



# Pioneer Valley Transit Authority

## Language Access Plan

October 2024

# DRAFT



### Providing Access to Programs and Services for People with Limited English Proficiency (LEP)





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## INTRODUCTION

This Language Access Plan has been developed consistent with FTA Circular 4702.1B, [“Title VI and Title VI-Dependent Guidelines for FTA Recipients,”](#) published October 1, 2012. This plan is a living document; it is continually reviewed, updated, and improved to help better meet the needs of transit customers in the PVTA service area.

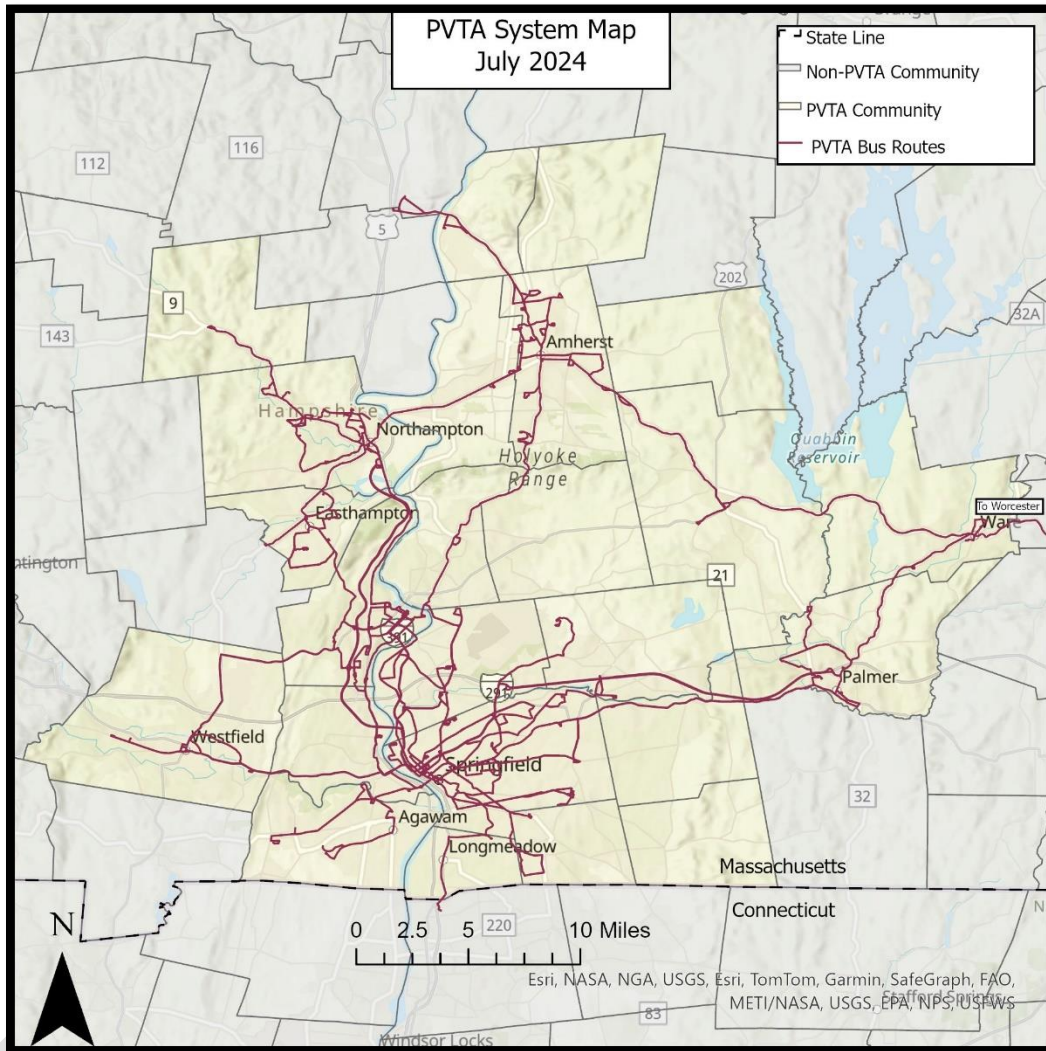
This plan describes the strategic approach that PVTA is pursuing to achieve its program to better deliver services to people who are Limited English Proficient (LEP). PVTA’s goal is to ensure that LEP persons have meaningful access to the benefits, services, and information provided by PVTA’s transit programs and related activities. This plan clarifies the fulfillment of PVTA’s responsibilities with respect to LEP requirements as a recipient of federal financial assistance from the U.S. Department of Transportation to people who are Limited English Proficient in accordance with:

**Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

**Executive Order 13166** “Improving Access to Services for Persons With Limited English Proficiency” of August 16, 2000, which directs that Federal agencies subject to the requirements of Title VI publish guidance for their recipients clarifying LEP obligations. Executive Order 13166 directs that all guidance documents be consistent with the compliance standards and framework detailed in the U.S. Department of Justice’s Policy Guidance “Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency.” This guidance advises that different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies, programs and operations of entities that receive funds from the federal government, which includes the PVTA.

These federal regulations and guidance define persons with Limited English Proficiency 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.

**Figure 1.1: Pioneer Valley Transit Authority Service and Routes**



**PVTA Member Communities:**

- |                 |                  |
|-----------------|------------------|
| Agawam          | Holyoke          |
| Amherst         | Leverett         |
| Belchertown     | Longmeadow       |
| Chicopee        | Pelham           |
| Easthampton     | South Hadley     |
| East Longmeadow | Springfield      |
| Granby          | Sunderland       |
| Ludlow          | Ware             |
| Northampton     | Westfield        |
| Palmer          | West Springfield |
| Hadley          | Wilbraham        |
| Hampden         | Williamsburg     |

## 1.0 FOUR FACTOR FRAMEWORK ANALYSIS

This plan utilizes the four-factor analysis of an individualized assessment described in the FTA guidance publication of FTA C 4702.1B [“Title VI Requirements and Guidelines for Federal Transit Administration Recipients”](#) effective October 1, 2012.

The PVRTA service area includes communities with diverse ethnicities, including many people for whom English is not their native language. Employees of PVRTA and its operators are also an ethnically diverse group, of which many individuals share cultural backgrounds with ethnic groups in the service area. This personal experience and connection with local communities is one of the most regular and important ways that PVRTA has developed and maintains its sensitivity to the concerns of LEP persons.

The PVRTA has developed policies and procedures to meet the requirements of Title VI of the Civil Rights Act of 1964, specifically as it pertains to improving access to services for persons with limited English proficiency (LEP). For this analysis, PVRTA relies on the guidance provided in FTA Circular 4701.B, which defines “Limited English Proficient (LEP) Persons” as:

“...persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the US Census that they speak English less than very well, not well, or not at all.”

PVRTA uses this definition as required by the federal guidance and the most recently available US Census American Community Survey (2020-2024 ACS five-year estimates) to update the Language Access Plan.

The language access needs assessment presented in this report involves the analysis of these four factors, which are required by the federal guidance:

**Factor 1: Proportion, Numbers and Distribution of LEP Persons in PVRTA Service Area**

**Factor 2: Frequency of PVRTA Staff Contact with LEP Persons**

**Factor 3: Nature and Importance of PVRTA Service to LEP Persons**

**Factor 4: Resources Available to PVRTA and Cost**

The main goal is to identify and document the number and geographic distribution of potential LEP customers within the PVRTA’s 24-community service area and to better understand where needs are being met—and where there may be gaps—in non-English language assistance.

Following is detailed guidance from FTA Circular Chap. III-7 about each of the four factors:



**FACTOR 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by PVRTA. In addition to the number or proportion of LEP persons served, the analysis should, at a minimum, identify:

- How LEP persons interact with PVRTA;
- LEP communities and the number or proportion of LEP persons from each language group;
- The literacy skills of LEP populations in their respective native languages to determine whether translation of documents will be effective; and
- Whether LEP persons are underserved by PVRTA due to language barriers.

**FACTOR 2:** The frequency with which LEP persons come into contact with the program. PVRTA surveys LEP needs and assesses major points of contact with the public, such as:

- Use of bus service;
- Purchase of passes and tickets through vending machines, outlets, websites, and phone;
- Participation in public meetings;
- Customer service interactions;
- Ridership surveys;
- Operator surveys.

**FACTOR 3:** The nature and importance of PVRTA service to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. Public transportation is a vital service, especially for people without access to personal vehicles.

**FACTOR 4:** The resources available to PVRTA for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Implementation measures to address the results are then based on the results of the analysis described in Section 3.0. The following sections apply the guidance described above to PVRTA specifically.

## 1.1 Factor 1: Proportion, Numbers and Distribution of LEP Persons in Service Area

This section presents information about LEP persons in the 24-municipality PVTA service area.

### 1.1.1 Service Area Geographic Boundaries

The geographic boundaries of PVTA service are the 24 municipalities listed below and displayed in [Figure 1-1: Pioneer Valley Transit Authority Service and Routes](#). (PVTA also serves locations in South Deerfield, Whately, Southampton, and Enfield CT, which are not PVTA member communities.)

### 1.1.2 Analysis of Language-related US Census Data

Presented below are US Census ACS 5-year estimates for the 24 PVTA member communities showing proportions of residents in the PVTA service area. The overall proportion considered LEP is 49,264, which is 7.5% of the total population of 657,025 in the PVTA service area.

This is significantly above the national average of 4.4% and the Massachusetts state average of 5.8%. ACS data for individual languages at the municipal level within PVTA’s service area has not been updated since the ACS 5-year estimates, however, this information is available for Public Use Microdata Areas (PUMAs). By comparing PUMA language-specific data with ACS language category data, PVTA has determined that the number of LEP persons exceeds 1,000 (the safe harbor minimum threshold) for six languages: Spanish; Russian, Portuguese, Chinese, Nepali, Polish, and Vietnamese.

**Table 1.1-1: People in PVTA Service Area Who Speak English Less than “Very Well”**

First Language Spoken by Person Who Speaks English Less than “Very Well”	Number of Persons	Percent of All People in PVTA Service Area
<b>Spanish</b>	<b>35,454</b>	<b>5.4%</b>
<b>Russian</b>	<b>2,674</b>	<b>0.4%</b>
<b>Portuguese</b>	<b>2,389</b>	<b>0.4%</b>
<b>Chinese (incl. Mandarin, Cantonese)</b>	<b>2,076</b>	<b>0.3%</b>
<b>Nepali, Marathi, or other indic Language</b>	<b>1,467</b>	<b>0.2%</b>
<b>Polish</b>	<b>1,425</b>	<b>0.2%</b>
<b>Vietnamese</b>	<b>1,070</b>	<b>0.2%</b>
French, Haitian, Cajun	893	0.1%
Arabic	645	0.1%
Other Indo-European	524	0.1%
Korean	268	<0.1%
Tagalog & Filipino	173	<0.1%
German	131	<0.1%
Other Unspecified	75	<0.1%
<b>LEP Total in PVTA Communities</b>	<b>49,264</b>	<b>7.5%</b>

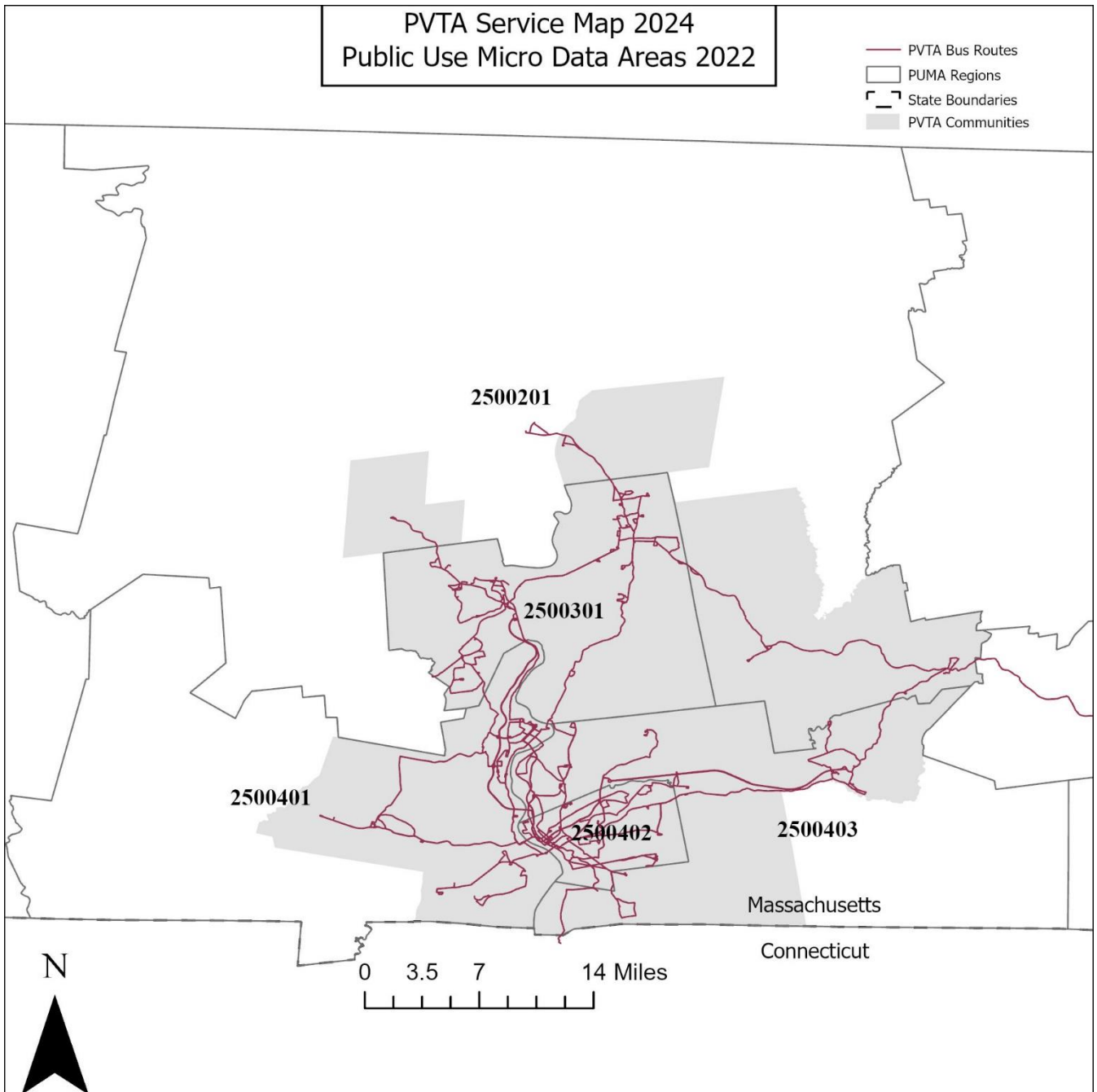
Source: Census Data, ACS 5-year estimates for 24 PVTA Communities

**Table 1.1-2: LEP for People in PUMAs Containing PVTA Communities**

First Language Spoken by Person Who Speaks English Less than "Very Well"	Number of Persons	Percent of All People in PUMAs Containing PVTA Communities
<b>Spanish</b>	<b>35,454</b>	<b>5.4%</b>
<b>Russian</b>	<b>2,674</b>	<b>0.4%</b>
<b>Portuguese</b>	<b>2,389</b>	<b>0.4%</b>
<b>Chinese</b>	<b>2,076</b>	<b>0.3%</b>
<b>Nepali</b>	<b>1,467</b>	<b>0.2%</b>
<b>Polish</b>	<b>1,425</b>	<b>0.2%</b>
<b>Vietnamese</b>	<b>1,070</b>	<b>0.2%</b>
French	813	0.1%
Ukrainian	721	0.1%
Arabic	645	0.1%
Khmer	607	0.1%
Other Indo-European	524	0.1%
Korean	268	<0.1%
Tagalog & Filipino	173	<0.1%
German	131	<0.1%
Haitian	80	<0.1%
Other Unspecified	75	<0.1%
All Others (47 additional languages)	3,691	0.6%
<b>LEP Total in PVTA PUMAs</b>	<b>50,592</b>	<b>7.7%</b>

Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), "Ability to Speak English" & "Language Other Than English Spoken at Home"

**Map 1.1-1: Public Use Microdata Areas in PVTA Region**

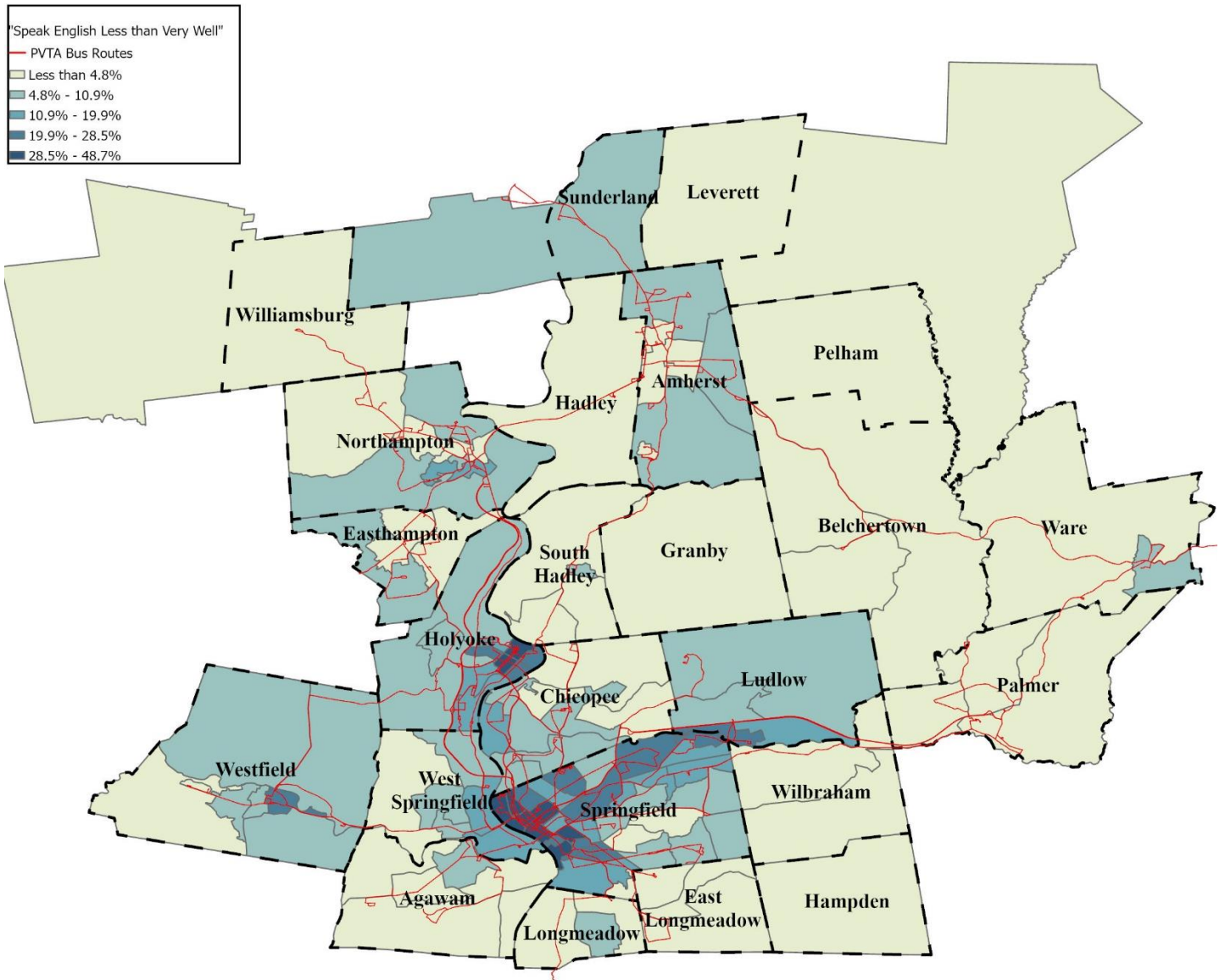


Source: 2022 Census PUMA Reference Maps

- 7-digit reference codes for each PUMA shown
- PVTA communities shown in grey
- PVTA routes shown in red

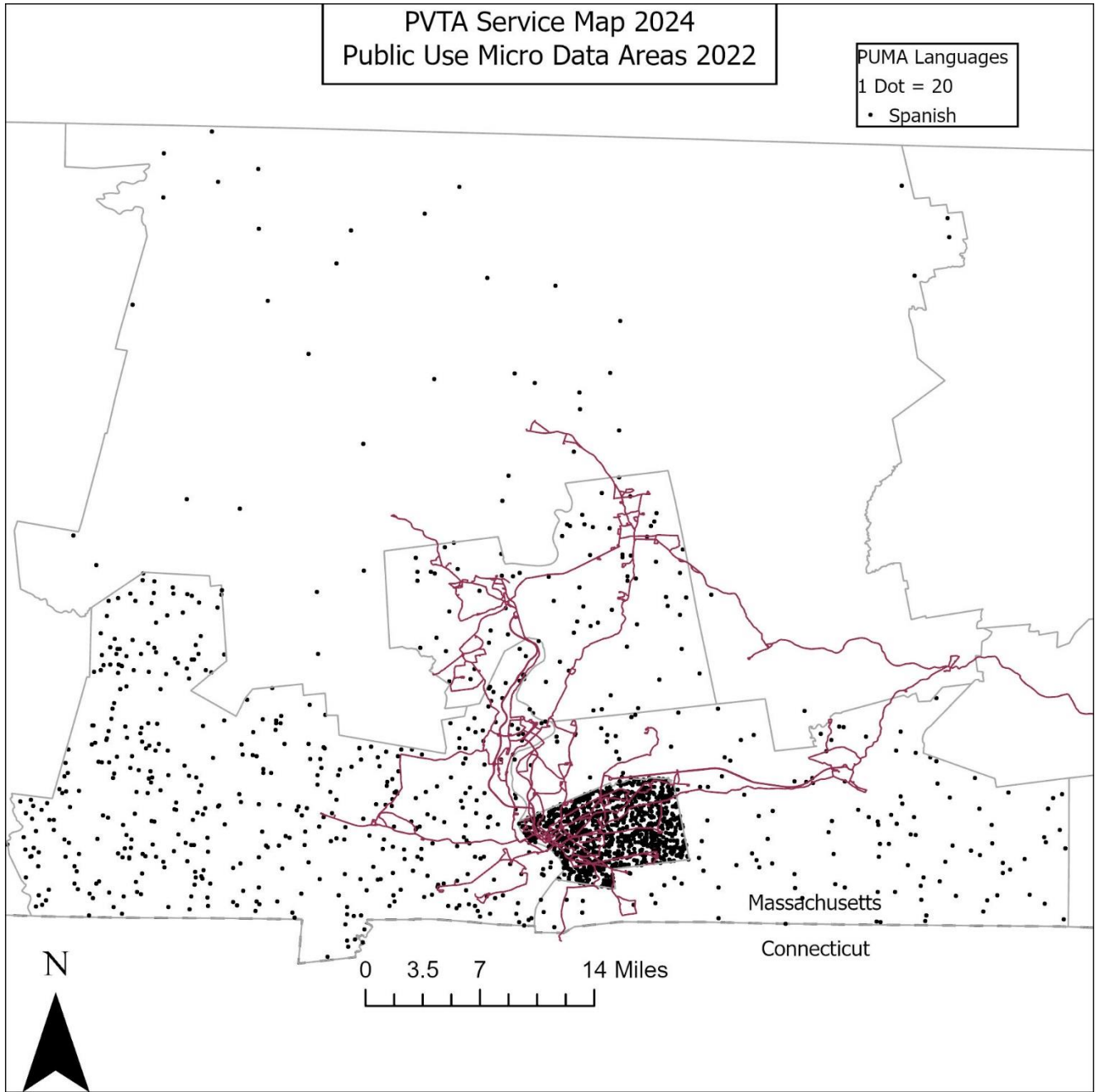
Map 1.1-2: Populations Considered LEP by Census Block Group

2024 LEP Populations by Census Tract



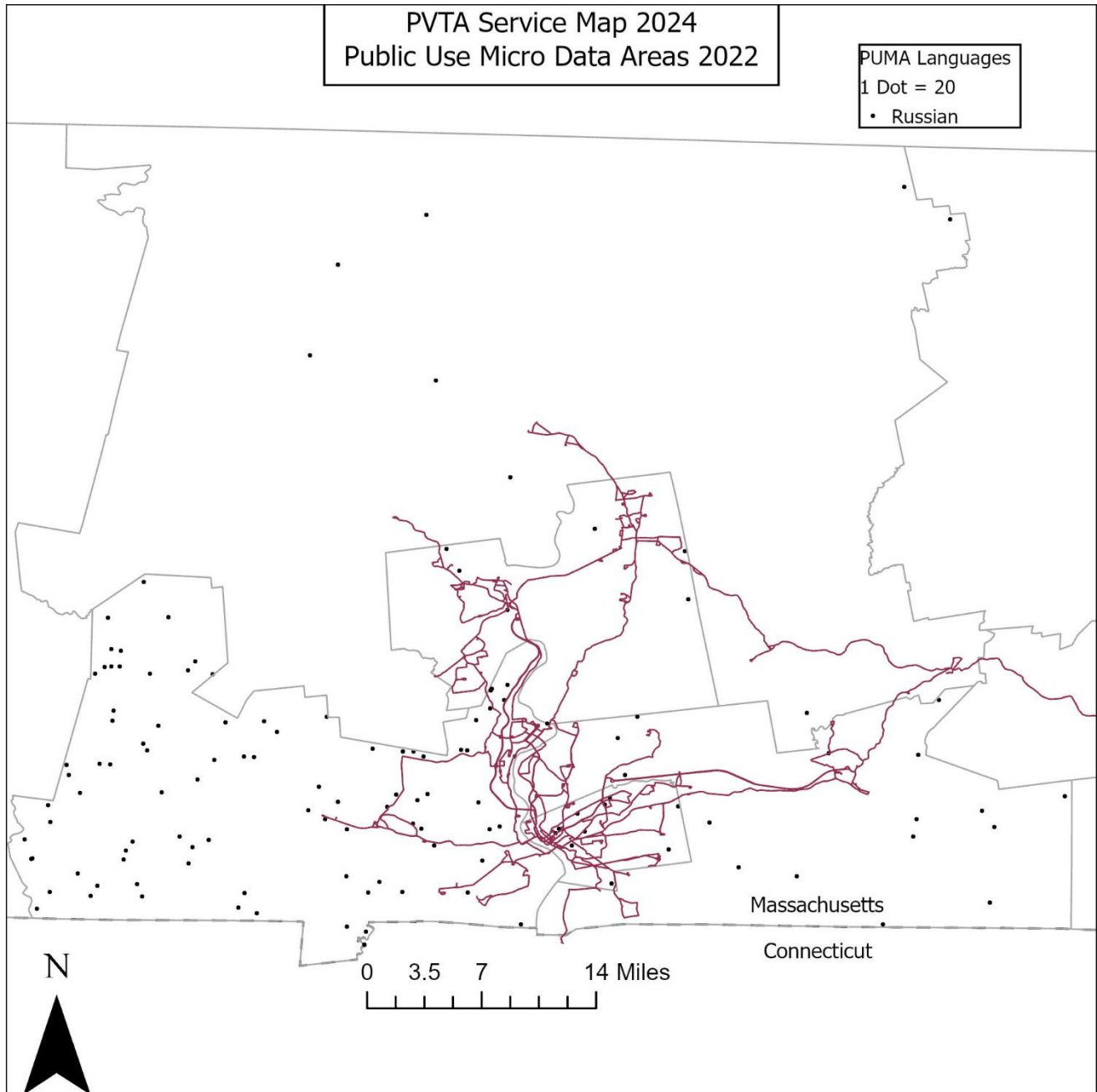
Source: Census Data, ACS 5-Year Estimate for 24 PVTA Communities

**Map 1.1-3: Spanish Speaking Residents Who Speak English "Less Than Very Well"**



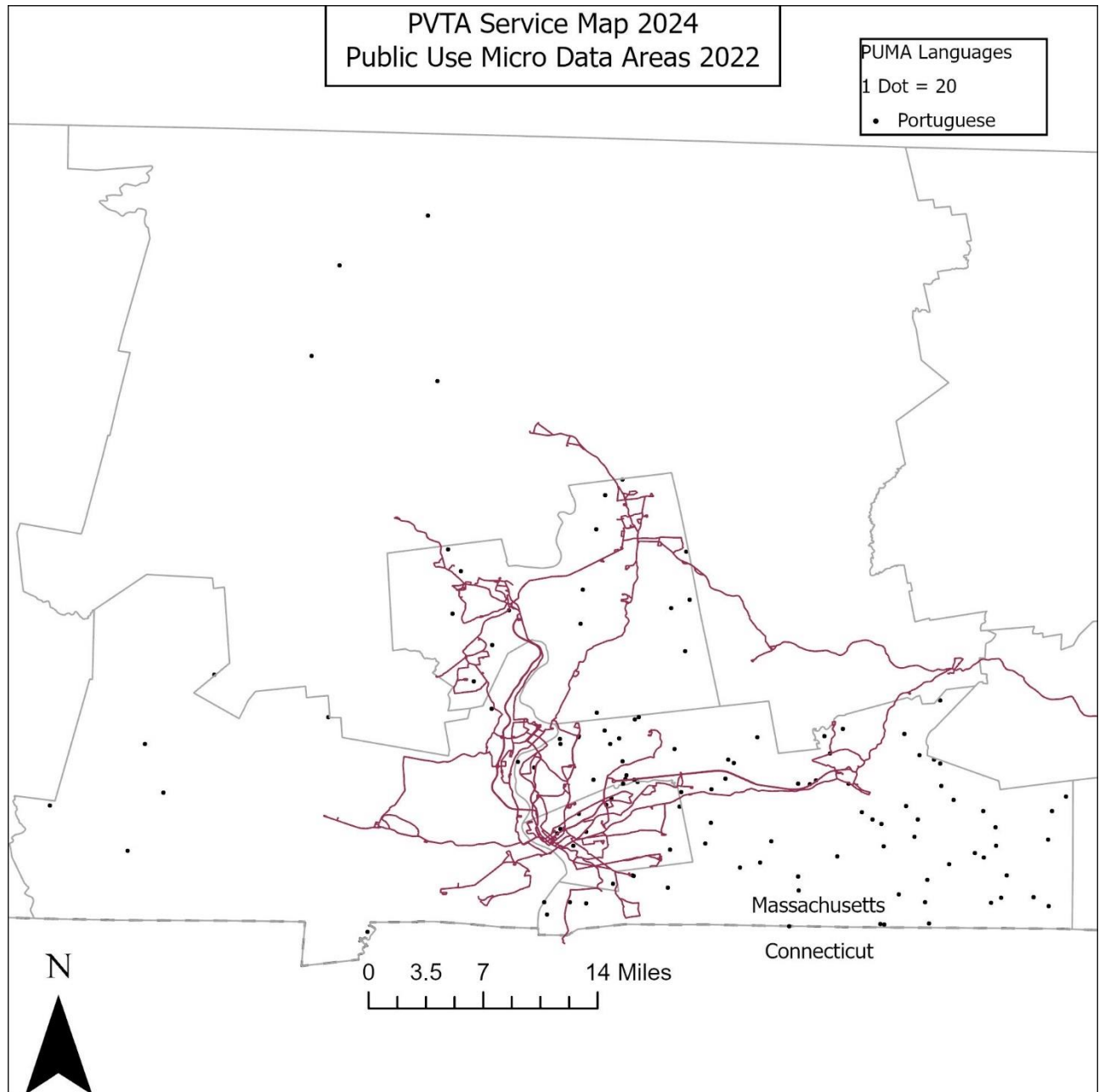
Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

**Map 1.1-4: Russian Speaking Residents Who Speak English "Less Than Very Well"**



Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

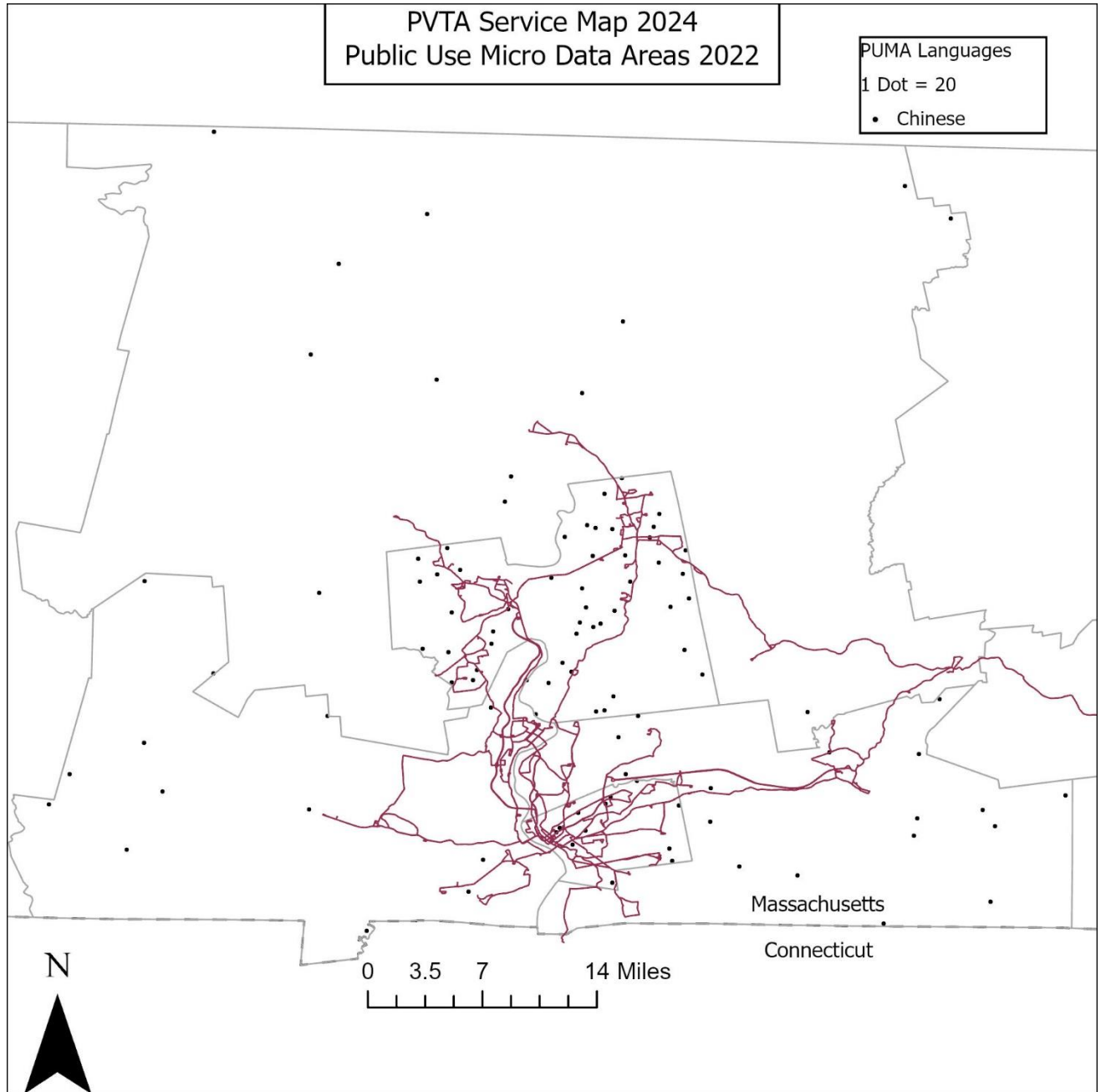
**Map 1.1-5: Portuguese Speaking Residents Who Speak English “Less Than Very Well”**



Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

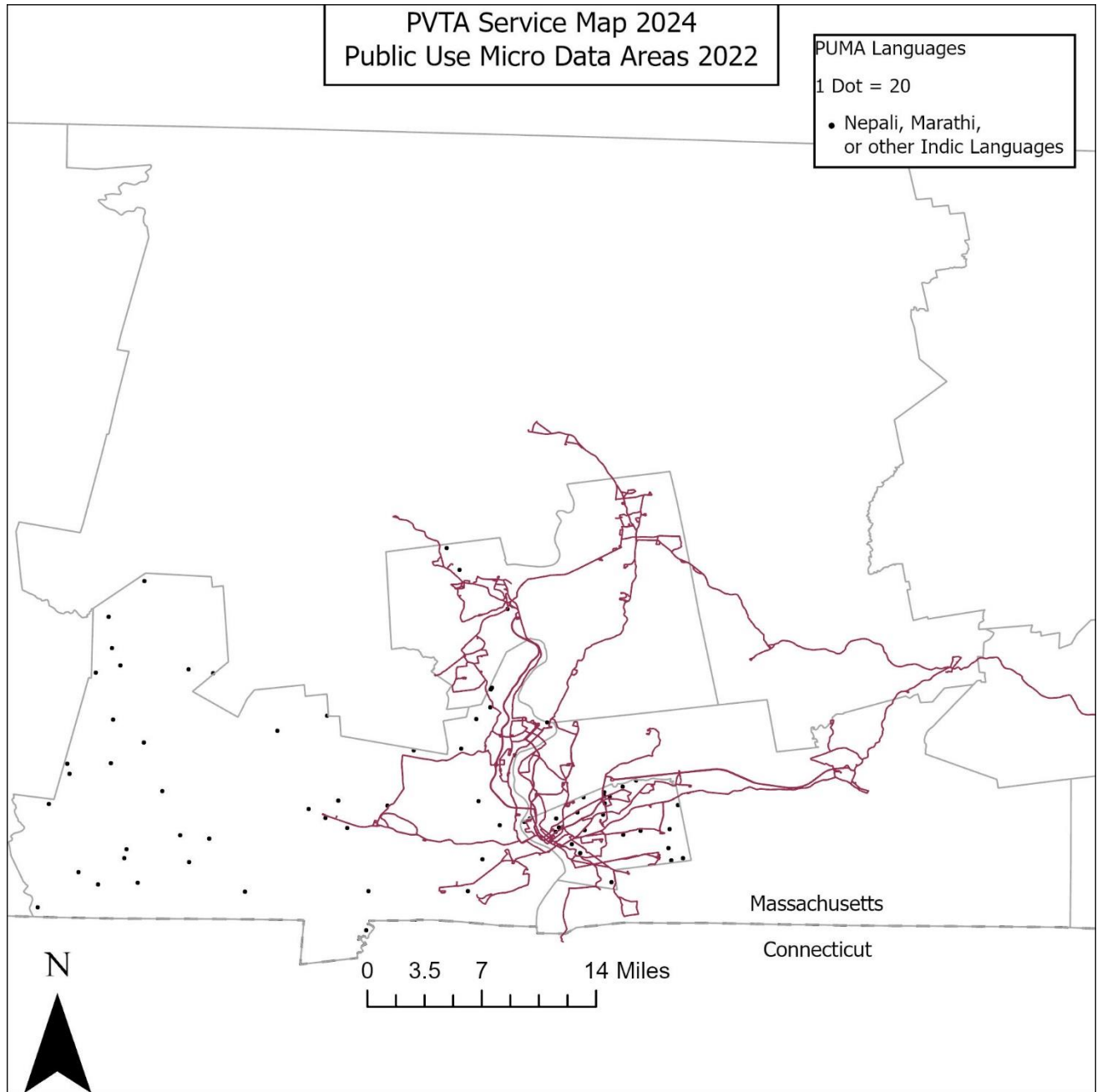


**Map 1.1-6: Chinese Speaking Residents Who Speak English “Less Than Very Well”**



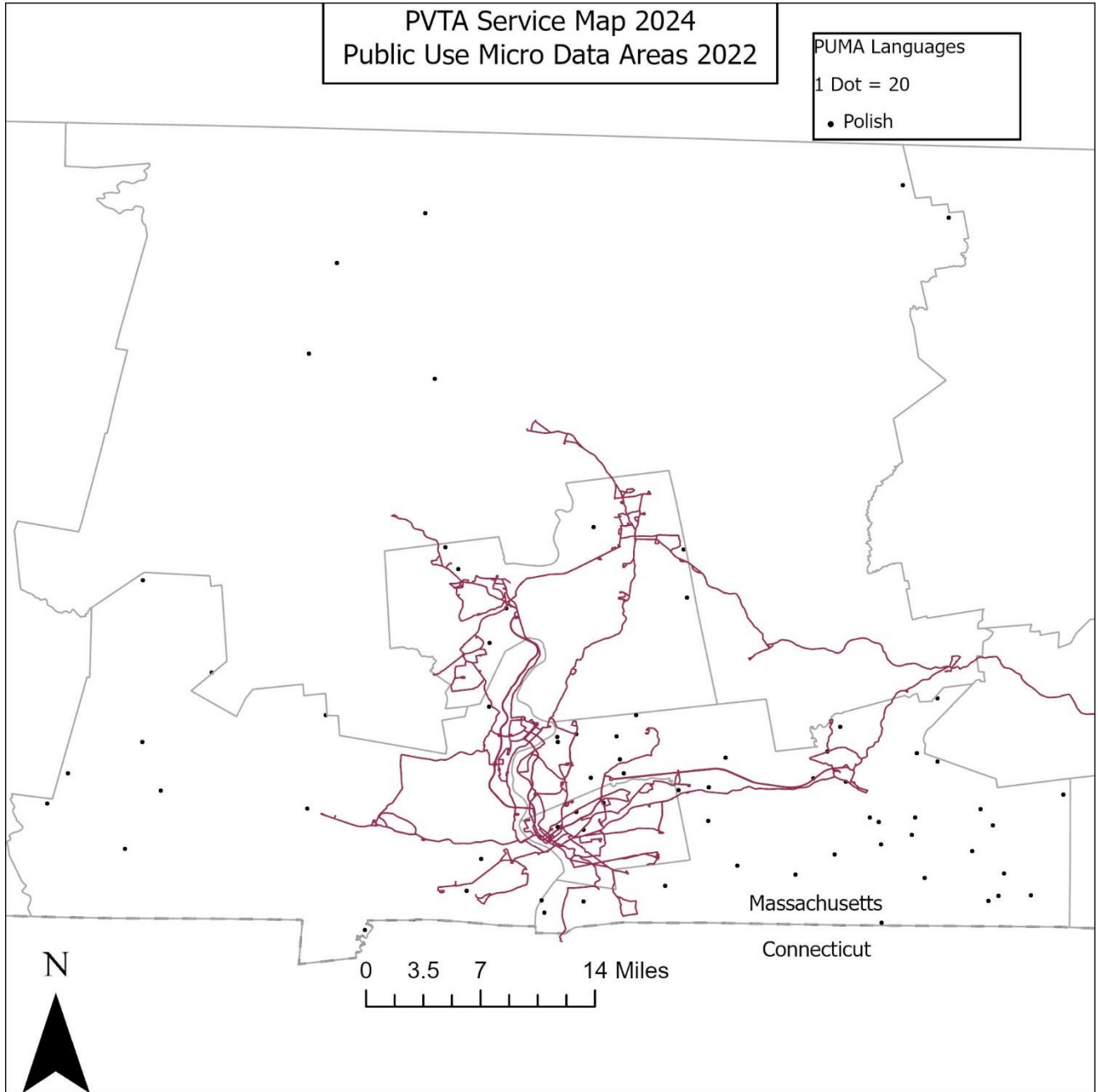
Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

**Map 1.1-7: Indic Language Speaking Residents Who Speak English “Less Than Very Well”**



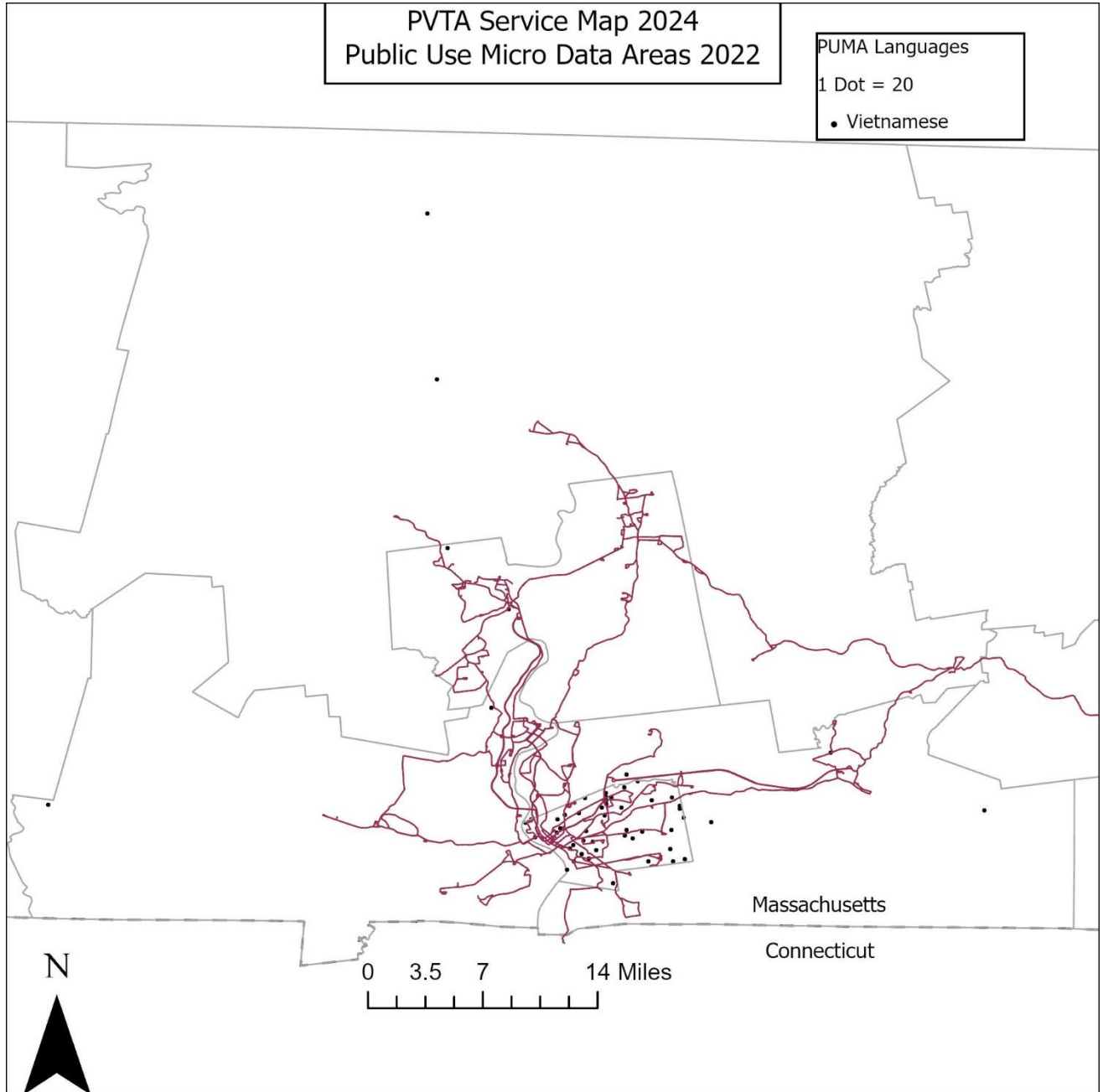
Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

**Map 1.1-8: Polish Speaking Residents Who Speak English “Less Than Very Well”**



Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

**Map 1.1-9: Vietnamese Speaking Residents Who Speak English “Less Than Very Well”**



Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), 1 dot = 20 residents

### 1.1.3 Involvement of Community Organizations and Committees

PVTA engages with community-based organizations that serve LEP persons in two general ways:

1. Participating in meetings of organizations and agencies that deal with LEP issues; and
2. Participating in the public outreach activities of the Pioneer Valley MPO.

PVTA participates on an ongoing basis in the meetings and activities of the following community and municipal organizations that address in part the needs of LEP persons:

- Directors of Councils on Aging in PVTA communities.
- Human service organizations, including Stavros Center for Independent Living.
- Springfield New North End Citizens Council.
- Emergency management agencies and staff of PVTA member communities.
- Homeland Security Councils of Hampden, Hampshire, Franklin, and Berkshire Counties.
- Arise for Social Justice, Springfield

PVTA is also a regular participant in meetings and activities of municipal and volunteer committees. PVTA and PVPC planning staff and operating contractors also support and attend meetings of the Town Amherst Public Transportation Committee. Both committees address issues of concern to LEP residents of the region. PVTA engages regularly with neighborhood community organizations to assist the “Live Well Springfield” effort of Bay State Health addressing public health issues in the City of Springfield, as well as engagement with the Western Massachusetts Public Health Institute. PVTA coordinated transportation options to farmers markets to low income and minority neighborhoods in Springfield and supported the coalition’s efforts to improve transportation access issues that impact public health, including donation of a van for conversion to a mobile fresh produce stand. Other community coalition partners include:

- [Baystate Health Brightwood Health Center](#)
- [Caring Health Center](#)
- [City of Springfield Dept. of Elder Affairs](#)
- [City of Springfield Office of Planning and Economic Development](#)
- [City of Springfield Parks Department](#)
- [City of Springfield Dept. of Public Works](#)
- [Develop Springfield](#)
- [Gardening the Community](#)
- [Health New England](#)
- [LiveWell Springfield](#)
- [Mason Square Health Task Force](#)
- [Mass in Motion](#)
- [Mass Mutual](#)
- [Massachusetts Dept. of Public Health](#)
- [Mercy Medical Center/Trinity Health](#)
- [MGM Springfield](#)
- [New North Citizens Council](#)
- [Pioneer Valley Asthma Coalition](#)
- [Pioneer Valley Riverfront Club](#)
- [Springfield Housing Authority](#)
- [Springfield Partners for Community Action](#)
- [Springfield Police Department](#)
- [University of Massachusetts Amherst](#)
- [WalkBike Springfield](#)
- [Wayfinders](#)

PVTA also works with staff of the Pioneer Valley Metropolitan Planning Organization (PVMPO) to identify other community based organizations not traditionally involved in service of LEP persons. The PVMPO maintains an active database of community organization contacts and provides emails to recipients regarding transportation concerns. PVTA maintains contact with and gathers information about the needs of LEP persons from the community-based organizations and committees of the region.

## **1.2 Factor 2: Frequency of Contact with LEP Persons**

Employees of PVTA and its operating companies are in contact with LEP persons on a daily basis. The most frequent type of encounter is between bus driver and passenger. The second most frequent contact is via telephone on the PVTA Information Center line.

- Bus driver and passenger conversations
- Inquiries to operations staff at the Springfield Bus Terminal (up to 10 inquiries from LEP persons per day)
- Walk-in customers to PVTA Information Center (10-15 LEP persons per week)
- Customer telephone calls to PVTA Information Center (1-2 LEP callers per day)
- Bus rider forums
- Quarterly meetings with paratransit riders
- Public hearings
- Meetings with community-based organizations

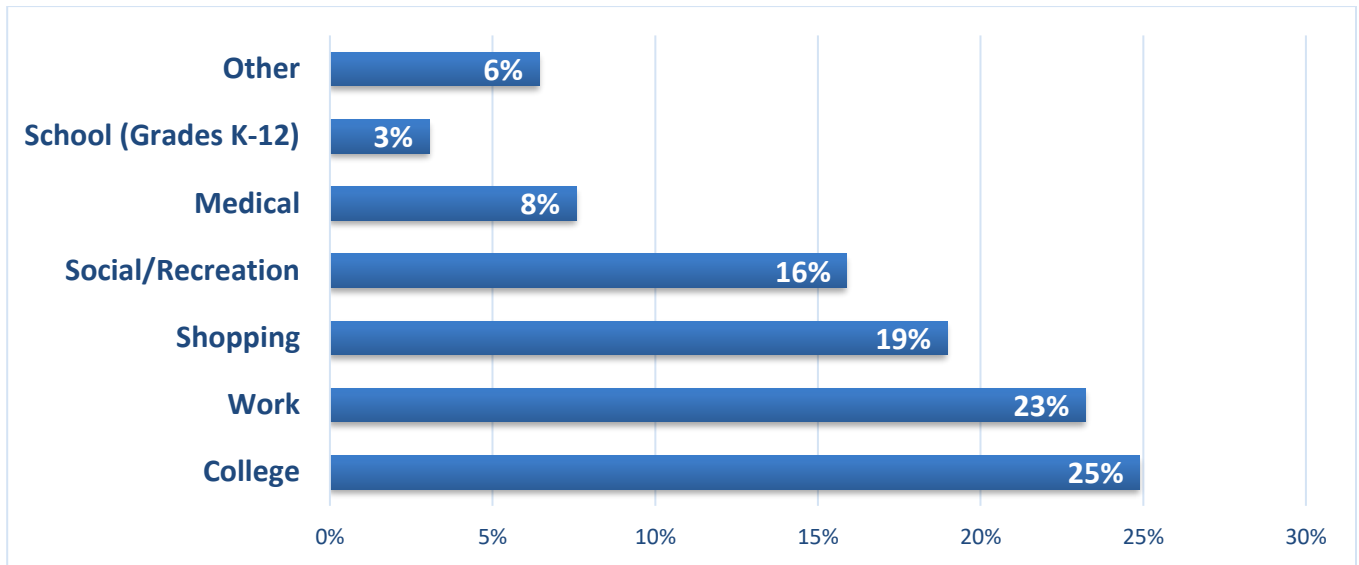
## **1.3 Factor 3: Nature and Importance of PVTA Service to LEP Community**

PVTA is committed to making its services available and as accessible as possible to all persons living within its service area. PVTA is also committed to providing opportunities for all persons to participate in transit planning processes.

This outreach to LEP persons is important to PVTA service because: 1) the proportion of LEP people in the service area exceeds that of the MPO regional average; 2) LEP persons may tend to be more dependent on transit service than English speakers in the region

Any denial, delay, or reduction in access to PVTA services because of language-related barriers is unacceptable to PVTA. PVTA recognizes that thousands of people depend on transit each day in its service region for critical mobility needs, such as traveling to medical appointments, shopping for food, commuting to work, and getting to school. The chart below reports the principal trip purposes from the 2022 Northern System Customer Survey and 2024 Southern System Customer Survey spread to the region by March 2024 Ridership.

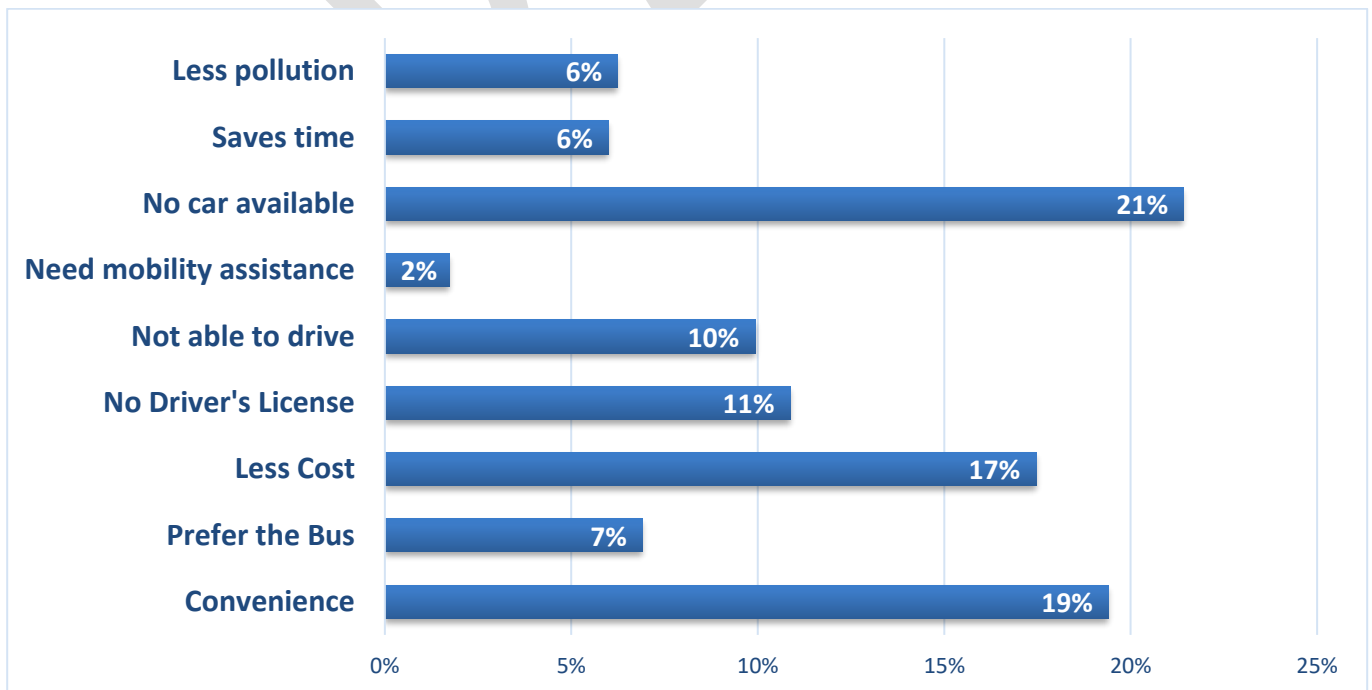
*Figure 1.3-1: PVRTA Rider Trip Purposes*



Source: 2022 Northern and 2024 Southern System Customer Surveys by March 2024 Ridership.

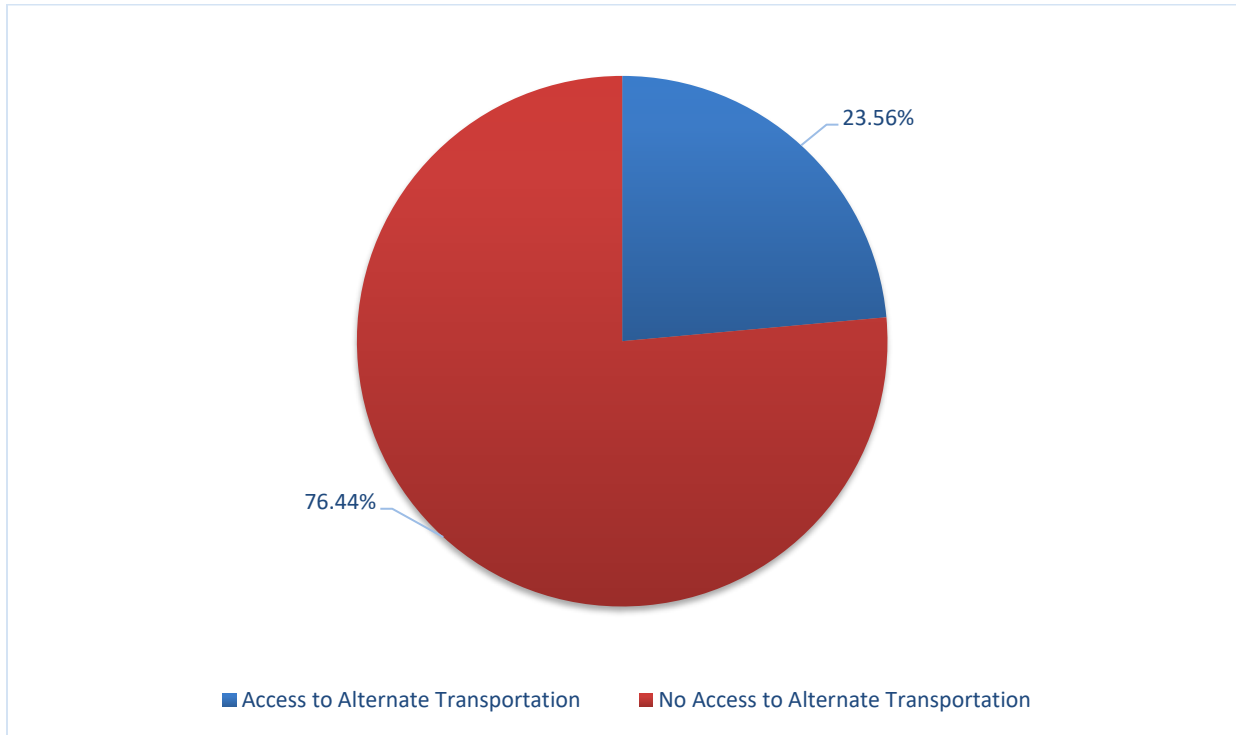
Over a third (11%) of PVRTA riders cite the lack of a driver’s license as a main reason for using the bus, and a majority (33%) report no other way to make their trip. It is a strong indication that PVRTA riders are dependent on this service to a very high degree for their regular mobility—and a majority of current users would not be able to get around without it.

*Figure 1.3-2: Main Reason for Riding*



Source: 2022 Northern and 2024 Southern System Customer Surveys by March 2024 Ridership

*Figure 1.3-3: Travel Alternatives*



Source: 2022 Northern and 2024 Southern System Customer Surveys by March 2024 Ridership

## **2.4 Factor 4: Resources Available to PVTA and Overall Cost**

PVTA utilizes federal and state sources of operating and capital assistance to support LEP programs and services. LEP is integrated with operations and customer services.

In the future, PVTA will continue to identify LEP concerns and seek appropriate additional funding that may be available for LEP programs and services.



## 2.0 SAFE HARBOR STIPULATION

Federal law provides a “safe harbor” stipulation so that recipients can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A safe harbor means that if a recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis.

For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not required. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient's written-translation obligations under safe harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. PVRTA’s translation of other documents, if needed, can be provided orally.

This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

The size of LEP language groups constitutes 5% or 1,000 persons of population (threshold for which written translations of key documents can be provided meet the safe harbor standard) for the following:

**Table 2.0-1 PVRTA “Safe Harbor” Languages (>5% of total or 1,000 persons)**

First Language Spoken by Person Who Speaks English Less than “Very Well”	Number of Persons	Percent of All People in PUMAs Containing PVRTA Communities
Spanish	35,454	5.4%
Russian	2,674	0.4%
Portuguese	2,389	0.4%
Chinese	2,076	0.3%
Nepali	1,467	0.2%
Polish	1,425	0.2%
Vietnamese	1,070	0.2%

Source: ACS 5-Year Estimates, Public Use Microdata Sample (2022), “Ability to Speak English” & “Language Other Than English Spoken at Home”

### **3.0 IMPLEMENTATION PLAN FOR LANGUAGE ASSISTANCE**

This section describes PVTA's current and future plans for providing language assistance to LEP persons in the service area.

#### **3.1 Identifying LEP Persons Who Need Language Assistance**

PVTA identifies LEP persons who need language assistance through the following programs, activities, and services:

- Telephone assistance and assessment by Information Center operators.
- Periodic surveys of Information Center staff about languages encountered when engaging with customers.
- Periodic surveys of bus and van operators about languages encountered when engaging with customers.
- Conversational assessment of walk-in customers at the Information Center.
- Conversation with PVTA bus operators and field personnel.
- Inclusion of instructions for requesting language translation on public meeting notices.
- Asking persons attending public hearings if Spanish language translation and/or signing interpreter services are desired or needed (services are always available).
- Demographic assessment of census data to ascertain likely geographic location of potential LEP customers.
- Outreach to community-based organizations and municipal agencies to ask their assistance in identifying LEP persons who may need language assistance.

#### **3.2 Providing Language Assistance**

This section describes the current and future services that PVTA provides for enhancing the access of its system to LEP persons.

Information regarding PVTA services is made available through multiple means, including website translation services, system maps and providing a bilingual staff whenever possible. There are no costs to users for these services.

##### **3.2.1 Existing LEP Programs and Services**

Following is a summary of the language assistance, programs and services currently provided:

- All bus schedules are now provided in English/Spanish bilingual format.
- All bus riders' guides are printed in English/Spanish bilingual format.
- All public notices of meetings, service changes, fare changes, and other relevant customer service information are now posted in English/Spanish bilingual format.
- All vital documents are posted on PVTA website at <http://www.pvta.com/titleVI.php> in English and Spanish format with instructions in 13 languages on how to request translation to other languages.
- Bilingual staff (Spanish) is always available at the PVTA Springfield Information Center.
- Two PVTA staff members at the Holyoke Intermodal Center are bilingual (Spanish).
- Information Center staff routinely evaluate LEP needs and provide recommendations.

- Information Center staff are trained in the use of online translation services for other languages (i.e., Russian, Portuguese, Vietnamese) to assist customers.
  - Onboard passenger surveys available in Spanish administered by bilingual surveyors.
  - Translation and interpretation services are available upon request at (877) 779-7882.
  - Many PVRTA vehicle operators are bilingual (Spanish, Russian).
  - Many vehicle operators are also familiar with common phrases used by customers in languages other than English.
  - Website translation function (list of languages available included in appendix).
  - Translation of key PVRTA documents available upon request.
  - Meeting notices include explanation of procedures to request language translation.
  - Meetings with community-based organizations.

PVRTA defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and a translator as person who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.

### 3.2.2 Future LEP Programs and Services

PVRTA's proposed future programs and services to enhance accessibility of transit services to LEP persons include:

- Partnerships with community organizations to develop a list of language translation volunteers who are available for public meetings. This option could be used where advanced notice is provided that translator services are needed. This option may also help increase the number of languages for which translation services are available.
- Development of written translation and oral interpreter service providers database. This would improve the speed and convenience with which written documents can be translated for the public and reduce the need to have public requests for them.
- Use of PVMPO's LEP services outlined in the organization's LEP plan, as developed.
- Ensure other PVMPO members are aware of the USDOT LEP guidance and support their LEP planning activities, as appropriate.
- Updates to the PVRTA LEP Plan, as needed by new events
- Identify community-based organizations that are not being contacted through existing outreach.
- Incorporate services to assist LEP customers in forthcoming intelligent transportation system (ITS) passenger information capabilities, including onboard audio announcement in multiple languages and multiple language capability on LCD display boards.

### 3.2.3 PVTA LEP Coordination with Regional MPO

PVTA also participates in the public involvement activities of the Pioneer Valley Metropolitan Planning Organization (PVMPO) for capital planning. The PVMPO works to engage persons with LEP in regionwide planning activities, such as the adoption of the Regional Transportation Plan (RTP), Unified Planning Work Program (UPWP), transit studies, and the regular updating of the Transportation Improvement Plan (TIP). The PVMPO does this through outreach to Spanish-speaking residents, which represent the largest group of LEP people in the region. The PVMPO publishes meeting notices are published in Spanish and provides translation services upon request within 10 business days of a scheduled meeting. PVMPO provides translated summaries of key reports in Spanish upon request. In addition, the PVMPO utilizes Spanish language newspapers (media) with distribution to communities with significant Spanish speaking populations.

PVMPO also engages LEP persons in the region in special activities focused that may be on a specific neighborhood or corridor. This is accomplished by producing maps that depict the distribution of non-English speaking persons at the beginning of any such project to assess whether or not outreach in languages other than English are needed. If it is determined that such outreach is needed, PVMPO consults with neighborhood groups, ethnic associations, and religious organizations to identify the best methods and channels for reaching and involving LEP residents.

### 3.3 Training Staff

PVTA's existing staff training for better serving LEP transit customers includes:

- Bus driver training (for new and existing drivers) that addresses the needs of LEP persons and helps drivers learn key phrases in Spanish and other languages for better communication with non-English speakers.
- Regular discussion, assessment, and refinement of practices for communicating with LEP persons who call the PVTA Information Center by telephone.
- Regular discussion, assessment, and refinement of practices for communicating with LEP persons who are walk-in customers to the PVTA Information Center.
- Regular discussion, assessment, and refinement of practices for communicating with LEP persons who are walk-in customers to PVTA terminal facilities.

Anticipated LEP training activities in the future will include:

- Assessment and refinement of LEP training for bus drivers.
- Assessment and refinement of LEP training for Information Center staff.
- Design and implementation of LEP training for all agency staff is forthcoming.

### 3.4 Providing Notice to LEP Persons

USDOT LEP guidance states: "Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons can understand.

PVTA provides this notification through the following:

- Meeting notices include instructions on how to request language assistance (with advance notice).
- Stating in outreach documents that language services are available from the agency.
- Collaborating with community-based organizations and other stakeholders to inform LEP individuals of the recipient's services, including the availability of language assistance services.
- Using automated telephone voice mail attendant or menu which can provide information about available language assistance services and how to get them.
- Including notices in local newspapers in languages other than English, including Spanish language newspapers.
- Onboard posting on PVTA buses

Future notification services are expected to include:

- An inventory of existing public service announcements and community outreach the agency currently performs.
- Greater incorporation of notices of language assistance availability into existing outreach.
- Targeted community outreach to LEP persons, especially via community-based organizations that serve and represent them.
- Providing notices on non-English-language radio and television states about the available language assistance services and how to get them.

### **3.5 Monitoring and Updating This LAP Plan**

PVTA continues to develop a process for monitoring and updating this LEP Plan. Related activities will likely include:

- Obtaining feedback from LEP persons, directly, as well as community members and agencies.
- Conducting internal monitoring and random spot checks of LEP services.
- Refining and improving the LAP Plan described above consistent with feedback received.
- Considering new language assistance needs when expanding service.
- Regularly updating the plan when new language-related ACS demographic data becomes available.