

CHICAGO TRANSIT AUTHORITY LANGUAGE ASSISTANCE PLAN

March 2014

Adopted by the Chicago Transit Board on: _____

I. INTRODUCTION

Chicago Transit Authority (“CTA”) is committed to serving individuals who may require language assistance and supports the goals established by the Federal Transportation Administration to provide meaningful access to its transit services. This Language Assistance Plan 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.

Individuals who 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 2000 U.S. Census also reported that more than 11 percent of LEP persons (ages 16 years and over) use public transit as their primary means of transportation to their place of employment. Comparatively, 4 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.

II. BACKGROUND

Title VI of the Civil Rights Act of 1964, as amended (“Title VI”), 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, *Improving Access to Services for Persons with Limited English Proficiency* (“Order”), 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 Federal Transit Administration (“FTA”) references the DOT LEP Guidance in its Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients FTA Recipients* (“Title VI Circular”), published on October 1, 2012. 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.

III. FOUR-FACTOR ANALYSIS

Based on the previous version of the Title VI Circular, CTA conducted the “Limited English Proficiency Study” (“LEP Study”) in the fall of 2008. The LEP Study used data from the 2006 American Community Survey, which represents 2,157,586 households, 4,811,638 individuals, and 771,385 LEP persons. 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 seven foreign language-speaking LEP groups that represented the highest concentrations within the LEP Study Area: Spanish, Polish, Chinese, Russian, Tagalog, Korean and Greek.

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;
- (2) the frequency with which LEP persons come into contact with the program;
- (3) how important the program, service or activity is to LEP persons; and
- (4) the resources available to the recipient for LEP outreach and 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.

The LEP Study included a comparative analysis of the seven LEP language groups. The analysis shows the socio-demographic characteristics, socio-economic conditions, mobility, and language-related barriers of these language groups. Of the seven, Spanish, Polish, and Chinese are the three largest LEP language groups, comprising 62 percent, 11 percent, and 4 percent of the LEP population in the LEP Study Area, respectively. **See Figure 1.**

Figure 2 breaks down and scales the degree of proficiency with the English language that was indicated by LEP respondents who primarily speak Spanish, Polish, Chinese, Korean and Tagalog within the LEP Study Area. An individual's ability to read, speak and understand English can impact her or his tendency to use transit services, because comprehending service schedules, routes, notices, and safety signage may require English literacy skills.

The LEP Study revealed that, of the LEP respondents in the LEP Study Area, the Spanish, Polish, and Chinese-speaking LEP groups have the highest percentages of individuals who speak English either "not well" or "not at all". Conversely, Korean and Tagalog LEP language groups have a higher percentage of individuals who indicated that they speak English "well" or "very well". **See Figure 2.**

While the LEP Study Area covered a broader area (all of Cook County) for reference, CTA focuses language assistance decision making analysis to LEP persons residing within a half-mile radius of CTA's fixed route service ("CTA Service Area"). If any portion of a census tract is within that half-mile radius, then the entire census tract is factored into the targeted analysis. **See Figure 3.**

Individually, Figures 4, 5, and 6 each indicate the census tracts within the CTA Service Area that have a high percentage (e.g. meeting or exceeding 10.2 percent) of Spanish, Polish, and Chinese-speaking LEP persons.

Figure 4 indicates that Spanish-speaking LEP persons in the CTA Service Area are concentrated throughout the West, Southwest, and Northwest in areas with extensive transit service. The Spanish-speaking LEP persons in the Far Southeast area have somewhat more limited transit service. **See Figure 4.**

Figure 5 indicates that Polish-speaking LEP persons are concentrated in the far North and Northwest areas of the CTA Service Area. These areas have extensive transit service. **See Figure 5.**

Figure 6 indicates that Chinese-speaking LEP persons are concentrated in the Central part of the CTA Service Area. This area has extensive transit service. **See Figure 6.**

Factor 2: The frequency with which LEP persons come into contact with the program.

DOT LEP Guidance recommends that recipients assess the frequency with which they have or may have contact with LEP persons seeking assistance. The more frequent the contact, the more likely it is that enhanced translation services may be necessary. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.

Figure 7 represents how often respondents to the LEP Study indicated that they use CTA's Bus and Rail services. When making translation service decisions, CTA considers the frequency of contact with the transit system that a particular LEP group has relative to the concentration of the LEP group in a specific geographic region. **See Figure 7.**

Factor 3: The nature and importance of the program, activity, or service provided by the program 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.

Also, through the oversight procedures that are involved with making paratransit service as well as Half Fare and other Fare certification programs available to the region, CTA ensures that Pace and RTA take similar language-based considerations into account when providing their respective transit or transit-related services for the LEP populations that are specific to their purview.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

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 data¹ shows that those LEP populations are Spanish and Polish-speaking groups. **See Figure 8.**

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.

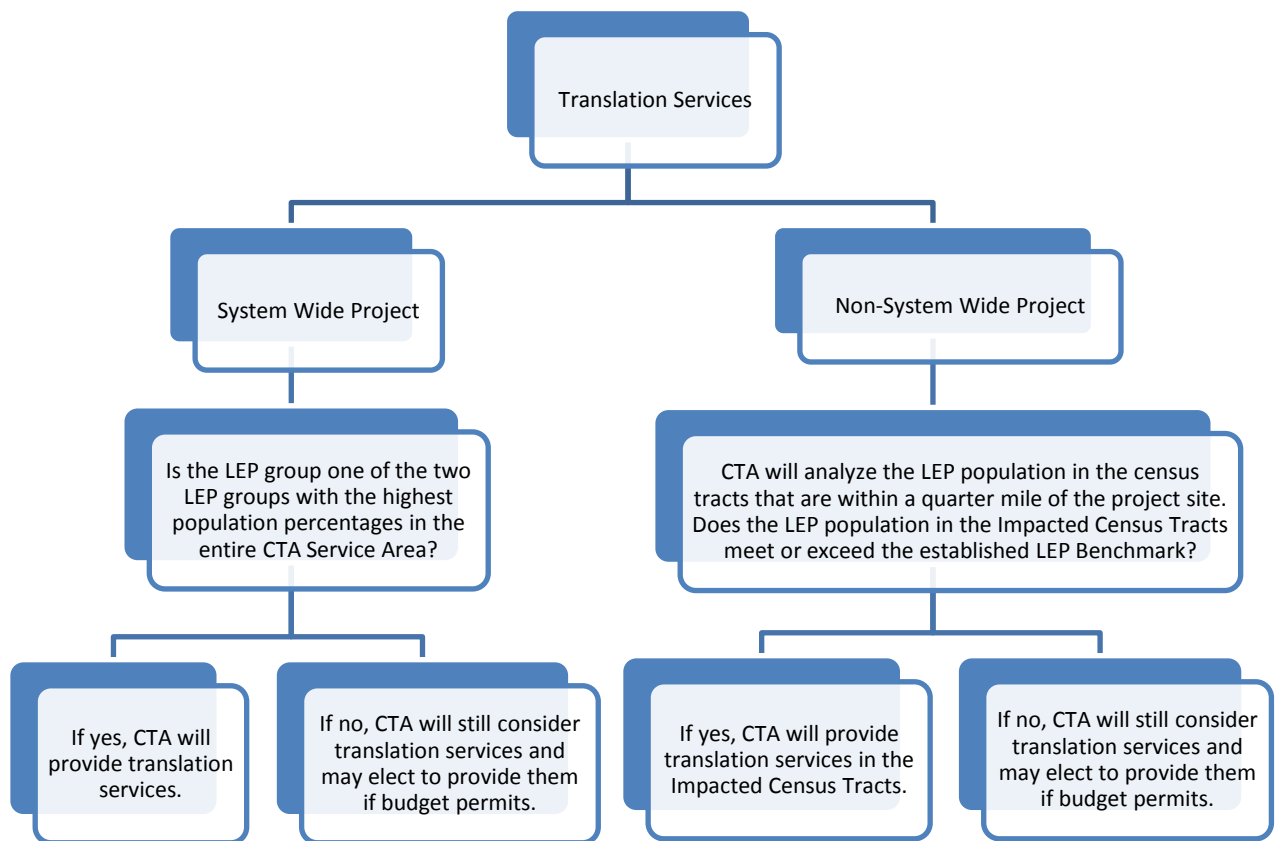
In this manner, the standard by which individual census tracts are measured is set by a number that is derived from the sum total of all census tracts that comprise the CTA Service Area.

When using the most recently available survey data² 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 flow chart below illustrates the steps that are taken to determine when translation services would be provided.

¹ American Community Survey (2005-2009)

² *Id.*



Additional Customer Communication Outreach

In addition to studies and surveys, CTA has also worked with Ideo, a leading product design and customer experience firm, to examine how it communicates with customers and to target specific areas for potential improvement. As a result of the collaboration, a new section of CTA's Communications Department, titled "Customer Information," was formed in 2007. Since its inception, Customer Information has revamped many of the ways which public information is designed and phrased in order to make messages clearer for all customers, including LEP persons.

Customer notices that are posted throughout the transit system represent one example of an area that has experienced 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.

Also, between 2008 and 2010, CTA embarked on an additional customer communication project. Signage was updated 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 multiple points of feedback, and tailor services accordingly. Below is a sample list with some of the language assistance services that CTA provides.

1. **CTA System Map:** Each year, the CTA updates and publishes a translated System Map.
2. **Overnight Service Brochure:** A translated version of the "Night Owl" (overnight) service brochure is published.
3. **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.
4. **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.

5. **Interpreters:** Spanish, Polish and Chinese speaking interpreters (as appropriate) are used at community meetings and public hearings.
6. **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.

IV. 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.

V. MONITORING AND OVERSIGHT OF LANGUAGE ASSISTANCE PLAN

CTA will continue to monitor, evaluate, and update the Language Assistance Plan 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 must be updated 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: Comparative Analysis of LEP Language Groups

	Spanish LEP	Indo-European Language LEP			Asian/Pacific Language LEP			All Foreign Language LEP
		Polish	Russian	Greek	Chinese	Tagalog	Korean	
<i>LEP Population</i>	481,185	85,622	16,477	8,605	29,442	14,883	14,167	771,385
<i>% Total LEP Population</i>	62%	11%	2%	1%	4%	2%	2%	100%
<i>LEP Rate (% of within Language Population)</i>	50%	57%	61%	29%	60%	37%	53%	47%
Immigration Status								
<i>% Foreign-born Immigrants</i>	81%	95%	97%	87%	94%	98%	91%	85%
<i>% U.S. Citizen by Naturalization</i>	20%	48%	58%	78%	49%	56%	51%	31%
<i>% Not a U.S. Citizen</i>	61%	47%	40%	9%	45%	42%	38%	51%
<i>% Newcomers</i>	26%	40%	65%	2%	39%	42%	23%	33%
<i>% Settled</i>	37%	41%	28%	6%	35%	45%	46%	36%
<i>% Transplants</i>	37%	19%	7%	92%	26%	13%	31%	32%
Demographics								
<i>% Female</i>	46%	49%	55%	58%	52%	58%	55%	49%
<i>% 24 years of age or younger</i>	22%	10%	5%	5%	12%	6%	14%	18%
<i>% 65 years of age or older</i>	7%	15%	39%	47%	18%	29%	20%	12%
<i>% Less than Grade 9 education</i>	50%	16%	11%	48%	35%	13%	14%	39%
<i>% High School Graduate or higher</i>	36%	75%	85%	34%	55%	82%	86%	49%
Socioeconomic Conditions/Mobility Barriers								
<i>% Employed</i>	62%	66%	49%	35%	56%	57%	57%	61%
<i>% Self Employed</i>	6%	20%	14%	29%	14%	3%	27%	10%
<i>% Unemployed</i>	4%	5%	4%	11%	5%	3%	3%	5%
<i>% Not in Labor Force</i>	33%	29%	47%	54%	39%	40%	40%	35%
<i>% Persons with Social Security Income</i>	8%	12%	15%	45%	14%	15%	15%	11%
<i>% Persons with Retirement Income</i>	3%	5%	9%	19%	3%	12%	2%	4%
<i>% Persons with Public Assistance Income</i>	1%	1%	13%	0%	0%	1%	1%	1%
<i>% Less than \$25,000 Household Income</i>	25%	17%	42%	24%	40%	9%	17%	25%
<i>% Zero-Vehicle Households</i>	11%	12%	26%	13%	9%	11%	6%	12%
Language Barriers								
<i>% Speak English 'not well' and 'not at all'</i>	61%	54%	55%	47%	59%	15%	52%	55%
<i>% Linguistically Isolated Households</i>	57%	61%	67%	30%	64%	47%	59%	58%

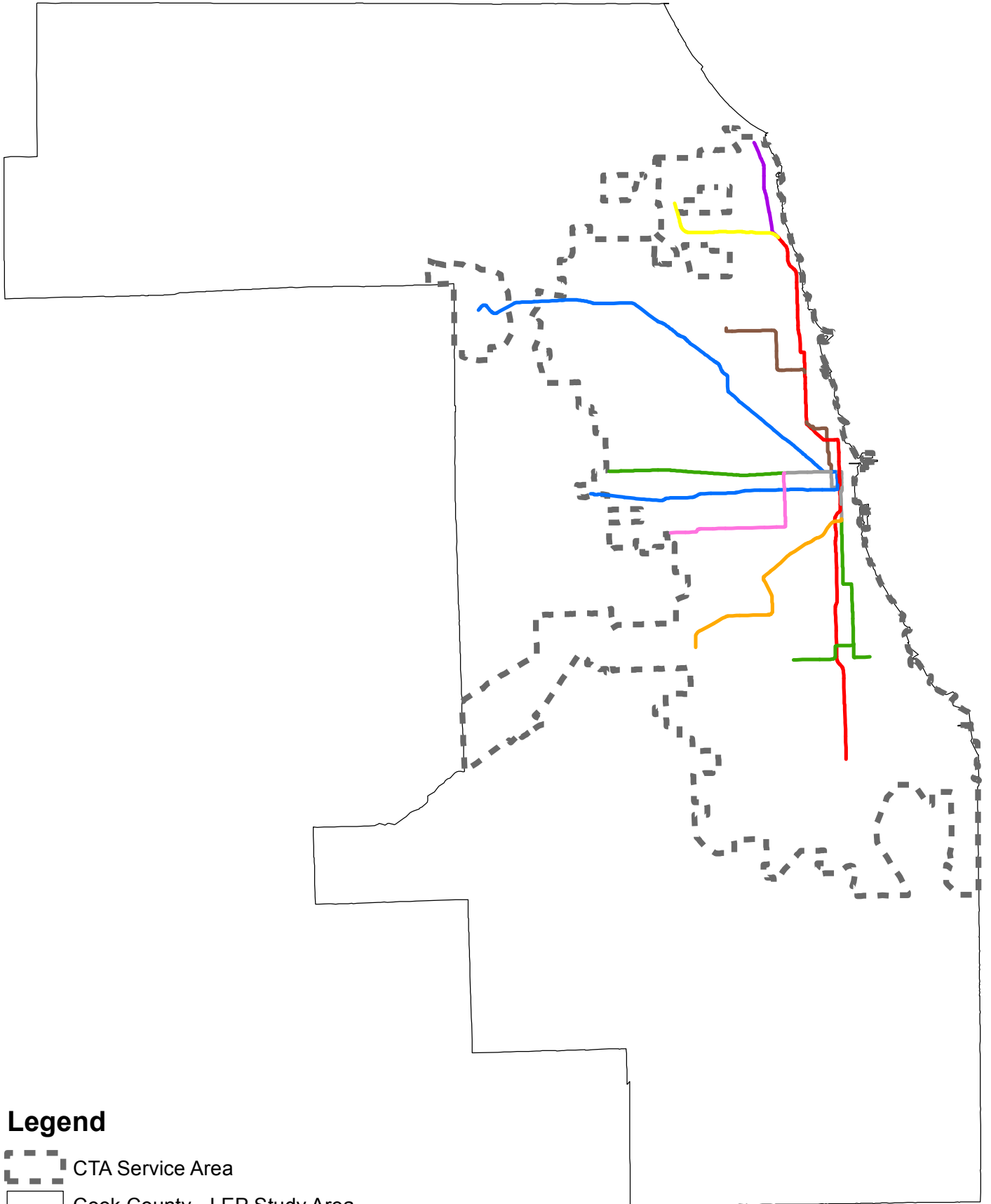
Source: Limited English Proficiency Study, 2008 NuStats

Figure 2: Proficiency of Speaking, Reading, and Understanding English Respondent

Speaking English	Language					Total
	Spanish	Chinese	Korean	Polish	Tagalog	
Not at all	44.4%	16.3%	7.3%	9.1%	0.9%	23.6%
Not well	47.3%	47.5%	54.7%	66.2%	21.7%	48.3%
Well	8.3%	36.3%	38.0%	24.7%	76.5%	27.9%
Very well	0.0%	0.0%	0.0%	0.0%	0.9%	0.1%
Total:	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
N:	410	160	150	154	115	989
Reading English						
	Spanish	Chinese	Korean	Polish	Tagalog	Total
Not at all	47.1%	20.6%	6.0%	11.7%	0.9%	25.6%
Not well	42.2%	42.5%	31.3%	61.0%	18.3%	40.6%
Well	10.2%	36.9%	62.0%	27.3%	79.1%	33.3%
Very well	0.5%	0.0%	0.7%	0.0%	1.7%	0.5%
Total:	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
N:	410	160	150	154	115	989
Understanding English						
	Spanish	Chinese	Korean	Polish	Tagalog	Total
Not at all	22.4%	16.3%	4.7%	7.8%	1.7%	14.1%
Not well	59.0%	43.8%	46.7%	57.1%	20.9%	49.7%
Well	16.8%	40.0%	48.7%	35.1%	76.5%	35.4%
Very well	1.7%	0.0%	0.0%	0.0%	0.9%	0.8%
Total:	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
N:	410	160	150	154	115	989

Source: Limited English Proficiency Study, 2008 NuStats

Figure 3:
LEP Study Area and
CTA Service Area



Legend



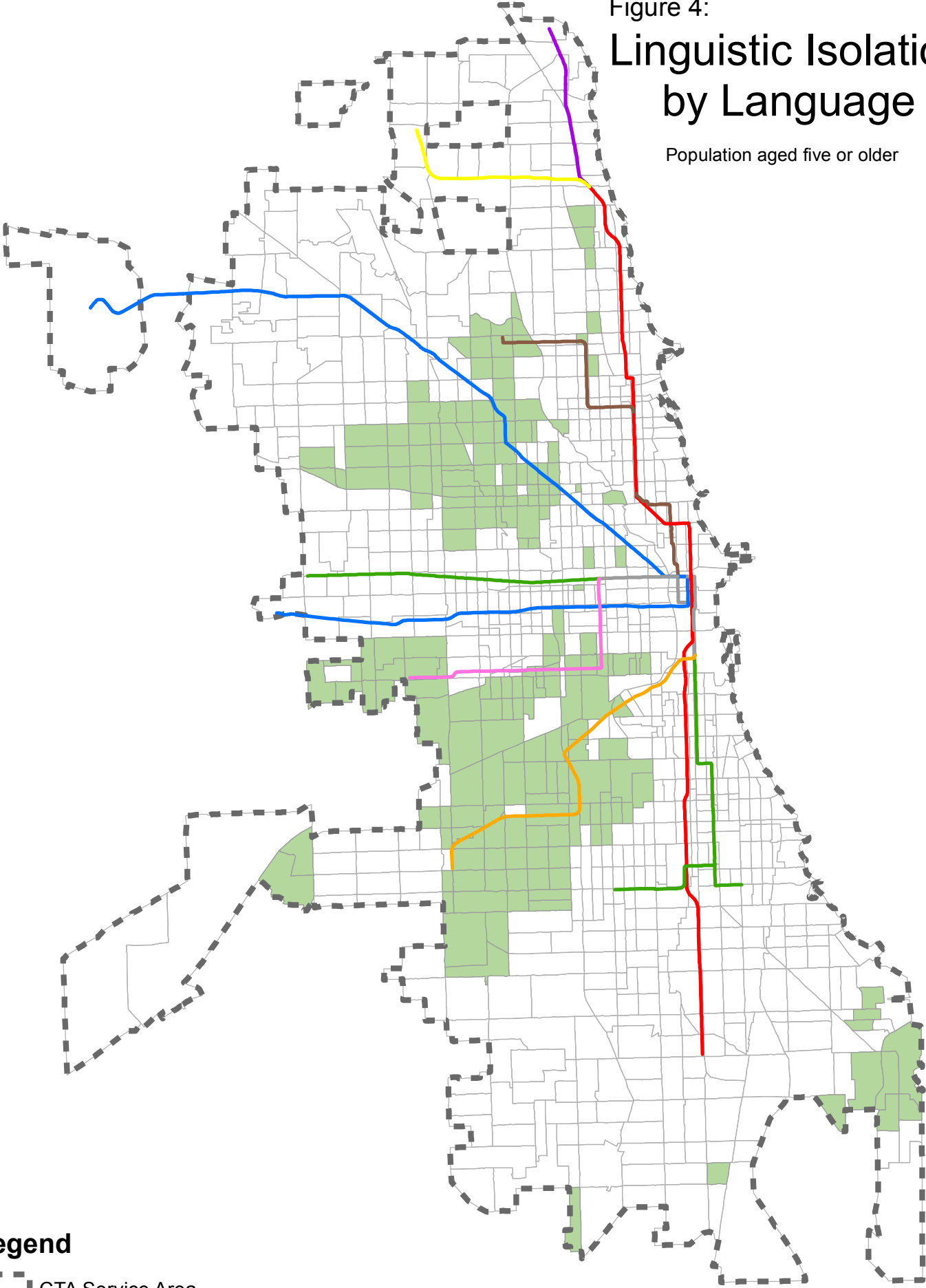


-  CTA Service Area
-  Cook County - LEP Study Area

Figure 4:
**Linguistic Isolation
by Language**

Population aged five or older



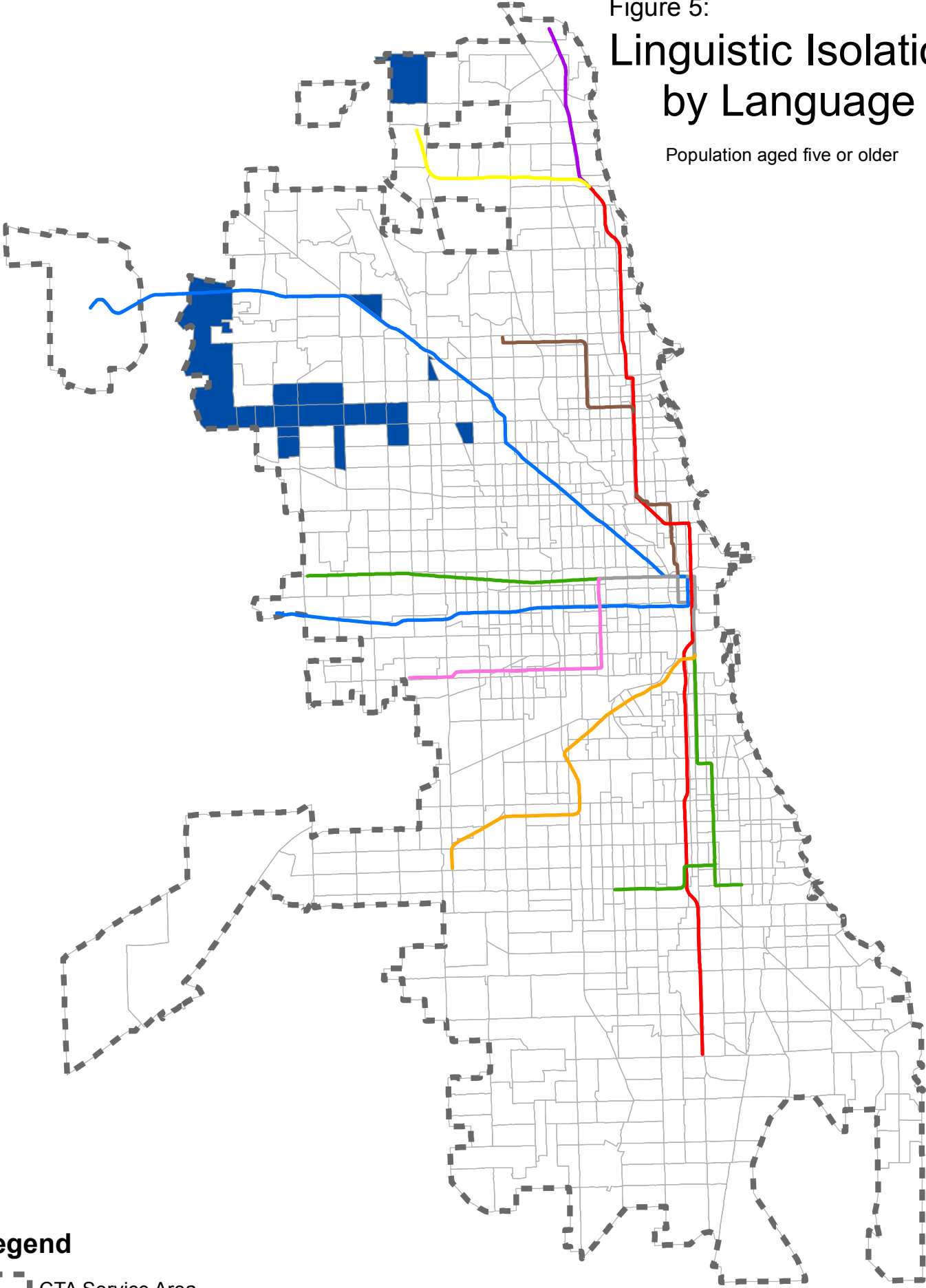
Legend

-  CTA Service Area
-  Spanish LEP > 10.2%

Source: American Community Survey 2005-2009

Figure 5:
**Linguistic Isolation
by Language**

Population aged five or older



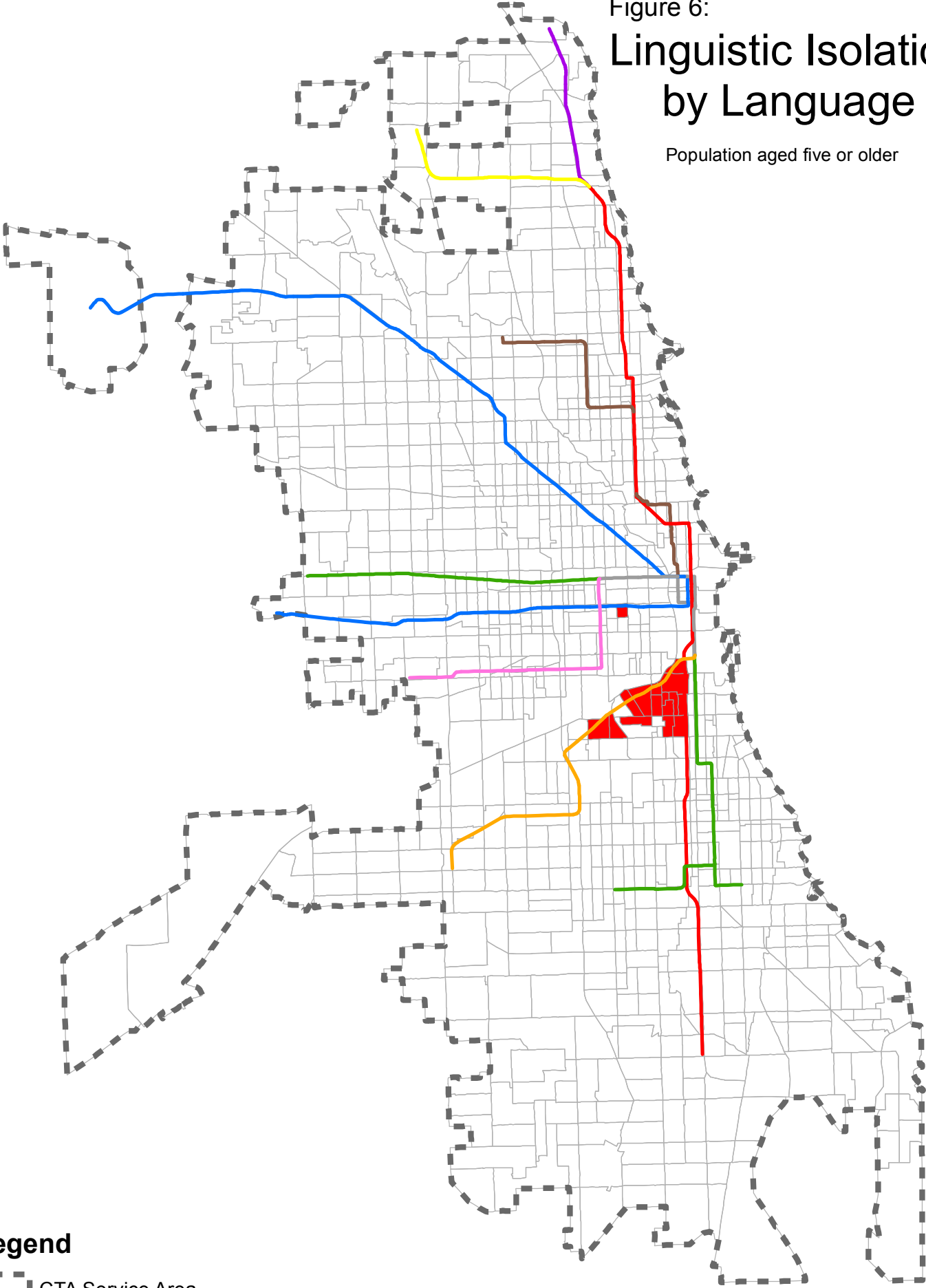
Legend

- CTA Service Area
- Polish LEP > 10.2%



Source: American Community Survey 2005-2009

Figure 6:
**Linguistic Isolation
by Language**

Population aged five or older



Legend

-  CTA Service Area
-  Chinese LEP > 10.2%

Source: American Community Survey 2005-2009

**Figure 7: Frequency of
CTA Bus/Train Use**

CTA Transit Use	Language					Total
	Spanish	Chinese	Korean	Polish	Tagalog	
Regular (in the past week)	35.4%	48.8%	5.3%	25.3%	27.8%	30.8%
Occasional (in the past month)	15.6%	18.1%	6.7%	9.1%	9.6%	13.0%
Previous (in the past year)	13.9%	23.1%	14.7%	14.9%	17.4%	16.0%
Former (has ridden at some point)	20.0%	8.1%	37.3%	43.5%	13.9%	23.5%
Never used	15.1%	1.9%	36.0%	7.1%	31.3%	16.8%
Total:	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
N:	410	160	150	154	115	989

Source: Limited English Proficiency Study, 2008 NuStats

Figure 8: LEP Population in CTA Service Area

	Total Persons	% of Total Population	% of LEP Population
Population five years and over	3,039,632		
Isolated Population (five years and over)	309,618	10.29%	
Spanish	222,971	7.37%	74%
Polish	48,443	1.61%	16%
Chinese	22,916	0.76%	8%
Other	5,539	0.18%	2%

Source: American Community Survey 2005-2009

Figure 8A: Breakout of 'Other' LEP in CTA Service Area

	Count +/- 10%		Count +/- 10%
Tagalog	555	Other Indic languages	89
Russian	472	Japanese	85
Other Indo-European languages	390	Thai	73
Korean	382	French Creole	62
Serbo-Croatian	374	Armenian	33
Other Slavic languages	339	Portuguese or Portuguese Creole	33
Arabic	335	Mon-Khmer, Cambodian	32
Urdu	283	Persian	31
African languages	269	Hebrew	25
Vietnamese	268	Laotian	24
Italian	231	Other Pacific Island languages	22
Greek	233	Hungarian	15
Other and unspecified languages	189	Yiddish	11
French (incl. Patois, Cajun)	163	Other West Germanic languages	4
Hindi	139	Hmong	3
German	132	Other Native North American languages	2
Gujarati	130	Scandinavian languages	1
Other Asian languages	124		

Source: American Community Survey 2005-2009