

Washington Metropolitan Area Transit Authority

Language Assistance Plan

October 2020 – September 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. This is not only recommended, but mandated, for Metro to provide services that fully include customers with little or no proficiency in English.

Formed in 1967 under a 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. 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 four million people¹.

According to the 2000 U.S Census data on language use and English-speaking ability², 18 percent of the total U.S. population aged 5 and over, or 47.0 million people, reported that they spoke a language other than English at home. Census data also indicates that the proportion of the population aged five and over who spoke English less than “Very Well”³ 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 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 1.2 million people, or 32 percent of the region’s population, 5 years and older, who speak a language other than English at home (2014-2018; ACS 5-year). Of these individuals, 469,133 or 12 percent speak English less than “Very Well,” and thus are considered to have limited or no-English proficiency. The terms limited and non-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, and under the direction of Executive Order 13166, and the Policy Guidance Concerning

¹ WMATA (2020). WMATA Performance Report Q3/FY2020 July 2019 – March 2020 [PDF]. Retrieved from https://www.wmata.com/about/records/scorecard/upload/MetroPerformanceReport_Q3FY2020.pdf

² U.S. Census Bureau (2000). Language Use and English-Speaking Ability. Census 2000 Brief. Retrieved from <https://www.census.gov/prod/2003pubs/c2kbr-29.pdf>.

³ “Very Well,” is one of four U.S. Census categories of language proficiency: “Very Well,” “Well,” “Not well,” and “Not At All.”

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 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.

For our purposes, 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, to 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 focused on a description of the legal responsibilities Metro has under the Federal Transit Authority's (FTA) funding to ensure this meaningful access for linguistic minorities in the service area, an outline on the collection and analysis of demographic data, a description of what has been done, and plans for 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, 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 (I), "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 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 as a result of national origin, are limited in their English language proficiency.

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 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 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 will 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 pages of this document provides Metro's 2020-2023 Language Assistance Plan and includes:

- 1) Updated information on the four-factor analysis,
- 2) Language assistance measures employed by Metro;
- 3) Report on efforts to implement the 2017 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, and the 2017 update was approved by FTA on December 9, 2019.

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, according to new Census data, new 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, Korean, Vietnamese, and Japanese; Afro-Asiatic languages (Arabic, Amharic, Somali), African and West Africa languages, such as French (including Cajun), Yoruba, Twi, and Igbo, and an increasing representation of various Indic languages (Urdu, Nepali, Marathi, Bengali, Hindi, Punjabi, Gujarati, and Telegu). Persian (including Farsi-Dari), Tagalog (including Filipino), Russian, and some Tai-Kadai languages such as Thai, and Lao. Portuguese and Haitian are now included 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 has identified 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 activities of interest to various linguistic populations.

Demographic Data

The demographic data used here has been collected through Metro's Planning Administration, drawn from the 2014-2018 ACS 5-year estimates, which evidences changes in the composition of the service area population since the last version of this Language Assistance Plan was approved by the FTA. Rail and bus passenger ridership data is also taken into consideration as part of Metro's frequency of contact with limited and non-English proficient persons.

It is known that most of the LEP/NEP individuals being served by Metro speak Spanish. Their presence is significant in that Spanish speakers now comprise 52 percent of the serving area's limited and non-English proficient population, with an increase of 2 percent since the last 2011-2015 ACS 5-year estimate. Census data collected for this new 5-year estimate period, however, show a new presence of Afro-Asiatic (Amharic and Somali), and other languages from Western Africa (Yoruba, Twi, and Igbo), indicating an increase in African languages over traditionally present Asian languages.

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 four million people. The average weekday daily ridership on Metrorail from 2019 is 669,000, and on Metrobus is 368,000.

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

Using 2014 - 2018 ACS 5-year estimate 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. Metro also collects information, through its Rail and Bus passenger survey data to estimate frequency of contact, and language choice of customers for communication and interaction. These are FTA-mandated passenger surveys that Metro is required to administer every five years, or at least two years after the launch of new rail service, and they provide an alternative source of information for actual utilization of Metrorail and Metrobus services by LEP/NEP individuals. It allows for the Authority to pinpoint areas with the highest concentration of LEP/NEP persons in the Metro service area from actual usage of the system by riders.

The U.S. Census Bureau's American Community Survey (2014 - 2018), ACS 5-year estimate data release⁴ shows that the Washington, D.C. region has 1.2 million people, constituting 32 percent of the region's population, 5 years and older, who speak a language other than English at home. Of these individuals, 469,133 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.

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

Jurisdiction	Total Population (Ages 5+)	Speak Only English	Speak another language at home	% of Speakers of another language at home	LEP -- Speak English Less than "Very Well"			
					LEP	% of Total Population	% of LEP in each Jurisdiction	% of Region LEP in Each Jurisdiction
DC	639,806	528,179	111,627	17%	36,568	6%	17%	8%
MD--Montgomery County	973,433	577,767	395,666	41%	136,654	14%	14%	29%
MD--Prince George's County	846,145	629,551	216,594	26%	98,402	12%	45%	21%
VA--Arlington County	217,891	152,968	64,923	30%	17,074	8%	26%	4%
VA--Fairfax County	1,069,499	653,951	415,548	39%	159,299	15%	38%	34%
VA--City of Alexandria	145,133	96,269	48,864	34%	17,542	12%	36%	4%
VA--City of Fairfax	21,968	14,670	7,298	33%	2,927	13%	40%	1%
VA--City of Falls Church	13,240	10,585	2,655	20%	667	5%	25%	0%
Region	3,927,115	2,663,940	1,263,175	32%	469,133	12%	37%	100%

Source: Source: ACS5 (2014 – 2018).

⁴ The long form was eliminated from the 2010 Census. Information on languages spoken at home, English-speaking ability and income is now collected through the American Community Survey.

Changes of note in the region's limited and non-English proficient population since the 2017 – 2020 Language Assistance Plan, include the following:

- The limited and non-English proficient population in the Metro's service area has grown by six percent, from 441,323 reported on the ACS5 2011-2015, to the 469,133 number of limited and non-English proficient population reported on the ACS5 2014-2018 data. This six percent increase doubles the three percent of the total population, 5 years and older, growth in the region, which increased from a total population of 3,826,942 to the current number of 3,927,115 total population, 5 years and older, reported on the ACS5 2014-2018.
- The region's population of speakers of languages other than English at home has grown seven percent, as it increased from a total population of 1,179,722 reported on the ACS5-2011-2015 to the current 1,263,175 individuals speaking another language at home reported on the ACS5 2014-2018. 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 relatively static with a half a point increase from the 2011-2015 ACS 5-year estimates. Prince George's County saw the biggest increase, from 10 percent to 12 percent of their LEP population in the last three years. Washington, DC, City of Alexandria, Arlington County, and Fairfax County saw small increases from .3 to .6 in their limited and non-English proficient populations. Montgomery County, City of Fairfax, and the City of Falls Church experienced small decreases in their LEP populations by -.4, -1.0, and -1.1 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.

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 ACS5 (2014-2018) estimate data. These data will also be used on 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	245,334
Chinese (incl. Mandarin, Cantonese)	33,828
Korean	29,158
Vietnamese	23,134
Amharic, Somali, or other Afro-Asiatic languages	21,051
French (incl. Cajun)	13,196
Arabic	12,114
Persian (incl. Farsi, Dari)	10,329
Yoruba, Twi, Igbo, or other languages of Western Africa	7,564
Tagalog (incl. Filipino)	7,303
Urdu	6,233
Russian	5,481
Other languages of Asia	4,355
Nepali, Marathi, or other Indic languages	4,077
Bengali	4,063
Hindi	3,822
Thai, Lao, or other Tai-Kadai languages	3,719
Portuguese	3,709
Japanese	3,497
Haitian	2,617
Other Indo-European languages	2,233
Punjabi	2,111
Gujarati	2,081
Telugu	1,941
Other and unspecified languages	1,903
Ilocano, Samoan, Hawaiian, or other Austronesian languages	1,726
Khmer	1,545
Swahili or other languages of Central, Eastern, and Southern Africa	1,513
Tamil	1,479
German	1,448
Italian	1,188
Malayalam, Kannada, or other Dravidian languages	1,135
Greek	1,111
Ukrainian or other Slavic languages	1,080
Serbo-Croatian	606
Armenian	471
Polish	363
Yiddish, Pennsylvania Dutch or other West Germanic languages	269
Hebrew	235
Other Native languages of North America	66
Hmong	33
Navajo	12
Total LEP Individuals	469,133

Source: ACS5 (2014 – 2018).

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 (2014 – 2018) (ACS5-year) estimate data release, these maps are shown below as Figures 1-7. Each map illustrates the distribution of limited and non-English proficient speakers within the eight 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 and Fairfax Counties and Alexandria, Fairfax, and Falls Church cities to the southwest. The colors on the maps 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 Amharic, Somali, and other Afro-Asiatic Languages
- Figure 7. Limited and non-English proficient Populations Speaking other languages of West-Africa

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

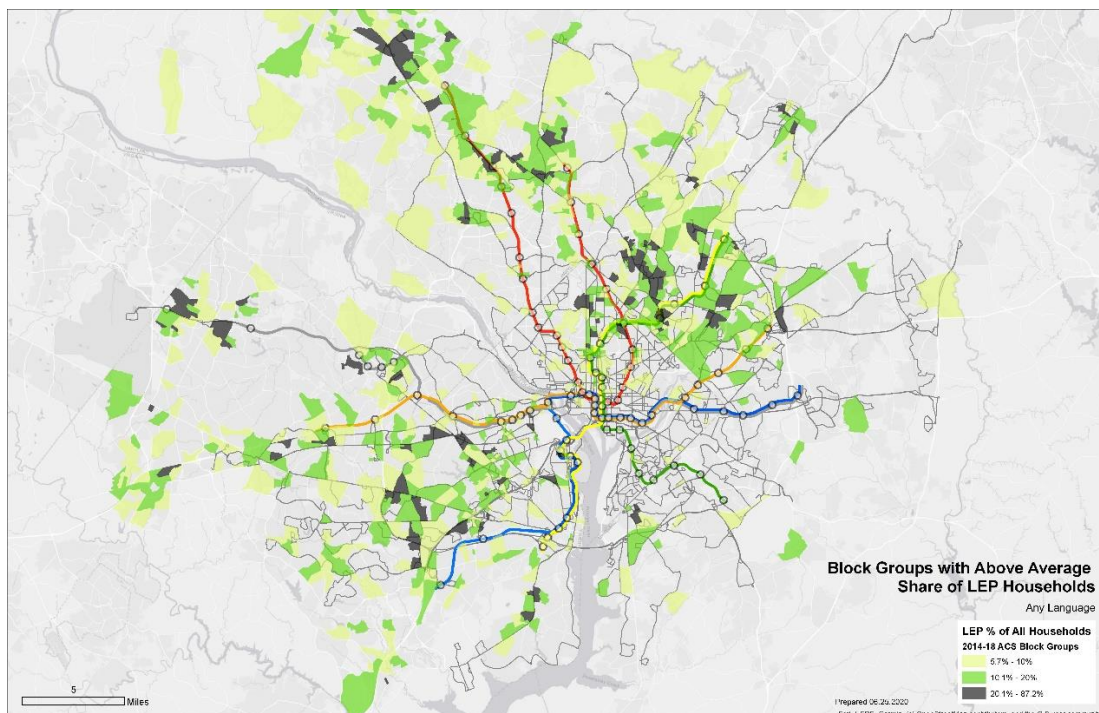


Figure 2. Map of Limited and non-English proficient Population Spanish Speaking in the Metro Service Area

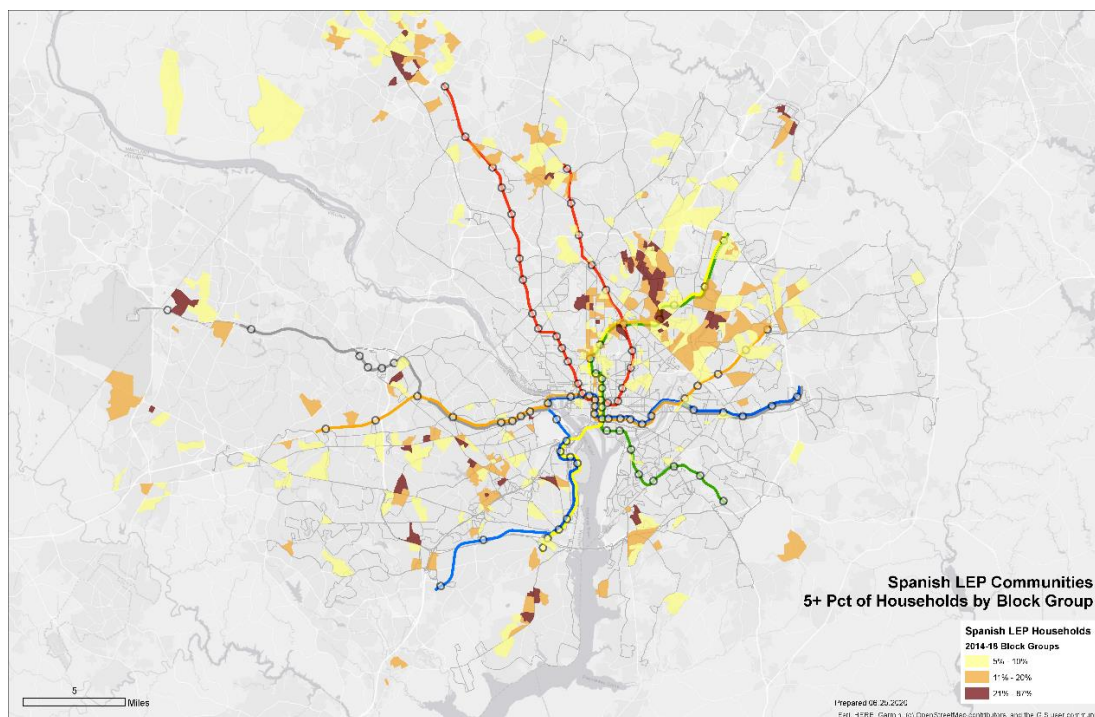


Figure 3. Map of Limited and non-English proficient Populations Speaking Chinese in the Metro Service Area

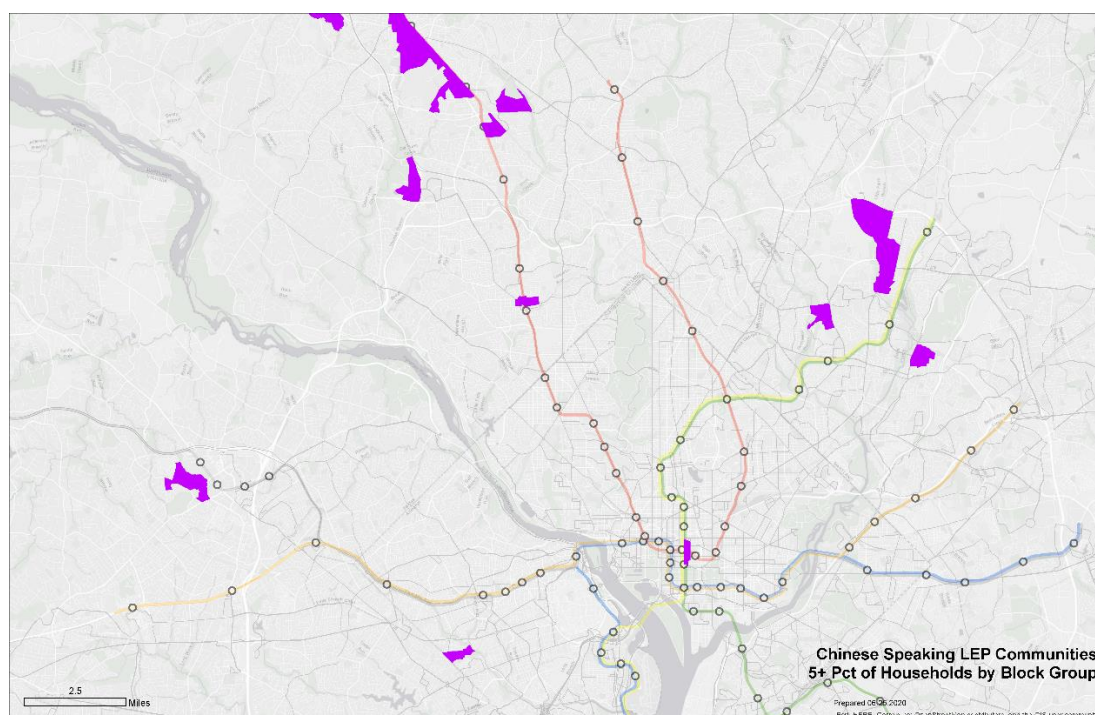


Figure 4. Map of Limited and non-English proficient Populations Speaking Korean in the Metro Service Area

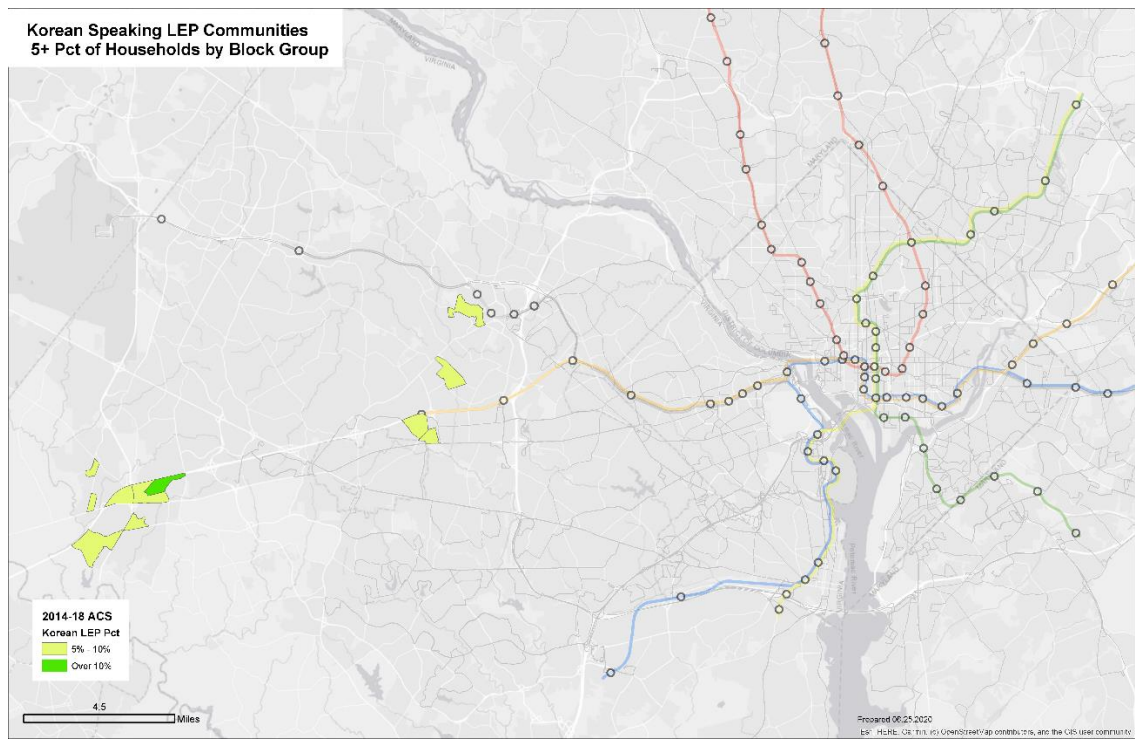


Figure 5. Map of Limited and non-English proficient Populations Speaking Vietnamese in the Metro Service Area

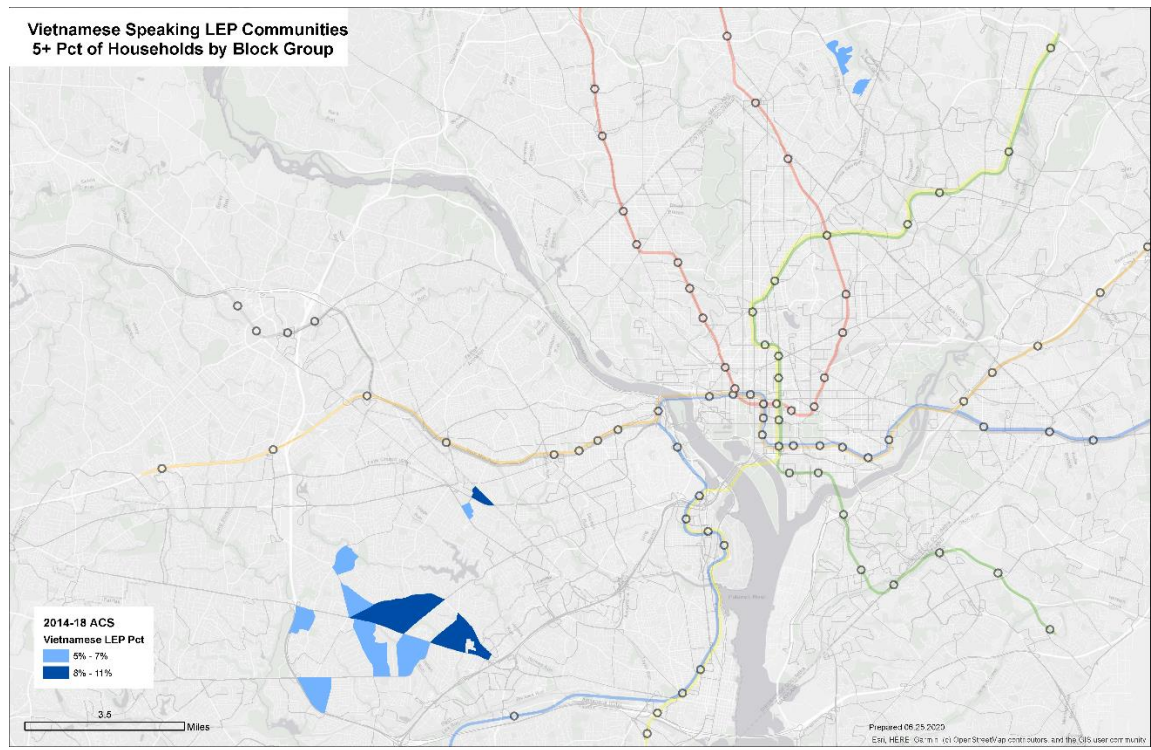


Figure 6. Map of Limited and non-English proficient Populations Speaking Amharic, Somali and Other Afro-Asiatic Languages in the Metro Service Area

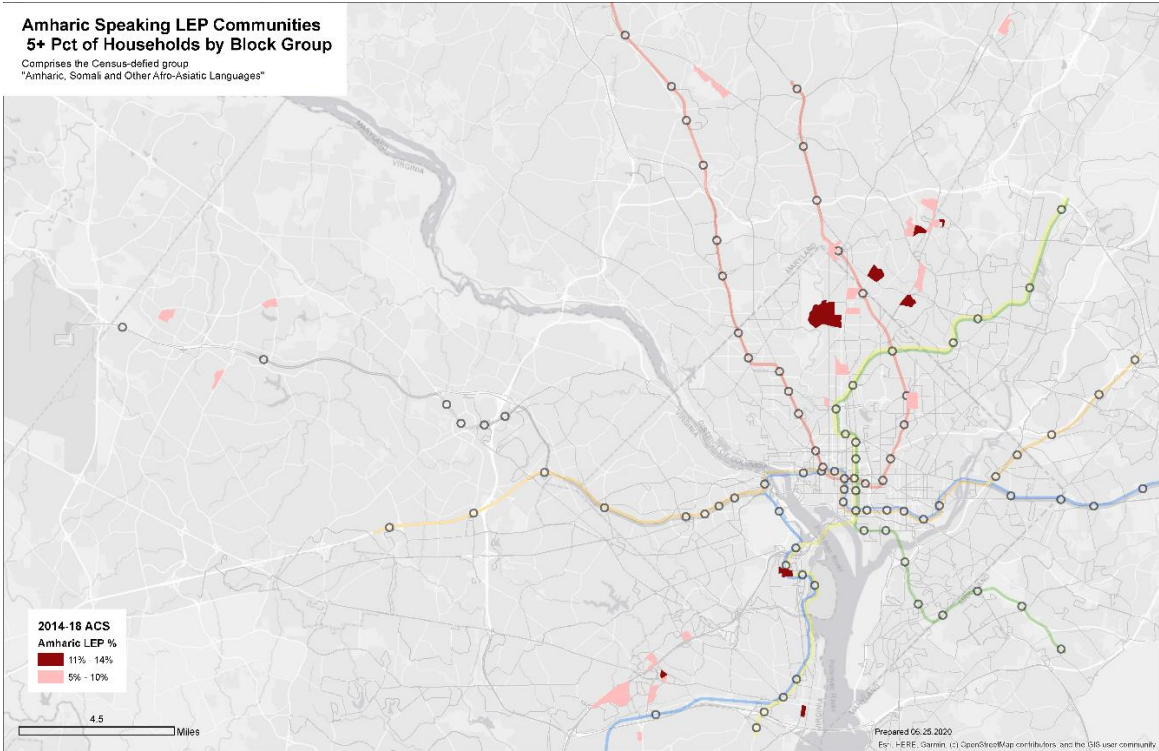
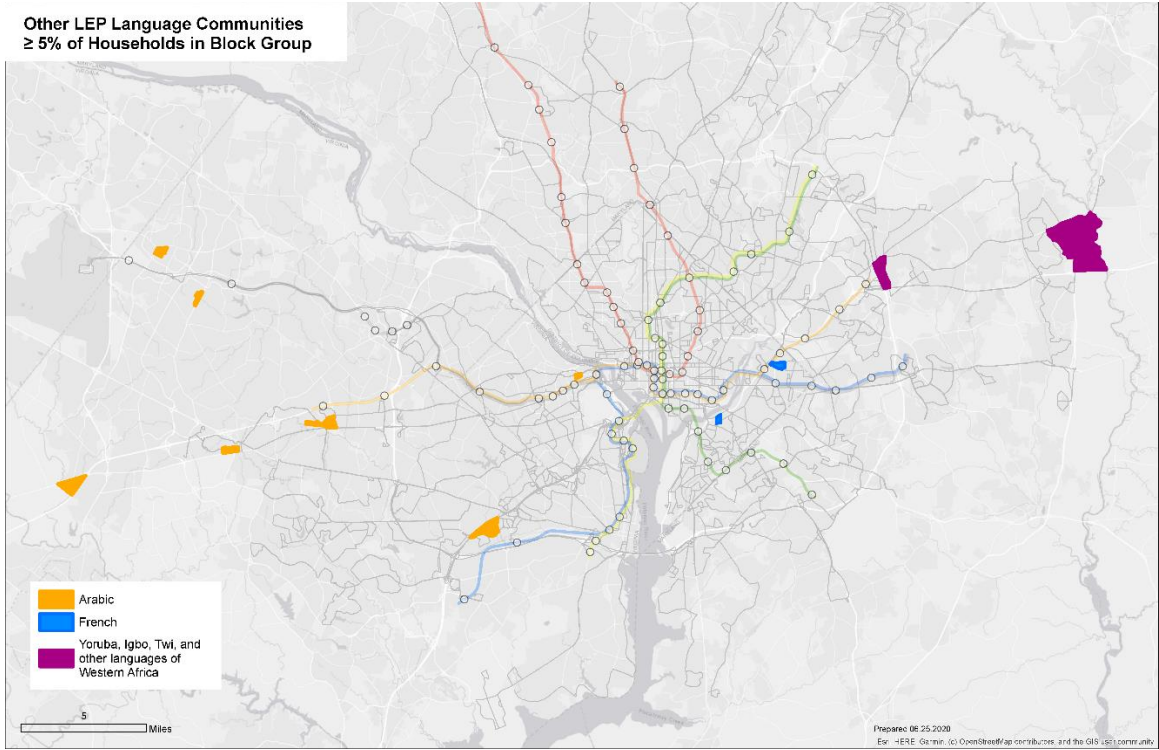


Figure 7. Map of Limited and non-English proficient Populations Speaking Yoruba, Igbo, Twi, and other languages of West Africa in the Metro Service Area



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, and the distribution of these populations within the service area, as visually displayed on the maps listed on Figures 1 - 7 above:

- Over 1 million individuals or 26 percent of the region's residents are foreign born.
- 32 percent of the region's population speaks 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 increased by half a point at exactly 12 percent.
- Every jurisdiction in the service area has a limited and non-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 about one-third of the region's LEP/NEP population), followed by City of Fairfax, Prince George's County, City of Alexandria, and Arlington County.

In addition, limited and non-English proficient individuals in the service area use about 39 additional languages (or language demographic clusters) where the number of speakers for each language exceeds 1,000 persons. This includes other Afro-Asiatic languages, various West African languages, other Indic languages, and other Indo-European languages, which comprise multiple and distinct language families.

Using 2014-2018 ACS 5-year estimate 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.

These data will assist the Washington Metropolitan Area Transit Authority's offices in developing projections for language services requests and potential language needs. Table 3 below 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 determined what written in-language materials may be needed for limited and non-English proficient individuals speaking those languages.

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

Persons that Speak English Less than "Very Well" in the Metro Service Area		% of Service Area LEP Population	% of Total Population that Speaks Language	% of Total Population that is LEP
Language	Number			
Spanish	245,334	52.3%	14.0%	6.2%
Chinese (incl. Mandarin, Cantonese)	33,828	7.2%	2.0%	0.9%
Korean	29,158	6.2%	1.4%	0.7%
Vietnamese	23,134	4.9%	1.1%	0.6%
Amharic, Somali, or other Afro-Asiatic languages	21,051	4.5%	1.5%	0.5%
French (incl. Cajun)	13,196	2.8%	1.4%	0.3%
Arabic	12,114	2.6%	1.0%	0.3%
Persian (incl. Farsi, Dari)	10,329	2.2%	0.8%	0.3%
Yoruba, Twi, Igbo, or other West African languages	7,564	1.6%	1.0%	0.2%
Tagalog (incl. Filipino)	7,303	1.6%	0.8%	0.2%
Urdu	6,233	1.3%	0.6%	0.2%
Russian	5,481	1.2%	0.5%	0.1%
Other language of Asia	4,355	0.9%	0.3%	0.1%
Nepali, Marathi, or other Indic languages	4,077	0.9%	0.4%	0.1%
Bengali	4,063	0.9%	0.4%	0.1%
Hindi	3,822	0.8%	0.7%	0.1%
Thai, Lao, or other Tai-Kadai languages	3,719	0.8%	0.2%	0.1%
Portuguese	3,709	0.8%	0.4%	0.1%
Japanese	3,497	0.7%	0.2%	0.1%
Haitian	2,617	0.6%	0.3%	0.1%
Other Indo-European languages	2,233	0.5%	0.3%	0.1%
Punjabi	2,111	0.4%	0.2%	0.1%
Guajarati	2,081	0.4%	0.2%	0.1%
Telegu	1,941	0.4%	0.3%	0.0%
Other and unspecified languages	1,903	0.4%	0.3%	0.0%
Ilocano, Samoan, Hawaiian, or other Austronesian	1,726	0.4%	0.1%	0.0%
Khmer	1,545	0.3%	0.1%	0.0%
Swahili, lang. of Central, Eastern, & Southern Africa	1,513	0.3%	0.2%	0.0%
Tamil	1,479	0.3%	0.2%	0.0%
German	1,448	0.3%	0.4%	0.0%
Italian	1,188	0.3%	0.2%	0.0%
Malayalam, Kannada, or other Dravidian languages	1,135	0.2%	0.2%	0.0%
Greek	1,111	0.2%	0.2%	0.0%
Ukrainian or other Slavic languages	1,080	0.2%	0.1%	0.0%

Source: 2014-2018 ACS 5-year estimates. (Table B16001)

As indicated on the LEP Overview above, Metro 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, 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 Washington region include Spanish, Chinese, Korean, Vietnamese, and Japanese; Afroasiatic languages (Arabic, Amharic, Somali), African and West Africa languages, such as French (including Cajun), Yoruba, Twi, and Igbo, and an increasing representation of various Indic languages, such as Urdu, Nepali, Marathi, Bengali, Hindi, Punjabi, Gujarati, and Telegu. Persian languages (including Farsi-Dari), Tagalog (including Filipino), Russian, and some Tai-Kadai languages such as Thai, and Lao. Portuguese and Haitian appear now on this updated listing of languages where the number of speakers for each language exceeds 1,000 persons. The following top languages make up the majority seventy-five percent (for those falling within a five percent threshold) of all Metro's limited and non-English proficient customers:

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

Persons that Speak English Less than "Very Well" in the Metro Service Area		% of Service Area LEP Population	% of Total Population that Speaks Language
Language	Number		
Spanish	245,334	52.3%	14.0%
Chinese (incl. Mandarin, Cantonese)	33,828	7.2%	2.0%
Korean	29,158	6.2%	1.4%
Vietnamese	23,134	4.9%	1.1%
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Tagalog (incl. Filipino)	7,303	1.6%	0.8%
Urdu	6,233	1.3%	0.6%
Russian	5,481	1.2%	0.5%

Source: 2014-2018 ACS 5-year estimates. (Table B16001)

The top languages include Spanish, Chinese (Mandarin and Cantonese), Korean, Vietnamese, Amharic, Somali, French, and Arabic. It is important to note that Chinese includes both simplified and traditional for written documentation, and Mandarin and Cantonese for face-to-face and oral communication. Afro-Asiatic languages such as Arabic, Amharic, and now Somali continue having a presence, as does French (including Cajun), as spoken by African and West African limited and no-English proficient persons. Other West African languages such as Yoruba, Twi, and Igbo, are new in these data. Russian and Tagalog maintain their presence, as well seeing a presence of various Indic languages such as Urdu, Nepali, Marathi, Bengali, Hindi, Punjabi, Gujarati, and Telegu.

Factor 2: The frequency of contact from LEP individuals

In addition to the U.S. Census data, Metro uses other sources of information to estimate the frequency of contact with limited and non-English proficient individuals (factor two). Metro collects rider survey data⁵, which complements the U.S. Census data discussed above. Metro pays close attention to major points of interaction through which it can assess the frequency by which its employees encounter 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 of encounters by LEP persons with Metro services:

- Bus Ridership Survey Data
- Rail Ridership Survey Data
- Census Data on Transit Ridership by LEP/NEP persons
- Metro Call Center Data
- Metro Website Data

Metrobus Survey—Metrobus ridership from the 2018 passenger survey was used to estimate the number of limited and non-English proficient persons that ride Metrobus. First the bus ridership for the general population in each jurisdiction was determined. Next, the percentage of limited and non-English proficient population per jurisdiction was applied to estimate the potential number of limited and non-English proficient persons that would ride Metrobus by jurisdiction. The calculations listed below show that an estimate 44,222 limited and non-English proficient persons are likely to ride Metrobus each day. This represents 27 percent of all Metrobus riders. Please see Table 5 below:

5. Bus Ridership Survey Data

Jurisdiction	Area Population & Bus Ridership				LEP Bus Riders			
	Total Population (ACS5)	2018 Survey - All Trips	All Riders ¹	% of Total population	% LEP ²	LEP Number	LEP Riders ³	% of 2018 Riders
DC	684,498	173,531	86,766	13%	6%	5,206	15,618	18%
MD - Montgomery County	1,040,133	41,164	20,582	2%	14%	2,881	8,644	42%
MD - Prince George's County	906,202	61,397	30,699	3%	12%	3,684	11,051	36%
VA - Fairfax County	1,143,529	20,442	10,221	1%	15%	1,533	4,599	45%
VA - Arlington County	231,803	17,376	8,688	4%	8%	695	2,085	24%
VA - City of Alexandria	156,505	10,660	5,330	3%	12%	640	1,919	36%
VA - City of Falls Church	14,067	1,681	841	6%	5%	42	126	15%
VA - City of Fairfax	23,865	915	458	2%	13%	59	178	39%
Region	4,200,602	327,166	163,583	3.8%	12%	14,741	44,222	27%

Sources: U.S. Census Bureau's American Community Survey (2014-2018) ACS5-year estimate data and 2018 Metrorail Survey.

Notes: LEP is defined as speaking English less than "very well." It includes people who reported to the U.S. Census that they speak English "well," "not well," or "not at all."

¹Number of riders estimated at half of the Metrobus Survey trips to account for round trips

⁵ The program was implemented in 2000 with the most recent bus data being collected in the fall of 2018 and rail in the spring of 2016. Refer to *Appendix B: Demographic Profile Data* of the 2020-2023 Public Participation Plan to see a complete list of Metrorail Station and Metrobus Line Demographics.

²The percent of the jurisdiction's population that is limited and non-English proficient was based on ACS5 2014-2018 data

³Estimated number of limited and non-English proficient riders based on Census data that shows that the limited and non-English proficient population rides bus transit at three times the rate of the general population

Metrorail Passenger Survey—Utilizing data from Metro’s 2016 Rail Passenger survey, which provide ridership by jurisdiction, estimates of limited and non-English proficient individual encounters were made by first, determining rail ridership for the general population in each jurisdiction, and next, applying the percentage of limited and non-English proficient population in that jurisdiction, to determine the potential limited and non-English persons that would ride Metrorail by jurisdiction. The calculations in Table 6 below show that an estimated 15,378 limited and non-English proficient individuals are likely to ride Metrorail each day. This represents 5.2 percent of all Metrorail riders as shown below:

Table 6. Rail Passenger Survey Data

Jurisdiction	Area Population & Rail Ridership				LEP Rail Riders			
	Total Population (ACS5)	2016 Survey - All Trips ¹	2016 Riders ²	% of Total population	% LEP ³	LEP Number	LEP Riders ⁴	% of 2016 Riders
DC	684,498	200,145	100,073	15%	6%	6,004	3,002	3%
MD - Montgomery County	1,040,133	119,090	59,545	6%	14%	8,336	4,168	7%
MD - Prince George's County	906,202	93,542	46,771	5%	12%	5,613	2,806	6%
VA - Fairfax County	1,143,529	79,724	39,862	3%	15%	5,979	2,990	8%
VA - Arlington County	231,803	65,954	32,977	14%	8%	2,638	1,319	4%
VA - City of Alexandria	156,505	32,476	16,238	10%	12%	1,949	974	6%
VA - City of Falls Church	14,067	2,512	1,256	9%	5%	63	31	3%
VA - City of Fairfax	23,865	2,688	1,344	6%	13%	275	87	7%
Region	4,200,602	596,131	298,066	7%	12%	30,757	15,378	5.2%

Sources: U.S. Census Bureau's American Community Survey (2014-2018) ACS5-year estimate data and 2016 Metrorail Survey.

Notes: LEP is defined as speaking English less than "very well." It includes people who reported to the U.S. Census that they speak English "well," "not well," or "not at all."

¹The 2016 Rail Survey captured average weekday trips from the AM peak period to the evening.

²Number of riders estimated at half of the Metrorail of the Metrorail Survey trips to account for round trips.

³The percent of the jurisdiction's population that is LEP was based on ACS5 2014-2018 data.

⁴Estimated number of LEP riders based on Census data shows that the LEP population rides rail at half the rate of the general population.

Utilizing ridership data for Metrorail and Metrobus, and applying the proportions of limited and non-English proficient individuals in those jurisdictions to the general population of riders in each jurisdiction yields the following estimates of limited and non-English proficient individuals that utilize Metro services:

- Metrobus – 44,222 daily limited and non-English proficient riders, or 27 percent of all riders
- Metrorail – 15,378 daily limited and non-English proficient riders, or five percent of all riders

The areas with the highest concentration of limited and non-English proficient individuals in the Metro service area continue to be Fairfax County and City of Fairfax in Virginia, and Montgomery County in Maryland. As shown above, limited and non-English proficient population encounters with Metro services occur mostly on Metrobus. The agency’s resources for language assistance are concentrated more heavily on Metrobus resources, products, services, and activities.

Metro Call Center Data – Requests for Interpretation – The busiest points of 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, were used to further determine the 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 a source of data collection for all instances in which information and services are provided in languages other than English right at that moment of interaction. Telephonic interpretation data usage also provides Metro important information on the demand for this service by comparative minutes of the requests by language, identifies top languages in which information has been provided, and pinpoints departments’ demand for this kind of language service provision. For this reporting period, 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 evaluated to assess the frequency of contact with limited and non-English proficient individuals. The customer service line for *SmarTrip® & SmartBenefits Participants* was also included, but given its approach to customer service, it is addressed below, separately from these customer service calling centers.

The customer service (information) center received an average of 661,893 calls in the last three years. Transit Accessibility’s Metro Access Paratransit reports an average of 56,265 total calls answered via a telephonic interpretation service for its reservation cue from October 2017 to July 2020, while its Eligibility section reports having received about 149,889 phone calls for the same three-year period. Metro currently employs four bilingual (Spanish/English) customer service representatives in the customer service (information) call center, nine bilingual (Spanish/English) agents answer calls in Transit Accessibility (seven in MetroAccess Paratransit, and two in MetroAccess Eligibility), and two to three bilingual officers are available to attend calls in Metro Transit Police.

To complement this information, Table 7 below shows telephonic interpretation data for the number of calls in which service was provided in a language other than English by each department. The numbers are drawn directly from the reports submitted by the telephonic interpretation company and shows all completed calls in which the service was provided in the customer’s language of preference. The difference between calls received for some of the departments such as Transit Accessibility (56,265) and service requests completed (4,216) requires further break out and analysis.

Table 7. Customer service calls completed in-language via telephonic interpretation

Language	Department			Total
	WMATA Customer Information	Transit Accessibility (MACS & ELIG)	Metro Transit Police (MTPD)	
Spanish	2605	3989	209	6803
Mandarin	75	27	4	106
Amharic	30	27	12	69
French	37	19	1	57
Korean	19	26	2	47
Arabic	17	26	1	44
Somali	4	40		44
Vietnamese	10	29		39
Farsi-Iranian Persian	3	20		23
Farsi-Afghani	8	13	1	22
Total	2808	4216	230	7254

Table 8 below shows a more visual representation of the top ten languages served via an interpreter online by these customer relations and customer service call lines. In this case, each number represents totals by language for all customer service interactions that were completed in the language indicated.

Table 8. Top languages in which service was completed

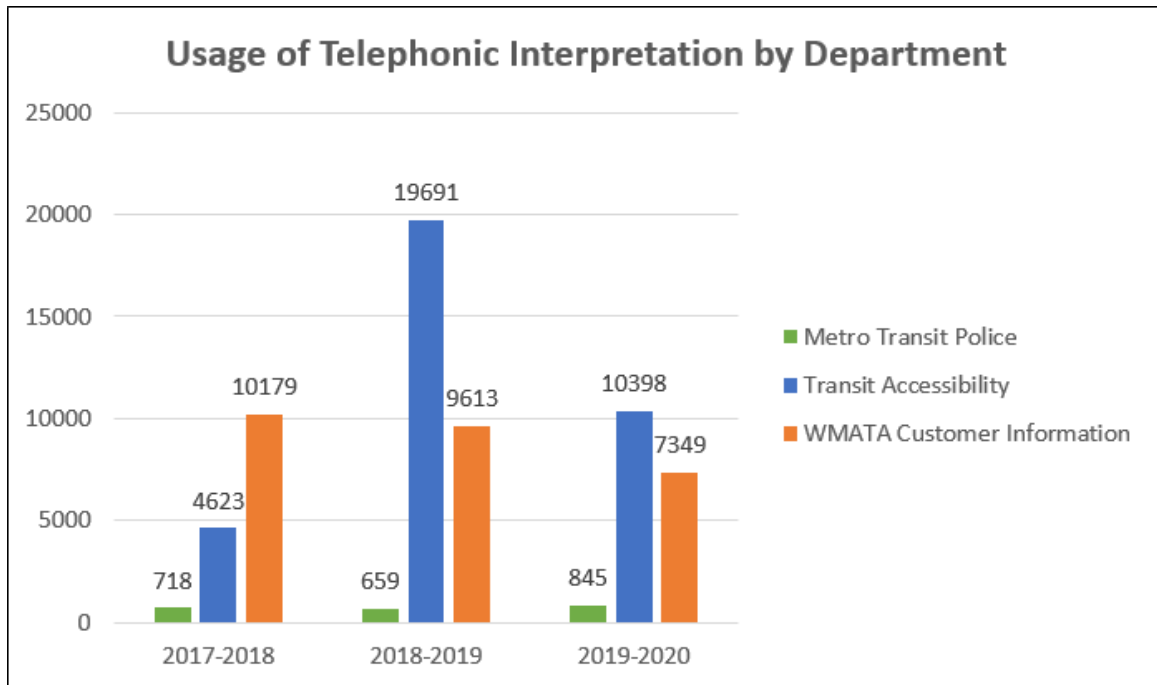
Top 10 languages based on telephonic-interpretation usage									
6,803	106	69	57	47	44	44	39	23	22
Spanish	Mandarin	Amharic	French	Korean	Arabic	Somali	Vietnamese	Farsi-Iranian Persian	Farsi-Afghani

Upon close analysis of the telephonic interpretation data for FY 2018, 2019, and 2020, one can determine comparative telephonic interpretation usage. Table 9 shows the overall usage of telephonic interpretation for these three Metro customer relations and customer service call lines. 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 9. Usage of Telephonic Interpretation: Sum of minutes by Department per FY

WMATA Department	2017-2018	2018-2019	2019-2020
Metro Transit Police	718	659	845
Transit Accessibility	4623	19691	10398
WMATA Customer Information	10179	9613	7349
Total	15520	29965	18597

Figure 10. Telephonic interpretation usage by sum of interaction minutes



Most of the interactions between limited and non-English proficient individuals where service and information are requested in languages other than English are accomplished 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 the data shown above, one can see that the largest volume of sum of interaction minutes is found in the Transit accessibility and the customer service information lines.

The top 10 languages in which language provision is completed mirrors the top languages identified through the 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. This information confirms Spanish, Chinese (Mandarin and Cantonese), Korean, Vietnamese, Amharic, Somali, French, and Arabic as the top languages spoken by limited and non-English proficient individuals and shows which provision of services has been requested and provided within the Authority. Farsi-Iranian Persian, and Farsi-Afghani, as well as Somali are three languages which have emerged in the analysis of these new data.

The customer service line for SmarTrip® & SmartBenefits functions differently in that it has nine customer service representatives that are either bilingual or multilingual in Spanish, French, and Korean. Per information received by that department, they received an average of 53,136 customer service phone calls from October 2017 to July 2020, and they averaged about two requests for telephonic interpretation services a month for the same time period. Unlike the other call-in customer centers, SmarTrip® & SmartBenefits provide direct in-language customer service via their in-house bilingual and multilingual customer service representatives. For the purpose of this

report, they indicated that on average, a representative used their language skills 157 times per month to complete a call for this reporting period (Oct 2017- July 2020).

Website – Translation of documentation – Metro’s website (<https://www.wmata.com>) received on average of, for this reporting period, over 3 million page views each month from about 183,454,156 website users. The website is the preferred source for Metro information, particularly during service suspensions and delays. During 2017 to 2020, data from Google Analytics indicated that website translations accounted for 10 percent of all web sessions on Metro’s website. Users translated the website an average of 47,716 times per month into five languages other than English. 49 percent of the website translations were in Chinese (Simplified), 20 percent in French, 18 percent in Spanish, 12 percent in Korean, and 5 percent in Vietnamese. The high number of Chinese and French Google translation requests are not proportionate to the size of these languages relative to the Spanish-speaking persons in the Metro service area. These numbers, however, could be attributed to the fact that the DC area is a tourist hub for which speakers of many languages make public transportation plans via the website.

As of July 2020, Metro maintains *Google Translate* as an option for the public to automatically translate webpages into these five languages. Metro will expand this automated function with additional languages identified through the estimation of the frequency of contact with limited and non-English proficient individuals as presented in this report. 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.

The combination of these sources of information allows for Metro to estimate the frequency of contact with limited and non-English proficient individuals, as evidenced by the close analysis of the data collected at these sites of engagement. Their utilization of Metrorail and Metrobus services, direct in-language phone communication with various call centers, and their engagement through web-sessions provide insight into the contact members of these linguistic minorities have with Metro. These points of contact also allow for information to be drawn on 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 2000 U.S. Census, nationally about 19 percent of limited and non-English proficient individuals age 16-years and older reported use of public transit as their primary means of transportation to work, compared with about 5 percent of English speakers⁶.

Metro is committed to identify critical services unique to limited and non-English proficient persons that ride Metrorail and Metrobus, request services, and engage in activities sponsored by

⁶ U.S. Census Bureau (2011) Means of Transportation to Work by Selected Characteristics. 2011 -2015 American Community Survey 5-year estimates. Table S0802.

Metro. An understanding of the importance of access to public transportation is 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 services platforms, all of which have been discussed above.

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, these customer service and customer relations centers have bilingual and multilingual 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.

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 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 language access services.

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 or 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) 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 is 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 2017 through 2020, Metro estimates that it spent 160,766.67 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 External Relations (now Office of Content and Strategic Communications), 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 several 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 their programs and activities for limited and non-English proficient individuals. In order to have an effective Language Assistance Plan, and after identification of limited and non-English proficient individuals who need language assistance, Metro has put in place the following language assistance measures, including, but not limited to the following:

Interpretation:

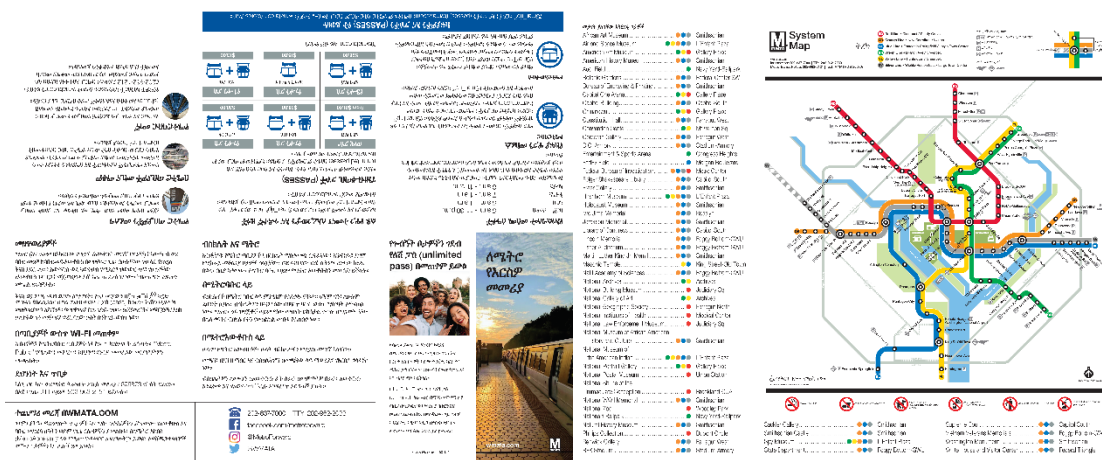
Limited and non-English proficient customers who call the Metro Service Call Center (WMATA Customer Information), the Transit Accessibility (Metro Access Paratransit and MetroAccess Eligibility), Metro Transit Police, and the customer service line for SmarTrip® & SmartBenefits Participants, have direct access to bilingual and multilingual customer service representatives and can be connected to a telephonic interpretation service, which upon request, can facilitate over the phone interactions in 336 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 it is available in English and in top languages (Amharic, Chinese, French, Korean, Spanish, 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, French, Korean, Spanish, and Vietnamese.

All Metrobus timetables are bilingual in English and Spanish, and are available on their corresponding bus routes, and on the Metro [website](#). The timetables page online can be automatically translated into six different languages using Metro’s automated Google Translate feature, which will have emerging top languages identified in this Language Assistance Plan’s update 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 through different departments in Metro.

Public Outreach and Communications

Metro continues to conduct robust, 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 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 2017 through 2020, Metro conducted more than 2,000 public participation activities including pop-up events, community-based organizations (CBO) visits, surveys, open houses, and other engagement tactics; these events incorporated strategies to engage

limited and non-English proficient customers. Metro's Public Participation team directly managed the communications and outreach for more than 60 projects between January 2018 through March 2020.

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. Metro's stakeholder's database includes about 2500 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 Metro's Office of Content and Strategic Communications, and the Office of Equal Employment Opportunity, to communicate and engage these stakeholders. The list of the current 335 Community Based Organizations as of July 2020 is included in Appendix I.

Metro's Office of Equal Employment Opportunity periodically meets with, and solicits feedback on its language initiatives from, the National Capital Region Transportation Planning Board Access for All (AFA) Advisory Committee, Metro's Rider's Advisory Council (RAC), Metro's Joint Coordinating Committee (JCC), and Metro's Advisory Council (AAC).

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, 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. Copies of the various trainings are included in Appendix II.

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 responsibilities to ensure that there is equal access and participation for all linguistic and other low-income 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 Service and Research, and the new department of Content and Strategic Communications (previously known as External Relations) 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, and to identify other activities and projects that should follow Title VI compliance, or be under the 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 in-language 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: 2017 – 2020

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, and the 2017 update was approved by FTA on December 9, 2019.

Demographic analyses of the Metro service area conducted in the prior Language Assistance Plan indicated that over one million individuals or 27 percent of the total population was foreign born, and 11.5 percent of the total population spoke English less than "Very well." Their analyses identified Spanish (including Spanish Creole), Chinese, Korean, Vietnamese, African languages (to include Amharic) and French (including Patois, Cajun) as the top six 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 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

information was effectively communicated and input and participation was received at representative levels.

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

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. This section highlights the notable work that was done around public communications and engagement, including the structure that has been put in place to support these efforts.

Project Highlights

Metro's Public Participation team managed the communications and outreach for more than 60 projects between January 2018 through March 2020. Below are summaries of two projects that applied new communications and participation techniques. A complete list of projects can be found in *Appendix D: Outreach Activity List* that can be found in the Public Participation Plan 2020 – 2023.

Fiscal Year 2020 Budget

Every winter, Metro completes a robust public input process for its upcoming fiscal year budget. The proposed budget for Fiscal Year 2021 was developed to improve the customer experience and fare options and manage costs. It included 11 proposed fare changes and seven categories of proposed service changes.

The communications plan included standard tactics like outreach events at stations, transit centers and bus stops, stakeholder engagement, targeted marketing and earned media, open houses and Compact Public Hearings. However, due to the complexity and number of proposals, it was determined that new tools and techniques were needed to increase customer understanding and ensure more constructive responses would be received.

FY2021 Fare Proposal Calculator

Are you curious how each of next year's fare proposals may impact the cost of your trip? With no price increase for passes, a weekly or monthly pass may save you money today and in the future.

1. Enter the trip below that you want to calculate on Metrolink, Metrobus or both
2. Click on the "gear" icon [6] to change the proposals you would like to evaluate

Your Usual Trip

How are you traveling? ☐ Metrolink ☐ Metrobus ☒ Both rail and bus

Do you currently qualify for Metro's Senior/Disabled Fare Program? ☒ No ☐ Yes

How often do you travel? Weekdays (40 trips/mo)

Choose your usual rail station pair: Cleveland Park - Columbus Heights

When do you usually take this trip? Weekday Peak

Peak period is Weekdays only, 5 AM to 9:30 AM and 3 PM to 7 PM

What type of Metrobus will you use? ☒ Regular ☐ MetroExtra ☐ Express ☐ Airport

Express bus routes: 11E, 170, 170, 171, 176, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

How do you pay your bus fare? ☒ SmartTrip ☐ Cash

Compare Your Fares:

	Current Fare	Proposed Fare	Change (\$)	Change (%)
Rail	\$3.95	\$2.70	-\$1.25	-32%
Bus	\$2.45	\$2.70	\$0.25	10%
Transfer	\$2.00	\$2.00	\$0.00	0%
Transfer	\$0.50	\$2.00	\$1.50	300%

Compare Your Fare Products

Product	Current Fare	Proposed Fare	7-Day Pass	Monthly Pass
Cost per Ride	\$3.95	\$2.70	\$3.80	\$2.25
Weekly Cost	\$39.50	\$27.00	\$38.00	\$22.50
Monthly Cost	\$158.00	\$108.00	\$152.00	\$90.00

FY2021 Budget Proposals

Metrolink

- ☒ Increase minimum peak fare to: \$2.50
- ☐ Weekly mileage fare
- ☐ Increase maximum peak fare to: \$7.00
- ☐ Flat fare on weekends: \$2.75
- ☐ Off peak discounts for senior/disabled fares
- ☐ Peak fares after midnight (Friday & Saturday nights)

Metrobus

- ☐ Add \$0.25 surcharge for cash use
- ☐ \$3 fare on MetroExtra bus routes
- ☐ Reduce Weekly Regional Bus Pass from \$15 to \$12

Other Options

- ☐ Increase transfer discount (\$0.50) to: \$2.00

[dismiss]

- To properly cover all of the proposals that were part of the budget (18 categories, for a total of 100 different proposals), an online survey tool was used to collect feedback. The survey, though streamlined, required at least five to 10 minutes to complete depending on what proposals the customer chose to provide feedback on. Since creating a paper survey wasn't an option due to the complexity of the proposals, new tools were created for outreach street teams to encourage online participation.
- Over 106,440 brochures were distributed by street teams during the public comment period. The brochures, which included Spanish translations, and a statement in Amharic, Chinese, French, Korean and Vietnamese about how to receive information in their preferred language, included a QR code for customers to scan and automatically go to the survey from their own mobile device. The materials also advertised an incentive to take the survey for a chance to win a \$50 SmarTrip® card.
- Multilingual outreach teams carried tablets with them during the outreach events. Customers who were interested could take the survey on the spot, but those who didn't have time could quickly provide contact information and get the survey link sent to them directly via email or text in English and Spanish.
- For the first time ever, an online fare proposal calculator was developed by Metro staff. Available in English and Spanish, the tool allowed a customer to enter in a trip to calculate their potential fare versus their current fare. Different fare proposals could be toggled on and off, and the tool highlighted which pass products could help the customer save money. Links to the calculator were available on the website and on the outreach team tablets. There were over 2,500 visits to the calculators from over 2,200 unique visitors.

These efforts helped Metro gather over 17,000 responses to the budget, with 93 percent of the input received coming through the survey.

Route 79 *MetroExtra* Cash-Free Pilot



To test the operational and customer impacts of eliminating cash transactions on buses, a year-long pilot of cash-free boarding on *Route 79 MetroExtra* was launched in June 2018. The route was selected for the pilot for a number of reasons, particularly the structure, frequency and availability of SmarTrip® purchasing and loading options along the corridor.

The intention of the pilot was to assess whether the expected benefits would be realized under actual operating conditions. This included whether customers would like the pilot, whether it would impose a serious burden on customers or operators, and whether cash-free boarding poses any operational difficulties or improves service performance.

Metro personnel used new tactics as part of the communications plan to educate customers and collect the input needed for the performance measures:

- Bus operators were surveyed about their experience with the pilot. Their comments stated that customers were confused by the term “cash-free” thinking it meant that the fare was free, which informed future communications and outreach messaging decisions.
- To measure the effects of the pilot on customer perceptions and behavior, ride-along surveys were conducted aboard the local Route 70 and Route 79 *MetroExtra* three months into the pilot and garnered 1,200 responses. Instead of the typical convenience sample, a rigorous sampling plan was devised to ensure a representative sample of weekday Metrobus riders on routes 70 and 79 and better understand how the “average” customer was impacted by the policy. The results showed that riders were in favor of the pilot and perceived improvements in running and wait times. Riders also stated that the pilot prompted them to change their SmarTrip® card loading habits.
- Prior to the pilot launch, multilingual outreach teams went to high-ridership bus stops to inform customers about the pilot. Teams focused on informing customers about different ways to reload their SmarTrip® cards, as well as the benefits of using one rather than paying with cash. Approximately 10,000 brochures that included SmarTrip® purchasing and reloading locations along the route were distributed.

Metro ultimately made a decision to not implement a permanent cash-free policy. However, this input has provided additional guidance that will inform future discussions around fare policies on bus.

Other Noteworthy Projects

The Platform Improvement Project’s communications plan expanded from previous shutdown plans and included an online personalized travel alternatives planner, a project blog, and bi-weekly construction updates. The team also successfully tested the use of NextDoor (a hyper-local social media network) to target impacted communities with relevant communications.

The West Hyattsville Concrete & Pavement Repair project’s communications plan focused on providing information in-language due to the station’s high percentage of limited English proficient customers. Because of this, all outreach team members were bilingual in Spanish ending up with over 2,300 interactions in Spanish over six shifts.

The Bus Transformation Project built a regional, inclusive communications plan that included a mix of team and committee meetings with stakeholders, pop-up events, focus groups and open houses to provide feedback on a Strategy and Action Plan for the next ten years.



For more information about these projects or to get a copy of any Public Communications & Input Reports, contact the Office of Content & Strategic Communication.

Outreach to Community Based Organizations



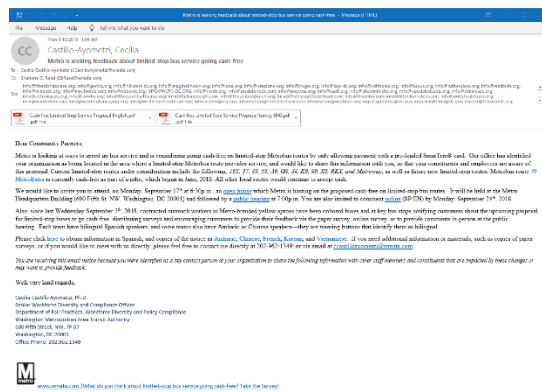
ENGLISH CENTER COMMUNITY SERVICE FAIR

In 2015 Metro's Office of Equal Employment Opportunity established a CBO Outreach Committee to assist Metro with public engagement and further dissemination of information relevant to their clients. The organizations that formed part of that committee represented a diverse cross-section of Metro customers including limited and non-English proficient persons, minority, and low-income populations. For about two years, the committee composed of 15 members, met quarterly.

Due to changes in personnel, re-prioritization of assignments, and funding difficulties for many CBOs, the committee changed the quarterly in person commitment to a more informal consistent interaction via email, follow-ups, and check-in phone calls, and if needed, site visits. Metro tested alternative modes of communication and engagement, such as web conferencing and webinars, thus exploring modes of communication more amenable to the CBOs' time resources due to the limited number of personnel. While testing options, Metro continued, upon request, with site visits to the organizations to inform them directly, or to deliver requested printed materials on specific projects, service, and activities.

In the end, one of the major changes in the communication approach with CBOs implemented during this reporting period was EEO's creation of a new systematic process for a more effective and interactive electronic communication and in-person engagement with external partners (CBOs, and other stakeholders, such as churches, schools, and management of apartment complexes).

For all Metro communications, in which help for further dissemination of in-language materials and information is 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, 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. It also includes an invitation to register



E-COMMUNICATION WITH LINKS IN-LANGUAGE

themselves and their clients to attend an open house and public hearing and collects requests for any language assistance needs.

Metro invariably receives follow-up messages or phone calls, especially for those 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, and a consistent engagement and collaboration.

This new 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. Metro personnel provide tailored and meaningful information to specific organizations impacted or benefitted by various Metro activities in their language of preference, build trust and collaboration, and help both the Office of Equal Employment Opportunity, and the Office of Content & Strategic Communication with follow-ups and site visits, as needed.

Most importantly, these interactions provide opportunities for Metro to easily extend invitations to CBO representatives to lend their voice in large-scale service efforts, such as the Washington Area Bus Transformation Project, 2018 - 2019, Blue/Orange/Silver Line Capacity and Reliability Study, 2019 – present, and Late-Night and Early-Morning Mobility Metro Study, 2019 - present.

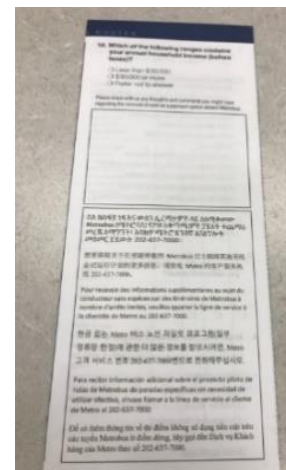
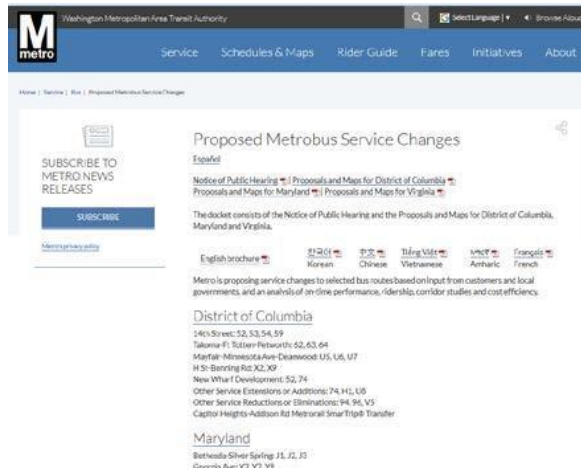
Metro collects invaluable information on issues specific to linguistic and other minority communities directly from the clients these partners serve. Community Partners have also been fundamental for EEO to identify modes of communication needed or preferred (written or oral, and language of preference) by different limited and non-English proficient groups served by these community organizations. It is through these interactions that the 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.



CBO FOCUS GROUP WASHING AREA BUS TRANSFORMATION PROJECT

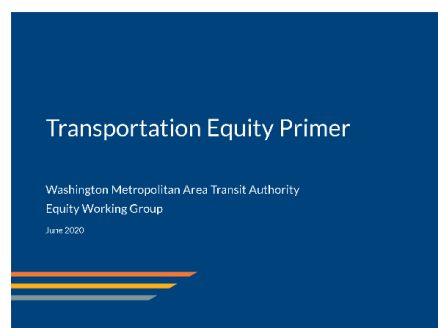
It is worth noting that this new communication approach has allowed EEO to implement these new practices:

- Prioritizing links over attachments, so that digital traffic to Metro’s website’s professionally translated documentation can be monitored and 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 Content & Strategic Communication and other project managers.
- Adding text “in-language” for all six top languages in all brochures and their digital copies to invite potential readers to request information in their language of preference. Requests for additional information are responded to by customer service representatives at the centralized customer service information line. All electronic, face-to-face, and over the phone 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.



Using this approach, EEO maintained open communication and partnerships with CBOs for about 60 projects under Metro’s Public Participation Plan, and for various large-scale engagement efforts that took place from 2017 - 2020. EEO also continuously 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



Metro has 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.

In recognition of the understanding that not all people start with the same access to opportunities, and that a lack of reliable, efficient, affordable transportation is often the major barrier to upward mobility, Metro launched this initiative 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 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 deliberation⁷.

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*."⁸

Metro's previous plan updated four factor analysis, based on the 2011 - 2015 ACS 5-year estimate data, identified *Spanish, Chinese, Korean, Vietnamese*, African languages (*Amharic* and *French*) as the top six 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 in 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 previously developed 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. 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,

⁷ Text drawn from: Washington Metropolitan Area Transit Authority (2020). Transportation Equity Primer.

⁸ FTA Circular 4702.1B –Chap. III-9 (italics added).

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. A sample list of Metro's vital documents is included in Appendix III.

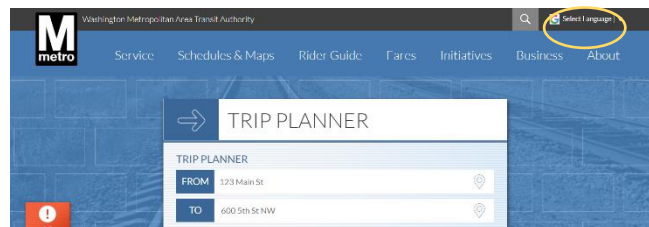
Notification of Title VI Rights - Take One

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.



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. As of December 2016, the Title VI and language assistance notifications had been placed on all in-service Metrobuses.

Proposed Metrobus Service Changes

In compliance with its Public Participation Plan, Metro requested limited and non-English proficient person's feedback on its Metrobus State of Good Operations (SOGO) service package to implement service adjustments for Board approval and subsequent implementation.

Most of the communications and outreach efforts were concentrated in the months of September and October 2017.

Amharic and Korean

Give Metro your feedback about proposed bus changes!
iDé a Metro sus comentarios sobre los cambios de autobuses propuestos!

District of Columbia
14th Street: 52, 53, 54, 59
Takoma-Petworth: 62, 53, 54
Mayfair-Minnesota Ave-Dashwood: US, US, U7
H St-Banning Rd: X2, X3
New Market Development: 52, 74
Other Service Extensions or Additions: 74, H1, U8
Other Service Reductions or Eliminations: 54, 55, 56
Capitol Heights-Adams Rd Metrolink SmartRide Transfer Station or Potomac Yard Station: 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

Información en Español en la página 9.

Pour plus de détails sur les changements proposés aux services de bus et comment vous pouvez faire vos commentaires dans votre langue de préférence, veuillez contacter la Ligne linguistique au 202-637-7000.

AMHARIC LANGUAGE ASSISTANCE: 202-637-7000

이러한 버스 변경 제안 사항 및 의견 제공 방법에 대한 자세한 정보를 선호하는 언어로 받으시려면 한국어 라인(Language Line)에 202-637-7000번으로 전화하십시오.

如需有关这些提议的巴士更改以及如何以您的首选语言提供意见反馈的更多信息，请拨打语言专线 202-637-7000。

Để biết thêm thông tin về những thay đổi đã được đề xuất đối với xe buýt này và cách quý vị có thể cung cấp phản hồi bằng ngôn ngữ của quý vị, vui lòng liên hệ với Language Line theo số 202-637-7000.

Metro is proposing service changes to select bus routes based on input from customers and local governments, and an analysis of on-time performance, ridership, corridor studies and cost efficiency. The following pages include details about the proposed changes. Additional information can also be found at wmata.com/bus.

Do these proposed changes impact you? Provide your feedback by 9:00 a.m. on Monday, October 2, 2017:

Take a survey and provide comments.

You can either fill out the survey online at wmata.com/bus, or fill out the attached survey and drop it in a survey collection box near the faregates at Metrorail stations closest to the impacted routes.

Attend an open house and public hearing.

Provide feedback in a traditional, formal setting at Metro's headquarters, 600 5th St NW, Washington, DC, on Tuesday, September 26. The open house will begin at 5:30 p.m. The public hearing begins at 6:00 p.m. and runs until 7:00 p.m., or until the last speaker is heard. Speaker registration is onsite only.

Your input will be given to Metro's Board of Directors for their consideration before any changes are approved. Any Board-approved service changes would begin within the next year.

Public participation is solicited without regard to race, color, national origin, age, gender, religion, disability or family status. If you require special accommodations under the Americans with Disabilities Act or translation services (free of charge), contact the project team at 202-962-2511 (TTY: 202-962-2593) at least 48 hours prior to the public hearing date.

District of Columbia

52 14th St (Wharf proposal)

Extend Route 52 to the Wharf via 12th Street and Maine Avenue SW to L'Enfant Plaza Metrorail station.

52, 53, 54 14th St and 59 14th St Limited MetroExtra

Add new Route 59 limited-stop service along 14th Street NW, replacing some Route 52, 53 and 54 local trips with limited-stop trips on weekday rush hours.

62, 63 Takoma-Petworth

Modify Route 63 to serve 11th Street south of Vermont Avenue NW, with service along 12th Street south of Logan Circle shifted to 11th Street NW. Every other Route 62 trip (off-peak) would be converted to Route 63 to provide off-peak trips between Takoma and Federal Triangle.

64 Fort Totten-Petworth

Modify Route 64 to serve Vermont Avenue and Florida Avenue NW, directly serving the U.S. Capitol Metrorail Station. Service along 11th Street NW between Vermont Avenue and Florida Avenue would be eliminated, with service shifted to Vermont Avenue NW. Every other trip would be shortened on weekdays off-peak, Saturdays, and Sundays to operate between the Fort Totten and Georgia Ave-Petworth Metrorail stations only, better aligning service levels with customer demand.

74 Convention Center-Southwest Waterfront

Extend service to 1st and V Streets SW to serve the new DC soccer stadium and increase ridership. Service along Delaware Avenue SW would be eliminated, with service available at nearby stops along 4th and P Streets SW.



Public Surveys

Metro's Office of Bus Planning regularly conducts evaluations of bus lines and relies heavily on public input to identify areas of improvement and suggest 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 this office to ensure 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 it was mentioned above, MetroAccess also uses the language interpretation line, and has nine bilingual (Spanish/English) agents who answer calls in Transit Accessibility (7 in MetroAccess Paratransit, and 2 in MetroAccess Eligibility).



Travel Restrictions

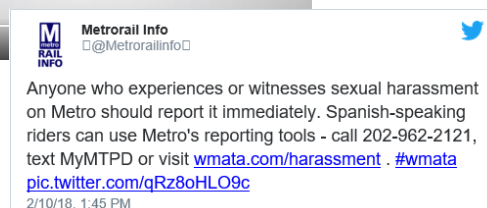
As part of Metro's efforts to keep passengers safe during the COVID-19 pandemic's travel restrictions, Metro provides passengers with guidance on service. Social media notifications offered critical information for passengers to be aware of changes in service for essential trips only.

These notifications were provided to the public on behalf Metrorail, and additional information was obtained by following the link, or via responses from community partners and customers. Additional information, including a telephone number to call was provided.



Sexual Harassment

Metro also created a video tailored to the Spanish-speaking population on how to report harassment while riding Metro. This announcement was shared with community partners via social media and posted on Metro's website. It was done completely in Spanish and it informs clients on how to anonymously report this kind of harassment, or if witnessing this and other kind of harassment behavior, to know what to report and how to report it.



Outreach to members of the Spanish-Speaking population



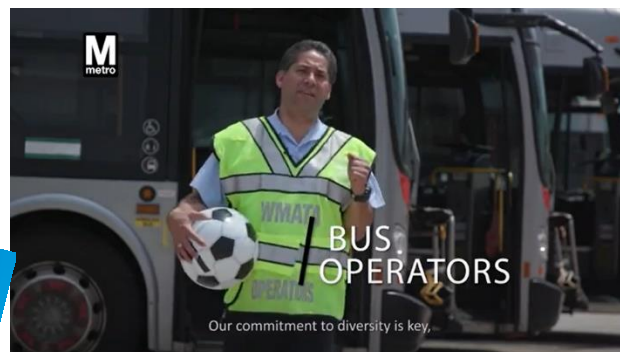
Metro's Human Resources Talent Acquisition's Recruitment Programs continue their efforts to recruit and hire bilingual and multilingual front-line employees by participating in community job fairs and advertising in publications and media that reach minority and LEP populations. These efforts

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



KOREAN COMMUNITY CENTER OPERATORS OUTREACH

The program also launched a television spot to air during the FIFA World Cup 2018 on the local Telemundo Channel 44, which aired in the Metro service area. The recruitment spot emphasized diversity as a value for Metro and showcased various job opportunities to become part of “*del equipo ganador* (the winning team).”



FIFA WORLD CUP 2018 LATINO OUTREACH

Employee's Training and Orientation

Metro has been conducting Title VI and language assistance training for frontline station managers, bus operators, customer service representatives, and Metro Transit Police since 2009. This training is ongoing and has become a regular part of the curriculum for frontline personnel,

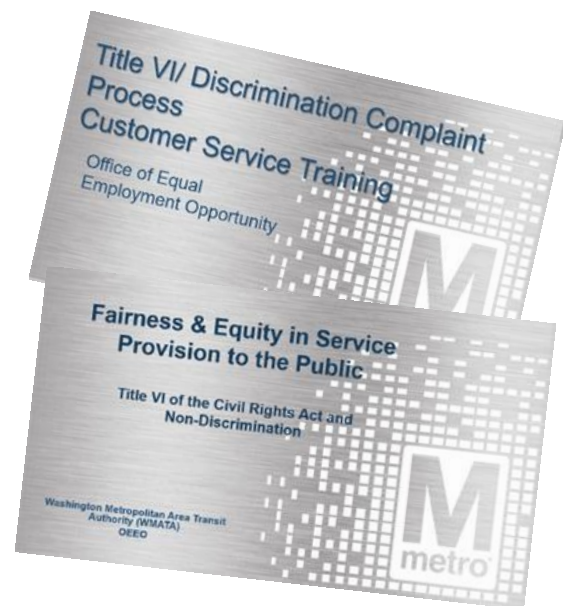
including refresher training for customer service representatives and part of the recertification for Metrorail station managers.

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. It also illustrates types of discrimination through scenarios and informs them 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. Copies of the different training presentations for Metro employees are included in Appendix II.



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 them 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 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. Most recently, in May 2017, Metro developed a survey to identify language assistance needs and piloted this effort with the AFA subcommittee on Language Access. See Appendix IV for a copy of the CBO Outreach survey. 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

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,⁹ and other community base programs that serve large numbers of limited and non-English proficient clients.

In 2017 Metro’s Office of Equal Employment Opportunity implemented major changes in the communication approach with Community-Based Organizations via a new systematic process for a more effective and interactive electronic communication and in-person engagement with external partners (CBOs, and other stakeholders, such as churches, schools, and management of apartment complexes). It is through these consistent interactions that the OEEO has been made aware of the need to create new data fields in the Metro Stakeholders database for CBOs’ social media channels, prioritized links to “in-language” information posted on Metro’s website for information on any project under PPP informing them on changes in service or fares, and adding text “in-language” for all six top languages in all brochures and their digital copies. This is to invite potential readers to request information in their language of preference.

⁹ The D.C. Language Access Coalition is an alliance of 41 community-based and civil rights organizations. Formed in 2002, the Coalition advocates for language access rights within D.C. as well as other social justice issues that affect local immigrant communities. A key agent behind the Language Access Act of 2004, the Coalition appears in the Act as a designated third-party consultant for implementation issues. Source: Office of Human Rights (n/d). Reference Guide: What is the D.C. Language Access Coalition? [PDF file]. Retrieved from https://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/Ref%20guide_LA%20Coalition.pdf

OEE continuous reaching out to CBOs to collect input on their LEP/NEP constituents' preferences for languages in which to receive information, and for language assistance measures. Community Partners have been fundamental for OEE 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.

Metro has just begun collecting and analyzing 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 departments' 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.



OUTREACH WORKER PROVIDING INFO BEHIND A PLASTIC BARRIER

Finally, 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, as we help protect individuals and communities and slow the spread of coronavirus disease 2019 (COVID-19). It was a reality that many of these institutions were already struggling to maintain services, due to changes in personnel, re-

prioritization of assignments, and funding difficulties. We can see an impact of that reality in the disappearance due to funding of many community partners in the last three years. Thus, a constant reevaluation of communication and engagement needs to be in place. In this new world of COVID-19, Community-Based Organizations will play a fundamental role in guiding Metro on best ways to provide meaningful information to limited and non-English proficient customers.

X. Language Assistance Initiatives 2020 – 2023

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 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 six 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, Somali, French, and Arabic. It is important, and 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 demographic diversity has consistently increased in numbers and distribution across jurisdictions, and for some groups, new languages have started to emerge. Metro will, thus, proactively, and with help from community partners, identify new language needs, as they may arise while providing services, engaging members of the community through 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, Metro website portal, and the insertion of text "in-language" 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, translate these materials, and disseminate them as appropriate.
5. The Office of Equal Employment Opportunity will centralize in-language information to facilitate a one-site access for frequently requested translated materials by 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 continue mandatory training of front line employees on Title VI, language assistance, and cultural sensitivity. Metro will send regular email notifications agency-wide on the importance of Title VI, its Language Assistance Plan, cultural sensitivity and the newly develop 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. It will be recommended that *Minuto Metro* be reincorporated on a regular basis to local media, TV and radio broadcasting in Spanish, to inform the Spanish speaking audience of Metro services and collect relevant feedback. It will also explore other languages and venues for an oral dissemination of information.
9. The Office of Equal Employment Opportunity will continue coordinating efforts with internal Metro stakeholders, such as the Office of Content & Strategic Communications, the Department of Customer Service, Communications 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 focus on communicating through newspapers, television, and internet resources to promote public participation and feedback opportunities for the limited and non-English proficient community.
10. In the context of COVID-19, Metro will continue increasing public engagement with Community-Based Organizations and community partners by using technology to continue providing alternative participation opportunities. This includes exploring engagement alternatives through other electronic modes of communication and visual media.
11. 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 is 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 2020 – 2023 plan years will demonstrate that commitment. ~