Washington Metropolitan Area Transit Authority

Language Assistance Plan

October 2023 – September 2026

Updated November 2023

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I. Introduction

The Washington Metropolitan Area Transit Authority (WMATA or "Metro") is committed to ensuring meaningful access to its programs, activities, and services to riders and customers for whom English is not their primary language. It is mandated for Metro to provide services that fully include customers with little or no proficiency in English.

Formed in 1967 under an interstate compact among the District of Columbia, the State of Maryland, and the commonwealth of Virginia, Metro provides service to this tri-jurisdictional area through its three core transit functions, Metrorail, Metrobus, and MetroAccess paratransit services. Metro is one of the largest transit agencies in the United States covering an area of approximately 1,500, square miles and serving a population of approximately 4 million people.¹

According to the 2016-2020 American Community Survey data on language use and English-speaking ability,² 21.5 percent of the total U.S. population aged five and over, or 66.1 million people, reported that they spoke a language other than English at home.³ Census data also indicate that the proportion of the population aged five and over who spoke English less than "Very Well" has been growing from 4.8 percent in 1980, to 6.1 percent in 1990, and to 8.1 percent (or 21.3 million people) in 2000. Combined, this means that the population of people that speak English less than "Very Well" in the U.S. increased by 3.3% in 20 years. Of those limited and non-English proficient individuals, 49 percent speak Spanish.

The U.S. Census Bureau American Community Survey (ACS) data show that the Washington, D.C. region has a total of 1.4 million people, or 33 percent of the region's population, 5 years and older, who speak a language other than English at home (2016 - 2020; 2020 ACS 5-year). Of these individuals, 518,503 or 12 percent speak English less than "Very Well," and thus are considered to have limited or no-English proficiency. The terms limited and no-English proficient (LEP/NEP) refer to individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It also includes individuals who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

II. Purpose

As a recipient of federal funds, Metro is obligated by law to maintain compliance with the provision of equal language access as stipulated by the Title VI of the Civil Rights Act of 1964,

WMATA (2023). WMATA Performance Report FY2023 July 2022 – June 2023[PDF]. Retrieved from https://www.wmata.com/about/records/upload/MetroPerformanceReport_FY23Q4_1Report_20230922.pdf
 U.S. Census Bureau (2000). Language Use and English-Speaking Ability. Census 2000 Brief. Retrieved from Census 2000 Brief: Language Use and English-Speaking Ability: 2000

³ ACS DP02| Selected Social Characteristics in the United States 1010: ACS (2016 – 2020 ACS) 5-year Data Profiles. Retrieved from https://data.census.gov/table/ACSDP5Y2020.DP02?q=social+characteristics

⁴ "Very Well," is one of four U.S. Census categories of language proficiency: "Very Well," "Well," "Not Well," and "Not At All."

and under the direction of Executive Order 13166, and the Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons ("DOT LEP Guidance"). Title VI refers to a Federal Law, which mandates that no person participating in any federally funded programs, policies, or activities, shall be excluded from participation; denied benefits; or be subjected to discrimination based on three protected classes: race, color (skin color or complexion); or national origin (foreign born ancestry). This obligation by law applies to both recipients and subrecipients of Federal financial assistance. Executive Order 12892 and FTA Circular 4702.1B guidance also includes low-income status as a protected category. Metro's non-compliance with Title VI can cause federal funds to be withheld.

Title VI has the following five objectives: 1) Ensure that the level and quality of transportation service is equitable; 2) Identify and address disproportionately high and adverse effects; 3) Maintain inclusive public involvement by underrepresented populations; 4) Prevent the denial, reduction of, or delay in benefits related to programs; and 5) *Ensure meaningful access to programs and activities by persons with limited English and no-English proficiency (NEP/LEP)*. The last objective, ensuring that Metro provides meaningful access to programs and activities to individuals for whom English is not their primary language and who have limited ability to read, write, speak, or understand English, is the focus of this Language Assistance Plan.

In what follows, attention will be first focused on the legal responsibilities Metro has under the Federal Transit Authority's (FTA) funding to attain meaningful access for linguistic minorities in the service area. An outline on the collection and analysis of demographic data is then provided, as well as a description of what has been done, and plans for current and future activities, processes, and procedures within Metro.

III. Authority and Guidance

Title VI Statute, 42 U.S.C. §2000d et seq. was enacted as part of the landmark *Civil Rights Act of 1964*, and in its section 601, it prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. One of its most quoted segments reads as follows: "[N]o 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 subjected to discrimination under any program or activity receiving Federal financial assistance" (Pub. L. 88–352, title VI, §601, July 2, 1964, 78 Stat. 252).

The 1974 Supreme Court case *Lau v. Nichols*, 414 U.S. 563 resulted in one of the most important court decisions regarding the education of language-minority students in terms of not imposing standards and actions, thought to be of an equal nature, that nevertheless result in disproportionate and unequal treatment and fail to support the needs of limited and non-English proficient individuals. *The failure of an agency to take appropriate action to overcome language barriers impeding equal participation for LEP individuals, including the denial of meaningful access, therefore constituted national origin discrimination. Per the FTA's Circular 4702.1B (1), "Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language*

and who have limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all." In this Language Assistance Plan, and to maintain consistency, Metro uses the combined terms of limited and non-English proficient (LEP/NEP) individuals to represent all those varying levels of English language knowledge, use and practice, which are evaluated in terms of English language ability.

Consistent with the Title VI of the Civil Rights Act of 1964, *Executive Order 13166*, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121, [August 16, 2000], 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 to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take *reasonable steps* to ensure that recipients of Federal financial assistance provide meaningful access to their federally conducted and federally assisted programs and activities for persons, who may, as a result of national origin, be limited in their English language proficiency, or who are in their daily life English language learners.

As for Metro's Federal guidance, The U.S. Department of Transportation published a revised version for its recipients on December 14, 2005, entitled Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons ("DOT LEP Guidance"). This guidance is based on the prohibition against national origin discrimination described in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons (LEP). It states that Title VI and its implementing regulations require that the Department of Transportation's grant recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important areas of their programs and activities for individuals with limited English proficiency, 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 LEP individuals. As stated in its introductory segment, "in certain circumstances failure to ensure that LEP persons can effectively participate in or benefit from federally assisted programs and activities may violate the prohibition under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, and Title VI regulations against national origin discrimination. [Thus], the purpose of this policy guidance is to assist recipients in fulfilling their responsibilities to provide meaningful access to LEP persons under existing law."

The Federal Transit Administration (FTA) references the DOT LEP Guidance in its Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," published on October 1, 2012. In Chapter III part 9, ("Requirements to Provide Meaningful Access to LEP Persons") it reiterates that recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for LEP individuals, and suggests that FTA recipients and subrecipients develop an implementation plan to address the identified needs of the LEP populations it serves. This implementation plan must be consistent with the provisions of Section V (How Does a Recipient Determine the Extent of Its Obligation to Provide LEP Services?) for which the DOT LEP

Guidance recommends establishing an individualized assessment that balances an analysis of four factors. The four factors established are:

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

Per the DOT LEP Guidance, these four factors, when applied to the kinds of contacts recipients of federal funds have with the public, will help them assess language needs, and decide what reasonable steps they should take to ensure meaningful access for LEP persons. The DOT LEP Guidance also states that the intent of this policy is to suggest a balance that ensures meaningful access by LEP persons to critical services, while not imposing undue burdens on small businesses, small local governments, or small nonprofit organizations.

In Section VII ("Elements of an Effective Implementation Plan on Language Assistance for LEP Persons"), 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. It 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 LEP plan.

Transit agencies that develop a Language Assistance Plan, implement it within their institution, and maintain a balance in their analysis of the four factors mentioned above, will thus be following this mandatory provision of language assistance to persons with limited and no-English proficiency. If done in a competent and effective manner, it ensures that their services are safe, reliable, convenient, and accessible to all customers. These actions attract and retain riders and customers who would otherwise be excluded from participating in these services and activities because of language barriers, and ideally will encourage riders to be independent advocates of the system, as they are included and welcomed as customers whose rights are being upheld by having an equal and safe access to a public transportation system that takes pride in serving their communities.

Furthermore, providing equal access to individuals with limited or no-English proficiency will also help increase and retain ridership among the transit agency's broader immigrant communities in two important ways: 1) transit agencies that reach out to recent immigrant populations to conduct a needs assessment and prepare a language assistance plan (pursuant to the DOT LEP Guidance) will send a positive, inclusive message to members of different linguistic communities that their presence and use of the system is valued; and 2) community engagement and outreach

designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and other linguistically diverse populations and to ensure 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 individuals with limited and no-English proficiency can increase their potential for recruiting bilingual employees to better serve the needs of the diverse community the transportation agency serves. In summary, serving the needs of limited or non-English proficient populations is not only a good business decision; it fulfills the mission, and maintains the required compliance of the transit agency to serve the public in a non-discriminatory manner.

The following sections of this document provide Metro's 2023 - 2026 Language Assistance Plan and include:

- 1) Updated information on the four-factor analysis,
- 2) Language assistance measures employed by Metro;
- 3) Report on efforts to implement the 2020 Language Assistance Plan; and
- 4) Proposed language access initiatives planned for the next three years.

IV. Title VI Limited and Non-English Proficient Policy Statement

The Washington Metropolitan Area Transit Authority (WMATA or "Metro") is committed to ensuring compliance with Title VI of the Civil Rights Act of 1964, Executive Order 13166, and supports the goals of the DOT LEP Guidance to provide meaningful access to its services to individuals with limited and no-English proficiency. Therefore, Metro will ensure that no person shall, on the grounds of race, color, national origin, or language be excluded from participation in; be denied the benefits of; or be otherwise subjected to discrimination under any Metro service, program, or activity. Furthermore, Metro will continue its commitment to provide oral and written language services by taking the necessary steps to provide meaningful access to services and activities to persons for whom English is not their primary language or who have limited or no-English proficiency when reading, writing, speaking, or understanding English; and these include LEP/NEP customers who speak English less than very well, not well, or not at all.

Metro first created its Title VI compliant Language Assistance Plan (LAP) in October 2007, which was approved by the FTA on November 3, 2007. Metro's 2011 LAP update was approved by the FTA on January 27, 2012, later the 2014 update was approved on February 2, 2015, the 2017 update was approved by FTA on December 9, 2019, and the 2020 was submitted to the FTA on May 2021.

V. LEP Population Overview

The Washington Metropolitan Area Transit Authority attends to a very diverse population living and working in Metro's tri-jurisdictional service area. This demographic diversity has consistently increased in numbers and distribution across jurisdictions, and for some groups, evidenced by new Census data, additional languages have started to emerge. The number of limited and non-English proficient individuals in the region continues to include a solid representation of the five habitable continents in the world. Languages spoken in the area include Spanish, Chinese (Mandarin and Cantonese), African and West Africa languages, such as French, Yoruba, Igbo, and Akan (including Twi), Korean, Vietnamese, Afro-Asiatic languages (Arabic, Amharic, Somali), Persian (including Farsi-Dari), Russian, Portuguese, Filipino (including Tagalog), an increasing representation of various Indic languages (Urdu, Hindi, Bengali, Punjabi, Telegu, Nepali, Gujarati, and Tamil), Japanese, some Tai-Kadai languages such as Thai and Lao. Haitian, Tigrinya. Burmese, Khmer (Cambodian), Sinhala, German, and other Bantu languages (such as Swahili) are also represented in this new listing of languages where the number of speakers for each language exceeds 1,000 persons.

Metro is committed to provide equal access to individuals served and likely to be served, and this includes providing information to its LEP/NEP customers through language interpretation, and translation of vital documentation. Through outreach and engagement with the public, Metro also identifies documentation of importance to inform its customers of upcoming planned capital projects related to service and fare changes, making sure that printed information is distributed to members of the public in their language of preference. Upon request, Metro also provides interpretation services for public hearings, during customer service interactions and planned projects and activities of interest to various linguistic populations.

Demographic Data

The demographic data used here have been collected through Metro's Planning Administration, drawn from the 2016 - 2020 ACS 5-year estimates, which evidence changes in the composition of the service area population since the last version of the Language Assistance Plan that was submitted to the FTA.

Most of the LEP/NEP individuals being served by Metro speak Spanish. Their presence is significant in that Spanish speakers now comprise 58 percent of the serving area's limited and non-English proficient population, with an increase of six percent since the last 2014 - 2018 ACS 5-year estimate. Languages spoken by the region's limited and non-English proficient population also includes Chinese, Korean, and Vietnamese in top positions of representation. Census data collected for this new 5-year estimate period show an increase of speakers of Portuguese. The presence of Afro-Asiatic languages (Amharic (Semitic), Arabic, Tigrinya) continues, as well as the presence of African and West African languages (French, Yoruba, Igbo, and Akan [including Twi]). Indic languages (Urdu, Bengali, Punjabi, Telegu, Nepali, Gujarati, Tamil) have maintained their presence as well, and for some of them (Punjabi, Telegu), their numbers have shown an increase of two tenths of a percent. There is also Russian and Tagalog presence in these new data.

VI. Four-Factor Analysis

This Language Assistance Plan is consistent with the provisions of Section V (How Does a Recipient Determine the Extent of Its Obligation to Provide LEP Services?) for which the DOT LEP Guidance recommends establishing an individualized assessment that balances an analysis of the following four factors: 1) the number of LEP people served or encountered; 2) the frequency of contact from LEP individuals; 3) the nature and importance of the contact being made by LEP persons; and 4) the available resources to provide access for LEP persons.

Metro provides service to this tri-jurisdictional area through its three core transit functions, Metrorail, Metrobus, and MetroAccess paratransit. It is one of the largest transit agencies in the United States covering an area of approximately 1,500 square miles and serving a population of approximately 4.6 million people. The average weekday daily ridership on Metrorail from 2019 is 505,903, and on Metrobus is 287,624.⁵

Factor 1: The number of LEP/NEP people served or encountered in the Metro Service Area

Using 2016-2020 Public Use Microdata Sample (PUMS) data, Metro identifies the number of limited and non-English proficient (LEP/NEP) individuals in the Metro service area by language spoken at home. These data help to inform Metro on factor one (number of limited and non-English proficient people served or potentially being encountered) within the Washington region.

The U.S. Census Bureau's American Community Survey (2016 - 2020), ACS 5-year estimate data release⁶ shows that the Washington, D.C. region has 1.4 million people, constituting 33 percent of the region's population, 5 years and older, who speak a language other than English at home. Of these individuals, 518,503 or 37 percent speak English less than very well or not at all. The limited English and non-English proficient population for each of the jurisdictions served by Metro is shown in Table 1 below.

⁵ Washington Metropolitan Area Transit Authority Ridership Data Portal. Retrieved July 21, August 2, 2023, from https://wmata.com/initiatives/ridership-portal/Metrobus-Ridership-Summary.cfm, https://wmata.com/initiatives/ridership-portal/Metrobus-Ridership-Summary.cfm.

⁶ The long form language was eliminated from the 2010 Census. Information on languages spoken at home, English-speaking ability and income are now collected through the American Community Survey.

Table 1: LEP population for each of the jurisdiction served by Metro.

					LEP Speak English Less than "Very Well"				
Jurisdiction	Total Population (Ages 5+)	Speak Only English	Speak another language at home	% of Speakers of another language at home	LEP	% of Total Population	% of LEP in each Jurisdiction	% of Region LEP in Each Jurisdiction	
DC	657,061	544,039	113,022	17%	37,257	5.7%	33.0%	7%	
MDMontgomery County	982,321	580,901	401,420	41%	143,346	14.6%	35.7%	28%	
MDPrince George's County	850,822	614,495	236,327	28%	108,572	12.8%	45.9%	21%	
VAArlington County	222,588	158,314	64,274	29%	18,480	8.3%	28.8%	4%	
VAFairfax County	1,075,736	656,217	419,519	39%	153,485	14.3%	36.6%	30%	
VALoudoun County	376,861	255,057	121,804	32%	36,401	9.7%	29.9%	7%	
VACity of Alexandria	146,970	100,051	46,919	32%	17,279	11.8%	36.8%	3%	
VACity of Fairfax	21,666	14,443	7,223	33%	2,904	13.4%	40.2%	1%	
VACity of Falls Church	13,536	10,852	2,684	20%	779	5.8%	29.0%	0%	
Region	4,347,561	2,934,369	1,413,192	33%	518,503	12%	36.7%	100%	

Source: *ACS 5-Year Estimates* (2016 – 2020).

Changes of note in the region's limited and non-English proficient population since the 2020 – 2023 Language Assistance Plan, include the following:

- The limited and non-English proficient population in the Metro's service area has grown by 10.52 percent, from 469,133 reported on the ACS5 2014-2018, to the 518,503 number of limited and non-English proficient population reported in the ACS5 2016-2020 data. This 10.52 percent increase is largely due to the inclusion of data for a new county (Loudoun County), which joined the WMATA Compact with the opening of the Silver Line 2 Extension. However, without the inclusion of Loudoun County data, the limited and non-English proficient population in Metro's service area still increased by three percent.
- The region's population of speakers of languages other than English at home has grown 12 percent, as it increased from a total population of 1,263,175 reported on the ACS5-2014-2018 to the current 1,413,192 individuals speaking another language at home reported on the ACS5 2016-2020. Again, this increase is largely due to the inclusion of Loudoun County data. The proportion of speakers of languages other than English that are LEP has been maintained at 37 percent in the region.
- In general, the increase in each jurisdiction for the LEP/NEP percentage of the total population has been maintained with the same 12 percent as the 2014-2018 ACS 5-year estimates. Prince George's County and City of Falls Church both saw the biggest increase of .8 percent of their LEP population in the last three years. Montgomery County, City of Fairfax, and Arlington County saw small increases from .3 to .6 in their limited and non-English proficient populations. Washington, D.C., Fairfax County, and the City of Alexandria experienced small decreases in their LEP populations of -.3, -.7, and -.2 respectively.

Metro has also identified the number of limited and non-English proficient individuals in the Metro service area by language spoken at home. The Census data listed below represent the answer to

the question of whether the person speaks a language other than English at home, lists the language spoken, and the number of individuals responding that they speak English "Well," "Not Well," and "Not At All." These numbers represent what the FTA Circular 4702.1B (1) labels "Limited English Proficient (LEP)." Per the FTA's Circular 4702.1B (1), "Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all."

Given that the term of limited English proficient (LEP) includes those individuals that speak English well, not well and not at all, Metro uses the combined terms of limited and non-English proficient (LEP/NEP) individuals to represent all those varying levels of English language use and practice, which are evaluated in terms of English language ability in their everyday life.

Metro takes into consideration two different segmentations of the data. On the one hand we have the number of limited and non-English proficient persons, ages 5 and older, who speak a language other than English at home, and on the other, it takes into consideration the percentage of the service area's limited and non-English proficient population, which helps determine what languages reach the 5 percent Safe Harbor threshold. The number of speakers allows Metro to immediately identify eligible language groups, spoken by LEP/NEP individuals, that constitute 1,000 persons of the total population in the Metro service area eligible to be served or likely to be encountered.

Table 2 below illustrates data on languages spoken at home and the number of limited and no-English speakers reported in the PUMS (2016-2020) estimate data. These data will also be used in Table 3 below to identify the most common languages spoken at home, which assists Metro offices in developing projections for requests for language services.

Table 2: Persons that Speak English Less than "Very Well," LEP/NEP in the Metro Service Area

Persons that Speak English Less than "Very Well" in the Metro Service							
Area Language Spoken at Home (for Population 5 Years and Over)							
Language	Number						
Spanish	201,517						
Chinese	18,048						
French	14,981						
Amharic	12,171						
Korean	10,527						
Vietnamese	9,243						
Arabic	4,676						
Farsi	4,112						
Russian	4,053						
Portuguese	3,964						
Tagalog	3,606						
Mandarin	3,567						
Urdu	3,085						
Hindi	2,886						
Bengali	2,670						
Japanese	2,327						
Thai	2,036						
Punjabi	1,981						
Cantonese	1,979						
Telugu	1,949						
Haitian	1,731						
Nepali	1,595						
Igbo	1,550						
Gujarati	1,505						
Tigrinya	1,482						
Filipino	1,450						
Yoruba	1,412						
Tamil	1,227						
Akan (incl. Twi)	1,191						
Burmese	1,164						
Khmer	1,138						
Sinhala	1,129						
German	1,020						
Other Bantu languages	1,008						
Italian	975						
Other English-based Creole languages	887						
Turkish	809						
Malayalam	726						
Greek	652						
Pashto	629						
Lao Othor Afra Aciatic languages	606						
Other Afro-Asiatic languages	600						
Indonesian	500						

Source: *PUMS* (2016 – 2020).

Metro has also created maps to visualize the distribution of limited and non-English proficient speakers in the service area overlaid on Metrorail lines and Metrobus service routes. Based again

on the U.S. Census Bureau's American Community Survey (2016 – 2020) (ACS5-year) estimate data release, these maps are shown below as Figures 1-7. The Office of Planning provided the following analysis of census block groups with above average share of LEP residents within a 1/2-mile radius of Metrorail stations and 1/4-mile radius of Metrobus routes. Each map illustrates the distribution of limited and non-English proficient speakers within the nine jurisdictions encompassing the Metro service area, with the District of Columbia in the center, the Maryland jurisdictions of Montgomery and Prince George's County to the north and east, and the Virginia jurisdictions including Arlington, Fairfax, and Loudoun Counties and Alexandria, Fairfax, and Falls Church cities to the southwest. The colors on the maps for each language population indicate Census block groups where at least 5% of the population is limited and non-English proficient; darker colors indicate higher percentages of LEP/NEP populations.

- Figure 1. Limited and non-English proficient Population (Total) in the Metro Area
- Figure 2. Limited and non-English proficient Populations Speaking Spanish
- Figure 3. Limited and non-English proficient Populations Speaking Chinese
- Figure 4. Limited and non-English proficient Populations Speaking Korean
- Figure 5. Limited and non-English proficient Populations Speaking Vietnamese
- Figure 6. Limited and non-English proficient Populations Speaking Other Languages (including Amharic, Somali, and other Afro-Asiatic Languages),
- Figure 7. Limited and non-English proficient Populations Speaking French and Arabic

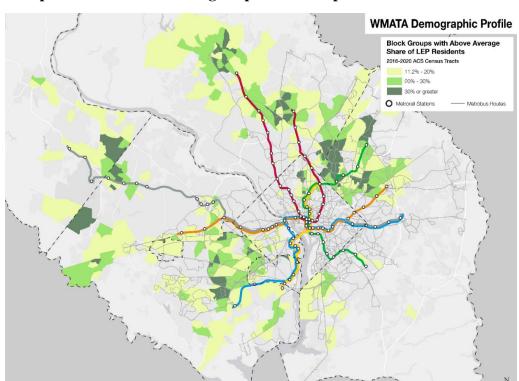


Figure 1. Map of Limited and non-English proficient Population in the Metro Service Area

Figure 2. Map of Limited and non-English proficient Population Spanish Speaking in the Metro Service Area

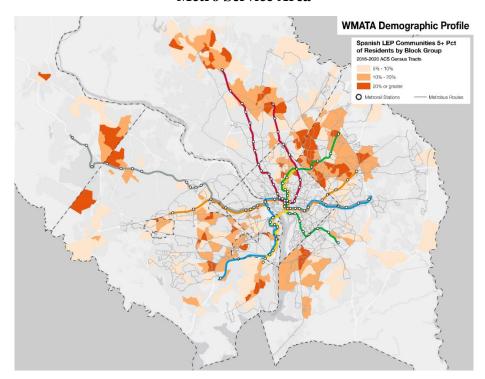
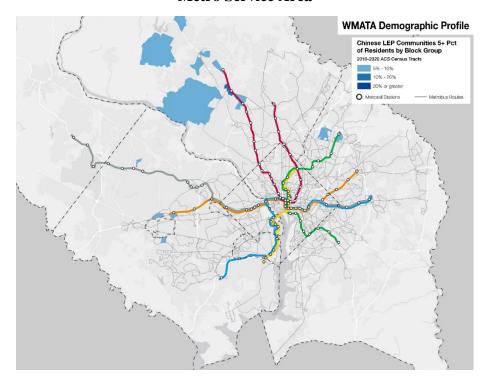
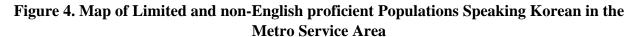


Figure 3. Map of Limited and non-English proficient Populations Speaking Chinese in the Metro Service Area





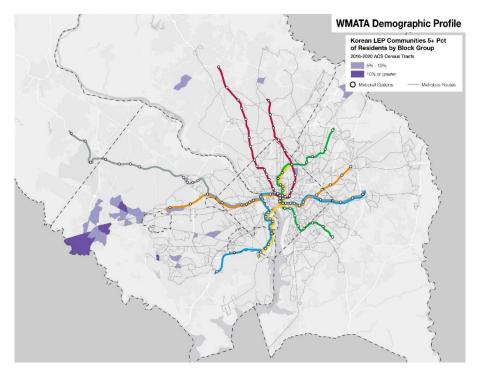


Figure 5. Map of Limited and non-English proficient Populations Speaking Vietnamese in the Metro Service Area

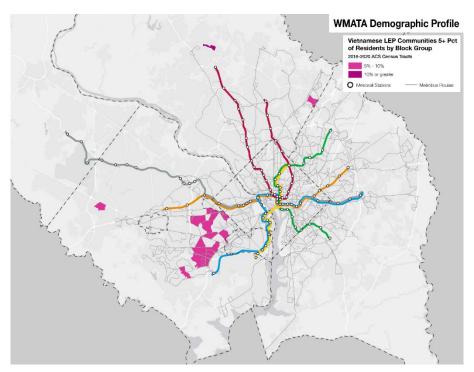


Figure 6. Map of Limited and non-English proficient Populations Speaking Other Languages in the Metro Service Area (including Amharic, Somali and Other Afro-Asiatic Languages)

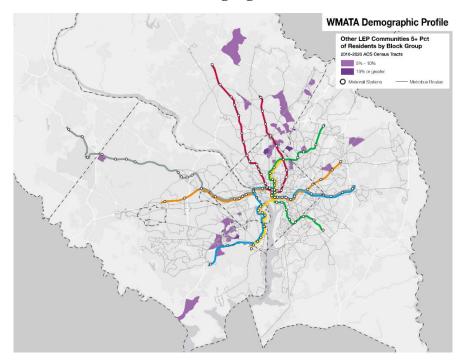
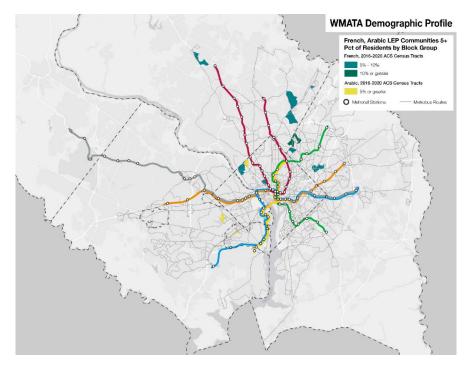


Figure 7. Map of Limited and non-English proficient Populations Speaking Arabic and French in the Metro Service Area



Assessing the current numbers and proportions of limited and non-English proficient individuals in the Metro service area, Metro can now draw the following information evidenced by both limited English and non-English proficient populations for each of the jurisdictions served by Metro as shown in Table 1 above, re-copied below, and the distribution of these populations within the service area, as visually displayed on the maps listed on Figures 1-7 above.

Revisiting Table 1: LEP population for each of the jurisdiction served by Metro.

					LEP Speak English Less than "Very Well"				
Jurisdiction	Total Population (Ages 5+)	Speak Only English	Speak another language at home	% of Speakers of another language at home	LEP	% of Total Population	% of LEP in each Jurisdiction	% of Region LEP in Each Jurisdiction	
DC	657,061	544,039	113,022	17%	37,257	5.7%	33.0%	7%	
MDMontgomery County	982,321	580,901	401,420	41%	143,346	14.6%	35.7%	28%	
MDPrince George's County	850,822	614,495	236,327	28%	108,572	12.8%	45.9%	21%	
VAArlington County	222,588	158,314	64,274	29%	18,480	8.3%	28.8%	4%	
VAFairfax County	1,075,736	656,217	419,519	39%	153,485	14.3%	36.6%	30%	
VALoudoun County	376,861	255,057	121,804	32%	36,401	9.7%	29.9%	7%	
VACity of Alexandria	146,970	100,051	46,919	32%	17,279	11.8%	36.8%	3%	
VACity of Fairfax	21,666	14,443	7,223	33%	2,904	13.4%	40.2%	1%	
VACity of Falls Church	13,536	10,852	2,684	20%	779	5.8%	29.0%	0%	
Region	4,347,561	2,934,369	1,413,192	33%	518,503	12%	36.7%	100%	

Source: *ACS 5-Year Estimates* (2016 – 2020).

- Over 1.2 million individuals or 26 percent of the region's residents are foreign born.
- 33 percent of the region's population speak a language other than English at home; 37 percent of which speak English less than "very well."
- The proportion of limited and non-English proficient LEP/NEP speakers has been maintained at 37 percent in the region.
- The share of the total population identified as limited and non-English proficient has been maintained at 12 percent.
- Every jurisdiction in the service area has a limited and no-English population exceeding five percent of the total population. See percentage of total population on Table 1 above. Fairfax County and Montgomery County still have the largest numbers of limited and non-English proficient individuals in the region (each still with just about one-third of the region's LEP/NEP population), followed by Prince George's County, the District of Columbia, Loudoun County, Arlington County, City of Alexandria, and City of Fairfax.

In addition, limited and non-English proficient individuals in the service area use about 34 languages where the number of speakers for each language exceeds 1,000 persons. This includes

⁷ Based on the U.S. Census Bureau's American Community Survey ACS 5-year Estimates (2016 – 2020).

other Afro-Asiatic languages, various West African languages, other Indic languages, and other Indo-European languages, which comprise multiple and distinct language families.

Using 2016-2020 PUMS data, Metro created Table 3 below listing the number of the region's limited and non-English proficient (LEP/NEP) individuals in the Metro Service area, by the most common language spoken at home.

Table 3 shows important pieces of information that help Metro to determine: 1) the number of speakers of the most common languages spoken at home, 2) top languages spoken within the region, and 3) percentage of limited and non-English proficient populations speaking those languages. Using this information, Metro can identify the languages that have reached the threshold of five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, to better determine what written inlanguage materials may be needed for limited and non-English proficient individuals speaking those languages. These data thus will assist the Washington Metropolitan Area Transit Authority's offices in developing projections for language services requests and potential language needs.

Table 3. Languages spoken by the region's limited and non-English proficient population.

Persons that Speak English Less than "Very Well" in Metro Service Area	% of Service Area LEP Population	% of Total Population that Speaks	% of Total Population that is LEP	
Language	Number	Population	Language	tilat is LEP
Spanish	201,517	58.5%	14.2%	6.5%
Chinese	18,048	5.2%	1.3%	0.6%
French	14,981	4.3%	1.7%	0.5%
Amharic	12,171	3.5%	1.0%	0.4%
Korean	10,527	3.1%	0.8%	0.3%
Vietnamese	9,243	2.7%	0.6%	0.3%
Arabic	4,676	1.4%	0.7%	0.2%
Farsi	4,112	1.2%	0.5%	0.1%
Russian	4,053	1.2%	0.4%	0.1%
Portuguese	3,964	1.2%	0.4%	0.1%
Tagalog	3,606	1.0%	0.5%	0.1%
Mandarin	3,567	1.0%	0.3%	0.1%
Urdu	3,085	0.9%	0.5%	0.1%
Hindi	2,886	0.8%	0.7%	0.1%
Bengali	2,670	0.8%	0.3%	0.1%
Japanese	2,327	0.7%	0.2%	0.1%
Thai	2,036	0.6%	0.1%	0.1%
Punjabi	1,981	0.6%	0.2%	0.1%
Cantonese	1,979	0.6%	0.1%	0.1%
Telugu	1,949	0.6%	0.5%	0.1%
Haitian	1,731	0.5%	0.3%	0.1%
Nepali	1,595	0.5%	0.2%	0.1%
Igbo	1,550	0.4%	0.2%	0.1%
Gujarati	1,505	0.4%	0.2%	0.0%
Tigrinya	1,482	0.4%	0.1%	0.0%
Filipino	1,450	0.4%	0.2%	0.0%
Yoruba	1,412	0.4%	0.3%	0.0%
Tamil	1,227	0.4%	0.3%	0.0%
Akan (incl. Twi)	1,191	0.3%	0.3%	0.0%
Burmese	1,164	0.3%	0.1%	0.0%
Khmer	1,138	0.3%	0.1%	0.0%
Sinhala	1,129	0.3%	0.1%	0.0%
German	1,020	0.3%	0.3%	0.0%
Other Bantu languages	1,008	0.3%	0.1%	0.0%

Source: 2016-2020 PUMS. (Table B16001)

As indicated on the LEP Overview, Metro attends to a very diverse population living and working in its tri-jurisdictional service area. This demographic diversity has consistently increased in numbers and distribution across jurisdictions, and for some groups, new languages have started to emerge. The number of limited and non-English proficient individuals in the Metro service area continues having a solid representation of the five habitable continents in the world. Languages spoken in the area include Spanish, Chinese (Cantonese, Mandarin), Korean, Vietnamese, Thai, Filipino (including Tagalog); Afro-Asiatic languages (Arabic, Amharic, and Tigrinya), African and West African languages (French, Yoruba, Akan [including Twi]), Igbo, and distinct Niger-Congo languages (and others within Niger-Congo language family's languages, such as Bantu languages). There is also Persian (Farsi-Dari), and a growing representation of various Indic family languages (Urdu, Bengali, Punjabi, Telegu, Nepali, Gujarati, Tamil, and Sinhala). Haitian, Burmese, and some Dravidian languages (Telugu, Tamil). Khmer, Russian, German, and Portuguese are also among languages spoken in the Compact where the number of speakers speaking English less than "very well" exceeds 1,000 persons.

This approach then helps Metro to identify the top languages making up eighty-four percent (falling within a 1.0 percent threshold) of all Metro's limited and non-English proficient potential customers:

Table 4. Top Languages Spoken by the region Limited and non-English proficient population.

Persons that Speak English Less Service	% of Service Area LEP	% of Total Population	
Language	Number	Population	that Speaks Language
Spanish	201,517	58.5%	14.16%
Chinese	18,048	5.2%	1.29%
French	14,981	4.3%	1.68%
Amharic	12,171	3.5%	1.02%
Korean	10,527	3.1%	0.76%
Vietnamese	9,243	2.7%	0.58%
Arabic	4,676	1.4%	0.65%
Farsi	4,112	1.2%	0.49%
Russian	4,053	1.2%	0.45%
Portuguese	3,964	1.2%	0.42%
Tagalog	3,606	1.0%	0.53%
Mandarin	3,567	1.0%	0.34%

Source: 2016-2020 PUMS. (Table B16001)

The top languages identified include *Spanish*, Chinese (*Mandarin* and *Cantonese*), *Korean*, and *Vietnamese*. The presence of Afro-Asiatic languages (*Amharic*, *Arabic*), and African and West African languages (*French*) continues, as well as Persian (including *Farsi – Dari*). Census data shows an increase of speakers of *Portuguese*, and there is also a presence of *Russian* and Filipino (including *Tagalog*) speakers in these new data. Please note that for this ACS 5-year estimate

(2016 - 2020 PUMS data), Census provided more granular data by listing individual language variants. Note for example that all variants of Chinese were listed as Chinese, Mandarin, and Cantonese. This listing of individual languages, as opposed to clustering them into language groups (Afro-Asiatic languages, Indic languages, and so forth), thus reduces the percentage of the presence of these languages in the service area. Given Metro's familiarity with the language presence in its service area, this update has expanded the percentage of the service area's LEP/NEP population to a 1.0% threshold instead of the previously used 5%. This is to ensure that the speakers of the languages that now are outside the 5% threshold are still included as part of the top languages that reach the threshold of 1.0%. The change from 5% to 1.0% is not a reduction in population, but an artifact of recategorization.

Factor 2: The frequency of contact from LEP individuals

In addition to U.S. Census data, Metro uses other sources of information to estimate frequency of contact with limited and non-English proficient individuals (factor two). Metro pays close attention to major points of customer interaction through which it can assess the frequency by which its employees may be, or are already encountering, limited and non-English proficient individuals, which also helps the agency to determine language provision needs. The following are some of these sources used to estimate the frequency and/or potentiality of encounters by LEP persons with Metro services:

- Census Data on LEP/NEP persons within quarter mile of bus route or within half-mile of rail station
- Metro Call Center Data
- Metro Website Data

<u>Census Data on LEP/NEP persons within quarter mile of bus route or within half mile of rail station</u>

Utilizing ACS 5-Year Estimates 2016 - 2020, an analysis was conducted to determine the number of limited and non-English proficient residents living proximate to Metro services, to serve as a proxy for limited and non-English proficient ridership on Metrorail and Metrobus.

Table 5. LEP Population Near Metrobus and Metrorail

	Metrobus			Metrorail			
Jurisdiction	LEP Population	Total Pop	Percent LEP	LEP Population	Total Population	Percent LEP	
DC	30,830	572,560	5%	11,250	216,360	5%	
MD – Montgomery County	43,080	280,730	15%	5,480	47,180	12%	
MD – Prince George's County	77,600	471,990	16%	5,090	30,910	17%	
VA – Arlington County	16,700	191,210	9%	5,090	61,720	8%	
VA – Fairfax County	53,290	300,420	18%	4,690	34,720	14%	
VA – Loudoun County	-	-	-	90	1,040	9%	

Region	239,230	1,964,320	12%	32,280	409,210	8%
VA – City of Falls Church	580	10,410	6%	40	780	5%
VA – City of Fairfax	1,700	12,660	13%	-	-	-
VA – City of Alexandria	15,450	124,340	12%	550	16,500	3%

This analysis yields the following estimates of limited and non-English proficient individuals that live proximate to Metro services.

- **Metrobus** 239, 230 limited and non-English proficient residents within quarter mile of a Metrobus Route, or 12 percent of residents within quarter mile of a Metrobus route
- **Metrorail** 32,280 limited and non-English proficient residents within half-mile of a Metrorail station, or eight percent of all residents within half-mile of a Metrorail station.

The areas with the highest concentration of limited and non-English proficient individuals near Metrobus and Metrorail services in the Metro service area continue to be Fairfax County in Virginia, and Prince George's County and Montgomery County in Maryland.

As shown above, limited and non-English proficient populations near Metro services are higher for Metrobus. The agency's resources for language assistance may be best concentrated more heavily on Metrobus resources, products, services, and activities given the higher potentiality for having customer service encounters.

Metro Call Center Data - Requests for Interpretation

The busiest points of actual contact with members of the public are the direct communication with Metro's customer relations and customer service call lines, through which customers may request service and information in languages other than English. Information collected directly from managers of these customer call lines, and data provided by the telephonic interpretation company that Metro contracts for the provision of these services, are used to further determine the current frequency of contact by limited and non-English proficient individuals with Metro's services.

These points of contact with the public allow Metro to tap into centralized communication and also serve as a source of data collection for all instances in which information and services have been provided in languages other than English, right-at-the-moment of interaction. Telephonic interpretation data usage also provides Metro important information on the demand for this service by comparative minutes for the requests by language, and helps to identify top languages in which information has been provided, thus pinpointing which departments receive requests for this kind of language service provision.

For this Language Assistance update, call center data collected from the customer service lines for WMATA Customer (Service) Information, Transit Accessibility (Metro Access Paratransit and MetroAccess Eligibility), and Metro Transit Police were again evaluated to assess the frequency of contact with limited and non-English proficient individuals. The customer service line for *SmarTrip*® & *SmartBenefits* functions differently in that it has bilingual (Spanish/English) customer service representatives. Per information shared by that department to include in this reporting period, they received a monthly average of 16,783 calls since 2020.

The customer service (information) center received an average of 702,940 calls in the last three years. Metro currently employs bilingual (Spanish/English) customer service representatives in the customer service (information) call center, bilingual (Spanish/English) agents answer calls in Transit Accessibility, and two to three bilingual officers are available to attend calls directed to Metro Transit Police.

To complement this information, Table 6 below shows telephonic interpretation data for the number of calls in which service was provided in a language other than English by WMATA Customer (Service) Information, Transit Accessibility (Metro Access Paratransit and MetroAccess Eligibility), and Metro Transit Police. The numbers are drawn directly from the reports submitted by the telephonic interpretation company from July 2020 – June 2023 and show all completed calls in which the service was provided in the customer's language of preference. One can see that the languages aligned neatly to the top languages identified via Census data as discussed above. Transit Accessibility has the highest number of interactions with the public via telephonic interpretation.

Table 6. Customer service calls completed in-language via telephonic interpretation.

		Department		
Language	WMATA Customer	Transit Accessibility	Metro Transit Police	Total
	Information	(MACS & ELIG)		
Spanish	1915	3814	638	6367
Amharic	30	35	7	72
Mandarin	21	15	16	52
Arabic	8	31	4	43
Portuguese	6	35		41
Vietnamese	3	19	12	34
Russian	9		13	22
Korean	5	9	3	17
French	6	6	4	16
Farsi - Afghani - Dari	3	3		6
Creole	2	2	2	6
Cantonese	1	3	1	5
Iranian Farsi / Persian	2	3		5
Bengali	1	2		3
Somali		3		3
Albanian	1	1		2
Dari/Farsi	2			2
Nepali	2			2
Pashto			2	2
Tigrinya			2	2
Turkish	1		1	2
Armenian		1		1
Cambodian/Khmer		1		1
Greek	1			1
Hindi	1			1
Japanese			1	1
Mongolian			1	1
Punjabi			1	1
Swahili	1			1
Telugu	1			1
Thai	1			1
Urdu		1		1
Total	2023	3984	708	6715

Table 7 below shows a more visual representation of the top languages served via telephonic interpretation by these customer relations and customer service call lines. In this case, each number represents total calls by language for all customer service interactions that were completed in the language indicated.

Table 7. Top languages in which service was completed.

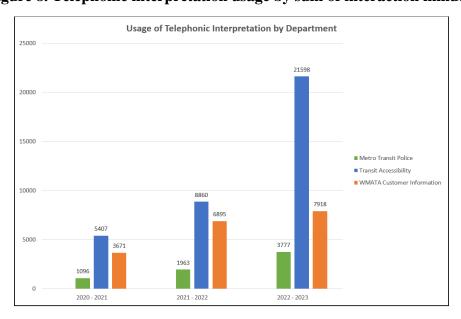
Top 10 languages based on telephonic interpretation usage									
6,367	72	52	43	41	34	22	17	16	6
Spanish	Amharic	Mandarin	Arabic	Portuguese	Vietnamese	Russian	Korean	French	Farsi - Afghani - Dari

Upon close analysis of the telephonic interpretation data for 2020 - 2023, one can determine comparative telephonic interpretation usage. Table 8 and Figure 8 show the overall increase in usage by year of telephonic interpretation services for these departments. The usage represented here is calculated by the sum of interaction minutes by department for these three fiscal years. Figure 10 provides a visual representation comparing their usage.

Table 8. Usage of Telephonic Interpretation: Sum of minutes by Department per FY

WMATA Department	2020 - 2021	2021 - 2022	2022 - 2023
Metro Transit Police	1096	1963	3777
Transit Accessibility	5407	8860	21598
WMATA Customer Information	3671	6895	7918
Total	10174	17718	33293

Figure 8. Telephonic interpretation usage by sum of interaction minutes



Most of the interactions between monolingual customer service representatives and limited and non-English proficient individuals where service and information were requested in languages other than English were completed via telephonic interpretation or sent directly to the information and customer service centers for Metro's customer service assistance. Metro's customer service (information) line handles customer complaints and general information for Metro. Per these data shown above, one can see that the largest volume of sum of interaction minutes is again found in the Transit accessibility and the customer service information lines.

On March 2020, the World Health Organization declared COVID-19 a pandemic and the FDA began announcing new policies affecting school closings, workplace shutdowns, and cancellations of large public gatherings and public events. This may explain why the usage of telephonic interpretation maintained a constant increase for each department and even doubled its demand in the last year. Transit accessibility is again the department with the largest volume of sum of interaction minutes, and it shows provision of services related to accessibility as services that have been requested and provided the most within the Authority.

The top 10 languages in which language provision is given mirrors, once more, the top languages identified through the ACS 5-year estimate (2016 - 2020 PUMS data) demographic analysis discussed above for the number of limited and non-English proficient (LEP/NEP) individuals in the Metro service area, by language spoken at home. In other words, this information confirms Spanish, Chinese (Mandarin and Cantonese), Korean, Vietnamese, Amharic, Arabic, French, Farsi-Afghani-Dari, Portuguese, Russian, and Tagalog as the top languages spoken by limited and non-English proficient customers when requesting interpretation services via Metro's telephonic interpretation. These data also affirm Portuguese, Russian, Tagalog as three new languages which have emerged in the analysis of these new data.

Website – Translation of documentation – Metro's website (https://www.wmata.com) received on average 64 million page views from July 2020 – June 2023 from about 28 million website users. The website is the preferred source for Metro information, particularly during service suspensions and delays. During 2020 to 2023, data from Google Analytics indicated that website translations accounted for two percent of all web sessions on Metro's website. 98 percent of the sessions were completed in English. Users translated the website an average of 85,106 times into 12 languages other than English during this reporting period. Of the two percent sessions using automatic translations, 51 percent were completed in Spanish, 10 percent in Chinese and French, nine percent in German, six percent in Japanese, and three percent in Korean and Portuguese. A small number of sessions were completed in Russian, Italian, Dutch, Polish and Swedish. The high number of Spanish, Chinese, and French Google translation requests correspond to the top 10 languages identified via US Census demographics and data collected from usage of Metro's telephonic interpretation services.

As of July 2023, Metro maintains *Google Translate* as an option for the public to automatically translate webpages. Metro expanded this automated function by adding languages identified through the estimation of the frequency of contact with limited and non-English proficient individuals as presented in this report. So, any website user has the option of selecting, via a drop-down menu on the main page, up to 13 languages to automatically translate the page. Metro is

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⁸ See CDC Museum COVID-19 Timeline: https://www.cdc.gov/museum/timeline/covid19.html.

aware of the limitations and inaccuracies in conveying meaning when using automated translation, however its usage gives the agency an alternative source of information on the demand of inlanguage information by considering the percentage of the web translations completed by the public when deciding language needs.

Since November 2021, Metro has convened a group of internal stakeholders to move forward a new strategy for WMATA.com modernization. Among many goals, this project is intended to "assess its website and related customer touchpoints, and to make recommendation for how to best redesign the website and integrate those touchpoints to better meet its customers' needs." Key to this effort is an inclusion of a website translation process giving priority to human translation for personnel recommended content, customer requests, and all new pages. This is an ongoing process and long-term project, which according to its status timeline, it is expected to be completed by calendar year 2026+.

As evidenced by the close analysis of the data collected at these potential and actual sites of engagement, the combination of these sources of information allows for Metro to estimate the frequency of contact with limited and non-English proficient individuals. Their utilization of Metrorail and Metrobus services, their in-language phone communication with various call centers, and their engagement though web-sessions provide insight into the contact that these members of these linguistic minorities have with Metro. These points of contact also allow for information to be drawn on types of information requested, preferred modes of communication, including direct over the phone communication, usefulness of written information, and the language of preference as customers interact with these sites of engagement as they use, request, and receive Metro services.

Factor 3. The nature and importance of the contact being made by LEP persons.

Public Transit is a key means of achieving mobility for many limited and non-English proficient customers. According to the 2020 U.S. Census, nationally about 15 percent of limited and non-English proficient individuals aged 16-years and older reported use of public transit as their primary means of transportation to work, this compared with about 5 percent of English speakers. In a later report, Census indicates that "COVID-19 pandemic began to affect U.S. commuting patterns and workplace conditions in March 2020, with social distancing measures, reduced transportation options, and uncertainty about workplace safety, leading many people to work from home [....] Public transportation commuting declined by about half over this period [2019 – 2021] to 2.5 percent of workers—the lowest percentage ever recorded by the ACS."

Metro is even more committed to identify critical services unique to limited and non-English proficient persons that ride Metrorail and Metrobus, request services, or that engage in activities sponsored by Metro. An understanding of the importance of access to public transportation is

⁹ WMATA Vision Statement & Project Objectives – 2021.11.24. SharePoint Internal documentation – Deliverables – Phase 1.1 Project initiation & Kickoff.

¹⁰ U.S. Census Bureau (2020) Means of Transportation to Work by Selected Characteristics. 2020: ACS 5-Year Estimates Subject Tables. Table S0802.

¹¹ Michael Burrows, Charlynn Burd, and Brian McKenzie, "Home-Based Workers and the COVID-19 Pandemic," American Community Survey Reports. ACS-52, U.S. Census Bureau, Washington, DC, 2023.

essential to note when deliberating on decisions about these services and activities that may have an impact on various non-English proficient populations. It is important for Metro to know the demographic composition of the linguistic minorities it serves, which in large part is informed by an analysis of demographic data, surveys, and usage of in-language provision service platforms, all of which have already been discussed.

Metro is also committed to maintaining full and fair participation, through a meaningful access to programs, services, and activities to persons with limited and no-English proficiency by providing language assistance through its website, bilingual announcements on bus routes, signage information at Metro stations, and through its Customer Service (Information) call center(s). As reported above, some of these customer service and customer relations centers have bilingual customer service representatives, to directly provide service to customers, as well as to provide access to the use of a telephonic interpretation company, allowing an immediate connection to an on-call interpreter able to facilitate interactions in-language.

Pursuant to the DOT LEP Guidance concerning recipients' responsibilities to limited and non-English proficient persons, Metro relies heavily on direct communication and input from the LEP communities it serves. Metro's assessment of the importance of its activities, programs, and services to its limited and non-English proficient customers and riders, is thus informed by the usage, demand, and identification of gaps to fulfill language assistance needs and service. Knowledge of their LEP/NEP demographic composition serves as a first step for Metro to determine potential (oral, written) language needs. It follows then that a proactive identification of areas where language assistance should always be provided be in place, so activities, such as public hearings, community forums, and notifications of emergency services, as well as all projects requiring a public hearing be, by default, included in provision of language assistance.

Equal access to navigation of the system, and the creation of a welcoming environment is also critical to a model service for Metro, which begins by having appropriate bilingual, and ideally multilingual signage on Metrorail stations and Metrobus routes. This welcoming environment, however, must be reinforced by an informed customer service support, an inclusive dissemination of information, and a proactive communication and engagement with identified Community-Based Organizations (CBOs) and other community-serving entities that may directly serve members of these linguistic minorities within the Metro service area. To illustrate some of the language assistance resources being used to reduce barriers encountered by limited and non-English proficient persons in accessing its services, we will now turn to the available resources and cost of language assistance, as well as language assistance measures that Metro has in place at various critical points of contact with the public.

Factor 4. The available resources to provide access for LEP persons.

Metro has been committed to ensure that a myriad of resources are available and used to reduce barriers that limit meaningful access to its programs, services, activities, and information to limited and non-English proficient individuals. Metro has invested significant funds on provision of language services. From 2020 through 2023, Metro estimates that it spent \$143,513.91 on language assistance activities, including 1) Translation of (vital) documents, 2) Media advertising in

languages other than English; 3) Telephonic interpretation services, and 4) Project-based outreach translated materials.

This estimate reflects costs tracked through Metro's Office of Content and Strategic Communications (now Office of Customer Experience and Engagement), Customer Service, Communications and Marketing, Office of Equal Employment Opportunity, Metro Transit Police, and Metro's Office of Transit Accessibility. It does not include other departments' outreach and translation costs, the costs associated with recruiting bilingual employees in frontline positions, or staff time for translations, acting as interpreters, or reviewers, and quality control of translation of documents. Metro will continue using a reasonable portion of its budgetary dollars to meet compliance goals and fulfill provisions of the language assistance plan.

In the following section there are some examples of language assistance and other resources provided by Metro that are available to customers and riders with limited and no-English proficiency.

VII. Language Assistance Measures Used by Metro

Metro supports the goals of the DOT LEP Guidance to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for limited and non-English proficient individuals. To have an effective Language Assistance Plan, and after a careful identification of where limited and non-English proficient individuals who need language assistance may be present, Metro has put in place the following language assistance measures, including, but not limited to the following:

Interpretation:

Limited and non-English proficient customers who call the Metro Service Call Center (WMATA Customer Information), the Transit Accessibility (Metro Access Paratransit and MetroAccess Eligibility), Metro Transit Police, and the customer service line for SmarTrip® & SmartBenefits Participants, some of which have direct access to in-person bilingual customer service representatives, can also be connected to a telephonic interpretation service, which upon request, can facilitate over the phone interactions in 324 languages.

Metro continues to maintain Metrorail system-wide announcements which are produced in English and Spanish. The majority of Metrobus announcements are also provided in both English and Spanish.

Frontline employees, such as Metro station managers, have access to and use visual translation cards and other tools to communicate with limited and non-English proficient customers.

Metro Transit Police Department officers have access to a dispatching process through which they can request support by available bilingual personnel, or through an over the phone interpreter via the telephonic interpretation service, and to an on-demand video remote interpreting (VRI) service.

Metrobus operators are supplied with multilingual tear-off sheets, "For help riding Metrobus and Metrorail in your language, call the number below," to hand to patrons. These tear-off sheets provide instructions on how to contact the call center to request interpretation services. The tear-off sheets are also distributed to the public during outreach events. Metro will be updating the information on these multilingual sheets before the next Language Assistance update to include the presence of new languages in which service has been provided.

Translation:

Metro provides written notification to its customers regarding their rights under Title VI of the Civil Rights Act of 1964 and language assistance services, which are available upon request and free of charge. This information, contained within a brochure, may be downloaded from Metro's website and is available in the top languages: Amharic, Arabic, Chinese (Simplified), English, Farsi, French, Korean, Portuguese, Russian, Spanish, Tagalog, Urdu, and Vietnamese. Somali has been identified as an emerging language in this update, so it will be included in the list. The brochure provides information on the prohibition of discrimination by Title VI, Metro's Title VI Policy Statement, and its Policy Statement regarding limited and non-English proficient customers, who may file and on the process of filing a complaint.

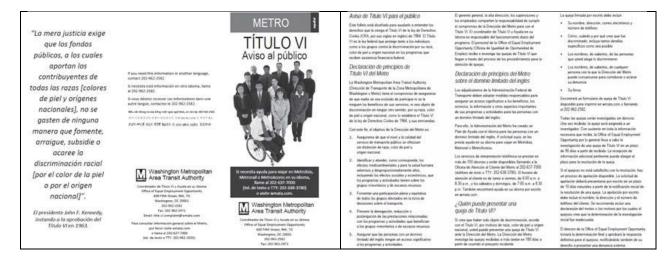
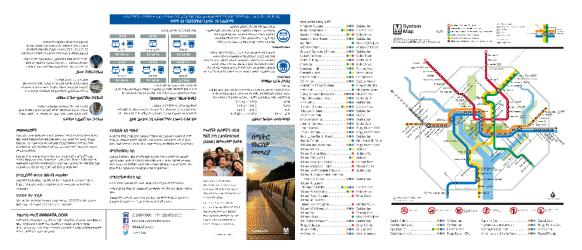


Figure 9. Título VI Aviso al público [Spanish]

The brochure continues to be shared with representatives from Community Based Organizations (CBOs), social service agencies, and other institutions that serve limited and non-English proficient persons, low income, and other minority populations in the region. The brochure is frequently distributed at public outreach events and to all customers who wish to file a complaint against Metrobus, Metrobus Transit Accessibility, or MTPD.

Metro's Title VI Complaint Form is available online in English and in the identified languages spoken by members of the various linguistic communities in the Metro service area. The languages include Amharic, Arabic, Farsi, French, Korean, Chinese (Simplified), Spanish. Tagalog, and Vietnamese. The form will be updated to include information in the newly identified top languages reported in this update.

The Metrorail Pocket Guide (now, Your Guide to Metro) is a very useful tool that provides information on Metrorail fares, passes, service hours, parking, and travel tips. It is currently being updated and it will be available in English and in the top languages (Amharic, Arabic, Chinese, French, Farsi-Afghani-Dari, Korean, Portuguese (Brazil), Russian, Spanish, Filipino (Tagalog), Somali, and Vietnamese), spoken in the Metro service area. Your Guide to Metro can be found at Metro offices, at rail station kiosks of Metrobus, and can also be downloaded from the Metro website.



YOUR GUIDE TO METRO [AMHARIC]

The executive summary of Metro's Public Participation Plan, describing Metro's goals and strategies for public participation, is also available on the website in Amharic, Chinese, English French, Korean, Somali, Spanish, and Vietnamese. The new update, once completed, will also be published online.

All Metrobus timetables are bilingual in English and Spanish, and are available on their corresponding bus routes, and on the Metro <u>website</u>. The timetables page online can be automatically translated into different languages using Metro's automated Google Translate feature, for which all 13 top languages identified in this Language Assistance Plan's update have been added to its dropdown menu list.

In compliance with this Language Assistance Plan, as executed through its Public Participation Plan, Metro places multilingual signage in selected Metrorail and Metrobus locations for specific planned projects and to inform the public about construction, change in fares and services, or other activities of importance to customers and their safety.

Materials critical for accessing and using Metro's services and related to transit benefits are continuously identified and translated though different departments in Metro.

Public Outreach and Communications

Metro continues to conduct inclusive public engagement and communication activities, following the guidelines set forth in its Public Participation Plan (PPP). This plan showcases Metro's commitment to public participation by serving as a guiding tool to guarantee that customers and community members receive high-quality information, communication, and feedback opportunities around planned projects (those that trigger compliance of the PPP) and to fulfill federal obligations. From 2020 through 2023, Metro conducted multiple public participation activities including public and community engagement at various public sites, throughout activities at the Transit center, stations, bus stops' pop-up events, community-based organizations (CBO) visits, surveys, in-person open houses, community engagement at festivals and other public events, door-to-door distribution, and other engagement tactics; these events incorporated strategies to engage limited and non-English proficient customers. Given the limitations of having in-person interactions during the pandemic, in-person outreach, bus ride-alongs, and in-person visits to Community Based Organizations were not re-implemented until mid-2022. Youth engagement and school visits, as well as community workshops were two new activities included in an already vast public engagement list.

Metro's Office of Customer Experience and Engagement directly managed the communications and outreach for more than 140 projects and initiatives between November 2020 and June 2023. Between September 2020 and June 2023, in-person outreach teams interacted with over 906,000 customers in a language other than English. Of those interactions, an estimated 85.2% were in Spanish, 9.7% in Amharic, 2.2% Mandarin, 1.2% Korean, 0.39% Vietnamese, 0.17% ASL, 0.13% French, and 0.10% Arabic. The remaining percentage of 0.15% non-English interactions consisted of a small number of these languages: Portuguese, German, Italian, Russian, Swedish, Farsi, Tagalog, Uzbek, Hindi, Turkish, Thai, Cantonese, and Czech.

Metro's interdepartmental efforts are aimed at securing participation from members of various linguistic minorities related to proposed service adjustments, fare changes, and other opportunities for public feedback. Metro works directly with different media outlets reporting in languages other than English to provide Metro information to their listeners, readers, and viewers.

Metro works closely with CBOs serving the migrant population in the area to disseminate Title VI information, obtain feedback on transit matters, and provide information on relevant Metro services and projects. Metro's stakeholder's database includes 2,627 organizations that serve minorities, low-income individuals, people with disabilities, older adults, limited and non-English proficient individuals, women and families, youth, immigrants, refugees, the homeless, religious groups, and businesses. The database categorizes these entities into civic associations, business, CBOs, event venues, government agencies, hospitals and medical services, hotels, places of worship, residences and apartments, schools, shopping sites, and transit-related entities. This database is maintained and used by the Office of Content and Strategic Communications (now Office of Customer Experience and Engagement), and the Office of Equal Employment Opportunity, to communicate with and engage these stakeholders. As of November of 2023, the list had a total of 377 Community Based Organizations and similar community-oriented organizations that provide direct services to various minority populations in the Metro service area.

Training Initiatives:

Metro has an extensive training program for frontline employees covering Title VI, language assistance, and cultural sensitivity. The training has been delivered on a regular basis to Metrorail

station managers, new Metrobus operators, customer service representatives, project managers for planned and other projects that require public engagement and communications, and other staff associated with communications and outreach.

Title VI training is also included in the new employee orientation (NEO) program received by all employees as they join Metro.

Monitoring

Metro's Office of Equal Employment Opportunity (EEO) provides relevant guidance and information to various departments on issues related to Title VI and Language Assistance compliance and responsibilities to ensure that there is equal access and participation for all linguistic and other minorities.

The EEO also monitors Title VI and Language Assistance Plan policy and compliance related to the Public Participation Plan as required by the Federal Transportation Agency. The plan details the Authority's projects, strategies, and initiatives to engage minority and limited and non-English proficient (LEP/NEP) populations, including low-income populations and people with disabilities, in its planning and programming activities.

The Office of Equal Employment Opportunity, the Office of Planning, Customer Survey and Research, Department of Access Services, and the Office of Content and Strategic Communications (now Office of Customer Experience and Engagement) come together on a biweekly basis to guarantee that a cross-section of various socio-economic, linguistic and other minority groups are taken into consideration in planning decisions related to projects and initiatives under the Public Participation Plan, to confirm demographic information and Title VI compliance, and to identify other activities and projects that should comply with Title VI, or be under the Public Participation Plan (PPP).

The Office of Equal Employment Opportunity ensures that the information disseminated is inclusive to maintain Title VI compliance with Metro's Language Assistance and the PPP plan. EEO provides recommendations, monitors best practices in creating, sharing, and posting inlanguage information or text in-language for each project, so that information is readily available to various linguistic groups. EEO also serves as internal advocate and external point of contact for Title VI community-service stakeholders.

Metro consistently solicits feedback from CBOs, DC Government Language Access Coordinators, the Transportation Planning Board's Access for All Advisory Committee and Metro advisory groups including the RAC, AAC, and JCC on the success of language ventures and potential new initiatives.

VIII. Language Assistance Initiatives: 2020 – 2023

Metro first created its Title VI compliant Language Assistance Plan (LAP) in October 2007, which was approved by the FTA on November 3, 2007. Metro's 2011 LAP update was approved by the

FTA on January 27, 2012, later the 2014 update was approved on February 2, 2015, the 2017 update was approved by FTA on December 9, 2019, and the 2020 was submitted to the FTA on May 2021.

Demographic analyses of the Metro service area conducted in the prior Language Assistance Plan indicated that over one million individuals or 26 percent of the region's population was foreign born, and 12 percent of the total population spoke English less than "Very well." Their analyses identified Spanish, Chinese (Mandarin and Cantonese), Korean, Vietnamese, Amharic, Somali, French, and Arabic as the top nine languages utilized by the limited and non-English proficient population. Spanish was the top language spoken by half of the entire service area's LEP population. These data helped tailor specific types of language assistance Metro provided to its LEP/NEP ridership during this reporting period.

Specifically, Metro sought to ensure meaningful access to programs and activities for those individuals with limited and no-English proficiency by developing several comprehensive interdepartmental initiatives that aimed to engage and recruit participation for members of these communities as it relates to service adjustments and enhancements. Beyond merely translating information into various languages, these initiatives required a specialized and coordinated approach by several departments within Metro to reach out these communities to ensure that information was effectively communicated, and input and participation were received at representative levels.

In the following section a description is presented of some Metro's initiatives that were spearheaded to address potential access barriers faced by limited and non-English proficient customers.

Metro's Public Participation Plan

Since Metro developed its Public Participation Plan as part of the 2014-2017 Title VI Triennial, the Authority has worked to become a leader in transit public participation practices. More importantly, many of the projects and policies that Metro has advanced since the implementation of the PPP have benefited from the feedback received from members of the public. Metro had a significant increase in project and policy initiatives over the last three years, especially around capital work, construction, service, and fares. Three representative projects include the Platform Reconstruction and Safety Improvements, the Metro's Silver Line Extension, and the Better Bus Network Redesign. These examples highlight the notable work that was done around communications and public engagement, including the continuously redefined process that has been put in place to support these public participation efforts.

Platform Reconstruction and Safety Improvements

The Platform Reconstruction and Safety Improvements was a 10-month project that rehabilitated aging platforms and installed customer



improvements at 20 outdoor Metrorail stations. This was Metro's largest, most complex capital construction project since the system opened in 1976.

Per the project's final report, there were 527,806 total customer engagements, 17% of those interactions were with speakers of languages other than English. Specifically, outreach teams interacted in the following languages: Spanish 10%, Amharic 6%, and 1% with other language speakers (Korean, Mandarin, Vietnamese, French, Arabic, German, and Portuguese). ¹² In addition, bilingual Spanish/English information was provided via the project's webpage.

Silver Line Extension

Metro's Silver Line Extension connected the Metrorail system with Herndon, Washington Dulles International Airport and points in Loudon County, VA. It was one of the largest capital construction projects in the United States and a generational infrastructure investment in Northern Virginia. The Silver Line provides Metro customers with a high-capacity transit



connection to the Dulles corridor and eastern Loudoun County. The first phase of the Silver Line opened in July 2014, adding five new Metrorail stations, and introducing Silver Line service to the Metrorail system. Phase two, referred to as the Silver Line Extension, added six new stations in November 2022, connecting the region to international travel with new Metrorail service to Washington Dulles International Airport.

Station profile booklets were available in English, Spanish, and Korean. Digital and print take-one's were produced in English, Spanish, Korean, Amharic, Arabic, Somali, French, Vietnamese, Chinese Traditional, and Chinese Simplified and distributed on wmata.com/silverline and at outreach events. There were a total of 306,360 customer engagements, from which 77.87% were done in English, 20.56% in Spanish, 0.63% in Amharic, 0.39% in Korean, and 0.91% in other languages.¹³

¹² Platform Reconstruction and Safety Improvements: Phase IV Communications and Outreach Report. A Closer Look. Helping Hands: Customer Outreach. November 2022. Page 14.

¹³ Silver Line Extension: Communications and Outreach Report. Grand Opening November 2022. A Closer Look. Page 23.

Better Bus Network Redesign

Better Bus is an ongoing multi-year initiative that began in 2022 to rethink, redesign, and revitalize the Metrobus system to better serve the needs of customers in the region. The launch of the Better Bus Network Redesign was a key recommendation of the 2020 Bus Transformation Project, which resulted in Metro's vision to make the bus the best way to travel on the region's roads. The Better Bus



VISUAL NOTETAKING - WEST HYATTSVILLE

Network Redesign project is the first comprehensive redesign of the entire Metrobus network since its creation in 1973. Metro's Public Participation Plan and Language Assistance Plan guided the plan's communication and engagement approach, which was designed to reach customers where it was most convenient for them—on their bus routes, in their communities, or online. The public engagement delivered targeted multilingual communications to a diverse customer and stakeholder base to increase awareness, provide key project information, and gather feedback.

Among the many new strategies used for communicating and engagement with the public that was used in this project was the creation of a project's Community Connections Committee (CCC), which included 28 representatives from transit advocacy groups, major employers, CBO employees, and interest groups connected to non-English speaking communities and members of equity focus communities. This was a core part of a new idea regarding "engaging partners with purpose." The Community Connections Committee (CCC) represents the diversity of the area's communities and a variety of perspectives from their members. CCC members hold leadership positions in community-based organizations, businesses and business groups, groups representing people of color and people with disabilities, labor organizations, advocacy groups, and others. Members of the CCC provided insight into the communities they represent related to bus service in the region and help extend the reach of our community engagement.

The community engagement teams provided more than 400 CBOs customized digital materials, as well as physical printed materials upon request, to distribute to their constituents. Through engagement with the CCC members, they held events with individual partner organizations that were customized to their needs. The public survey was also made available in the following languages: Amharic, Arabic, French, Mandarin, Korean, Vietnamese, and Somali.

As of the completion of phase two of this project, the leading outreach team completed more than 70% of the events in equity focus communities and 87% of customers on the routes selected for ride-alongs were people of color. More than 20% of their public conversations and comments were in languages other than English, which was a direct outcome of reducing barriers to providing input by offering multilingual materials and bilingual staff at events.¹⁴

¹⁴ Better Bus Network Redesign: Phase 2 Engagement Summary. Spreading the Word Across the Region, 27-37.

For more information about these projects or to get a copy of any Public Communications & Input Reports, contact the Office of Content and Strategic Communications (now Office of Customer Experience and Engagement).

Outreach to Community Based Organizations



more amenable to the CBOs' time resources due to the limited number of personnel. While testing options, Metro continued communicating with organizations to inform them directly, or to deliver requested printed materials on specific projects, service, and activities. This was a successful approach used for the Better Bus Network Redesign project described above. Community-Based Organizations and advocates were engaged

Since 2020, the Office of Equal Employment Opportunity (EEO) maintains a consistent interaction via email, follow-ups, check-in phone calls, and if needed, site visits with employees at 377 unique Community Based Organizations, as well as organizations that provide direct services or support to various linguistic minorities.

Metro tested alternative modes of communication and engagement, such as web conferencing and webinars, thus exploring modes of communication



through briefings, workshops, and pop-ups, as well as given informational packets in languages other than English for distribution, and a digital communications toolkit to amplify public engagement opportunities for their clients and constituents. Through engagement with the CCC members, the lead outreach team held events with individual partner organizations that were customized to their needs, including with House of Ruth, So Others Might Eat, and the Dar Al-Hijrah Islamic Center.

In the end, one of the major challenges in the communication approach with CBOs during this reporting period was pandemic and post-pandemic communication with employees at various CBOs, as many organizations closed or stopped providing direct in person services to their clients, office work stood at a stand-still, and community engagement and communication moved to virtual meetings via various digital platforms. There was a significant personnel turnover as the demands of the area workforce changed, frequent bounced-back messages included notifications of disappearing non-profit organizations, or long-time employees' informing Metro of their no longer being employed by a particular community-based organization.

Still, the process of email communication with CBOs that was implemented in 2020 continues to be useful for the Office of Equal Employment Opportunity. For all Metro communications, in

which help for further dissemination of in-language materials and/or information about a particular Metro project may be requested, EEO first identifies, by geographic location, the organization being served, and/or likely to be affected by a Metro project, event, service, or activity. Once the organization is identified, EEO sends an electronic message to each CBO, listed on the Metro's stakeholder database as having presence in the area, and provides unique information of relevance to them. Each tailored message contains links to surveys and other information in the language of preference of their clients and offers CBOs a site visit to provide additional information, or delivery of printed in-language materials. When appropriate, messages also include the same information in Spanish, and links to materials in all the languages identified as top languages for each project. It also includes an invitation to CBO employees to register themselves and their clients to attend an open house and public hearing and collects requests for any language assistance needs.

Metro receives follow-up messages or phone calls, especially from individuals requesting additional in-language information and materials, invitations for site visits, or participation in community activities sponsored by the organization. The back and forth, person-to-person, interaction helps to maintain up to date contact information, a list of CBOs' language needs, and a consistent engagement and collaboration.

This approach has been successful in that it systematizes communication, helps Metro to avoid duplication of messages, minimizes attachments and increases website traffic, and allows for an efficient and consistent updating of the stakeholder database. When available, Metro personnel provide tailored information to specific organizations impacted or benefitted by various Metro-planned or other projects and activities in their language of preference. This approach has built trust and collaboration during projects, and it helps both the Office of Equal Employment Opportunity, and the Office of Content and



CBO Focus Group Washing Area – 2020 Bus Transformation

Strategic Communications (now Office of Customer Experience and Engagement) with followups and site visits for the appropriate department, as needed. Most importantly, these interactions provided opportunities for Metro to easily extend invitations to CBO representatives to lend their voice in large-scale service efforts, such as the Better Bus Network Redesign, Metro Lift Program, Metro Certification Programs for Spanish Speaking Small Businesses, and the After-Hours Community Service Program to name a few.

Metro collects invaluable information on issues specific to linguistic and other minority communities directly from the clients these partners serve. Community Partners have also been fundamental for EEO to identify modes of communication needed or preferred (written or oral, and language of preference) by different limited and non-English proficient groups served by these community organizations. It is through these interactions that EEO has been made aware of the need to create new data fields in the Metro Stakeholders database for CBOs' social media channels,

given that they have moved to communicate with their clients via those channels instead of the traditional expensive-to-maintain website portals.

It is worth noting that this communication approach has allowed EEO to implement these new practices:

- Prioritizing links over attachments, so that digital traffic to Metro's website's professionally translated documentation can be monitored and language sessions tracked.
- Implementing a best practice of making sure that links to "in-language" information are posted on Metro's website for every planned project (those that fall under the PPP), and that they are always added by the Office of Customer Experience and Engagement, as well as other project managers within the Authority.
- Keeping text "in-language" for all six top languages in all brochures and their corresponding digital copies to indirectly invite potential readers to request information their language in Requests for additional preference. information are responded to by customer service representatives at the centralized customer service information line. All electronic and the phone over





communications with representatives of CBOs are directly referred to personnel at the Office of Equal Employment Opportunity, thus ensuring that partners receive information in the language of preference of their clients and constituents, and to document the language needs requested by these community serving organizations.

Using this approach, EEO maintained open communication and partnerships with CBOs for about 70 projects under Metro's Public Participation Plan, and for various large-scale engagement efforts that took place from 2020 - 2023. EEO communicated and engaged with community partners regarding Title VI compliance, fare and service changes, and helped with recruitment to be part of advisory groups such as Metro's Riders' Advisory Council (RAC).

Metro's Equity Working Group



Transit Equity Working Group

Washington Metropolitan Area Transit Authority

Metro launched a multi-departmental Equity Working Group to develop an equity policy for the Washington Metropolitan Area Transit Authority. While it initially focused on communication and engagement with a diverse pool of Metro's customers, it has expanded to incorporate issues of equity and justice from a policy perspective to achieve social and racial equity through public engagement, service, fares, employment, and policing.

This initiative was launched in 2019 to better prepare the Authority for its role in addressing racial and economic equity. An early objective for this effort was to document current mobility equity conditions regionally and among Metro's customer base as well as to identify potential pathways to increase visibility and importance of equity considerations in Metro's decision-making. The working group wrote an Equity Primer, considering it as a starting point for informed reflection and deliberation.¹⁵

Of note, the working group's main accomplishments for this reporting update, include the following:

- 1. drafting a racial and social equity policy,
- 2. establishing an agency definition of "transit equity,"
- 3. developing an Equity Toolkit,
- 4. defining "equity focus communities,"
- 5. conducting a baseline assessment of how Metro departments understand and implement equity,
- 6. conducting informational interviews with jurisdictional partners and peer agencies to inform future development of an Equity-Focused Outreach plan, and
- 7. coordinating 19 meetings with their current members and four meetings with Metro's Executive Team. 16

¹⁵ Text drawn from: Washington Metropolitan Area Transit Authority (2020). Transportation Equity Primer.

¹⁶ Text drawn from: Transit Equity Working Group Charter. August 2022. Page 3.

Metro Ambassador Program

The Metro Ambassador program began in January 2023 and has over 25 dedicated Ambassadors. They serve as a bridge between Metro, customers, and the community, and they actively engage with customers on trains, at stations, and on Metrorail platforms.

They serve to assist Station Manager operations aiding customers, reporting problems within stations, and in using the fare machines. They undergo a 15-day intensive training period aligned with the station managers training in a condensed timeline. This training includes CPR, operations, systems, de-escalation, and customer service. They are equipped with cellphones and tablets to assist in providing information to customers.

While this program is currently experimental, it appears to be a great asset to Metro, especially regarding language assistance and interaction with individuals that speak a language other than English, as this ability has been recognized in the public discourse and the media.



Provision of In-language Information

Vital documents

Metro follows federal guidance, as stated in FTA Circular 4702.1B, to create an effective LEP plan in terms of the translation of vital documentation into the language of each frequently encountered LEP group eligible to be served, and/or likely to be affected by Metro's programs and services. Per federal guidance, Metro has considered vital written documents to include "consent and complaint forms; intake and application *forms with the potential for important consequences*; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Examples of [Metro's] vital documents include ADA complementary paratransit eligibility application, Title VI application form, public notice of a person's rights under Title VI, [and other gatekeeping documentation that gives limited and non-English proficient individuals equal] *access to essential services*."¹⁷

Metro's previous plan updated the four factor analysis, based on the 2014 - 2018 ACS 5-year estimate data, identified *Spanish*, *Chinese (Mandarin and Cantonese)*, *Korean*, *Vietnamese*, *Amharic*, *Somali*, *French*, and *Arabic* languages utilized by limited and non-English proficient population in the Metro's service area. Spanish was the top language spoken by half of the entire service area's limited and non-English proficient population. This information, combined with a two-pronged approach to translations helped Metro to ensure that vital documents were translated

¹⁷ FTA Circular 4702.1B –Chap. III-9 (italics added).

into the appropriate languages of limited and non-English proficient customers that may be eligible to be served, and/or likely to be affected by specific Metro plans, programs, or services.

Metro's two-pronged approach recommended that for all documentation it considered vital, translations needed to be automatically done in the top languages spoken by the limited and non-English proficient customers that had been identified to be affected or benefitted by a particular service, project, or activity. For this first tier of documentation, translations were recommended to be procured from pre-selected translation vendors and written by certified translators. Metro then identified new documents related to service or fare changes that needed to be disseminated to linguistic minorities who may have been eligible to be served, and/or are likely to be affected by specific Metro plans, programs, or services. Metro also identified documentation through individual requests from the public or community partners, as they were requested via different customer service centers, communications with CBOs, or during engagement and outreach with various community partners.

The Office of Equal Employment Opportunity is responsible for monitoring Title VI and Language Assistance Plan policy and compliance. It advises on compliance of language access and translation and interpretation needs and manages relationships with regional Community Based Organizations. This position permits the EEO to constantly communicate with various departments and proactively monitor information that may need to be distributed in languages other than English. Below is a sampling of Metro's translated vital documents.

Notification of Title VI Rights

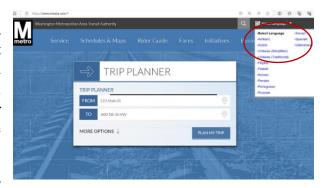
The Take One is a condensed version of the information brochure. It is permanently displayed at Metrorail stations in the station manager kiosks, and paper copies can also be found on Metrobus, at sales offices, and in the Metro's headquarters lobby. The notice is posted, and paper copies are distributed in multiple languages to community partners, and during public outreach events.





Automated Translation Option

The Language option feature available via Google Translate has been kept at the top-right of the page, which allows for an automated translation of all the menu options. EEO will continue providing recommendations to better access multilingual materials posted on the website.



As stated above, Metro is aware of the limitations

and inaccuracies in conveying meaning when using automated translation, however its usage gives the agency an alternative source of information on the demand of in-language information by considering the percentage of the web translations completed by the public when deciding language needs.

Requesting information in language of preference



In addition to placing Title VI Notice placards in bus interiors and on station manager kiosks, since 2014 Metro began placing notification placards on bus exteriors, near the front door for high visibility and posters with the same information inside the buses.

These multilingual placards provide the phone number for Metro Customer Service Information Center, where limited and non-English proficient customers may speak with bilingual customer service representatives or receive

service via telephonic interpretation. Since December 2016, the Title VI and language assistance notifications had been placed on all in-service Metrobuses.

Public Surveys

Metro's Office of Bus Planning, in coordination with Metro's Office of Customer Survey and Research, regularly conducts evaluations of bus lines and relies heavily on public input to identify areas of improvement and to solicit recommendations to enhance the quality of service along selected routes.

The Office of Equal Employment Opportunity is represented on each project management team led by the Office of Customer Experience and Engagement to ensure that comprehensive efforts are undertaken to engage in this decision process affecting customers who may be limited



and non-English proficient persons, minority, and low income. Part of this process involves distributing surveys to capture public feedback, including making surveys in the top languages found in the impacted service area.

Customer Guide to MetroAccess and Essential MetroAccess Policies Brochure

These documents are considered vital for understanding Metro's paratransit service. The Customer Guide outlines the customer bill of rights, customer responsibilities, fares and service area, service hours, and contact information. The brochure provides information on how to use MetroAccess service. As was mentioned above, MetroAccess also uses the language interpretation line, and has bilingual agents who answer calls in Transit Accessibility (MetroAccess Paratransit, and MetroAccess Eligibility).



Small Business Program Certification Training



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Metro's Small Business Programs' Office hosted its

first socioeconomic programs certification training in Spanish on September 15, 2022, in honor of Hispanic Heritage Month.

Participants had the opportunity to gain insights on how to tap into potential business opportunities with Metro and how to get certified through Metro's Small Business Program's Office for potential future and available contracts. This free training was provided online via Microsoft Teams and it was given in Spanish.

Outreach to members of the Spanish-Speaking population



Metro's Human Resources Talent Acquisition's Recruitment Programs continue their efforts to recruit and hire bilingual and multilingual front-line employees by participating in community job fairs and advertising in publications and media that reach minority and LEP

populations. These efforts focus on the recruitment of talented members of Latino, Asian, women, and other minority and linguistic communities.

There were about 100 recruitment events, from 2020 – 2023, achieved through Metro's partnerships and participation in different career fairs and expos, employment, and leadership conferences, and by attending special annual events that local governments, Community Based Organizations, schools, and media outlets planned and coordinated within the Metro's service area.

These recruitment efforts were tailored to reach out to a linguistically diverse workforce, members of other diverse groups, and were done in collaboration, and in parnership with community based organizations, local shools, local faith-based organizations, and local government serving new citizens, refugees, english-



learners, students enrolled in technical and trade schools, and employees at various workforce development centers.

Latinos in Transit Leadership Training



Metro celebrated a vibrant weekend centered on diversity, culture, and growth in partnership with the Latinos in Transit Leadership (LIT) Summit. Metro hosted this year's summit from September 22nd - 23rd serving as an opportunity for networking and professional development for Metro employees alongside transit professionals nationwide. This summit was held during Hispanic Heritage Month which further illuminated the spirit of the event. As colleagues, leaders, and organizations gathered it displayed the fervency within the transit industry for progressive change, solidifying an ongoing commitment towards fostering a more equitable space within this line of work and beyond.

The LIT Summit highlighted numerous industry leaders sharing insights on their professional and individual growth that fueled their path to success. Despite inclement weather, Metro conducted a technical tour at the Potomac Yard station.

This tour also highlighted Metro's newly commissioned electric buses.

One core theme throughout the series of events was community. Ultimately, the relationships we as professionals cultivate lead to growth. This can be challenging to accomplish, especially without larger outreach efforts. Most importantly, this concept has inspired Metro's initiative to establish our own Latino/Hispanic employee resource group.

Employee's Training and Orientation

Metro has been conducting Title VI and language assistance training for frontline station managers, bus operators, customer service representatives, planned projects managers, members of the new Metro Ambassador program, and Metro Transit Police since 2009. This training is ongoing and has become a regular part of the curriculum for frontline personnel, including refresher training for customer service representatives and the recertification for Metrorail station managers.

Title VI and Language Assistance Training for Frontline personnel

The Office of Equal Employment Opportunity offers ongoing mandatory training programs for frontline employees and their managers and supervisors. In its various forms, trainings include information on Title VI, and employees' responsibilities to provide services, and language assistance without discrimination, identification of unlawful discrimination, and discriminatory harassment.

The training also illustrates types of discrimination through scenarios and informs employees on internal policies and expectations, helps them



recognize acceptable and unacceptable behavior(s) and makes them aware of fairness and equity in service provision to the public. The training also includes a module on cultural awareness. To date, Metro has completed Title VI training for customer service representatives, Metrobus, and Metrorail station managers.





Monitoring and Benchmarking

Metro has developed relationships with community organizations and public-oriented institutions to secure information on specific issues related to the regional limited and non-English proficient community, such as languages spoken, population trends, and the services most frequently sought by members of these populations. Metro also follows up with these organizations to determine whether the existing written and oral assistance measures are effective. Some organizations are useful for benchmarking and trading best practices. Below are some of the institutions that Metro consistently interacted with on issues of language access provision.

The D.C. Language Access Coalition

The D.C. Language Access Coalition is an alliance of community based and civil rights organizations that advocates for language access rights within the District of Columbia. Although Metro does not fall under the scope of the DC Language Access Act, the Coalition supplies Metro with feedback on its Language Assistance Plan's implementation phase, so that it can better achieve access for limited and non-English proficient customers. Metro is frequently invited to participate in Coalition meetings to inform its members on ongoing projects that may affect or benefit their clients, distribute translated information, and to hear of any language access issues they or their clients may have with Metro. Metro also engages the Coalition to identify preferences for communication with both the coalition members and their limited and non-English proficient clients.

D.C. Mayor's Office on African Affairs, Asian & Pacific Islander Affairs, and Latino Affairs

The D.C. Mayor's Offices serve as community liaisons with various linguistic minorities residing in the District of Columbia. These government agencies attend to community affairs of their respective immigrant constituents, and connect them and help them to navigate benefits, programs, and services provided by D.C. Government, non-profit organizations, and other public-serving organizations.

Metro collaborates with these local agencies to address any issues their constituents may encounter when using Metro's services or programs. This collaboration helps Metro to identify needs and issues from their constituents' point of view. Each of these agencies have a Language Access program that helps government agencies, considered to have major public contact, to maintain compliance with the D.C. Language Access Act of 2004 and to help their limited and non-English proficient constituents to receive equal access to government services. Metro engages these agencies, as working partners, to help reach out to their constituents in languages other than English, which together represent speakers of Amharic, Arabic, Chinese, French, Korean, Spanish, and Vietnamese. Metro communicates with the Office on Asian & Pacific Islander Affairs and the Office on African Affairs for assessments of cultural competency and accuracy on translated documentation, in addition to support with a wider distribution of translated information.

Transportation Planning Board Access for All (AFA) Advisory Committee

The Access for All Advisory Committee advises the Transportation Planning Board on transportation issues, programs, policies, and services that are important to limited and non-

English proficient individuals, low-income communities, minority communities, people with disabilities, and older adults. The mission of this committee is to identify the concerns of these traditionally underrepresented populations, and to determine whether and how these issues might be addressed within the Transportation Planning Board process. Since 2001, the AFA Advisory Committee has emphasized the importance of transit information for those with limited English proficiency as a priority, and a subcommittee was created on this topic. Metro has provided reports on its Language Assistance Plan to this committee since 2008. Metro also presents to the AFA an overview of the Title VI Program when it updates it, attends monthly committee meetings, and obtains input on implementation of language assistance needs and measures.

American Public Transportation Association – Diversity and Inclusion Council

The Diversity and Inclusion Council promotes and values diversity as a strength of the industry and the Association. The Council serves to encourage, promote, and celebrate diversity throughout all levels of the Association during the normal course of the Association's business and programs. Metro, as a member of this council, has begun to engage on issues of race and discussions of diversity and inclusion initiatives, which will be useful to the improving of the provision of language assistance services.

IX. Efforts to Identify Additional Language Assistance Needs

Metrorail Title VI – Notice to the Public—Beginning on June 12th, 2023, and concluding on June 30th, 2023, two interns, assigned to the EEO, as part of the Metro College Internship Program, visited 127 stations (including mezzanine levels) and photographed the presence, or absence, of their Title VI "Notice to the Public" sign. In addition to identifying whether the Title VI signage was in place, they conducted 103 onsite interviews with Station Managers, all of whom listed Spanish as the primary language (excluding English) spoken amongst customers in their respective stations. The student interviewers also inquired on employee awareness of a previously used visual translator guide and collected feedback on introducing tablet aids to facilitate the Station Managers' customer service work. This idea was originally shared with EEO's personnel by station managers regarding Title VI. Of the 103 Managers, 87% (90 votes) were in favor of tablets as a tool that may be useful for language assistance purposes.

The initial report of findings from this project will be used to assess if a language assistance component could be added to Station Manager tablets. This will be assessed in a pilot project being conducted by RTRA Operations that will begin in December 2023. This small-scale pilot project is intended to evaluate the logistics of providing Station Managers with an electronic tool that enhances the level of customer service. The tablet in this pilot phase is meant to be used to complete streamlined forms, improve customer experience, increase transparency, and enable future application tools such as an interpretation application. The pilot will begin with station managers from a single division, and the results of this pilot project will determine whether to roll out this pilot project systemwide.

New points of data—Metro collects and analyzes data drawn from its telephonic interpretation service, which as reported in the section on Factor 2 above, provides additional information on the actual completed requests for services in languages other than English from its customer service and information centers. These data identify top languages in which information has been provided, and pinpoint which departments have a higher demand for this kind of language service provision. Most importantly, these data allow Metro to compare demographic Census data with actual, completed provision of services in languages other than English, and show the presence of 'emerging languages,' which may or may not coincide with the analysis of demographic Census data.

For this reporting period, two additional sets of data have been compiled to determine language need. First, reports have been provided by the Office of Customer Experience and Engagement's Outreach program on all languages encountered during in-person outreach from 2021 – 2023. There is also information collected via a Metro Outreach and Contractor Survey completed in August 2023 that was used in this update. This second report provides data on the languages other than English that outreach employees used when informing the public about various projects and activities. As indicated above, outreach teams interacted with over 906,000 customers in a language other than English from September 2020 - June 2023. Spanish, Amharic, Mandarin, Korean, Vietnamese, ASL, French, and Arabic were the languages in which information was provided. Additional interactions consisted of a small number of encounters with Portuguese, German, Italian, Russian, Swedish, Farsi, Tagalog, Uzbek, Hindi, Turkish, Thai, Cantonese, and Czech speakers.

CBO communication and engagement—Since the previous update, the Office of Equal Employment Opportunity implemented major changes in the communication approach with Community-Based Organizations. This was done via a systematic process with effective and interactive electronic communication and, when appropriate, with an in-person engagement with external partners (CBOs, and other community-serving stakeholders). These new continuous interactions with employees at the various community-based organizations have allowed EEO to know their preference for the types and modes of communications with Metro that they would prefer. To illustrate, CBOs' preferred mode of communication with clients, especially during COVID, was through social media channels as opposed to traditional posting on their website. Many CBO employees preferred to receive information via links to a Metro project website, instead of receiving informational flyers as attachments. Also, they appreciated the bilingual (SPA/ENG) messages with the inclusion of links to information in other languages that were embedded within these email messages. Metro's approach has been successful in that it invites potential readers to request information in their language of preference. Community Partners have also been fundamental for EEO for identifying modes of communication needed or preferred (written or oral, and language of preference) by limited and non-English proficient groups served by these community organizations.

Metro is constantly exploring alternative modes of communication and engagement with its community partners, such as web conferencing and webinars, which can be more amenable to the CBOs' time and other limited resources. Now more than ever, there are new considerations on

community engagement for community-based organizations and Metro. It was a reality that many of these institutions were already struggling to maintain services, due to changes in personnel, reprioritization of assignments, and funding difficulties. We can see an impact of that reality in the disappearance, due to program funding, of many community partners in the last three years. In this new world of post-COVID-19, Community-Based Organizations play a fundamental role in guiding Metro on best ways to provide meaningful information to limited and non-English proficient customers.

In its efforts to identify additional language assistance measures that could reduce the barriers that customers with limited and no-English proficiency face in riding public transit, Metro continues to consult with the Transportation Planning Board AFA's Subcommittee on Transit Information for limited and non-English proficient customers, members of the DC language Access Coalition, and other community-based programs that serve large numbers of limited and non-English proficient clients.

X. Language Assistance Initiatives 2023 – 2026

It is hoped that this report serves to illustrate Metro's commitment to providing meaningful access to programs and activities for individuals with limited and no-English proficiency. Metro will continue exploring ways to improve its Language Assistance Plan by incorporating best practices to complete ongoing projects and by launching new projects and initiatives. The following section highlights ongoing and future language assistance initiatives and identifies new strategies and initiatives planned for the next triennial period.

- 1. Metro will continue efforts to provide written notification, in the top languages and additional identified languages referenced in this update. This means that Metro will be at the ready to provide vital information, as requested in the top languages, which now include Spanish, Chinese (Mandarin and Cantonese), Korean, Vietnamese, Amharic, Arabic, French, Farsi-Afghani-Dari, Portuguese, Russian, Tagalog, and Somali. As has been done in previous reports, it will be noted to the various departments, that Chinese includes both language varieties of simplified and traditional Chinese for written documentation, and Mandarin and Cantonese for face-to-face and oral communication.
- 2. As indicated in the LEP Overview above, Metro serves a very diverse population living and working in Metro's tri-jurisdictional serving area. This diverse demographic population has consistently increased in numbers and distribution across jurisdictions, and for some groups, new languages have started to emerge. Metro will continue, with help from community partners, to identify new language needs as they may arise, while providing services and engaging members of the community through communication, and public outreach, or through information and feedback from Metro's customer relations and customer service call lines.
- 3. Metro will continue reinforcing practices and backing up language assistance provision messages to inform its clients of their rights under Title VI to receive equal access to available

services, upon request and free of charge. This will be done through feedback from departments engaging in community outreach, the Metro website portal, and the insertion of text "inlanguage" for all top languages in all brochures and their digital copies distributed for all projects under the Public Participation Plan.

- 4. Metro will continue recommending the publication and distribution of culturally appropriate translated informational materials and continue identifying vital written information to users of Metrobus, Metrorail, and MetroAccess, translating these materials, and disseminating them as appropriate.
- 5. The Office of Equal Employment Opportunity has begun and will centralize in-language information to facilitate one-site access for frequently requested translated materials by Metro's various departments, community partners and their clients and constituents.
- 6. Metro will continue its public announcements on Metrorail and Metrobus in LEP/NEP languages, principally in Spanish. During emergency situations, announcements to patrons will continue be made in both English and Spanish.
- 7. Metro will maintain training of front-line Metrorail and Metrobus employees on Title VI, language assistance, and cultural sensitivity. Metro will share information agency-wide on the importance of Title VI, its Language Assistance Plan, cultural sensitivity and the newly developed equity policy. Training on Language Access will include information on available tools and resources to assist limited and non-English proficient customers.
- 8. Metro's *Metro Trabajo* program will continue its efforts to recruit and hire bilingual and multilingual frontline employees by participating in community job fairs and advertising in publications and media that reach minority and limited and non-English proficient populations. *Minuto Metro* has been reincorporated on a regular basis to local media, TV and radio broadcasting in Spanish, to inform the Spanish speaking audience of Metro's critical information and services. *Minuto Metro* is a short informative segment, created in partnership with *NBC/Telemundo*.
- 9. The Office of Equal Employment Opportunity will continue coordinating efforts with internal Metro stakeholders, such as the Office of Planning, Office of Customer Experience Survey and Research, Customer Service, Office of Customer Experience and Engagement, Communications and Marketing, and the Department of Access Services to better target information to limited and non-English proficient persons. Based on input collected from limited and non-English proficient individuals through outreach and surveys for the Public Participation Plan, Metro will continue to focus on communicating through various channels and use appropriate resources to promote public participation and feedback opportunities for the limited and non-English proficient community.

10. Metro will continue to monitor the strengths and weaknesses of the Language Assistance Plan on an ongoing basis. Metro 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 Metro's Title VI Submittal to the Federal Transit Administration.

In conclusion, Metro reaffirms its committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin, as stated by Title VI of the Civil Rights Act of 1964. The accomplishments of the 2023 – 2026 plan years will demonstrate that commitment. \$\display\$