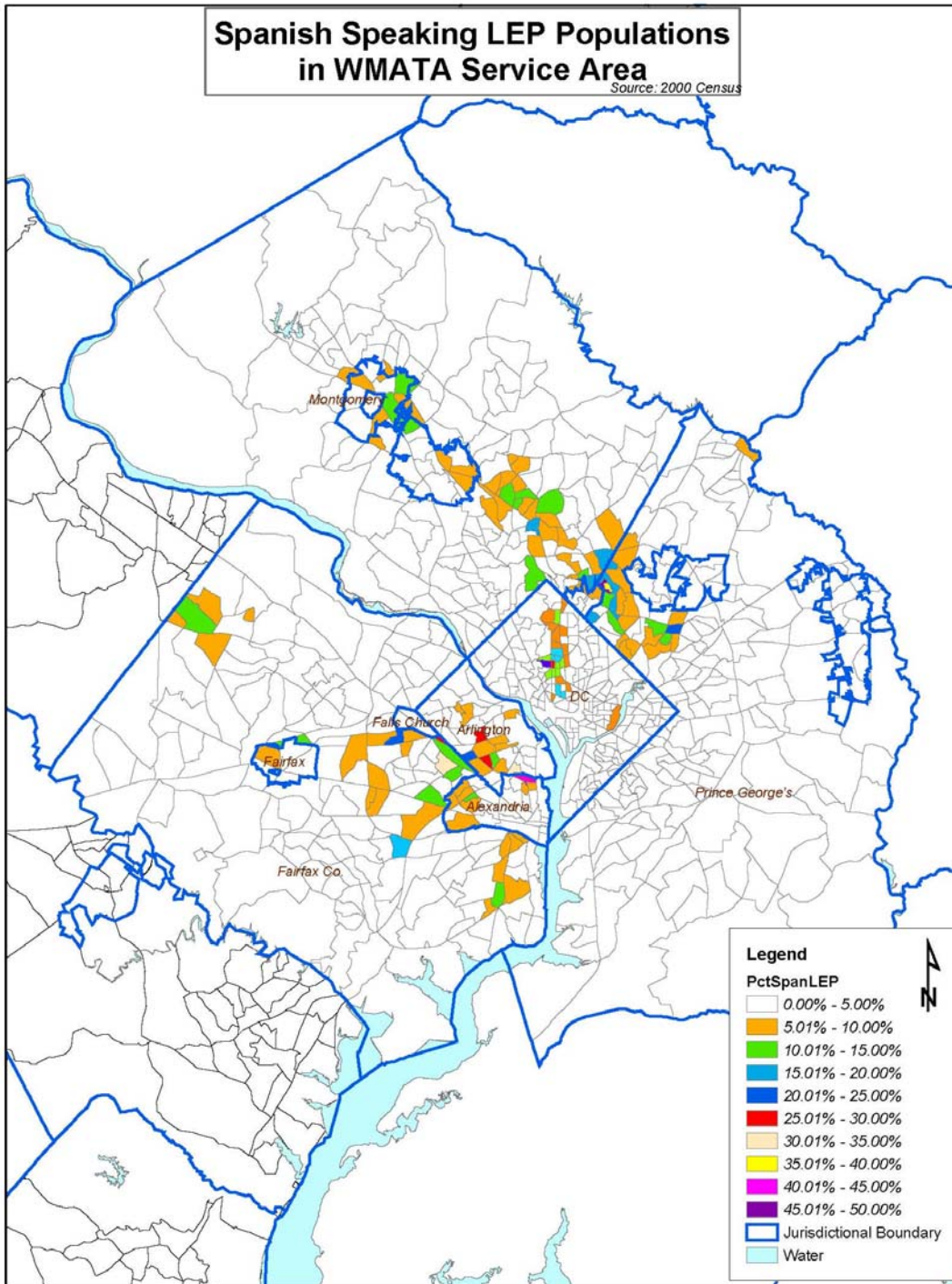


Figure 3 – Map of Indo-European Speaking LEP Populations in the WMATA Service Area

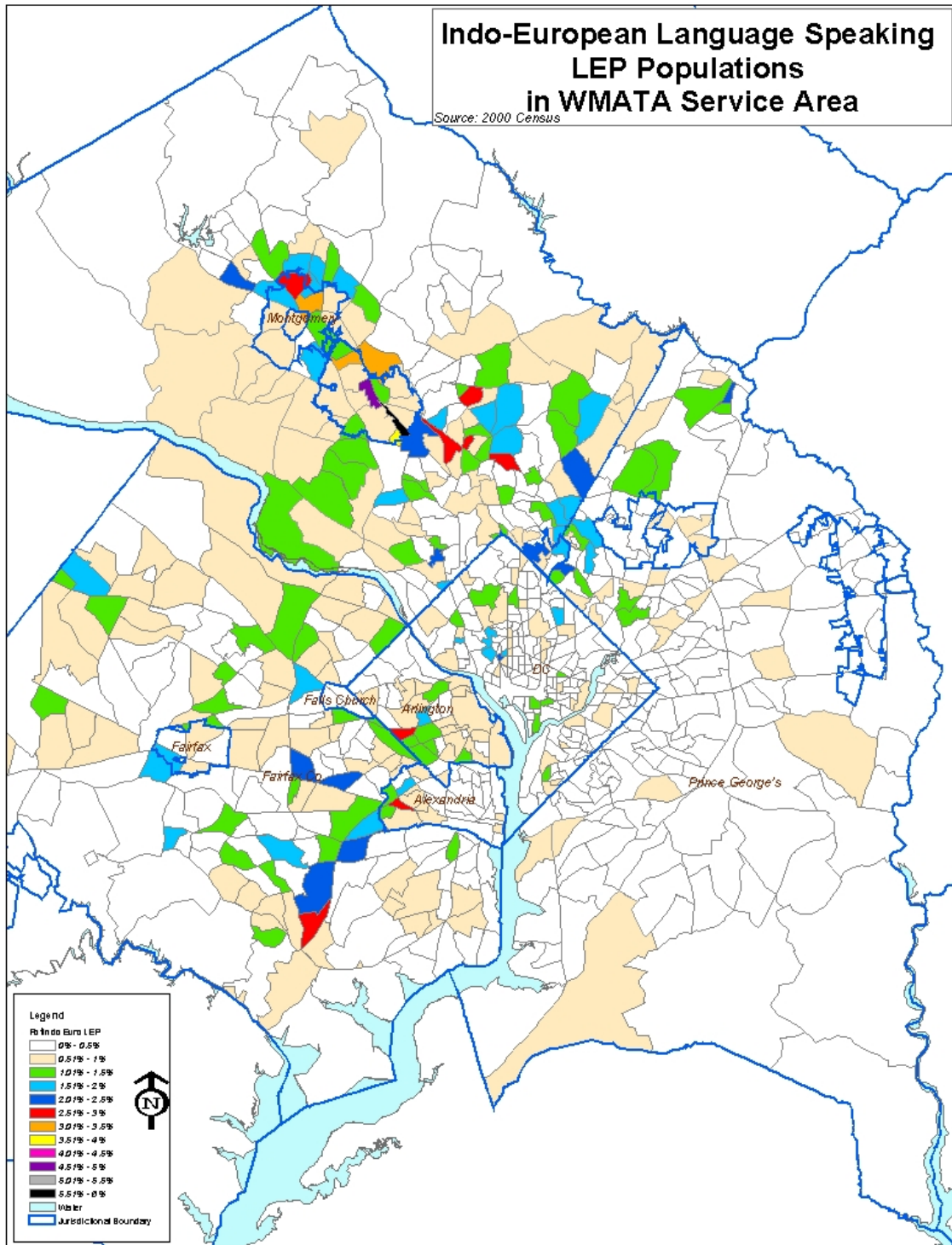


Figure 4 – Map of Asian-Pacific Speaking LEP Populations in the WMATA Service Area

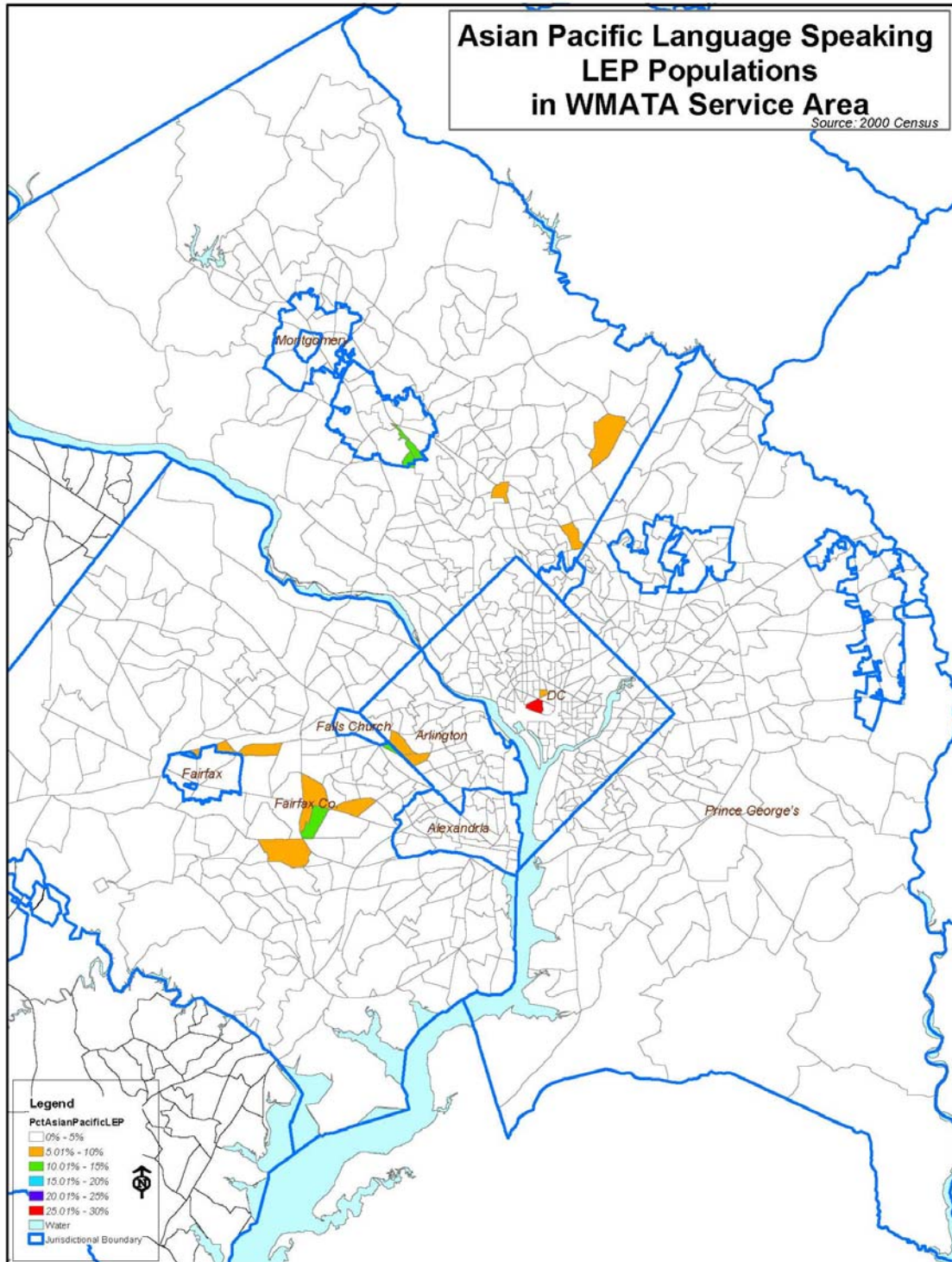
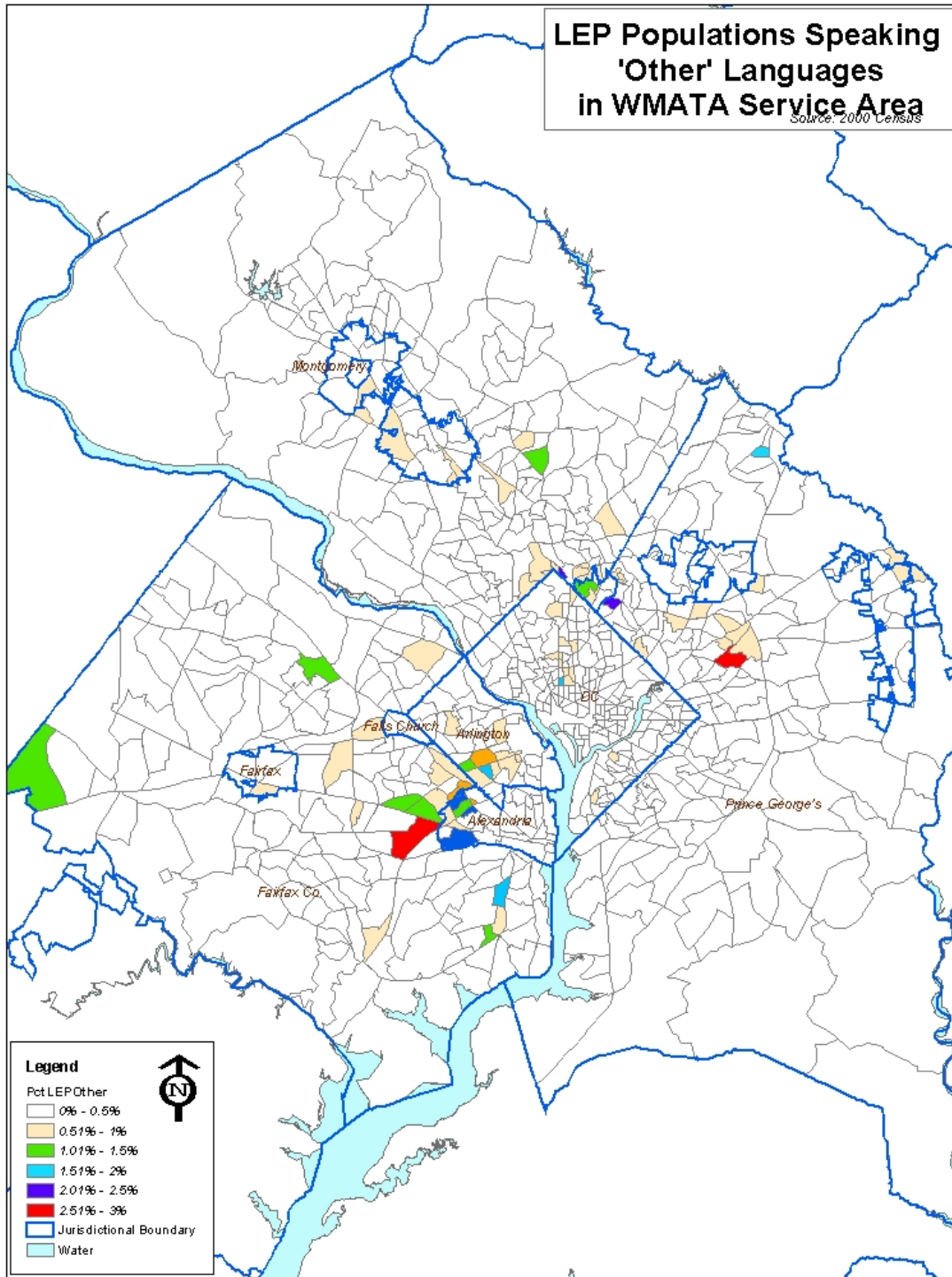


Figure 5 – Map of Other LEP Populations in the WMATA Service Area



In an effort to determine if there had been substantial growth or changes in the LEP populations since the 2000 Census, individual school districts in the WMATA service area were contacted. The following school districts provided data on LEP students registered during 2006/2007:

- District of Columbia Public Schools
- Montgomery County Public Schools
- Fairfax County Public Schools
- Prince George's County Public Schools

It should be noted that the LEP data from the school districts do not offer an “apples to apples” comparison to data from the U.S. Census. First, each school district has its own definition of LEP and often uses a different term entirely. Also, data from the schools was provided by zip code, not the smaller census tract level. Finally, sometimes the data provided by the school district provided LEP statistics for each school location and other times the school district provided information on the zip code where the LEP student resided. Nonetheless, this data is useful as a first step in identifying any differences or trends during the past six years from the 2000 Census. The data is displayed on Figures 6-9, showing the locations of LEP students as compared to the 2000 Census LEP populations for the District of Columbia; Fairfax County, VA; Prince George's County, MD, and Montgomery County, MD.

The school district data identifies a few areas where schools reported LEP enrollment of ten to twenty percent in areas where the 2000 Census reported LEP populations of less than five percent. These areas include:

- Georgetown in Northwest Washington, DC
- Woodbridge and Occoquan in southern Fairfax County
- Adelphi, north of Langley Park in Prince George's County
- Germantown, north of Gaithersburg, in Montgomery County

Figure 6 – DC LEP Populations per Census 2000 vs. DC Schools LEP Data

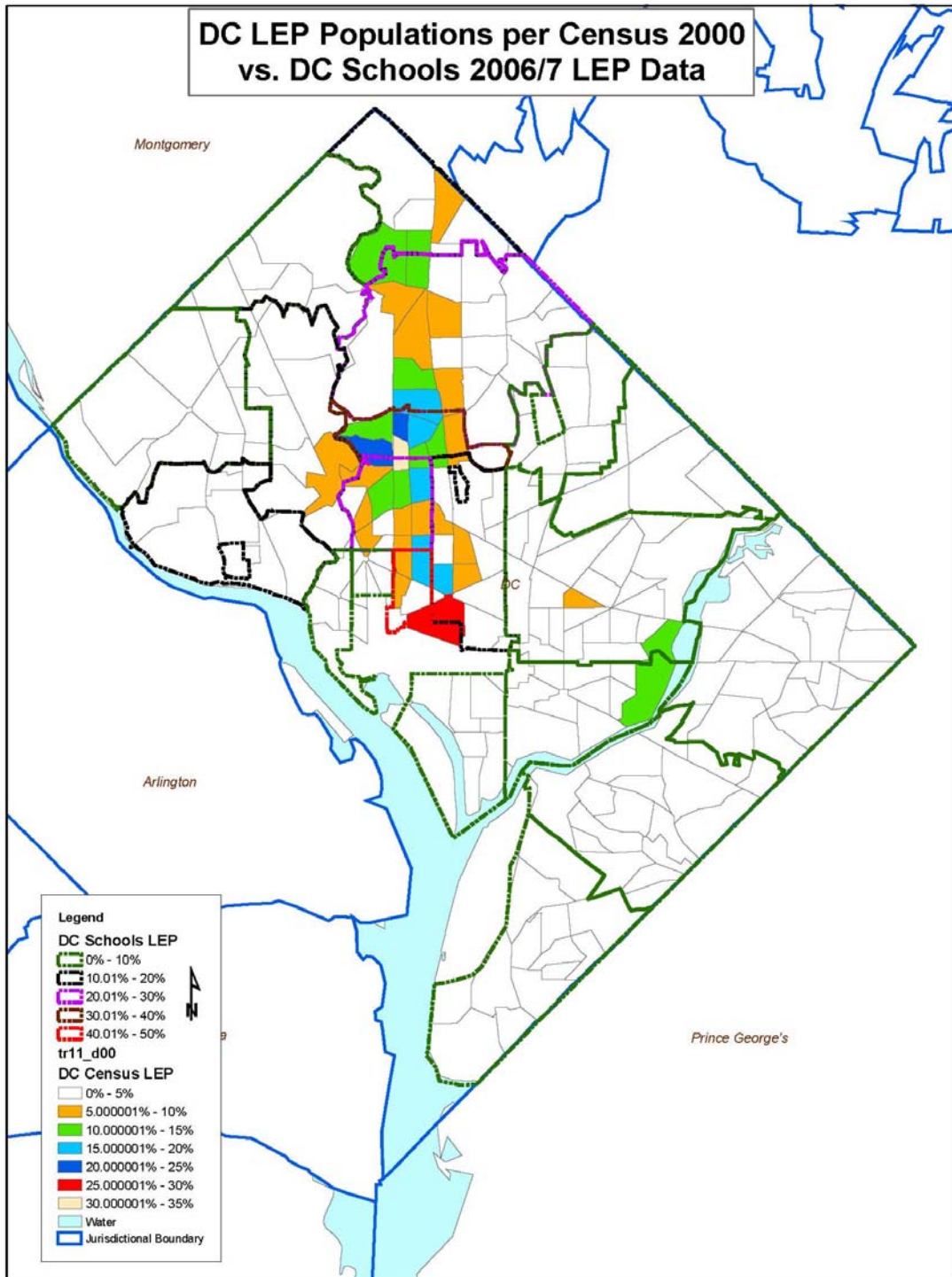


Figure 7 – Fairfax LEP Populations per Census 2000 vs. Fairfax Schools LEP Data

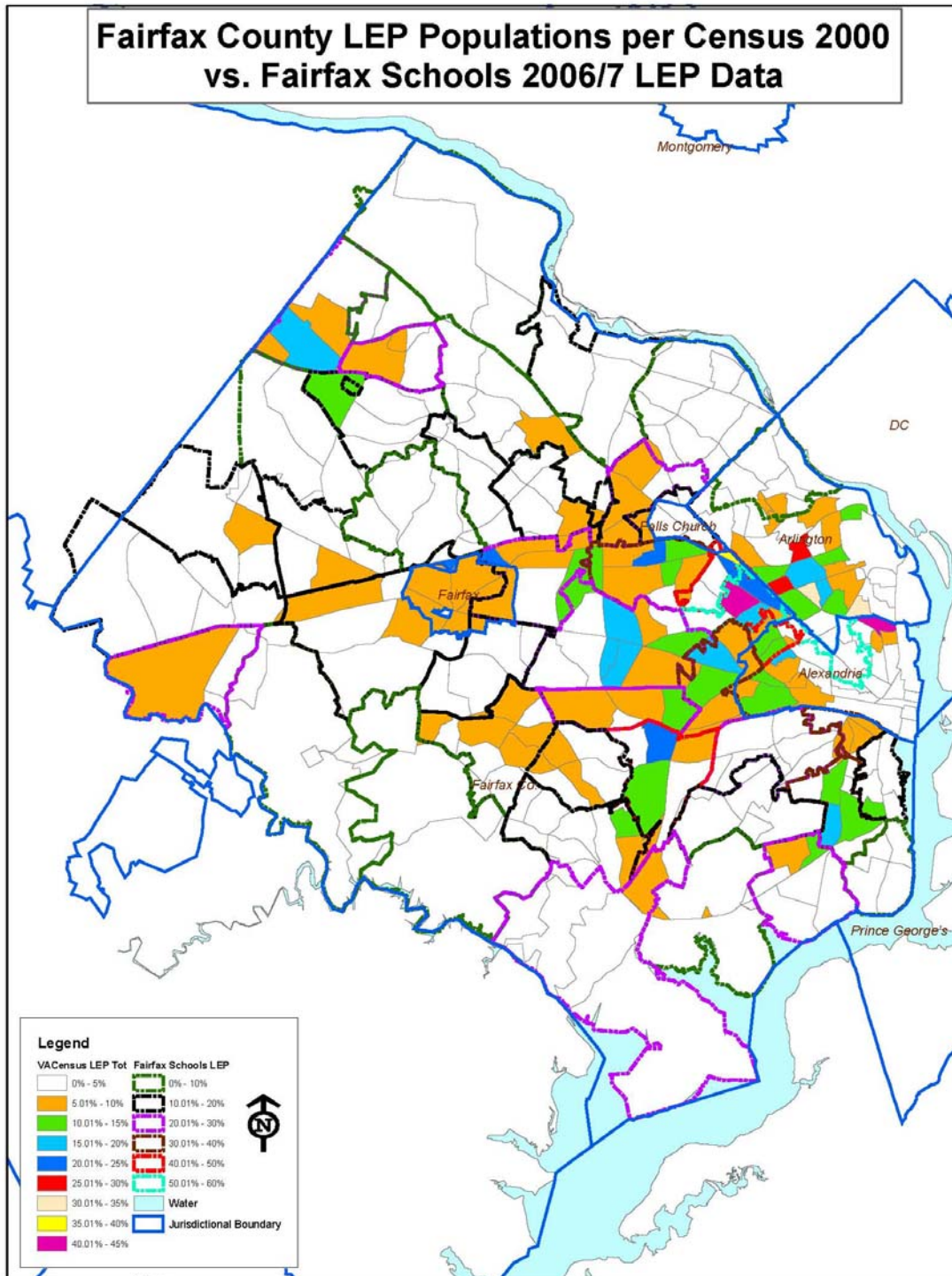


Figure 8 – Prince Georges (PG) LEP Populations per Census 2000 vs. PG Schools LEP Data

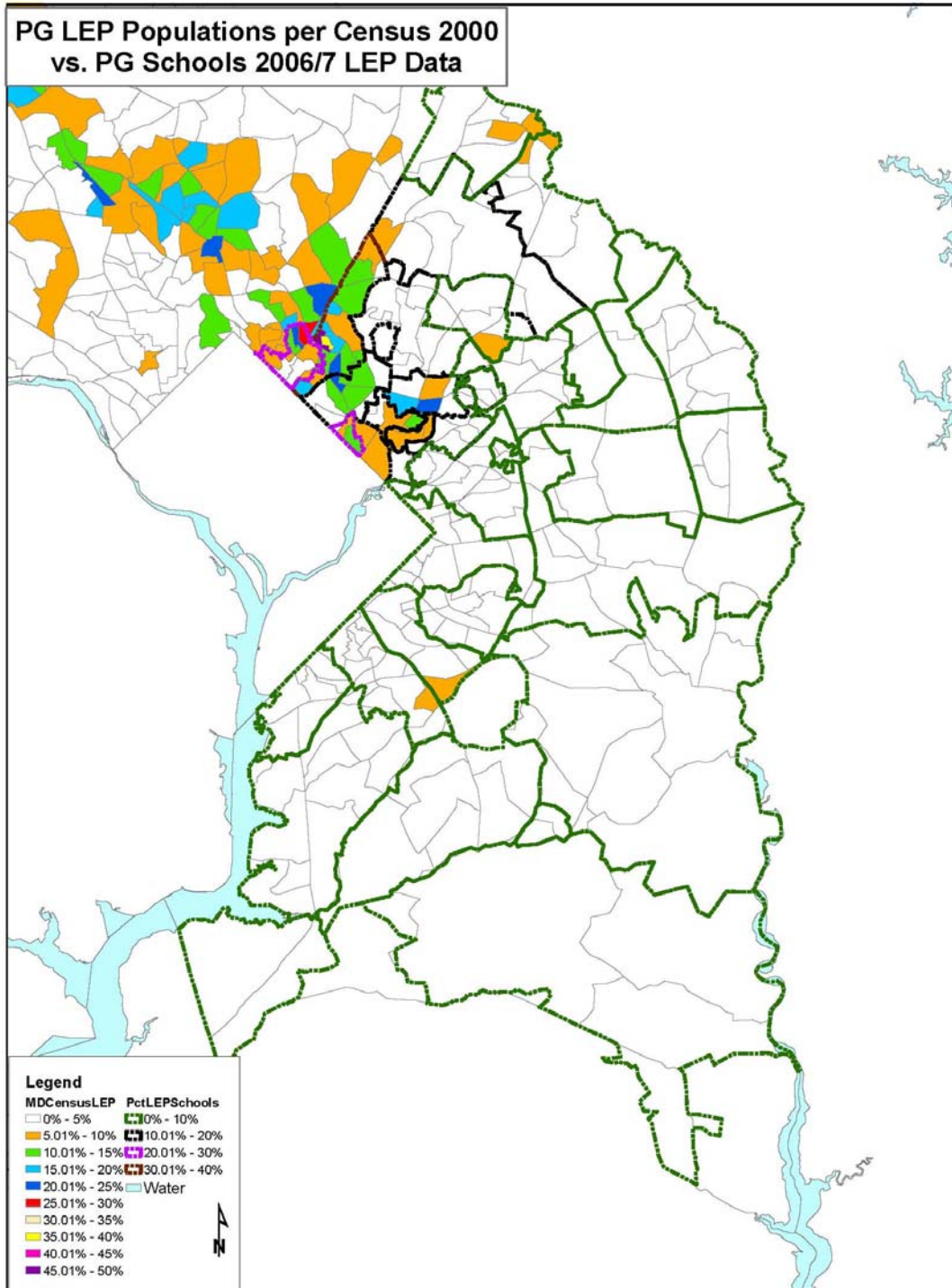
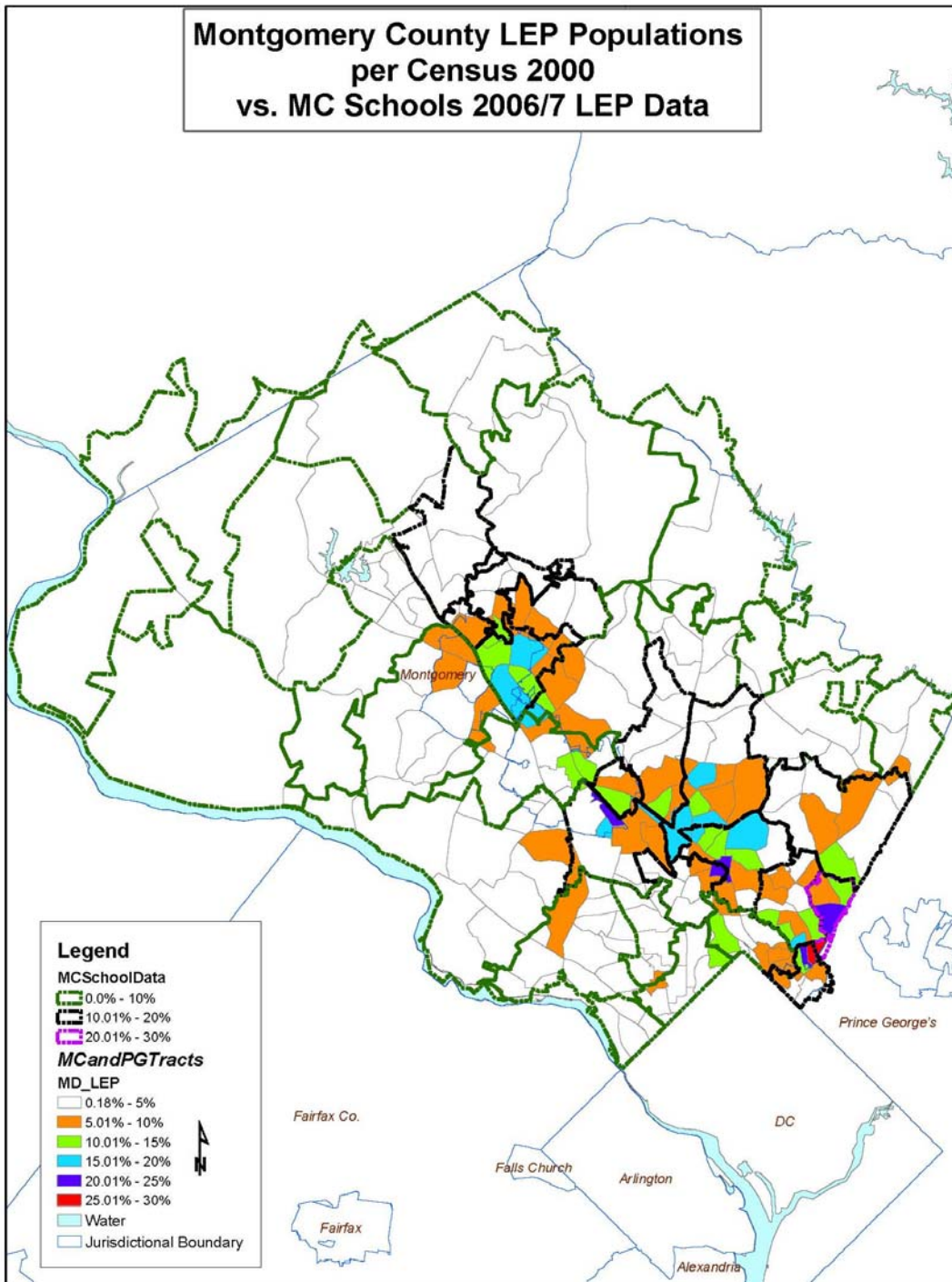


Figure 9 – Montgomery County LEP Populations per Census 2000 vs. Montgomery County Schools LEP Data



The following points summarize the findings of the assessment of the number and proportion of LEP persons in the WMATA Service Area:

- More than 800,000 persons, 21 percent of the Washington region, are foreign born
- Twenty-three percent of the region’s population speaks a language other than English at home, ten percent of which speak English less than “very well”.
- In the WMATA service area, Arlington, VA; Alexandria VA; Fairfax County, VA; and Montgomery County, MD have LEP populations exceeding ten percent.
- Of the languages spoken by the LEP population in the region, the following are most prevalent and appear to be growing:

<u>Language</u>	<u>Number of LEP Speakers</u>	<u>Percent of all LEP Speakers</u>
Spanish	215,581	52%
Korean	29,919	7%
Vietnamese	24,181	6%
Chinese	21,722	5%
French	12,705	3%
Arabic	8,197	2%
Amharic	7,377	2%

- LEP speakers use nearly thirty additional languages where the number of LEP speakers for each language exceeds 1,000 persons.
- Current data from public school districts in the WMATA service area primarily confirm the census data, but identify a few areas where concentrations of LEP persons have located since the 2000 Census.

Frequency of Contact by LEP Persons with WMATA Services

***DOT Guidance:** “Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.*

WMATA does not currently collect data from its riders on their level of English proficiency. In the future, WMATA will attempt to capture this specific data through periodic and/or ongoing data collection efforts. Approaches to this data collection could include requiring dispatchers, central control and/or station managers to enter a code into a database when a translator or bilingual employee is used. This approach is currently used to measure frequency of contact in the call center. Another possible approach is to utilize student interns or others to capture English proficiency counts along selected bus corridors and rail stations.

For purposes of this assessment, the following data sources were used to estimate the frequency of encounters by LEP persons with WMATA services. These sources are:

- WMATA Call Center Data
- WMATA Website Data
- Metro Customer Satisfaction Survey
- Rail Passenger Survey
- Bus Ridership Counts
- MetroAccess Monthly Operations Report
- Census Data on Transit Ridership by LEP Persons

Call Center Data - During 2006, the Call Center received from 1,200 to slightly over 2,000 calls monthly requesting a Spanish operator. WMATA employs 12 Spanish-speaking operators in its Call Center. Fewer calls, ranging from a low of 75 calls to 140 calls per month, requested alternative (non-Spanish) language services. The Call Center handles nearly 170,000 calls per month. This means that the frequency of encounter by the WMATA Call Center of persons that require language assistance is approximately one percent of all calls.

Website Data Translations – WMATA’s website (www.wmata.com) received an average of 18 million “hits” or visits per month during the first quarter of 2007. Of those, 15,000 pages per month were translated into six other languages using a machine translation service under contract to WMATA. During the first quarter of 2007, the translations, ranked by language averaged:

<u>Translation</u>	<u>Monthly Average</u>
English to Japanese	3,170
English to Spanish	3,046
English to Korean	2,662
English to French	2,378
English to Chinese	2,332
English to German	1,962

Based on the total volume of visits to WMATA’s website, the translation request amount to less than one percent of all visits.

Website Downloads of Metro Pocket Guide – In addition to the machine translator on WMATA’s website, customers can obtain copies of the Metro Pocket Guide which is available in eleven languages. These documents are “pdf” files and are not machine translated. The following shows the downloads during the first four months of 2007, which equate to approximately ten percent of the download requests in languages other than English:

<u>Language</u>	<u># of Downloads</u>	<u>% Of Downloads</u>
English	69,464	89.3%
Spanish	2,411	3.1%
Chinese	1,315	1.7%
French	912	1.2%
Korean	632	0.8%
Japanese	606	0.8%
Vietnamese	367	0.5%
Arabic	362	0.5%
All Others	1,743	2.2%

Metro Customer Satisfaction Questionnaire Data – This ongoing Customer Satisfaction Questionnaire is conducted via telephone. The survey does not request LEP information, but does ask if the survey respondent is of Hispanic heritage. According to the 2006 results, fewer than four percent of all respondents report that they are of Hispanic heritage. The Questionnaire is available in Spanish, upon request, but WMATA does not capture the number of respondents who completed the Questionnaire in Spanish.

Rail Passenger Survey – WMATA is currently compiling data from the 2007 Rail Passenger Survey. The previous Rail Passenger Survey was performed in 2002. Utilizing data from the 2002 survey which provides ridership by jurisdiction, estimates of LEP encounters were made by determining rail ridership for the general population in each jurisdiction and next, applying the percent of LEP population in that jurisdiction, to determine the potential LEP persons that would ride Metrorail by jurisdiction if LEP persons followed the riding patterns of the general public. However, according to 2000 Census data, LEP persons were half as likely as the general population to ride rail transit. Therefore, the final step was to reduce that number by 50 percent, resulting in an estimated

15,000 LEP persons that likely ride Metrorail each day. This represents approximately five percent of all persons that ride Metrorail as shown below:

Jurisdiction	Area Pop. & Rail Ridership			LEP Rail Riders				
	Census 2000	2002 Survey All Trips	% 2000 Pop	All Riders*	LEP %	LEP#	LEP Riders**	Percent of Total
DC	572,059	164,337	14.36%	82,169	7.1%	5,834	2,917	4%
Arlington	189,453	63,767	16.83%	31,884	16.6%	5,293	2,646	8%
Alexandria	128,283	27,140	10.58%	13,570	14.3%	1,941	970	7%
Fairfax	969,749	86,896	4.48%	43,448	13.2%	5,735	2,868	7%
City of Fairfax	21,498	2,305	5.36%	1,153	13.2%	152	76	7%
City of Falls Church	10,377	3,034	14.62%	1,517	16.6%	252	126	8%
Loudoun	169,599	2,739	0.81%	1,370	5.7%	78	39	3%
Montgomery	873,341	120,222	6.88%	60,111	12.9%	7,754	3,877	6%
Prince George's	801,515	110,096	6.87%	55,048	7.2%	3,963	1,982	4%
Totals	3,735,874	580,536		290,268		31,002	15,501	5%

* Riders are 1/2 of 2002 Metrorail Survey to account for round trips.

** LEP Population rides 1/2 of rate of general population.

Metrobus Ridership Counts

Metrobus Ridership counts from May 2007 that provided ridership by bus route and by areas, (DC, Montgomery and Prince George's Counties in Maryland, and Virginia) was utilized as the base data to determine LEP persons that ride Metrobus. In order to refine the estimated bus ridership in the Virginia jurisdictions, the percent that each jurisdiction contributes to the Metrobus subsidy allocation was used as a more accurate assessment of ridership than population. For example, Fairfax County's population is 73.5 percent of the population of Virginia that is a part of the WMATA service area, but the Metrobus subsidy is only 53 percent, reflecting less bus service proportionately, and, therefore lower ridership. Estimates of LEP encounters were then made by determining bus ridership for the general population in each jurisdiction and next, applying the percent of LEP population in that jurisdiction, to determine the potential LEP persons that would ride Metrobus by jurisdiction, if LEP persons rode at the same rate as the general population. However, according to the 2000 census LEP persons were three times as likely as the general population to ride bus transit. Therefore, the final step was to expand that number by three times. The result is that an estimated 62,553 LEP persons are likely to ride Metrobus each day. This represents approximately 28 percent of all bus riders:

Jurisdiction	Area Pop. and Bus Ridership			LEP Bus Riders				
	Census 2000	2007 Ridership	% 2000 Pop	All Riders*	LEP% by Jurisdiction	LEP #	LEP Riders**	Percent of Total
DC	572,059	242,653	21.21%	121,327	7.1%	8,614	25,843	21%
Arlington	189,453	21,861	5.77%	10,931	16.6%	1,814	5,443	50%
Alexandria	128,283	14,396	5.61%	7,198	14.3%	1,029	3,088	43%
Fairfax	969,749	38,313	1.98%	19,157	13.2%	2,529	7,586	40%
City of Fairfax	21,498	457	1.06%	229	13.2%	30	90	40%
City of Falls Church	10,377	1,143	5.51%	572	16.6%	95	285	50%
Montgomery	873,341	64,842	3.71%	32,421	12.9%	4,182	12,547	39%
Prince George's	801,515	71,031	4.43%	35,516	7.2%	2,557	7,671	22%
Totals	3,566,275	454,696		227,348		20,851	62,553	28%

*Riders are one-half the ridership to account for round trips.

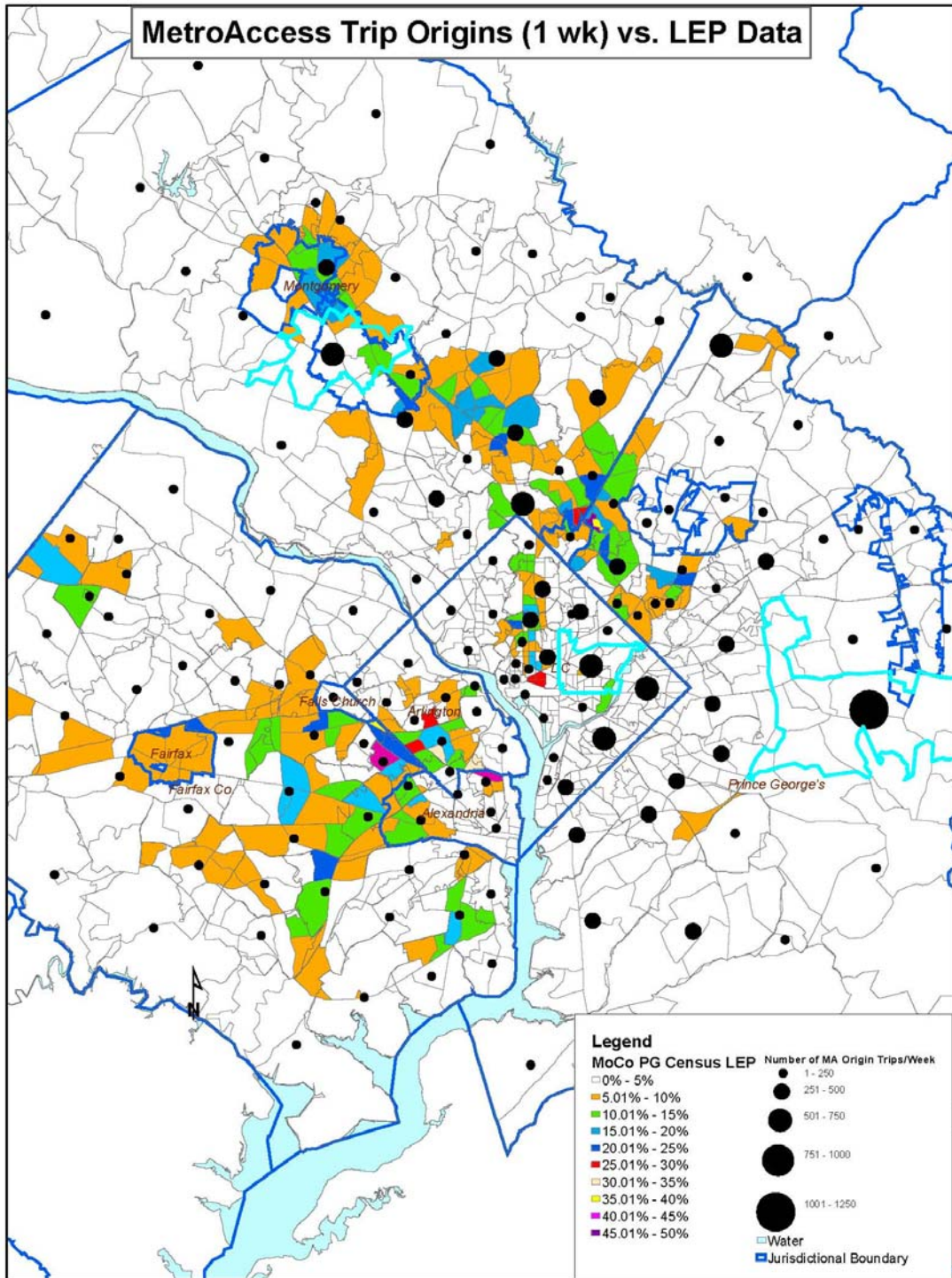
** LEP population rides at three times the rate of the general population

MetroAccess Ridership

MetroAccess management and staff report that contact with LEP persons is very infrequent. In fact, MetroAccess does not recall an applicant requesting a MetroAccess application in another language. At the present time, MetroAccess does not have applications or other informational material printed in other languages. MetroAccess does have a Spanish-speaking employee in the eligibility group but relies on bilingual Metro employees to serve LEP customers on an informal basis.

Figure 10 shows that very few of MetroAccess trips originate in areas with high concentrations of LEP persons. With this as background, it seems reasonable to assume that a LEP person with disabilities would not be able to use MetroAccess without a companion or a personal care attendant (PCA). MetroAccess ridership statistics for May 2007 were used to estimate the possible number of LEP persons that might use MetroAccess each day. According to the May 2007 Monthly Operations Report, a total of 636 persons traveled on MetroAccess on an average weekday with a companion or PCA. Estimates of LEP encounters were then made by using this ridership category for the general population in each jurisdiction and next, applying the percent of LEP population in that jurisdiction, to determine the potential LEP persons that would ride MetroAccess by jurisdiction (assuming that LEP persons with a companion or PCA would use MetroAccess at the same rate as the general population). The result is that an estimated 30 LEP persons are likely to ride MetroAccess each day. This represents a little more than one percent of all MetroAccess riders that use a companion or PCA, as shown below:

Figure 10 – MetroAccess Trip Origins



Jurisdiction	May 2007 Monthly Riders With PCA or Companion	Percent of Total	Allocated Daily Riders With PCA or Companion	LEP% by Jurisdiction	LEP Ridership	LEP Riders*
DC	5,800	32%	205	7.1%	15	8
Arlington	216	1%	7	16.6%	1	--
Alexandria	220	1%	7	14.3%	1	--
Fairfax County	1,549	9%	58	13.2%	8	4
City of Fairfax	55	<1%	1	13.2%	--	--
City of Falls Church	15	<1%		16.6%	--	--
Montgomery	4,202	23%	147	12.9%	20	10
Prince George's	5,918	33%	211	7.2%	15	8
Totals	17,975		636		60	30

*Riders are one-half the ridership to account for round trips.

The following points summarize the findings of the assessment of the frequency of contact by LEP persons with WMATA services:

- Less than one percent of all calls to WMATA’s Call Center or visits to WMATA websites involve use of language assistance services.
- Approximately ten percent of Pocket Guide downloads from the website are translated into languages other than English.
- Utilizing ridership data for Metrobus, MetroAccess, and Metrorail and applying proportions of general population riders in each jurisdiction to the proportion of LEP persons in those jurisdictions, the following estimates of LEP persons that utilize WMATA are:
 - Metrorail – 15,500 daily LEP encounters, approximately five percent of all riders
 - Metrobus – 62,500 daily LEP encounters, over 25 percent of all riders
 - MetroAccess – 30 daily LEP encounters, less than one percent of all riders

As shown above, a substantial majority of the LEP encounters with WMATA occur on Metrobus. Accordingly, WMATA resources for language assistance will be focused more heavily on Metrobus activities.

Areas with the highest concentrations of LEP Persons

The AFA Subcommittee on Transit Information for Limited English Proficiency Customers recommended that WMATA target its language assistance services to three “Hot Spot” areas in the WMATA service area with the highest concentrations of LEP persons. These areas are:

- Bailey’s Crossroads in Virginia
- Langley Park in Maryland
- Columbia Heights in DC

Based on a review of the demographic data and onsite visits to the “Hot Spot” areas and other areas with high LEP concentrations in the WMATA service area, these areas are appropriate to initiate LEP outreach activities.

Nature and Importance of Transit

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons. According to the 2000 Census, nationally, more than eleven percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. However, public transit use among recent immigrants decreases with length of residence in the United States. Many immigrants desire to switch from public transit to automobile use because personal vehicles are a symbol of assimilation and cars can provide greater mobility or access to economic and social opportunities that are beyond a transit system’s service area. Recent immigrants might elect to continue using public transit for at least a portion of their trips if their experience with public transit is positive. For transit agencies seeking to increase their “choice riders,” it may be easier to retain riders who have past, positive impressions of the system than to attract those persons who have never or rarely used transit. Catering to LEP persons may help to increase and retain ridership among WMATA’s immigrant communities.

Available Resources and Costs of Providing Language Assistance Services

WMATA is committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. WMATA has expended significant funds on language services, this includes: the telephone translation service, publication of Pocket Guides in over ten languages, printing of bus schedules and service change announcements in Spanish, website translation software, bilingual staff in the call center and in the administrative offices to make station announcements, and the production of video/DVDs on “How to Ride Metro” in four languages.

While WMATA currently does not track expenditures related to providing language assistance, this will be monitored ongoing as part of the language assistance plan. WMATA will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan.

IV. LANGUAGE ASSISTANCE MEASURES

DOT Guidance: “An effective LEP plan would likely include information about the ways in which language assistance will be provided.

Current Language Assistance Services Available

Oral Language Assistance

- Metro Service Call Center – Spanish Greeting and option for callers, Call Center staffed with 12 Spanish bilingual operators. WMATA uses a contract interpreter service (Tele-Interpreter) to provide translation in 85 languages.
- Rail Station Announcements – Service disruptions and selected safety announcements are made in English and Spanish throughout the Metrorail system.
- How to Ride Metro video/DVD is available in English, Spanish, Vietnamese, Korean and Japanese.
- WMATA’s Office of Customer Communications works with Spanish media (TV and radio) to get out information to listeners and viewers.
- Trip Planning is available in Spanish in the fall 2007.
- Translators are provided at community public meetings as appropriate.

Written Language Assistance

- All Metrobus schedules have narrative information in English and Spanish.
- Metro Pocket Guides are available in the following ten languages, Arabic, Chinese, French, German, Italian, Japanese, Korean, Portuguese, Spanish and Vietnamese. The Pocket Guides can be found at Metro offices, from station managers, and on the WMATA website.
- Bus detour signs are made available in Spanish, as appropriate.
- Service change brochures and signs are printed in English and Spanish.
- Bus maps at selected shelters include Spanish information.
- Spanish language signs are placed in selected Metrorail stations, as appropriate, for special events and to announce construction or other situations important to customer safety.
- WMATA advertises in Spanish media.
- SmarTrip brochure is available in Spanish.
- WMATA website contains a machine translator service that enables users to translate most (or all) *vital* materials into six languages (Spanish, Chinese, Japanese, Korean, French, and German).
- Translated materials are provided at community public meetings as appropriate.

WMATA has designated a staff position in its Office of Civil Rights to serve as WMATA's Language Assistance Liaison. This person will work with community groups, the National Capital Region Transportation Planning Board (TPB) Access For All (AFA) Committee's Subcommittee on Transit Information for Limited English Proficiency (LEP) Customers, WMATA's Rider Advisory Council (RAC) and others to assist in coordinating meaningful access for persons with LEP. The Language Assistance Liaison will be responsible for developing, executing and coordinating language services to LEP persons. The Liaison will also investigate and resolve language access complaints from the LEP community.

Efforts to Identify Additional Language Assistance Needs

To determine what additional language assistance measures could reduce the barriers LEP persons face in riding public transit, WMATA staff and The DMP Group first met with staff of the TPB and reviewed the findings and recommendations of the TPB AFA Committee's Subcommittee on Transit Information for Limited English Proficiency (LEP) Customers.

AFA's most recent report, issued as a draft on April 26, 2007, entitled, "Improving Language Access to transit in the National Capital Region" identified the following major barriers to language access:

- Existing transit materials are not well distributed.
- There is inadequate transit information in customer-friendly formats targeted to LEP speakers.
- Front-line transit employees lack consistent customer service skills and cultural sensitivity.
- LEP speakers have not been adequately involved in language access decisions at transit agencies.
- The point of contact for language access at WMATA is not widely known and WMATA does not yet have a language access plan.

In addition to reviewing the findings of the AFA Subcommittee, individual meetings were held with representatives of the following organizations who serve LEP populations to learn first hand, what types of language assistance services would best meet the needs of LEP persons:

- Multicultural Community Service (MCS)*
- CASA of Maryland*
- DC Language Access Coalition*
- Boat People SOS*
- Sudanese American Community Development Organization
- Prince George's County Language Access Office*
- District of Columbia, Office of Language Access
- Hispanic Committee of Virginia

A summary of these interviews can be found in Appendix F.

Finally, site visits were made to the “Hot Spot” areas and other areas with high LEP concentrations in the WMATA service area to observe travel patterns, businesses and visit community-based organizations.

Additional Language Assistance Services to Be Provided by WMATA

As a result of these efforts, it is recommended that WMATA employ the following additional strategies to provide language assistance services to LEP speakers in the WMATA service area:

1. Adopt standard operating procedures (SOPs) to be used by all WMATA frontline employees and frontline contractors when encountering a LEP customer. The SOPs may vary by mode of service operated and by the type of encounter, but should include consistent elements such as:
 - Use of “I Speak” cards (see Appendix E) to identify the language spoken by the customer.
 - Language assistance notifications
 - Provision of written translated materials
 - Customer call center contact information
 - Use of mobile telephones or vehicle radios for emergency situations
 - Emergency procedures

The utilization of the SOPs will be phased in throughout the system, starting with frontline employees and contractors who serve “Hot Spot” areas.

The initial Metrobus garages will include Northern, Montgomery and Four Mile Run, with emphasis on the following bus lines:

<u>Four Mile Run</u>	<u>Northern</u>	<u>Montgomery</u>
3	G	J
7	H	K
9	S	Q
16	50	Y
22	70	Z
23		

The initial rail lines would include the Green and Red Lines, with emphasis on downtown stations and Columbia Heights and College Park stations on the Green Line and Rockville, Takoma and Silver Spring stations on the Red Line.

2. Expand and enhance the written translation services available on WMATA's website to add the languages most frequently spoken by LEP persons in the service area. The languages to be added are Vietnamese, Amharic and Arabic. All of the language "links" will be identified by name, rather than the current use of "flags" that is not always meaningful to LEP persons. Additionally, WMATA will assure that the translations result in meaningful and simple descriptions of its services that can be understood by LEP persons in the service area. This effort will increase the number of written materials that can be made available as "pdf" files that can be distributed to LEP persons and community groups. In addition, WMATA will explore a better translation service for its website.
3. Provide written notification, in seven languages (Spanish, Korean, Vietnamese, Chinese, French, Arabic and Amharic), that language assistance services are available, upon request, free of charge. These language services can be requested for Board meetings, public hearings or for assistance in using WMATA's transit and paratransit services. An example of the type of notice can be viewed at <http://www.ssa.gov/multilanguage/langlist1.htm>. WMATA's notification message on its transit services will be similar to the following notice:

Welcome to Metro. We hope you have a safe and pleasant trip! WMATA will provide free interpreter services to help you ride Metrobus, Metrorail and MetroAccess. Please call us at 202-637-7000, if you speak Spanish press X. For all other languages press Y and stay on the line until a representative answers.

The notification will be printed on "car cards" or posters that would be placed in:

- All Metrobuses
- All Metrorail cars
- Map cases at major bus transfer locations throughout WMATA's service area
- Kiosks in Metrorail stations throughout WMATA's service area

In addition, the notification will be posted on WMATA's website and emphasized at staff training.

4. Distribute WMATA multilingual materials, such as the Metro Pocket Guide, bilingual bus schedules and "How to Ride Metro" videos/DVDs to the community organizations identified throughout the study process as well as other organizations that were identified in outreach efforts. Initially, these materials will be distributed to those organizations identified by AFA in the "Hot Spot" areas and other community organizations identified as a part of recent outreach efforts by WMATA. See Appendix G for a listing of these organizations. One-stop centers and refugee resettlement centers will also be identified for distribution of transit information, starting in the identified Hot Spots

WMATA will identify documents that are considered “vital” to users of Metrobus, Metrorail and MetroAccess, translate these materials, and expand the distribution of all multilingual materials to include all areas that have significant LEP populations.

5. Develop and implement a program of “training” LEP community leaders so that they can “train” LEP persons in their communities on how to use WMATA services and how to obtain language assistance services. WMATA staff would initially conduct “train the trainer” sessions in the “Hot Spot” areas and later expand this program to include all areas that have significant LEP populations. WMATA could use many of the elements of its successful *Metro is Accessible* outreach project. This program employs a train the “travel trainer” approach as well as use of a variety of written and oral information to familiarize persons with disabilities with Metrobus and Metrorail services.
6. Increase WMATA’s internal bilingual capabilities by identifying and certifying bilingual employees to provide oral language assistance, as needed. Initially, WMATA will conduct a survey of current employees to identify existing language skills and determine interest in providing language assistance to LEP persons. WMATA will develop a Language Assistance Resource Team of employees willing to participate in interpreter training and willing to serve as interpreters at Board meetings, public hearings, and outreach activities such as the program to provide “training” to LEP community leaders so that they can “train” LEP persons. WMATA will also continue its efforts to recruit and hire bilingual/multilingual frontline employees by participating in community job fairs and advertising in publications and media that reach diverse populations.
7. Expand the program for providing public announcements on Metrorail and Metrobus in LEP languages. Initially, the emphasis will be on safety and security related public announcements in Spanish and English on the Metrobus Annunciator system. The program will be expanded to include service interruptions in Spanish. Other languages will be added as warranted.
8. Employ increased use of pictographs or other symbols throughout the Metro system to convey messages on how to use Metro and Metro safety information to LEP persons, including those who have limited literacy in their native language.
9. Based on demographics of surrounding area, provide interpreter services at public meetings and translated materials. Provide these services, upon request, at WMATA Board meetings and all public hearings.
10. Utilize bilingual WMATA staff and staff from community groups to monitor language assistance measures by using the website, contacting the call center and riding Metrobus, Metrorail and MetroAccess services, posed as customers to identify continuing barriers faced by LEP persons.

11. WMATA does not currently collect data from its riders on their level of English proficiency. In the future, WMATA will attempt to capture this specific data through periodic and/or ongoing data collection efforts. Approaches to this data collection could include requiring dispatchers, central control and/or station managers to enter a code into a database when a translator or bilingual employee is used.
12. Expand use of the translation line to other parts of Metro such as MetroAccess.
13. Work with Access Services to determine and address the language needs of persons with disabilities.

A timetable for implementing additional strategies is presented in Chapter VIII of this plan.

V. STAFF TRAINING

DOT Guidance: “Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained.” An effective LEP plan would likely include training to ensure that:

- Staff knows about LEP policies and procedures.
- Staff having contact with the public (or those in a recipient’s custody) is trained to work effectively with in-person and telephone interpreters.

As of July 2006, WMATA and its MetroAccess contractor, MV Transportation, had approximately 4,800 front line employees, comprised of the following major categories:

<u>Department</u>	<u>Count</u>
Bus Operator	2,624
Rail Operators	527
Station Managers	528
Metro Police	477
MetroAccess Drivers	600

WMATA will develop a mandatory training program for front line employees and their managers and supervisors, to include the following information:

- A summary of WMATA’s responsibilities under the DOT LEP Guidance;
- A summary of WMATA’s Language Assistance Plan;
- A summary of the number and proportion of LEP persons in WMATA’s service area, the frequency of contact between the LEP population and WMATA’s programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that WMATA is currently providing and instructions on how WMATA staff can access these products and services; and

WMATA may use the following resources in the development of its training programs:

- “Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice.” This video, which is available on DVD and as a streaming video link on www.lep.gov, explains the language access requirements of Title VI and Executive Order 13166 through vignettes that expose the problems resulting from the absence of language assistance. The video goes on to show how these same situations could have been handled more appropriately if the service provider took reasonable steps to provide meaningful access.

- “Providing Language Access for Persons with Limited English Proficiency,” a PowerPoint presentation produced by the FTA Office of Civil Rights and available at http://www.fta.dot.gov/civilrights/title6/civil_rights_5102.html.
- “How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision making,” available at <http://www.fhwa.dot.gov/hep/lowlim>. This report documents “best practices” in identifying and engaging low-literacy and LEP populations in transportation decision making. These “best practices” were collected during telephone interviews with individuals in 30 States.
- “Guidelines for Developing Traffic Safety Educational Materials for Spanish-Speaking Audiences,” a manual developed by the Education in Traffic Safety project, Education Development Center, Inc., with funding from the National Highway Traffic Safety Administration. The manual is organized into three sections: research and planning, creating materials, and dissemination and evaluation. Available at <http://www.nhtsa.dot.gov/people/injury/airbags/TESM/index.htm>

WMATA will issue notices of the LEP policy and procedures to all of the front-line employees. WMATA will explore integrating training on LEP policies and procedures in several training programs, including:

- New Employee Orientation
- Customer Service Training
- Special Training for Front Line Employees in “Hot Spot” areas
- Training for Bus Transportation and Rail Transportation
- Training for MetroAccess frontline Contractors
- Diversity Awareness Training – modify to include cultural sensitivity module
- Functional Spanish – include element on cultural sensitivity

VI. PROVIDING NOTICE TO LEP PERSONS

DOT Guidance: *“Once an agency has decided, based on the four factors, that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge (emphasis added). Recipients should provide this notice in languages LEP persons would understand.*

WMATA will publish signs to be posted on buses and rail cars and at major bus transfer points and at rail stations with a notice similar to the following:

Welcome to Metro, we hope you have a safe and pleasant trip! WMATA will provide free interpreter services to help you ride Metrobus, Metrorail and MetroAccess. Please call us at 202-637-7000, if you speak Spanish press X, for all other languages press X and stay on the line until a representative answers.

This notice will be posted in seven languages (Spanish, Korean, Chinese (traditional), Vietnamese, French, Arabic and Amharic) on cards, such as the “car cards” placed for advertisement.

WMATA will initiate this effort by placing the signs on buses and at rail stations in the following “Hot Spot” locations:

- Bailey’s Crossroads, VA
- Langley Park, MD
- Columbia Heights, DC

Additionally, WMATA will include the notices in outreach documents to be sent to community organizations and will place notices in the following locations:

- Local media, including newspapers, television and radio stations serving LEP communities
- Schools, community and religious organizations
- WMATA website and Intranet
- As handouts in WMATA staff training materials

The timetable for distributing these signs throughout the WMATA service area and placing the notice on WMATA’s website and on vital documents is included in the Implementation Timetable in Chapter VIII.

VII. MONITORING AND UPDATING THE LEP PLAN

DOT Guidance: *“Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees.”*

WMATA will monitor the strengths and weaknesses of the LEP plan on an ongoing basis using the following strategies:

- Solicit feedback from the LEP community by distributing a questionnaire to the organizations listed in Appendix G and others identified during the year.
- Make annual presentations and seek feedback from WMATA’s Rider’s Advisory Council (RAC) and the Subcommittee on Transit Information for Limited English Proficiency (LEP) Customers of the Access For All (AFA) Committee of the National Capital Region Transportation Planning Board (TPB).
- Measure changes in the number and proportion of LEP persons eligible to be served by examining updates from the US Census and enrollment data from the public school districts in the WMATA service area.
- Collect data from the community organizations that serve LEP communities and work with the Council of Governments to compile regional information for use by local transit providers.
- Measure actual frequency of contact by LEP persons by collecting information from the Call Center, WMATA website and front-line employees and through customer surveys of customers who request language assistance services.
- Participate in the coalition of local government LEP coordinators to track trends and share LEP successes
- Consider conducting rider surveys to specifically collect LEP information.

WMATA will make changes to the language assistance plan as needed, but at a minimum, the plan will be updated every three years to coincide with WMATA’s Title VI Submittal to the Federal Transit Administration.

VIII. Implementation Timetable

ITEM	FY 2008			FY 2009	FY 2010
	2 ND Quarter	3 rd Quarter	4 th Quarter		
Adopt LEP Standard Operating Procedure (SOP)	Finalize and distribute SOP	Train frontline Employees in "Hot Spot Areas"		Train frontline employees and implement SOP system wide	
Enhance written translation services On WMATA's website		Add Vietnamese, Amharic and Arabic and Change "links" to language names	Assess translations to ensure they are clear and meaningful	Make translation changes as appropriate	
Provide written notification of language assistance services	Finalize notification language	<ul style="list-style-type: none"> • Print car cards and posters • Post on website 	<ul style="list-style-type: none"> • Place on WMATA vehicles • Place in "Hot Spot" areas 		
Distribute multilingual materials	Assess existing materials	Revise and/or create new materials	Print and assemble materials	Distribute materials to "Hot Spots"	Complete distribution system wide
"Train the Trainer" Program			Develop curriculum and materials		Initiate training sessions in "Hot Spot" areas
Identify and Recruit Bilingual Staff	Continue recruitment efforts	Conduct survey of current staff	Investigate certification training		Certify bilingual staff
Public Announcements	Develop SOP for bilingual announcements		Begin bilingual safety and security announcements		Begin bilingual service disruption announcements
Consider use of symbols and pictographs				Obtain examples from other transit systems	Determine applicability and develop plan, if appropriate.


Appendix A – Executive Order 13116, “Improving Access to Services for Persons with Limited English Proficiency”

Appendix B – U.S. DOT LEP Guidance to Recipients, 12/14/05

Appendix C – FTA Circular 4702.1 A, issued April 13, 2007

Appendix D – “Polyglot Washington: Language Needs and Abilities in the Nation’s Capital”, Brookings Institute

Appendix E – Census Bureau “I Speak” Cards

United States Census 2000		U.S. Department of Commerce Bureau of the Census 	
LANGUAGE IDENTIFICATION FLASHCARD			
<input type="checkbox"/>	املا هذا المربع اذا كنت تقرأ أو تتحدث العربية.	Arabic	
<input type="checkbox"/>	Խոսողո՞ւմ ե՞նք նշո՞ւմ կատարե՞ք այս քառակուսում, եթե խոսում կամ կարդում եք հայերեն:	Armenian	
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	Bengali	
<input type="checkbox"/>	សូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	Cambodian	
<input type="checkbox"/>	Matka i kakhon komu un taitai pat un sang i Chamorro.	Chamorro	
<input type="checkbox"/>	如果您具有中文閱讀和會話能力，請在本空格內標上X記號。	Chinese	
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	Creole	
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	Croatian (Serbo-Croatian)	
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	Czech	
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	Dutch	
<input type="checkbox"/>	Mark this box if you read or speak English.	English	
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بدرهستین، این مربع را علامت بگذارید.	Farsi	

D-3309

<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	Greek
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस गोले पर चिह्न लगाएँ।	Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	Italian
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	Korean
<input type="checkbox"/> ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືຢາກພາສາລາວ.	Laotian
<input type="checkbox"/> Zaznacz tę kratkę jeżeli czyta Pan/Pani lub mówi po polsku.	Polish
<input type="checkbox"/> Assinale este quadrado se voce lê ou fala Português.	Portuguese

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<input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți Românește.	Romanian
<input type="checkbox"/> Поставьте этот квадратик, если вы читаете или говорите по-русски.	Russian
<input type="checkbox"/> Maka pe fa'ailoga le pusa lea pe afai e te faitau pe tusitusi i le gagana Samoa.	Samoaan
<input type="checkbox"/> Обележите овај квадратих уколико читате или говорите српски језик.	Serbian (Serbo-Croatian)
<input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	Slovak
<input type="checkbox"/> Marque esta casilla si lee o habla español.	Spanish
<input type="checkbox"/> Markahan ang kahon na ito kung ikaw ay nagsasalita o nagbabasa ng Tagalog.	Tagalog
<input type="checkbox"/> ให้ทำเครื่องหมายลงในช่องว่างทางด้านขวาหรือทุกตารางไทย.	Thai
<input type="checkbox"/> Faka'ilonga'i 'ae puha ko'eni kapau 'oku te lau pe lea 'ae lea fakatonga.	Tongan
<input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	Ukrainian
<input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانہ میں نشان لگائیں.	Urdu
<input type="checkbox"/> Xin đánh dấu vào ô này nếu quý biết đọc và nói được Việt Ngữ.	Vietnamese
<input type="checkbox"/> צייכנט דעם קעסטל אויב איר שרייבט אדער ליינט אידיש.	Yiddish

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Appendix F – Summary of Outreach Interviews for WMATA’s Language Assistance Plan (LAP)

Summary of Input from Community Representatives
Conducted May 2, 2007 to July 1, 2007

- Most people in LEP communities are not aware that WMATA offers multilingual materials and language assistance services.
- Most people in LEP communities do not use the telephone information oral language services.
- Community organizations do not have information from WMATA to share with LEP communities.
- LEP persons rely on friends and family members to teach them how to ride transit.
- LEP persons often work more than one job and rely on WMATA to get them there, often, far distances from their homes.
- LEP persons, especially new immigrants, are wary of outsiders. They rely on community groups and leaders who they have come to trust.
- WMATA should train community groups to train LEP persons about WMATA (“Train the Trainer”).
- Machine translators often result in translations that are inaccurate and out of context.
- The process of developing a Language Access Plan takes many years and is an ongoing process.
- Be sure to check translations before printing or posting on the Internet.
- Over 90 percent of immigrants represented by the Sudanese community speak and understand English.
- Recalled that WMATA has participated in job fairs and other community outreach activities.
- If WMATA emailed “links” to multilingual information, the community organizations could print and distribute the information to LEP persons.
- WMATA information in other languages should be simple and easy to understand; current information is too detailed and complicated.
- Trip planner is hard to use...even if available in native language.
- Consider use of landmarks to aid with directions, e.g., reference a church, school, store, etc., that LEP persons are familiar with.
- LEP persons are not familiar with computers and machines, such as fare vending equipment.
- WMATA should advertise and make announcements on Telemundo and other Spanish speaking TV and radio. This is a sure way to reach the LEP audience.
- LEP persons are moving out to Prince William, Manassas and beyond to find affordable housing.
- First generation immigrants may use transit, but the second generation wants to get a car.
- Many recent immigrants satisfy their transportation needs by sharing a single auto among many family members and do not on transit.

- Immigrants who have a bad experience on transit can stop them from trying transit again.
- WMATA employees, including transit police can be rude and threatening to LEP persons.
- Bus stop announcements (on LED screens) should be in English. LEP persons have to learn the street names to navigate the area.

Appendix G – List of LEP Community Organizations for LEP Outreach

Baileys Crossroads, Virginia

- Woodrow Wilson Library
- Boat People SOS
- Business Development Assistance Group
- Tenants and Workers United
- Hispanic Committee of Virginia
- Sudanese American Community Development Organization

Langley Park, Maryland

- Prince George's County Library, Hyattsville Branch
- Beyond These Walls
- CASA of Maryland
- Catholic Community Services
- African Immigrant and Refugee Foundation, Silver Spring, MD
- Youth Empowerment and Success
- Takoma/Langley Crossroads Development Authority
- Langley Park Community Center

Columbia Heights, District of Columbia

- DC Public Library, Mt. Pleasant Branch
- DC Learns
- Columbia Heights Shaw Family Support Collaborative
- Neighbor's Consejo
- Multicultural Community Service
- Asian Pacific American Legal Resource Center
- CentroNia
- Mary's Center
- African Immigrant and Refugee Foundation, Washington, DC
- Latin American Youth Center
- African Resource Center