

03 Language Assistance Plan

Introduction

CTA is committed to serving individuals who may require language assistance and supports the goals established by the Federal Transportation Administration (FTA) to provide meaningful access to its transit services. The LAP includes measures that are currently provided by CTA, as well as CTA's language assistance initiatives that are proposed for the future. The plan is based, in part, on an in-depth language study which was designed to reduce barriers to transit usage by individuals who may require language assistance.

Title VI requirements includes Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" and U.S. DOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons", CTA conducted its "Limited English Proficiency Study" ("LEP Study") in the summer of 2019.

Individuals who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English are characterized as limited English proficient, or "LEP." According to the 2000 U.S. Census, more than 10 million people reported that they do not speak English at all, or do not speak English well.

Public transit is a key means of achieving mobility for many LEP persons. The 2013-2017 U.S. Census also reported that more than 10 percent of LEP persons (ages 16 years and over) use public transit as their primary means of transportation to their place of employment. Comparatively, 5 percent of English speakers reported public transit as their primary means of transportation. Language assistance measures allow agencies to provide safe, reliable, convenient, and accessible services to LEP persons. These efforts attract riders who might otherwise be excluded from utilizing the service because of language barriers.

Background

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, and national origin under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disparate impact on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166 ("Order"), "Improving Access to Services for Persons with Limited English Proficiency," was issued on August 11, 2000. The Order directs each Federal agency that provides financial assistance to non-Federal entities to examine the services that they offer, and then to develop and implement a system that provides meaningful access to LEP persons for those services. President Bush affirmed his commitment to the Order through a memorandum issued on October 26, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. The memorandum directed Federal agencies to provide guidance and technical assistance to Federal funding recipients as to how they can make meaningful access to their services available to LEP persons.

Accordingly, the U.S. Department of Transportation (“DOT”) developed guidance for recipients and subsequently published a document, DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries (“DOT LEP Guidance”) on December 14, 2005. This document both clarifies the responsibilities of Federal funding recipients and provides guidance on best practices for serving LEP populations in accordance with statutory and regulatory requirements.

The DOT LEP Guidance recommends that all recipients, especially those serving large LEP populations, develop and implement a plan to address the needs of the LEP populations that they serve. According to the DOT LEP Guidance, an effective plan should cover the following five elements: 1) identifying LEP persons who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

The FTA references the DOT LEP Guidance in FTA C 4702.1B. Chapter III, Part 9 of the Title VI Circular reiterates the requirement to ensure meaningful access to benefits, services, and information for LEP persons. It also requires that Federal funding recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

Four-Factor Analysis

Based on the previous version of the Title VI Circular, CTA conducted the “Limited English Proficiency Study” (“LEP Study”) in 2019. The LEP Study used data from the 2013-2017 American Community Survey, which represents 3,488,072 households, 7,687,641 individuals, and 487,668 LEP persons for the 6-County Chicago metropolitan region (Cook, Du Page, Kane, Lake, McHenry, and Will). The purpose of the LEP Study was to collect data and conduct outreach efforts in order to identify the predominant languages spoken, determine the level of transit use, and identify whether or not LEP status presents an obstacle to transit use.

Geographically, the LEP Study accounted for Cook County, Illinois (“LEP Study Area”). The LEP Study analyzed the LEP groups that represented the highest language concentrations within the LEP Study Area: English, Spanish, Polish, and Chinese. The data garnered from the LEP Study helps to inform CTA’s language assistance decision making process in an ongoing manner with regards to four specific factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
- (2) The frequency with which LEP persons come into contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program to people’s lives; and
- (4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis¹. The following sources are used to evaluate this Factor:

2013-2017 Census Bureau’s American Community Survey

A primary data source identified in the FTA Handbook for the purposes of LEP Factor 1 analysis is the American Community Survey (“ACS”), a monthly survey conducted by the US Census Bureau. The following tables present data on the LEP population in the 938 census tracts, reflecting CTA’s service area. The top five languages spoken in Cook County are Spanish; Polish; Arabic; Filipino/Tagalog; and Chinese.

Table 1 presents data from the ACS on the entire population’s ability to speak English. The last column presents the data on the limited English proficient population that is the combined totals of those individuals who either do not speak English well or do not speak English at all. All data are limited to the population five years or older. For the population five years of age and older in the CTA service area, 8.1 percent are LEP and self-identify as speaking English less than well, which is shown in Table 1. While only 2.3 percent speak no English whatsoever, a much larger group comprehends some level of English but still struggles with communicating in English.

Table 1: LEP Population: Ability to Speak English

	Total	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Number	3,154,751	1,989,941	686,159	223,141	183,304	72,206	255,510
Percent	100.00%	63.1%	21.8%	7.1%	5.8%	2.3%	8.1%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 2 indicates the distribution of this population across the 106 non-English languages spoken in Cook County.

Table 2: LEP Population: Language Spoken at Home

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Spanish	1,012,544	58.7%	58.7%
Polish	139,275	8.1%	66.8%

¹ The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Arabic	49,659	2.9%	69.7%
Filipino, Tagalog	48,587	2.8%	72.5%
Chinese	38,119	2.2%	74.7%
Urdu	27,759	1.6%	76.3%
Russian	27,327	1.6%	77.9%
Korean	26,975	1.6%	79.5%
Gujarathi	25,295	1.5%	81.0%
Greek	22,460	1.3%	82.3%
Hindi	20,737	1.2%	83.5%
Italian	19,162	1.1%	84.6%
French	18,394	1.1%	85.6%
Cantonese	15,244	0.9%	86.5%
Niger-Congo regions (many subheads)	14,850	0.9%	87.4%
Ukrainian, Ruthenian, Little Russian	13,292	0.8%	88.2%
Rumanian	13,081	0.8%	88.9%
German	12,542	0.7%	89.7%
Vietnamese	11,157	0.6%	90.3%
Near East Arabic dialect	10,576	0.6%	90.9%
Serbian	8,955	0.5%	91.4%
Bulgarian	8,483	0.5%	91.9%
Malayalam	8,483	0.5%	92.4%
Mandarin	8,202	0.5%	92.9%
Telugu	8,052	0.5%	93.4%
Japanese	7,738	0.4%	93.8%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Bosnian	6,732	0.4%	94.2%
Lithuanian	6,553	0.4%	94.6%
Albanian	5,736	0.3%	94.9%
Tamil	5,509	0.3%	95.2%
Persian, Iranian, Farsi	5,082	0.3%	95.5%
Hebrew, Israeli	4,198	0.2%	95.8%
Thai	4,156	0.2%	96.0%
Turkish	3,829	0.2%	96.2%
French or Haitian Creole	3,751	0.2%	96.4%
Amharic, Ethiopian, etc.	3,543	0.2%	96.7%
Croatian	3,475	0.2%	96.9%
Bengali	3,396	0.2%	97.1%
Portuguese	3,057	0.2%	97.2%
Panjabi	2,756	0.2%	97.4%
Nepali	2,622	0.2%	97.5%
Pakistan nec	2,165	0.1%	97.7%
Mongolian	1,968	0.1%	97.8%
Czech	1,866	0.1%	97.9%
Magyar, Hungarian	1,792	0.1%	98.0%
Armenian	1,702	0.1%	98.1%
Marathi	1,699	0.1%	98.2%
India nec	1,623	0.1%	98.3%
Bantu (many subheads)	1,619	0.1%	98.4%
Dutch	1,502	0.1%	98.5%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Other specified African languages	1,481	0.1%	98.6%
Cushite, Beja, Somali	1,452	0.1%	98.6%
Mon-Khmer, Cambodian	1,419	0.1%	98.7%
Serbo-Croatian, Yugoslavian, Slavonian	1,401	0.1%	98.8%
Sebuano	1,147	0.1%	98.9%
Other Afro-Asiatic languages	1,109	0.1%	98.9%
Chinese, Cantonese, Min, Yueh	1,012	0.1%	99.0%
Kannada	971	0.1%	99.0%
Laotian	964	0.1%	99.1%
Swedish	944	0.1%	99.2%
Slovak	893	0.1%	99.2%
Irish Gaelic, Gaelic	863	0.1%	99.3%
Other Asian languages	839	0.0%	99.3%
Malay	753	0.0%	99.4%
Other Indo-Iranian languages	699	0.0%	99.4%
Other n.e.c.	697	0.0%	99.4%
Jamaican Creole	605	0.0%	99.5%
Yiddish, Jewish	605	0.0%	99.5%
Norwegian	596	0.0%	99.5%
Other Indo-European languages	592	0.0%	99.6%
Burmese, Lisu, Lolo	559	0.0%	99.6%
Lettish, Latvian	530	0.0%	99.6%
Karen	524	0.0%	99.7%
Macedonian	479	0.0%	99.7%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Swahili	463	0.0%	99.7%
Pashto, Afghan	401	0.0%	99.7%
Danish	340	0.0%	99.8%
Indonesian	337	0.0%	99.8%
Other specified American Indian language	327	0.0%	99.8%
Mande	316	0.0%	99.8%
Llocano, Hocano	306	0.0%	99.8%
Finnish	290	0.0%	99.9%
Nilo-Saharan, Fur, Songhai	284	0.0%	99.9%
Tibetan	248	0.0%	99.9%
Sinhalese	214	0.0%	99.9%
Afrikaans	203	0.0%	99.9%
Other English-based Creole languages	202	0.0%	99.9%
South/Central American Indian	192	0.0%	99.9%
Kurdish	174	0.0%	99.9%
Miao, Hmong	134	0.0%	100.0%
Swiss	133	0.0%	100.0%
Dari	115	0.0%	100.0%
Hawaiian	108	0.0%	100.0%
Aztecan, Nahuatl, Uto-Aztecan	100	0.0%	100.0%
Chin languages	81	0.0%	100.0%
Muskogean	53	0.0%	100.0%
Kiowa	45	0.0%	100.0%
Ojibwa, Chippewa	38	0.0%	100.0%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Dakota, Lakota, Nakota, Sioux	32	0.0%	100.0%
Tongan	29	0.0%	100.0%
Fulani	28	0.0%	100.0%
Other Malayan	25	0.0%	100.0%
Cherokee	23	0.0%	100.0%
Pennsylvania Dutch	14	0.0%	100.0%
Cape Verdean Creole	14	0.0%	100.0%
Lu Mien	12	0.0%	100.0%
Total	1,723,694	100.00%	

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 3: LEP Population: Ability to Speak English by Language Category (number)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	755,737	449,314	127,930	126,224	52,269	178,493
Indo-European	226,964	135,555	50,105	32,324	8,980	41,304
Asian/Pacific Islander	125,461	66,479	31,844	18,549	8,589	27,138
Other	56,648	34,811	13,262	6,207	2,368	8,575
Total	1,164,810	686,159	223,141	183,304	72,206	255,510

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 4: LEP Population: Ability to Speak English by Language Category (percent share of total)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	100.00%	59.5%	16.9%	16.7%	6.9%	23.6%
Indo-European	100.00%	59.7%	22.1%	14.2%	4.0%	18.2%
Asian/Pacific Islander	100.00%	53.0%	25.4%	14.8%	6.8%	21.6%
Other	100.00%	61.5%	23.4%	11.0%	4.2%	15.1%
Total	100.00%	58.9%	19.2%	15.7%	6.2%	21.9%

CHA analysis of American Community Survey data 2013-2017 5-year sample

In **Tables 5 and 6**, the data on ability to speak English are grouped by the respondent’s citizenship status.

Table 5: LEP Population: Ability to Speak English by Citizenship Status (number)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635
Naturalized Citizen	384,825	27,687	52,500	175,602	54,687	74,349	249,951
Not Citizen	3,154,751	1,989,941	449,314	306,423	236,845	172,228	478,651
Total	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635

Table 6: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	100.0%	78.8%	14.3%	2.5%	3.9%	0.5%	2.9%
Naturalized Citizen	100.0%	13.0%	14.5%	21.1%	25.8%	25.6%	46.7%
Not Citizen	100.0%	7.2%	13.6%	45.6%	14.2%	19.3%	65.0%
Total	100.0%	63.1%	14.2%	9.7%	7.5%	5.5%	15.2%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Tables 7 and 8 present data on the degree that a household is linguistically isolated. A linguistically isolated household is defined as a household where no one in the household 14 years or older speaks English only at home or no one in the household 14 years or older speaks English very well.

Table 7: LEP Population: Linguistic Isolation by Language Category (number)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	755,737	615,038	140,699
Indo-European	226,964	172,489	54,475
Asian/Pacific Islander	125,461	92,996	32,465
Other	56,648	43,126	13,522
Total	1,164,810	923,649	241,161

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 8: LEP Population: Linguistic Isolation by Language Category (percent share of total)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	100.0%	81.4%	18.6%
Indo-European	100.0%	76.0%	24.0%
Asian/Pacific Islander	100.0%	74.1%	25.9%
Other	100.0%	76.1%	23.9%
Total	100.0%	79.3%	20.7%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Factor 2: The frequency with which LEP individuals come in contact with the program

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis². The following sources are used to evaluate this Factor:

- **CTA Customer Facing Employee Interviews**
- **Group interviews with LEP stakeholder organizations**
- **CTA internal staff interviews**

48 customer facing bus and rail employees participated in 6 group interview meetings. The following topics were discussed and reviewed:

How often are you asked for assistance by LEP individuals?

What services are available to assist LEP riders?

Have you been asked to translate signage for LEP riders?

How often do LEP individuals ask you for directions?

How often do LEP individuals ask you for printed materials in their native language, *i.e.*, timetables?

How are assistance requests from LEP riders tracked?

Do you think the services for LEP riders are adequate, including in emergency situations?

What do you think are the biggest obstacles for LEP riders?

What suggestions do you have for improving access for LEP riders?

The following is a summary of common responses:

- Many reported interacting with LEP individuals on a regular basis. The frequency of how often a customer facing employee came in contact with an LEP individual depended on the route.
- Spanish and Polish speaking customers who did not speak English were the most common languages. This was followed by people who spoke a Chinese language.
- Three different groups of non-English speaking riders were identified: tourists, elderly non-English speaking persons and younger non-English speaking persons.

Additional Interviews with LEP Stakeholder Groups

CTA's LEP Consultancy firm, CHA interviewed LEP stakeholder groups that directly serve LEP customers. They researched stakeholder organizations representing populations speaking Spanish, Polish, Chinese, Korean, Russian, Arabic, Portuguese, Assyrian, Japanese, Thai, Vietnamese, Punjabi, Hindu, Farsi, other Indo-European Languages, and other Slavic languages.³ These organizations were invited to group interviews to share their experiences and make recommendations for improving access to CTA's services for their constituents.

² The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

³ CHA interviewed a total of 19 representatives from the following Community Stakeholder Groups:

1) Alivio Medical Center, 2) CALOR AHF Affiliate HIV Testing, 3) Central States SER, 4) Coalition for a Better Chinese American Community, 5) El Valor, El Rincon Family Services, 6) Family Focus, Howard Area Community Center, 7) Hana Center, Mexican Fine Arts Museum, North, 8) River Commission, Polish American Association, 9) El Hogar del Niño, Northwest Side Housing Center, 10) The Resurrection Project, Urhai Community Service Center.

Among the attendees at the LEP community stakeholder interviews were:

A representative from a qualified health center.

An executive director of a HIV & AIDs prevention center.

A manager for an employment services center.

The executive director of a faith, business and social service organization for the Chinese community.

A representative of a workforce development employment agency.

A representative of a mental health, substance use, re-entry, a recidivism reduction for youth center.

A representative from a center that provides job seeker training, counseling and English as a Second Language (“ESL”) services for the Korean community.

A coordinator from an economic development and housing agency that provides housing and education assistance.

An employee from the Polish American Association that provides adult education for employment, social services, counseling, and immigration services.

A case manager for a community organization that provides early childhood programs.

An employee from a community organization that provides immigration, health, and housing assistance.

A representative from a group that provides home care and assistance to the elderly in the Assyrian Community.

The executive director and founder of a community center offering homemaker services and Medicare Transportation.

A family services coordinator from a day care and social services agency.

A representative from a community organization for housing and organizing education.

The following topics were discussed and reviewed with Community Stakeholder representatives:

How do LEP individuals learn how to use the CTA system?

What are barriers to transit use the LEP individuals that you serve?

How do LEP individuals currently travel? What is their main mode of transportation?

- How do LEP individuals obtain information on various aspects of CTA communication? What is the importance of each of these: Line, station, and schedule information?
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ Emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ Public involvement processes
- CTA website

Effectiveness of CTA's current communications efforts

What resources do LEP individuals rely on for information on other public services?

How do LEP individuals file complaints? Do they know how to do so?

Which methods of communication do you feel would be most useful?

- Print materials in other languages
- Verbal communication in other languages
- Nonverbal communications (symbols, etc.)

CTA Internal Staff Interviews

CHA interviewed 11 CTA staff members from the following departments: Emergency Preparedness, Talent Acquisition, Planning and Scheduling, Diversity Business Enterprise, Recruiting, Title VI and Affirmative Action, Legislative Affairs, Compensation Planning, Service Planning, Revenue and Fare Systems.

The following topics were discussed and reviewed:

How do LEP individuals learn how to use CTA?

What barriers do CTA LEP riders face?

How do LEP individuals obtain information on various aspects of CTA?

- Line, station, and schedule information
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ public involvement processes
- CTA Title VI website

How do LEP individuals file complaints with CTA?

In-depth discussion and suggestions for improving LEP access to CTA.

Factor 3: The nature and importance of the program, activity or service provided by the recipient to people’s lives.

DOT LEP Guidance notes that providing public transportation access to LEP persons is crucial, as denial or delay of access to such services could have serious or even life-threatening implications for LEP populations. An LEP individual’s inability to utilize public transportation effectively may adversely affect her or his ability to access health care, education, or employment.

CTA recognizes the significance of transit services, and it is that consideration which underscores CTA’s commitment to accommodating LEP populations. CTA reviews survey data from a number of different perspectives and, on an ongoing basis, uses it to assess a variety of transit service provisions. Independent of language considerations, CTA sorts and monitors data relating to portions of the CTA Service Area that contain high concentrations of transit-dependent households. If a particular portion of the CTA Service Area has both a high concentration of a specific LEP group as well as a high percentage of transit-dependent households, then CTA considers those factors together when making translation service decisions.

CTA conducted an LEP study in 2019 to evaluate this Factor with these data sources:

- CTA Customer Facing Employee Interviews
- Group interview with LEP stakeholder organizations
- CTA Internal staff interviews
- Interview with Cubic/ Ventra call center staff

CTA Customer Facing Employee and LEP Stakeholder Organizations Interview Summary:

As described for Factor 2, 48 customer facing bus and rail employees were interviewed, along with nineteen LEP stakeholder organizations.

Employees reported that LEP individuals regularly use CTA rail and bus services. LEP stakeholder organizations report that LEP individuals frequently use CTA bus and rail services, and these services are important to their lives.

The 2019 LEP study underscores the importance of the CTA service to LEP communities and CTA’s commitment to serve LEP populations.

¹ The consulting firm Colette Holt and Associates (CHA) led the study also using American Community Survey data

Factor 4: Determine the resources available to the recipient and costs

CTA balances a variety of factors when making language assistance determinations. As a result of the LEP Study and other supplemental analyses, CTA has determined that, for system-wide projects, translation services will be provided as needed for the two LEP language populations with the highest percentages in the overall CTA Service Area. Currently, the most recently available survey data shows that those LEP populations are Spanish and Polish-speaking groups.

Non-system wide projects which affect only a specific and limited portion of the CTA Service Area are administered in a different manner. First, CTA derives a standard by calculating the total population located within the entire CTA Service Area. CTA then determines what percentage of that total population are LEP persons. Once established, that number serves as a benchmark (“LEP Benchmark”) to be used later in the analysis.

Then, CTA considers the specific populations likely to be impacted by the non-system wide project. To that end, adjacent census tracts that are within a quarter mile radius of the project site are identified (“Impacted Census Tracts”). CTA assesses the LEP group concentrations within the Impacted Census Tracts. If an LEP group concentration within an Impacted Census Tract meets or exceeds the threshold previously established as the LEP Benchmark, then CTA will provide translation services as needed.

In this manner, the standard by which individual census tracts are measured is set by a number that is derived from the sum total of all census tracts that comprise the CTA Service Area.

When using the most recently available survey data with this methodology, the analysis shows that 10.2 percent is the current LEP Benchmark. Spanish, Polish, and Chinese speaking LEP populations are the three language groups that either meet or exceed 10.2 percent in some of the CTA Service Area census tracts at this time. CTA balances the type and extent of translation service outreach to be provided with the resources available pursuant to the budget of each individual project.

The 2019 LEP Study evaluated this Factor. The study examined both interpretation and translation services at CTA both systemwide and at identified locations with high LEP populations. The Study identified opportunities to utilize available resources to serve LEP populations such as opportunities to provide translated signage.

UPDATED: LEP DATA using US Census Bureau American Community Survey 5-Year Estimates, 2016 - 2020

Table 9: LEP Population: Ability to Speak English

	Total	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (<Well)
Number	3,131,989	1,993,406	687,083	227,613	166,716	57,171	223,887
Percent	100.0%	63.6%	21.9%	7.3%	5.3%	1.8%	7.1%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 10: LEP Population: Language Spoken at Home

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Spanish	749,776	65.3%	65.3%
French	13,034	1.1%	66.4%
French Creole	2,757	0.2%	66.7%
Italian	11,073	1.0%	67.6%
Portuguese	2,454	0.2%	67.8%
German	9,172	0.8%	68.6%
Yiddish	913	0.1%	68.7%
West Germanic Languages	893	0.1%	68.8%
Scandinavian Languages	1,082	0.1%	68.9%
Greek	10,724	0.9%	69.8%
Russian	12,259	1.1%	70.9%
Polish	73,188	6.4%	77.3%
Serbian-Croatian	14,964	1.3%	78.6%
Other Slavic Languages	12,548	1.1%	79.7%
Armenian	866	0.1%	79.7%

Persian	2,722	0.2%	80.0%
Gujarati	7,545	0.7%	80.6%
Hindi	10,006	0.9%	81.5%
Urdu	14,654	1.3%	82.8%
Other Indic Languages	7,451	0.6%	83.4%
Other Indo-European Languages	17,101	1.5%	84.9%
Chinese	49,182	4.3%	89.2%
Japanese	3,410	0.3%	89.5%
Korean	12,391	1.1%	90.6%
Khmer	1,320	0.1%	90.7%
Hmong	86	0.0%	90.7%
Thai	3,146	0.3%	91.0%
Laotian	247	0.0%	91.0%
Vietnamese	8,069	0.7%	91.7%
Other Asian	10,412	0.9%	92.6%
Tagalog	30,031	2.6%	95.2%
Other Pacific Islander Languages	1,949	0.2%	95.4%
Other Native-American Languages	317	0.0%	95.4%
Hungarian	1,127	0.1%	95.5%
Arabic	20,667	1.8%	97.3%
Hebrew	3,208	0.3%	97.6%
African Languages	17,412	1.5%	99.1%
Other Unspecified	10,415	0.9%	100.0%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2015-2019

Table 11: LEP Population: Ability to Speak English by Language Category (Number)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	735,841	446,033	135,106	115,217	39,485	154,702
Indo-European	214,879	135,109	45,843	26,766	7,161	33,927
Asian/Pacific Islander	129,947	68,764	33,036	18,939	9,208	28,147
Other	57,916	37,177	13,628	5,794	1,317	7,111
Total	1,138,583	687,083	227,613	166,716	57,171	223,887

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 12: LEP Population: Ability to Speak English by Language Category (percent share of total)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	100.0%	60.6%	18.4%	15.7%	5.4%	21.0%
Indo-European	100.0%	62.9%	21.3%	12.5%	3.3%	15.8%
Asian/Pacific Islander	100.0%	52.9%	25.4%	14.6%	7.1%	21.7%
Other	100.0%	64.2%	23.5%	10.0%	2.3%	12.3%
Total	100.0%	60.3%	20.0%	14.6%	5.0%	19.7%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 13: LEP Population: Ability to Speak English by Citizenship Status (number)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	2,436,468	1,913,170	350,682	64,861	95,978	11,777	76,638
Naturalized Citizen	344,601	49,021	50,645	77,169	87,053	80,713	157,882
Non-Citizen	350,920	31,215	44,706	147,778	58,019	69,202	216,980
Total	3,131,989	1,993,406	446,033	289,808	241,050	161,692	451,500

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 14: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well
US-born Citizens	100.0%	78.5%	14.4%	2.7%	3.9%	0.5%
Naturalized Citizen	100.0%	14.2%	14.7%	22.4%	25.3%	23.4%
Non-Citizen	100.0%	8.9%	12.7%	42.1%	16.5%	19.7%
Total	100.0%	63.6%	14.2%	9.3%	7.7%	5.2%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 15: LEP Population: Linguistic Isolation by Language Category (number, households)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	261,697	207,100	54,597
Indo-European	109,564	82,263	27,301
Asian/Pacific Islander	59,724	43,191	16,533
Other	25,789	20,431	5,358
Total	456,774	352,985	103,789

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Table 16: LEP Population Linguistic Isolation by Language Category (percent share of total, households)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	100.0%	79.1%	20.9%
Indo-European	100.0%	75.1%	24.9%
Asian/Pacific Islander	100.0%	72.3%	27.7%
Other	100.0%	79.2%	20.8%
Total	100.0%	77.3%	22.7%

Source: US Census Bureau American Community Survey 5-Year Estimates, 2016-2020

Additional Customer Outreach Efforts

Customer notices that are posted throughout CTA's transit system and this represents one example of an area that is experiencing improvements. These notices typically regard construction impacts, reroutes, or other service changes. CTA introduced new, redesigned, more easily understandable alerts that utilize mode icons, larger route numbers, and increased use of maps to augment text. These measures were designed to communicate information in a more simple, direct, and graphical manner for customers.

Some signage improvements and updates were made throughout the rail system in order to improve consistency and incorporate the colors of the rail lines. These measures make it easier for all customers to navigate the transit system during trips.

Signage standards were also revised to decrease the amount of text on signs, to place greater emphasis on proper names and terminals for navigation, and to greatly increase the use of symbols and icons for easier use and quicker cognition. These measures serve to decrease barriers for all passengers, including LEP persons. They are also representative of the types of actions that CTA takes, in addition to other studies, surveys, and analyses, in order to accommodate customers efficiently and effectively.

CTA continues to monitor the needs of LEP customers, evaluate feedback, and tailor services accordingly. Below is a sample list with some of the language assistance services that CTA provides.


CTA System Map: Each year, the CTA updates and publishes a translated System Map.

Overnight Service Brochure: A translated version of the "Night Owl" (overnight) service brochure is published.

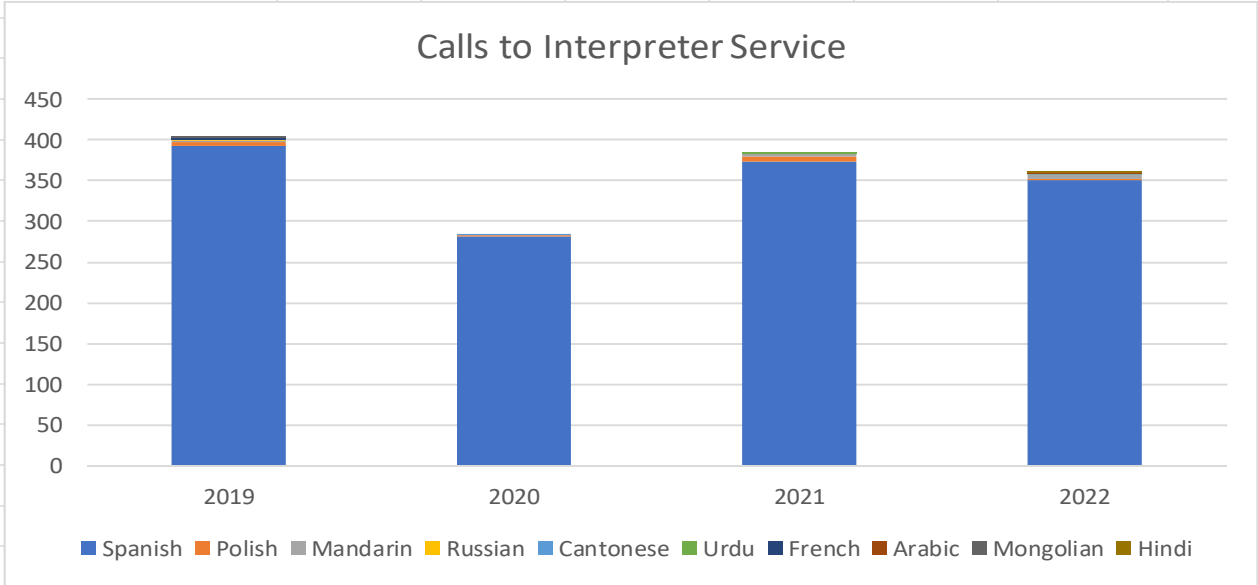
Customer Service: Bilingual Customer Service Representatives (Spanish) are available to customers via an immediate prompt through CTA's Customer Service Department at 1-888-YOUR-CTA. On-call translation services in approximately 170 languages are also available upon customer request. **Table 17** below represents the number of calls received during each of the respective reporting years and the languages for which interpreter services were requested.

Table 17: Customer Service Department Calls for Interpreter Service

Table 17: Customer Service Department Calls for Interpreter Service

		Customer Service Department Calls to Interpreter Service						
Language	2019	2020	2021	2022	Total	Percent		
Spanish	392	281	373	351	1397	97.5%		
Polish	5	2	7	1	15	1.0%		
Mandarin	2		3	5	10	0.7%		
Russian	1			1	2	0.1%		
Cantonese	1	1		1	3	0.2%		
Urdu			1		1	0.1%		
French	1				1	0.1%		
Arabic				1	1	0.1%		
Mongolian	1				1	0.1%		
Hindi				2	2	0.1%		
Total	403	284	384	362	1433	100%		

Calls to Interpreter Service



The chart displays the number of calls for interpreter services across four years: 2019, 2020, 2021, and 2022. The y-axis represents the number of calls, ranging from 0 to 450. The x-axis lists the years. Each bar is stacked with colors representing different languages: Spanish (blue), Polish (orange), Mandarin (grey), Russian (yellow), Cantonese (light blue), Urdu (green), French (dark blue), Arabic (brown), Mongolian (dark grey), and Hindi (gold). Spanish consistently makes up the vast majority of the total calls in every year.

Website Translation and Online Language Guides: CTA’s website has language guides for the three most commonly spoken LEP languages in the CTA Service Area: Spanish; Polish; and Chinese with links to Google Translate© for translation in additional languages.

Interpreters: Spanish, Polish, and Chinese speaking interpreters (as appropriate) are utilized at CTA community meetings and public hearings.

Customer Alerts and Notices: Translation services for items like customer alerts regarding public meetings, permanent route changes or discontinuations, or major temporary service changes may be provided depending on CTA's analysis of the language assistance needs of the affected census tracts.

Notice to LEP Persons Regarding Language Assistance Availability

CTA notifies LEP persons of its services through various means. CTA distributes and posts translated materials throughout the transit system as well as on the CTA website. CTA also distributes materials to elected officials' offices, libraries, and other community groups to spread awareness.

Next Steps

Through the 2019 LEP Study, CTA has identified additional opportunities to enhance communications with LEP persons, such as:

- 1) **Reviewing Title VI Notices at all bus and rail stations and providing translations where appropriate.**
- 2) **Continue Signage and Communication Improvements.**
As previously referenced, the Authority has begun the process of moving away from wordy signs. New signs will offer more pictures that provide information about directions, what to do in case of an emergency, while offering improved guidance to both English and LEP customers.
- 3) **Enhancing CTA's Title VI website to incorporate additional user friendly and LEP features.**
- 4) **Improvements to CTA's fare system (Ventra) for LEP persons.**
- 5) **Enhanced Support for Front-Line Employees.**
- 6) **Additional Engagement with LEP Community Stakeholders**

Monitoring and Oversight of Language Assistance Plan

CTA will continue to monitor, evaluate, and update the LAP based on the most recently available annual American Community Survey data for the CTA Service Area, multiple points of customer feedback, and additional ongoing customer service measures.

Specifically, since the overall LEP population within the CTA Service Area fluctuates, the data is updated with regularly. To that end, CTA uses the most recently available American Community Survey data to recalculate the LEP populations of each individual census tract. By its nature, this action reestablishes a new LEP Benchmark to be used for future language assistance decision making by CTA.

Figure 1:

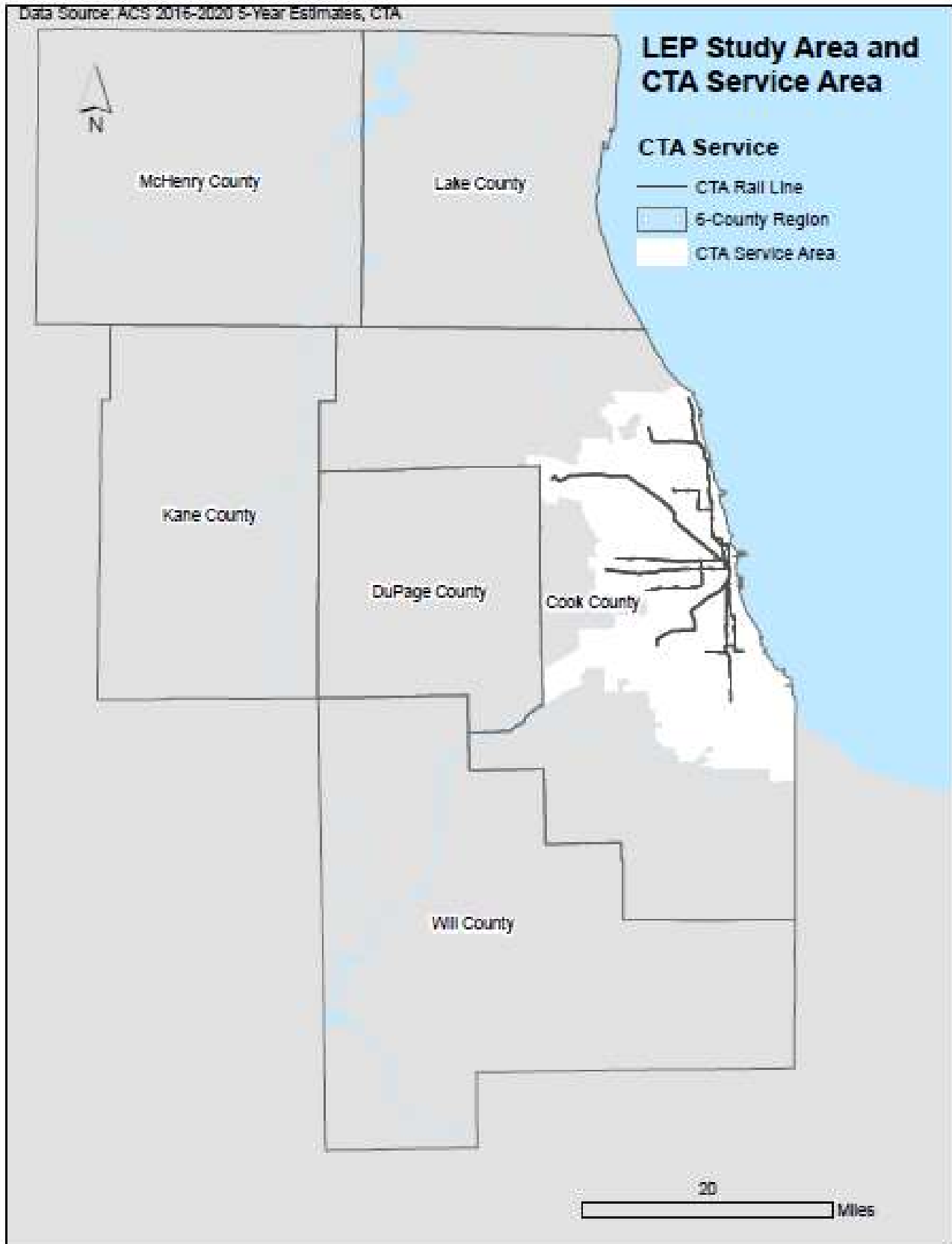


Figure 2:

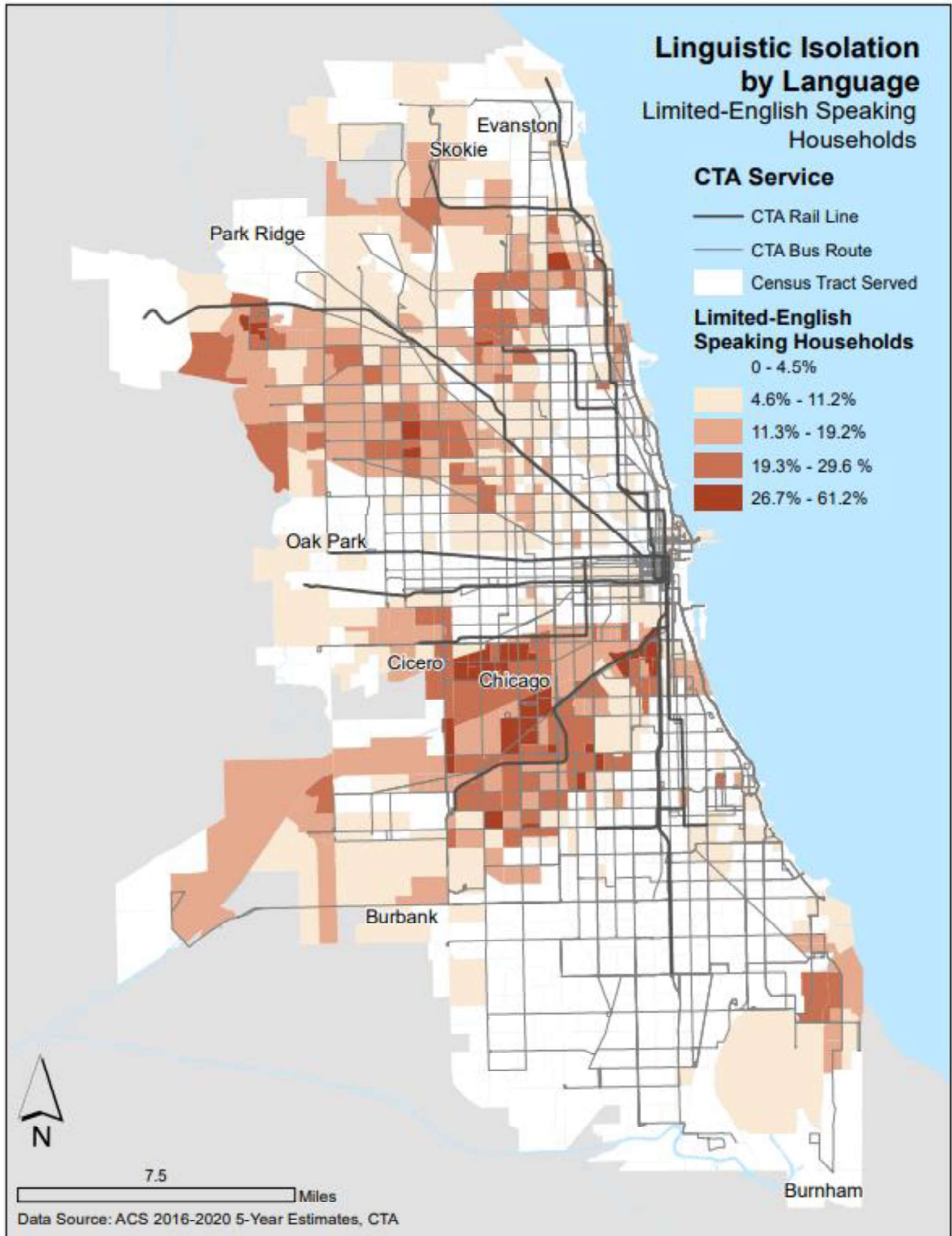


Figure 3:

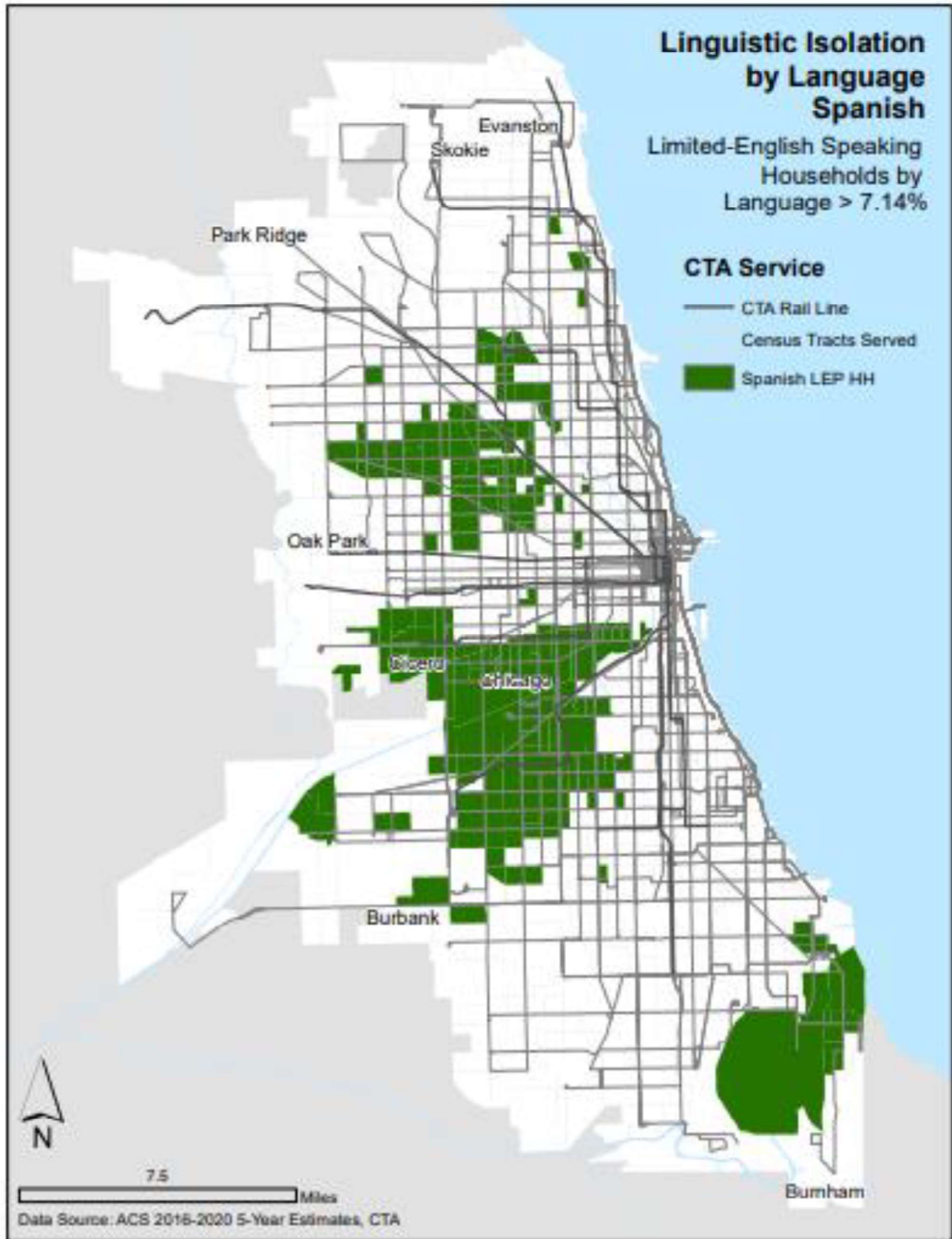


Figure 4:

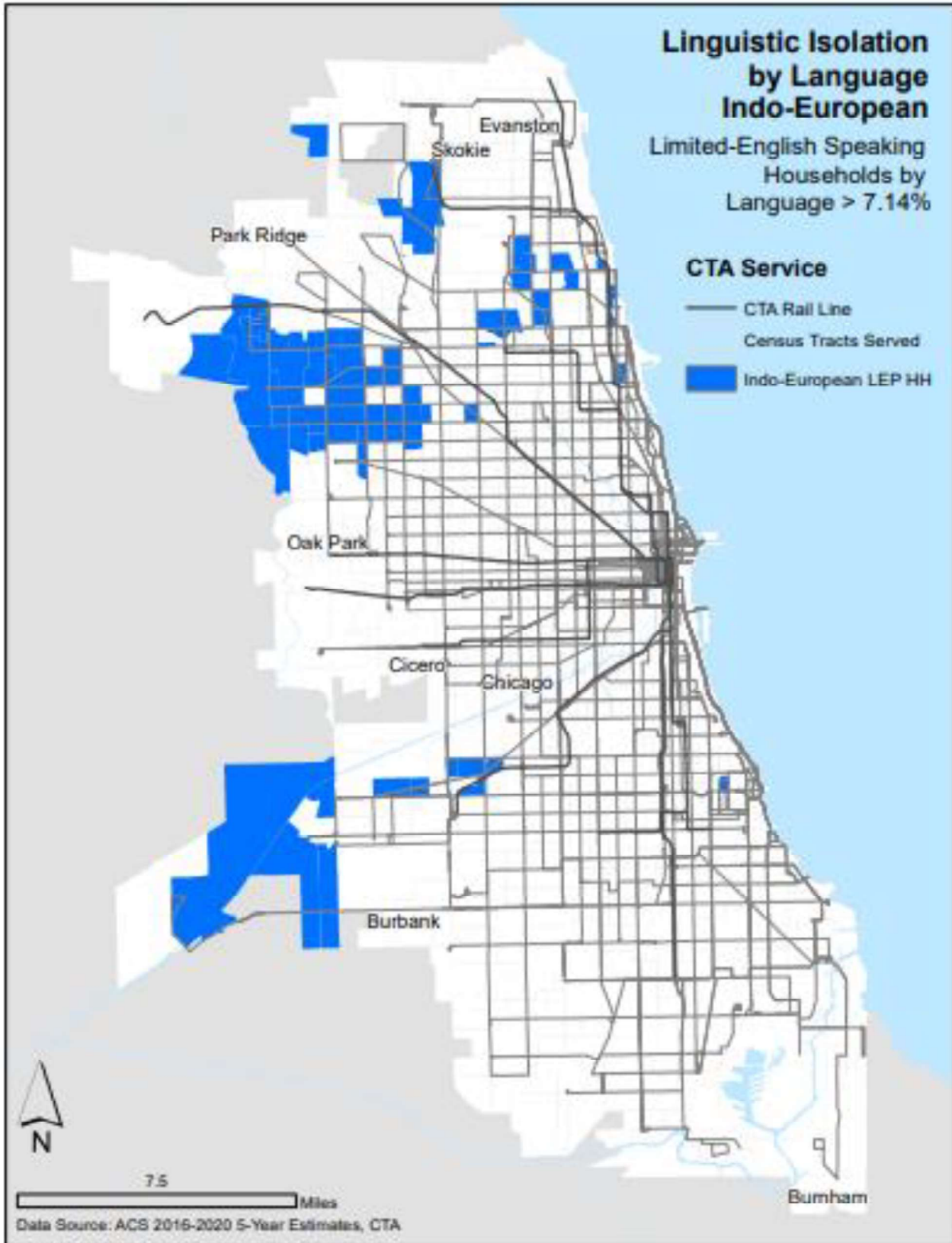
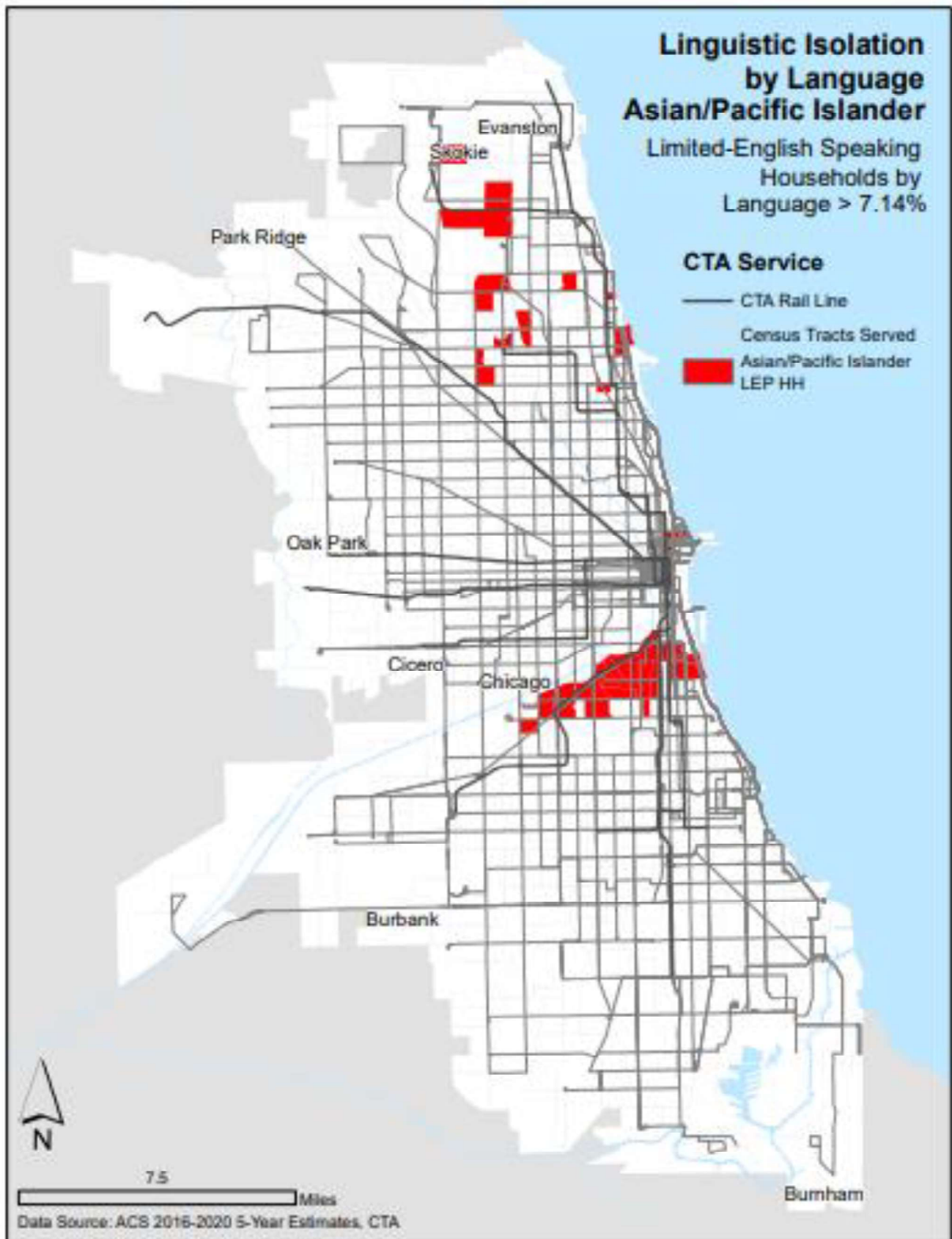


Figure 5:



Finally, all Title VI related calls are routed through CTA’s Customer Service Department’s call center, which also provides general CTA information, logs customer feedback and directs the information to the appropriate departments. Spanish speaking customer representatives are available and the Language Line Services has the ability to translate in approximately 170 languages for customers who request an interpreter. CTA established a Facebook page and a Twitter account and customers are encouraged to leave feedback on both of these social media sites. **Table 18** below shows the total number of Title VI calls received by CTA’s call center during the reporting years (2019 – 2022).

Table 18: Title VI calls during the reporting period received by CTA’s Customer Service Department

Table 18: Title VI calls during the reporting period received by CTA’s Customer Service Department



Customer Service Department
CSR-Reported Title VI Complaints

2019-2022

Type	2019	2020	2021	2022	Total
CTA ADA Violations/Issues	25	11	18	17	71
CTA Behavioral Complaints	193	791	123	122	1,229
CTA Claims	6	0	5	3	14
CTA Commendations	0	1	0	0	1
CTA Fare Systems	1	0	0	0	1
CTA General Maintenance	8	1	3	3	15
CTA Information Request	12	10	14	6	42
CTA Major Renovation	2	0	0	1	3
CTA Operational Complaints	6	7	3	2	18
CTA Procedural Complaints	69	58	68	51	246
CTA Schedule Violations	61	29	107	108	305
CTA Security Issues	7	4	7	13	31
CTA Service Change	1	1	0	0	2
CTA Vehicle Maintenance	1	0	2	1	4
Grand Total	392	913	350	327	1,982

Notes

* Includes complaints with the answer "yes" chosen for the question "Is this a Title VI Issue?"

* Answer is chosen at time of data entry by Customer Service Representative

* System does not require a yes or no answer (may be left blank)

**The number of behavioral complaints received in June 2020 received by one individual employee skewed that year's overall total*