

Language Access Plan

Public Transportation Department

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Public Transportation Department

Language Access Representative

Bart Rudolph

bart.rudolph@anchorageak.gov

(907) 343-8490

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I. INTRODUCTION

This *Language Access Plan* (LAP) has been prepared to address the Municipality of Anchorage's responsibilities as a recipient of Federal Transit Administration (FTA) financial assistance as it relates to the needs of Limited English Proficient (LEP) persons. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the Municipality of Anchorage.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1A, —Title VI and Title VI-Dependent Guidelines for FTA Recipients, which was published on April 13, 2007. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

Pursuant to Anchorage's Municipal Policy and Procedure #16-6, the Municipality of Anchorage must "provide timely and meaningful access to LEP and deaf or hard-of-hearing individuals in the conduct of municipal business." Part of meaningful access is up-to-date plans for each Municipal Agency to best support residents and visitors of this city, not only to meet Federal Civil Rights laws, but also to create a more welcoming municipal government and community for all people.

Department Description

The Public Transportation Department's (PTD) mission is to connect the community with safe, reliable transportation options; emphasizing customer service while providing economic, social and environmental benefits. PTD operates three services; People Mover, AnchorRIDES, and RideShare.

People Mover is the largest public transit provider in the State of Alaska. People Mover offers fixed route bus service. People Mover provides about 3.4 million annual trips.

AnchorRIDES is a shared ride service that provides trips from origins to destinations by advanced reservations. Eligible riders include people with disabilities prevented from using People Mover routes, senior citizens (60+), and Medicaid recipients authorized for NEMT or HCB Waiver trips. The core service area covers up to ¾ mile from People Mover routes. The premium service areas cover most outlying areas in Anchorage.

RideShare provides carpool group subsidies and oversight of COMMUTE with Enterprise, hired to manage and operate carpooling services for the Anchorage commute area. A carpool is a group of five or more riders who work and travel at agreed upon times, days and locations. Carpool members receive a variety of benefits in one low, monthly rate plus fuel costs.

Plan Summary

The Public Transportation Department has developed this *Language Access Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the PTD used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the PTD.
2. The frequency with which LEP persons come in contact with the PTD services.
3. The nature and importance of services provided by the PTD to the LEP population.
4. The interpretation services available to the PTD and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

II. MEANINGFUL ACCESS: FOUR FACTOR ANALYSIS

1. Number or proposition of LEP persons in the service area who may be served or are likely to require Municipality of Anchorage services:

According to the U.S. Census Bureau's 2009-2013 American Community Survey 5-Year Summary, 6.2% of the Municipality of Anchorage's population, 5 years and over, (17,050 individuals) speak English "less than very well". It should be noted that "less than very well" is inclusive of responses indicating they spoke English "not well," and "not at all."

The Department of Transportation has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding language barriers due to national origin. The Safe Harbor Provision requires the translation of written materials for Limited English Proficient persons. Considering the safe harbor provision, the PTD considers the translation of written material if the LEP language group constituted 5% or 1,000 persons or more of the total population.

**Table 1. Populations Exceeding the LEP Safe Harbor Threshold
(5% of total population or 1,000 individuals – whichever is less)**

Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Anchorage Municipality, AK: 2009-2013				
Language Spoken at Home	Number of speakers ¹	% of Total Population	Speak English less than "Very Well" ¹	% of Total Population
Population 5 years and over	273,105	(X)	17,050	6.2%
Speak only English at home	225,813	82.68%	(X)	(X)
Tagalog	7,321	2.68%	3,881	1.4%
Spanish	12,635	4.63%	3,287	1.2%
Hmong	3,031	1.11%	1,687	0.6%
Korean	2,849	1.04%	1,539	0.6%
Samoan	3,050	1.12%	790	0.3%
Yupik	2,655	0.97%	785	0.3%
Laotian	1,067	0.39%	460	0.2%
Russian	1,320	0.48%	317	0.1%
German (incl. Luxembourgian)	1,743	0.64%	225	0.1%
French (incl. Patois, Cajun)	1,058	0.39%	128	0.0%
<i>**Other languages with fewer than 1,000 speakers not listed in this table.</i>				

Notes:

¹ Detailed-language estimates are rounded to the nearest multiple of five. Aggregate estimates are unrounded and appear in table B16001 (http://factfinder.census.gov/bkmk/table/1.0/en/ACS/13_5YR/B16001/0500000US02020). Detailed-language estimates may not sum to aggregate estimates because of rounding.

Source: U.S. Census Bureau, 2009-2013 ACS

2. Frequency with which LEP persons interact with the Public Transportation Department:

The PTD Customer Service office at the Downtown Transit center interacts with individuals who speak English as a second language several times a week. During the summer months, some of these encounters include tourists, but most encounters year-round are from residents.

Between May 2016 and May 2021, the PTD log shows 39 calls through Language Link. The majority of Language Link interpretation services (66.7%) were needed for Spanish speakers. Other interpretation services were needed in Korean (10.3%), Arabic (7.7%), Russian (5.1%), Armenian (2.6%), Tagalog (2.6%), French (2.6%) and Vietnamese (2.6%).

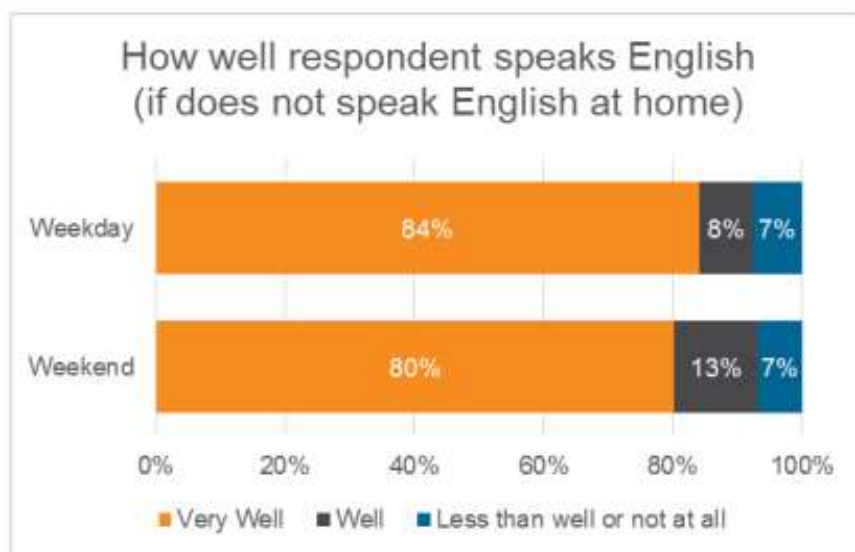
The Planning and Marketing teams regularly hold public meetings and promotional events. Meeting notices include instructions with how to request language assistance or special

accommodations that are translated into Korean, Spanish, Tagalog and Hmong. Between 2015 and 2020, no requests for language assistance have been made. The PTD hired Korean, Spanish, Tagalog, Hmong, and American Sign Language interpreters for the May 5, 2016 kick-off meeting for the redesign of the bus network, but no one utilized the services. In February 2019, a postcard was mailed to every resident in the Municipality of Anchorage inviting them to participate in the first meeting to develop a short-range transit plan. The flyer had the following sentence translated into Korean, Spanish, Tagalog and Hmong; “For more information or to request language assistance to attend one of the meetings, please contact us or visit the website listed below.” No one requested language assistance.

The Anchorage Metropolitan Transportation Solutions (AMATS) hired RSG Inc. to conduct an Onboard Origin-Destination Survey in 2014 to understand ridership patterns on the People Mover and Eagle River Connect systems. The Survey sampled 10% of weekday riders, and 5% of weekend riders. In total, there were 2,070 respondents to the Survey.

The respondents were asked their ethnicity and to “select all that apply” in this case, so the percentages do not add up to 100%. On weekdays, 47% of riders identified as White while 33% identified as Alaskan Native and 14% identified as Black/African American. Weekend riders had a very similar profile with 45% identifying as White, 36% as Alaskan Native, and 14% as Black/African American.

The survey also identified that the most common languages spoken at home among weekday riders were Spanish (35%), Tagalog (11%), Yupik (9%) and French (6%). Thirty-five other languages were spoken by small fractions of the sample. On weekdays, 11% of respondents indicated that they speak a language other than English at home. Of these, 84% spoke English very well and another 8% spoke English well. On weekends, 8% of respondents spoke a language other than English, while 80% of these spoke English very well and 13% spoke well. Overall, less than 1% of total respondents spoke English less than well or not at all.



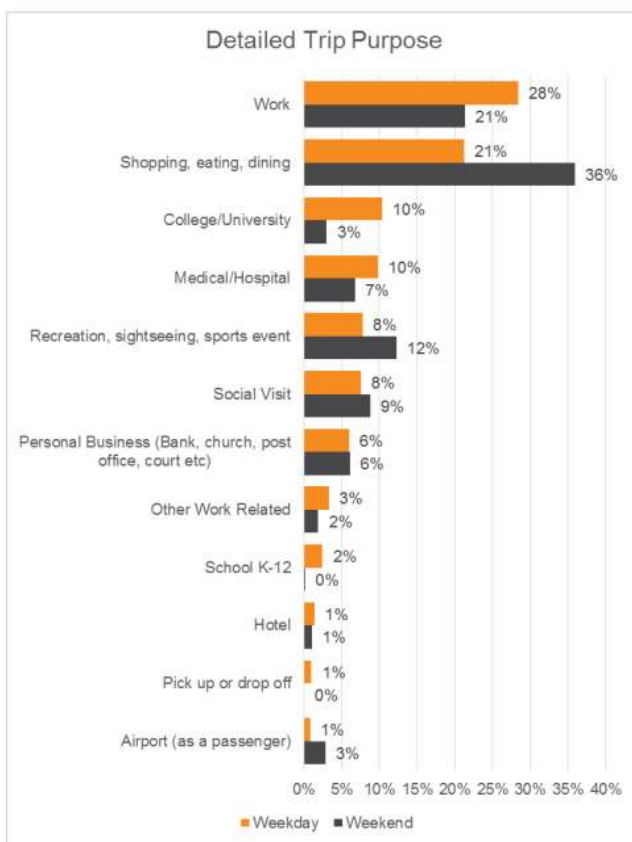
Source: Onboard Origin-Destination Survey (2014)

3. Nature and importance of services the Public Transportation Department provides to LEP population:

Access to public transportation is critical for minority and LEP individuals who may not have personal transportation. The PTD anticipates public transportation riders have multiple travel needs that include rides to work, school, job interviews, grocery and retail stores, medical appointments, community and social service agencies, and entertainment. Recent immigrants to the United States (including those persons who may not be limited English proficient) typically use public transit at higher rates than native-born adults.

According to the Onboard Origin-Destination Survey in 2014, most weekday riders (58%) came from a household without any vehicles while 62% did not have a valid driver's license. Weekend riders were even more likely to come from a household without vehicles (68%) while 64% do not have a driver's license.

On weekdays, the most common trip purposes were to and from work (28%), and shopping, eating or dining (21%). College or university related travel accounted for 10% of trips and travel for medical purposes also accounted for 10%. On weekends, travel to and from work accounted for 21% of trips while shopping, eating or dining accounted for 36%. Travel for the purpose of recreation, sightseeing or sporting events accounted for 12% of weekend trips.



Source: Onboard Origin-Destination Survey (2014)

4. Resources available to the Public Transportation Department and overall costs to provide LEP assistance:

The Public Transportation Department reviewed its available resources that could be used for providing LEP assistance and documents that it would be most useful to translate. The PTD will use Language Link for telephonic interpretation services, and the Alaska Institute for Justice-Language Interpreter Center for in-person interpretation. Written interpretation will be done by either Language Link or the Alaska Institute for Justice-Language Interpreter Center. Currently, Language Link does not provide services in any Alaska Native Language. The PTD will exclusively use the Language Interpreter Center for these needs.

The Municipality of Anchorage has a contract with Language Link to provide telephonic language interpreter services 24/7. The cost of Language Link is \$0.62 per minute of service provided. Language Link provides a customer portal to track and monitor how often this system is used and for which languages.

Written translation services provided by the Alaska Institute for Justice-Language Interpreter Center have typically cost between \$0.40 and \$0.50 per word depending on the word count. In 2016, onsite interpreters provided by the Alaska Institute for Justice-Language Interpreter Center cost about \$70 per hour.

III. LANGUAGE ACCESS PLAN

Identification of a LEP Person who needs language assistance services

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the PTD services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language, and/or translation, which means the written transfer of a message from one language into another language.

The data assembled in the four-factor analysis shows that Tagalog, Spanish, Hmong and Korean are the most prevalent of the non-English languages spoken in the Municipality of Anchorage with the highest number of individuals who speak English less than "Very Well." In addition to those languages, the PTD has encountered a growing number of individuals who speak Arabic and Russian, but the overall population does not meet the LEP Safe Harbor Threshold. Furthermore, according the 2014 Onboard Origin-Destination Study, less than 1% of total respondents who use PTD's fixed-route service spoke English less than well or not at all.

Based on the language distribution data summarized above, the PTD will translate public communication materials and vital documents into Tagalog, Spanish, Hmong and Korean when feasible within available resources. The PTD will translate materials into the other commonly spoken non-English languages when those are the primary languages spoken by 5 percent or more of the target audience or upon request.

How the Public Transportation Department staff may identify an LEP person who needs language assistance:

Below are tools to help identify persons who may need language assistance:

- Signage about language services in different languages
- “Point to Your Language” Posters
- Self-identify as needing an interpreter
- Assessed and trained bilingual staff to assist
- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- At public meetings, set up a sign-in sheet table and have a staff member greet and briefly speak to each attendee. This method will allow staff to informally gauge the attendee’s ability to speak and understand English, while asking an open-ended question that requires a full sentence reply;
- Survey bus operators and other frontline staff of any direct or indirect contact with LEP individuals.

Individuals maintain the right to self-identity as a LEP person and should not in any circumstances be expected to pay for translation or interpretation services in order to effectively communicate with the department.

Language assistance measures:

The Public Transportation Department uses Language Link and the Language Interpreter Center. The PTD staff will use invoices from these vendors to track use and necessity.

1. The PTD staff will take reasonable steps to provide opportunities for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
 - i) Language Link brochures with iSpeak language identification and instructions will be available at all public meetings, events, and Customer Service at the Downtown Transit Center.
 - ii) The PTD staff will be trained on how to identify language of LEP
Staff will utilize Google Translates for quick LEP assistance or Language Link if required. Staff will determine if paid translation of long documents is necessary.
3. The PTD may use alternative forms of language assistance when the alternative is more effective or practical. One alternative approach is to place a notice on public communication materials about the availability of interpretation service. Another alternative is to include a summary of a communication piece in Tagalog, Spanish, Hmong, Korean and other languages as relevant and offering a full translation upon request.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information about Title VI policy and LEP responsibilities
- Description of language assistance services that are offered to the public
- Use of “iSpeak” and point-to-your-language cards
- Documentation of language assistance requests
- Title VI/LEP complaint procedures
- Working with an interpreter
- Note that PTD staff / all Municipal employees are prohibited from asking for any individual’s citizenship status

All contractors or subcontractors performing work for the PTD and/or Municipality of Anchorage must follow applicable Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

It is important to ensure that written materials routinely provided in English also are provided in regularly encountered languages other than English. It is particularly important to ensure that vital documents are translated into the non-English language of each regularly encountered LEP group eligible to be served or likely to be affected by the program or activity. A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits or is required by law.

The following documents are considered vital documents by the Public Transportation Department (PTD) and must be translated in the languages identified in the PTD’s four factor analysis.

- People Mover Ride Guide
- Title VI Policy and Complaint Procedure
- Rider Code of Conduct
- Service and Fare Information
- Fare and Service Change Public Comment Policy and Procedure
- Half Fare Application
- AnchorRIDES Rider Guide
- AnchorRIDES Application and Visitor’s Application
- AnchorRIDES Eligibility Policy and Process
- AnchorRIDES Service and Fare Information
- Reasonable Accommodation Policy & Procedures
- Reasonable Accommodation Request Form

Other documents will be translated on an as needed basis.

When staff prepare public meeting notices, documents, flyers, and agendas, information on how to request language assistance will be printed in alternative language(s) based on the known LEP population.

VI. MONITORING

Monitoring and Updating the LAP

The Public transportation Department will update its LAP as required. At a minimum, the plan will be reviewed annually and updated with data points from following year and incorporate any new U.S. Census data as available. Updates will incorporate data gained from the reporting tool and staff observation, including:

- Evaluate number of documented LEP persons encountered during previous year
- Assess current LEP population in the service area
- Determine if LEP needs have been accommodated
- Determine if translation services needs have changed
- Determine if local language assistance programs have been effective and sufficient to meet needs
- Verify the PTD's financial resources are sufficient to fund necessary language resources
- Determine if the PTD meets the goals of this Language Access Plan
- Access complaints regarding the PTD's failure to meet LEP needs

VII. DISSEMINATION AND COMPLAIN PROCEDURES

The PTD includes the LEP Plan with its Title VI Policy and Complaint Procedures. The Notice of Rights under Title VI to the public is posted on all public transportation department vehicles, in the public offices, on the PTD website and in selected printed materials. Copies of the LEP Plan will be provided, upon request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding the Title VI plan should be directed to:

Municipality of Anchorage Public Transportation Department

Title VI Coordinator

P.O. Box 196650 Anchorage, AK 99519-6650

907-343-8246 (phone)

907-563-2206 (fax)

titlevi@muni.org

Questions or comments regarding this plan should be directed to:

Municipality of Anchorage Public Transportation Department
Language Access Liaison
Bart Rudolph
P.O. Box 196650 Anchorage, AK 99519-9980
Bart.rudolph@anchorageak.gov

Language Access Services Complaint Process:

- Complaints regarding denial of language accessible services or the quality of language accessible services, including interpreters or translated materials, may be made in person, or in writing, or online at:
https://moaonlineforms.formstack.com/forms/language_access_complaint
- The complaint should specify date of incident, individuals involved, and the nature of the client (i.e. the interpreter was summarizing, or an LEP individual was denied services because he/she did not bring his/her own interpreter);
- All complaints will be directed to the department's Language Access Plan Representative, and the Mayor's Language Access Liaison, who will respond timely and make recommendations for corrective action, if needed;

Complaint form is online at:

https://moaonlineforms.formstack.com/forms/language_access_complaint

Hard Copies will be available at City Hall and will be translated into Spanish, Tagalog, Korean, Hmong, Samoan and Yupik.

VIII. DEFINITIONS

- A. **Essential Public Information:** Any information used by a department when dealing with the public which is necessary to accomplish the department's mission and with respect to public safety, public health, and economic development.
- B. **Department Language Access Representative:** The employee designated by the department director to be responsible for the department Language Access Plan (LAP) program.
- C. **Four Factor Analysis:** The procedure to determine the level of need for language services by documenting: 1) the number and proportion of LEP persons as reported by the most recent census; 2) the frequency with which LEP persons visit various MOA locations; 3) the nature and kind of programs or activities LEP persons use; and 4) the available resources and overall costs for LEP services.
- D. **Interpretation:** The immediate spoken communication of meaning from one language (the source language) to another (the target language).
- E. **Interpreter:** A person who is bilingual or multilingual and possesses the ability to successfully convey a message from one language to another through oral communication.
- F. **Language Access Plan (LAP):** Department specific documents outlining the procedures and practices that the department will implement to provide language access services to LEP individuals.
- G. **Limited English Proficient (LEP):** Someone who is not able to speak, read, write or understand English at a level that allows the person to interact effectively with department staff. Individuals maintain the right to self-identity as a LEP person and should not in any circumstances be expected to pay for translation or interpretation services in order to effectively communicate with the department.
- H. **Mayor's Language Access Liaison:** The employee designated by the Mayor to support the LAP program and to support the Department Language Access Representative.
- I. **PTD:** Public Transportation Department
- J. **Telephonic Interpretation:** A service that connects human interpreters via telephone to individuals who wish to speak to each other but do not share a common language. The telephone interpreter converts the spoken language from one language to another, enabling listeners and speakers to understand each other. Interpretation over the telephone most often takes place in a consecutive mode, which means that the interpreter waits until the speaker finishes an utterance before rendering the interpretation into the other language.
- K. **Translation:** The written communication of meaning from one language (the source language) to another (the target language).
- L. **Translator:** A person who is bilingual or multilingual and possesses the ability to translate from one language to another in written form.