Appendix G
MBTA Language Access Plan

Page intentionally blank

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY

LANGUAGE ASSISTANCE PLAN:

PROVIDING ACCESS TO PROGRAMS and SERVICES FOR PEOPLE WITH LIMITED ENGLISH PROFICIENCY

Revised April 2014

The MBTA has developed policies and procedures to meet the requirements of Title VI of the Civil Rights Act of 1964, specifically as it pertains to improving access to services for persons with limited English proficiency (LEP). The purpose of the MBTA's Title VI Program is to ensure that no person 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.

In April 2012, the MBTA updated its LEP Four-Factor Analysis in compliance with the guidance provided at that time, which defined "Limited English Proficient (LEP) Persons" as "persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the US Census that they do not speak English well or do not speak English at all." [1] In October 2012, the Federal Transit Administration (FTA) updated its Title VI Circular (FTA C 4702.1B)—Title VI Requirements and Guidelines for FTA Recipients. The updates to the circular included a revised definition of "limited English-proficient (LEP) persons." While the previous definition was limited to people who reported to the US Census that they do not speak English well or do not speak English at all, the new definition, below, includes people who speak English well:

> Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the US Census that they speak English less than very well, not well, or not at all.

The MBTA used this definition and the latest available US Census American Community Survey (ACS) to update the Language Access Plan.

The language access needs assessment, as defined by the US Department of Transportation (DOT), is based on an analysis of four factors.

1. The number and proportion of LEP persons served or encountered in the eligible service population by a program, activity, or service of the MBTA

   The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.

2. The frequency with which LEP individuals come in contact with the program, activity, or service

---

[1] FTA C 4702.1A: Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients, May 13, 2007.

The greater the frequency with which LEP individuals from different language groups come into contact with the MBTA's program, activity, or service, the more likely enhanced language services will be needed.

3. The importance to LEP persons of the program, activity, or service provided by the MBTA

The more important the activity, information, service, or program, or the greater the possible consequences of the contact with the LEP individuals, the more likely language services are needed. Importance is based on whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual.

4. The resources available to the MBTA and costs of providing the program, activity, or service

The level of resources and the costs imposed by an LEP policy may have an impact on the extent to which meaningful access can be provided for LEP persons. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits.

The first two of the four factors are used to identify individuals who need language assistance. The third factor determines what needs to be translated, and the fourth factor identifies translation resources and costs. The MBTA has followed FTA guidance in completing a four-factor analysis to identify and document the number and geographic distribution of potential LEP customers within the MBTA's 175-community service area and to evaluate the need for language assistance.

I. Identification of LEP individuals for whom language assistance may be needed

---

As stated above, the first two factors of the four factor analysis, which are the number and proportion of persons in the service population who are LEP and the frequency of contact, are used to identify individuals who may need language assistance.

Factor 1: The Number and Proportion of Persons in the Service Population Who Are LEP

The MBTA conducted quantitative analyses of data from two sources to estimate the number and proportion of people who have limited proficiency in English: the US Census and the Massachusetts Department of Education.

US Census Data

Data from the 2007–2011 five-year American Community Survey (ACS) were used to analyze the number of LEP persons living in the MBTA service area.[2] The total LEP population in the MBTA service area is 440,534 people, which is the sum of the LEP populations of all census tracts in the MBTA service area, including all languages, or approximately 9.67 percent of the total population above the age of five. The largest single group of LEP persons is composed of Spanish speakers, which represent 38.3 percent of the LEP population of the service area; approximately 168,834 people in the service area are limited-English Spanish speakers. The LEP populations in the service area that meet the USDOT's "safe harbor" threshold definition of either 5 percent of the total population of the service area or 1,000 individuals, whichever is less, include speakers of the following 24 languages:
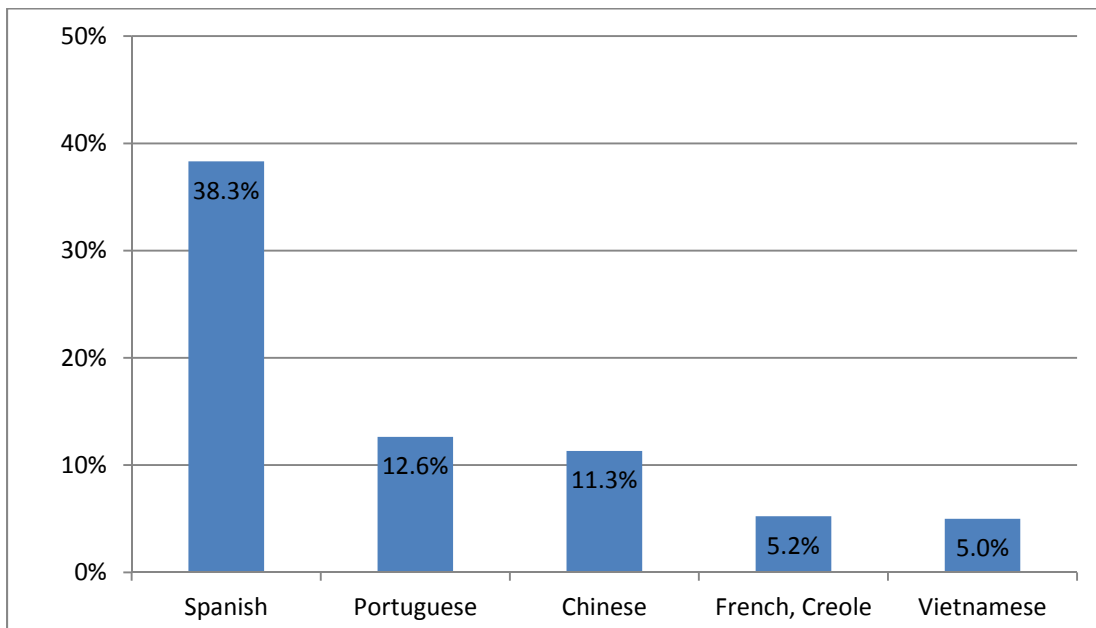
- Spanish/Creole (168,834)
- Portuguese/Creole (55,647)
- Chinese (49,849)
- French Creole (23,053)
- Vietnamese (21,982)
- Russian (14,016)
- Mon-Khmer/Cambodian (11,255)
- French (10,859)
- Italian (10,703)
- Arabic (8,764)
- Korean (7,270)
- Greek (6,018)
- Polish (3,506)
- Japanese (2,897)
- Gujarati (2,874)
- Hindi (2,808)

---

[2] The US Census tables, "Language Spoken at Home by Ability to Speak English by Census Tract" were used to estimate the number of LEP people for all census tracts within the MBTA service area. To calculate the number of people with limited English proficiency, we summed the counts of people who self-reported to speak English "not at all," "not well," and "well" in each census tract and for the entire service area.

- Armenian (2,137)
- Tagalog (2,117)
- Persian (1,884)
- German (1,598)
- Urdu (1,279)
- Serbo-Croatian (1,191)
- Thai (1,075)
- Hebrew (1,022)

Figure 1 presents the percentage of total LEP persons that each of the top five languages represent in the MBTA service area. Each of these top five language groups represent at least 5 percent of the LEP population, and together they represent approximately 73 percent of all LEP people in the MBTA service area.

Figure 1
Percentage of Total LEP Persons in the MBTA Service Area by Language for the Top Five Languages Spoken
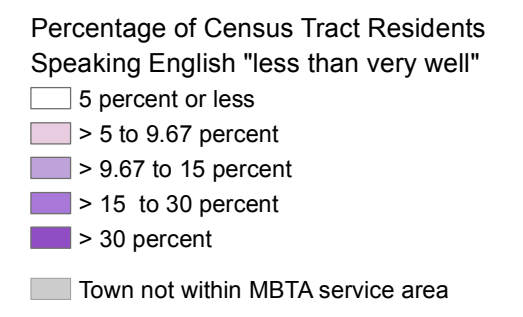

The MBTA mapped the ACS data to provide a geographic representation of where concentrations of LEP persons live and to show what languages are spoken at home in those areas. Figure 2 (a and b) present the percentage of LEP persons by census tract in the MBTA service area, regardless of the language spoken at home. One version (a) of each figure displays the percentage of LEP persons for the entire MBTA service area, and a second, more detailed, version (b), magnifies the area where the majority of MBTA transit services are located. Most of the areas with the highest LEP percentages are urban areas.

Page intentionally blank

FIGURE 2a
MBTA Title VI Report

Percentage of Population
with Limited English
Proficiency*

Percentage of Census Tract Residents
Speaking English "less than very well"

- 5 percent or less
- > 5 to 9.67 percent
- > 9.67 to 15 percent
- > 15 to 30 percent
- > 30 percent

- Town not within MBTA service area

NOTE:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

*See Figure 2b for detailed map.

Page intentionally blank

FIGURE 2b
MBTA Title VI Report

Percentage of Population
with Limited English
Proficiency:
Detailed Map

Percentage of Census Tract Residents
Speaking English "less than very well"

- 5 percent or less
- > 5 to 9.67 percent
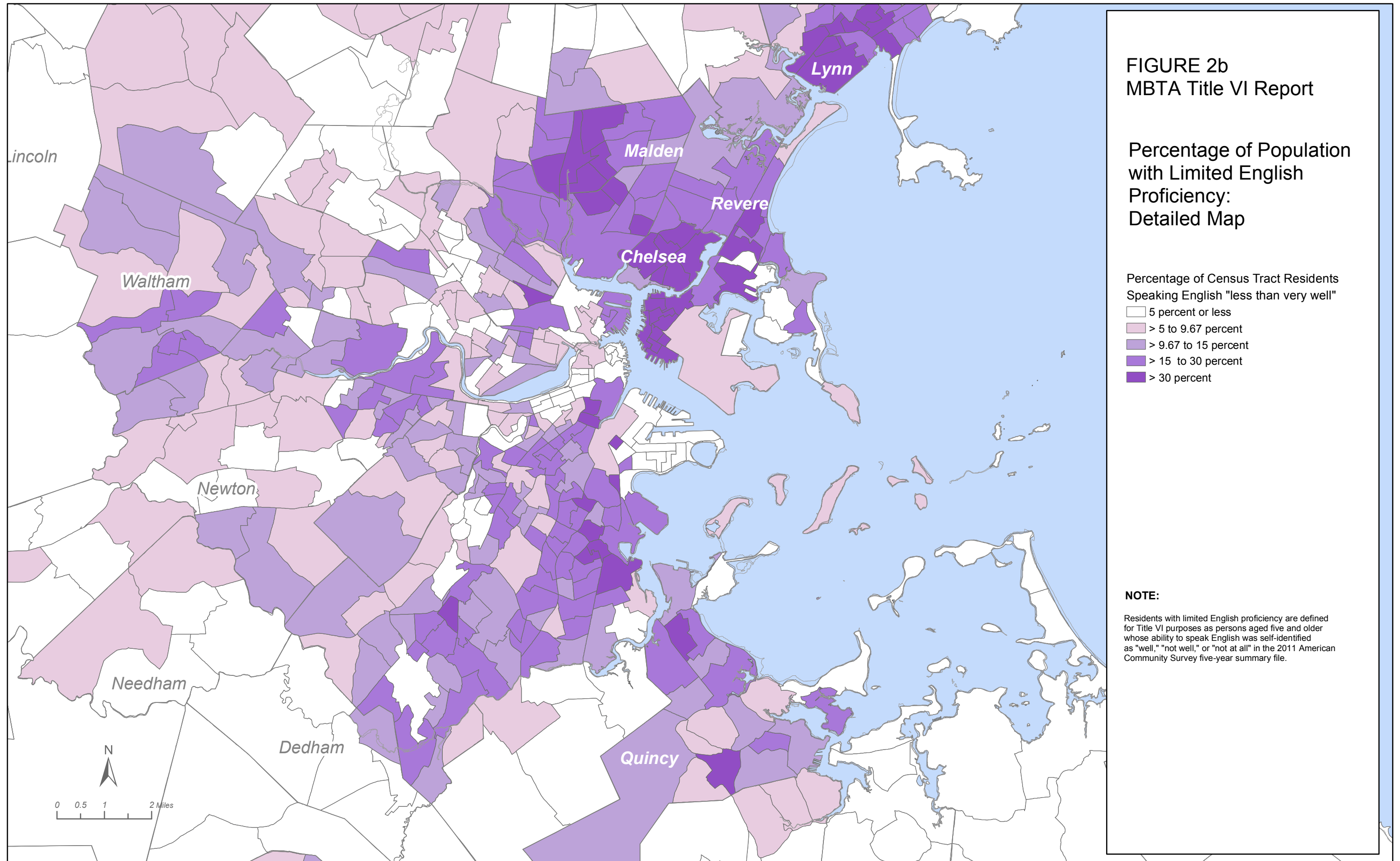- > 9.67 to 15 percent
- > 15 to 30 percent
- > 30 percent

NOTE:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Lynn

Malden

Revere

Chelsea

Waltham

Lincoln

Newton

Needham

Dedham

Quincy

N

0   0.5   1   2 Miles

MBTA TITLE VI REPORT: 2014

Page intentionally blank

Figures 3 (a and b) through 7(a and b) present the distributions of individuals for whom the primary language spoken at home is Spanish, Portuguese, French Creole, Chinese (all dialects), and Vietnamese, overlaid on the LEP percentages presented in Figure 2. Version (a) of each figure displays the data for the entire MBTA service area, and version (b) magnifies the area where the majority of MBTA transit services are located. These are the five languages, after English, that are reported as being the most frequently spoken at home and that show the highest levels of limited English proficiency in the MBTA service area. As the figures show, it is apparent that some languages are spoken primarily in and around Boston, while others are more broadly distributed. The areas with the largest proportions of each of the five languages are summarized below.

Spanish-Speaking LEP Populations

The Spanish-speaking population is the largest LEP population in the MBTA service area and Spanish is also the language spoken by the largest group of LEP people in many of the largest municipalities of the MBTA service area.

Table 1
Representation of the Spanish-Speaking Population by Municipality

LEP Representation	Municipality
Spanish-speakers constitute the largest group in the LEP population	Boston Chelsea Everett Fitchburg Haverhill Lawrence Lynn Revere Saugus Waltham Worcester
Spanish speakers are a significant proportion in the LEP population	Brockton Brookline Cambridge Framingham Lowell Malden Quincy Somerville

Page intentionally blank

FIGURE 3a
MBTA Title VI Report

Limited English Proficiency:
Spanish Speakers

● Spanish speakers who speak
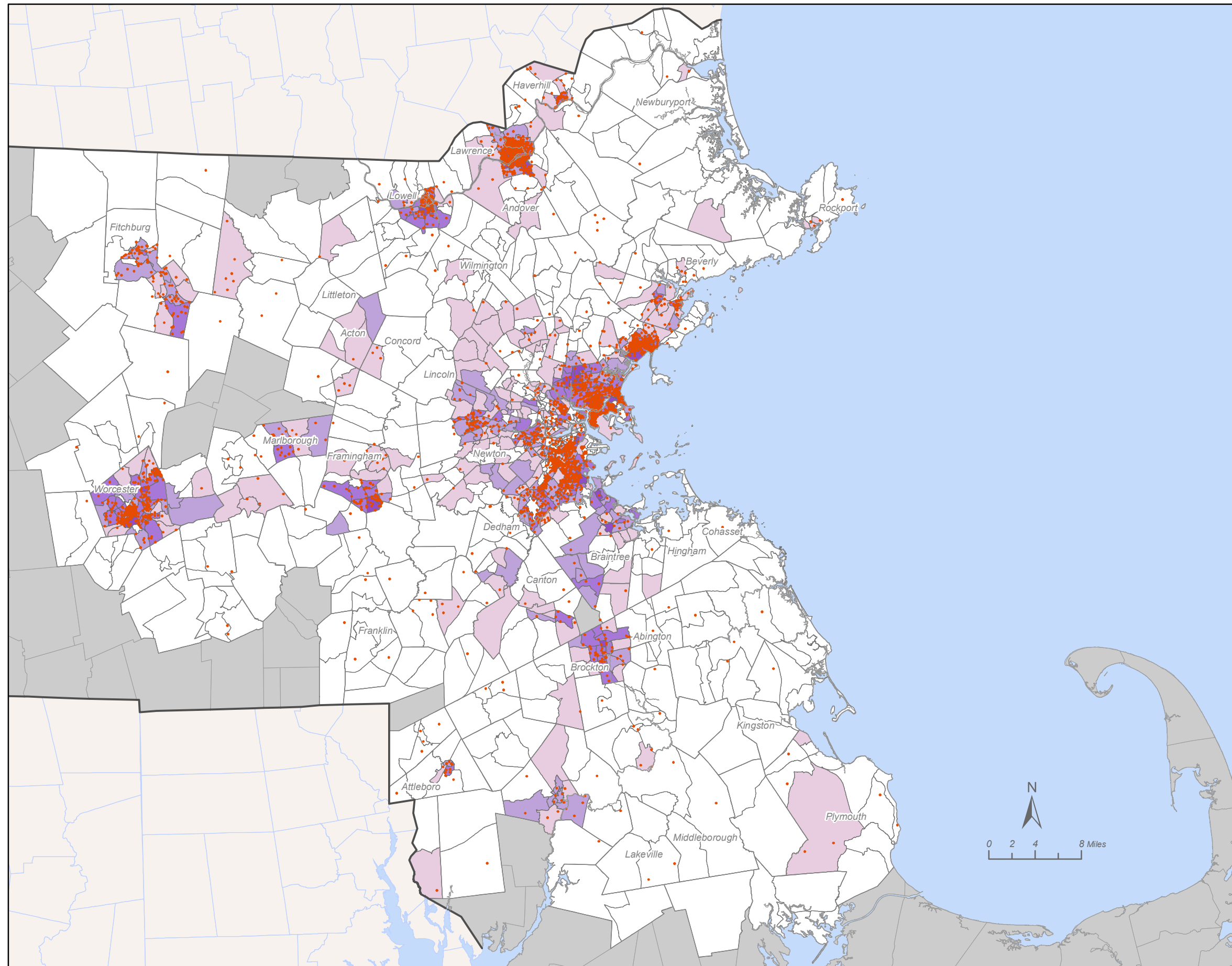English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
☐ > 15 to 30 percent
☐ > 30 percent

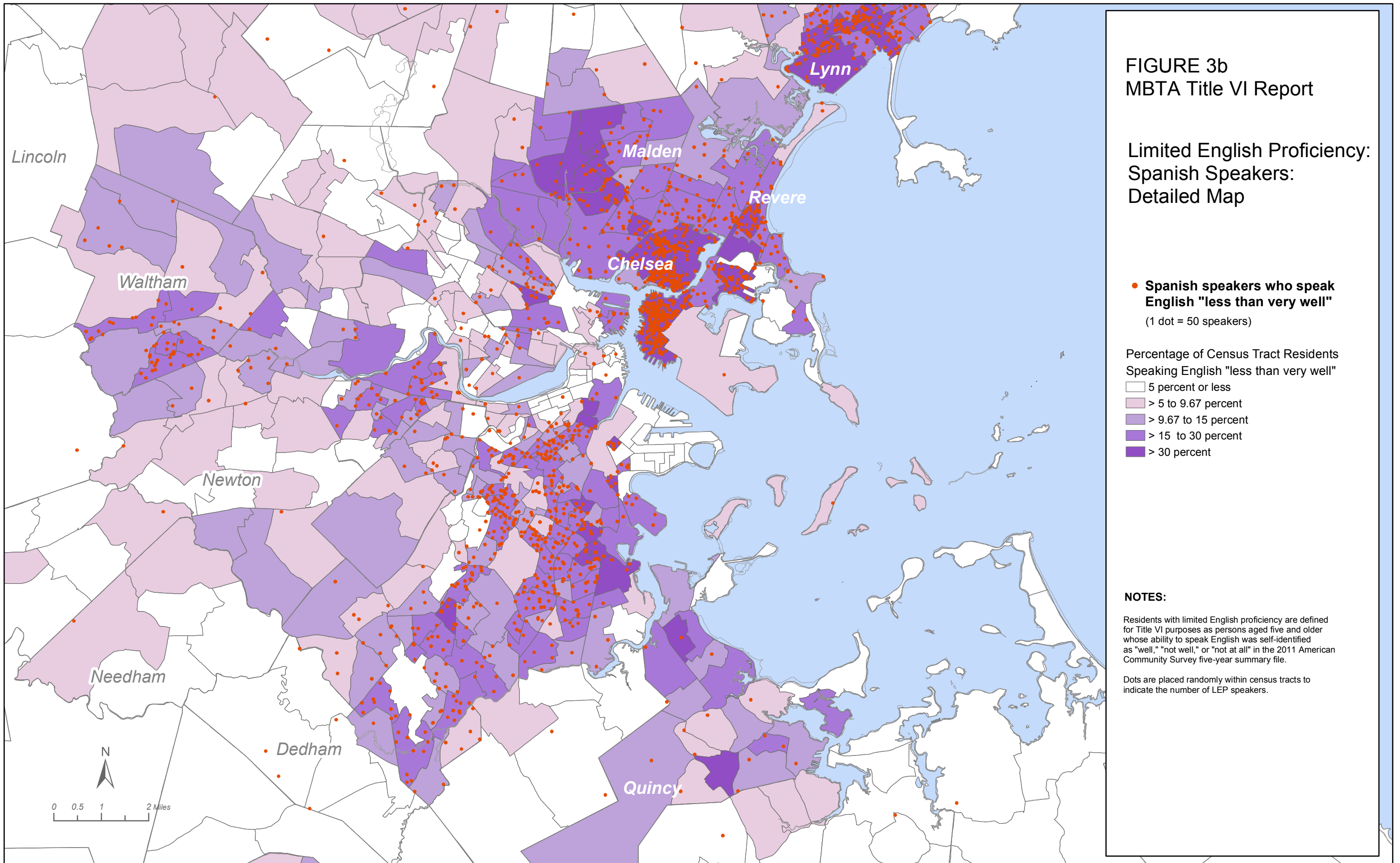☐ Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

N

0 2 4   8 Miles

Page intentionally blank

FIGURE 3b
MBTA Title VI Report

Limited English Proficiency:
Spanish Speakers:
Detailed Map

● Spanish speakers who speak
English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
☐ > 15 to 30 percent
☐ > 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

Lincoln

Lynn

Malden

Revere

Chelsea

Waltham

Newton

Needham

Dedham

Quincy

N

0   0.5   1   2 Miles

Page intentionally blank

FIGURE 4a
MBTA Title VI Report

Limited English Proficiency:
Portuguese Speakers

● Portuguese speakers who speak
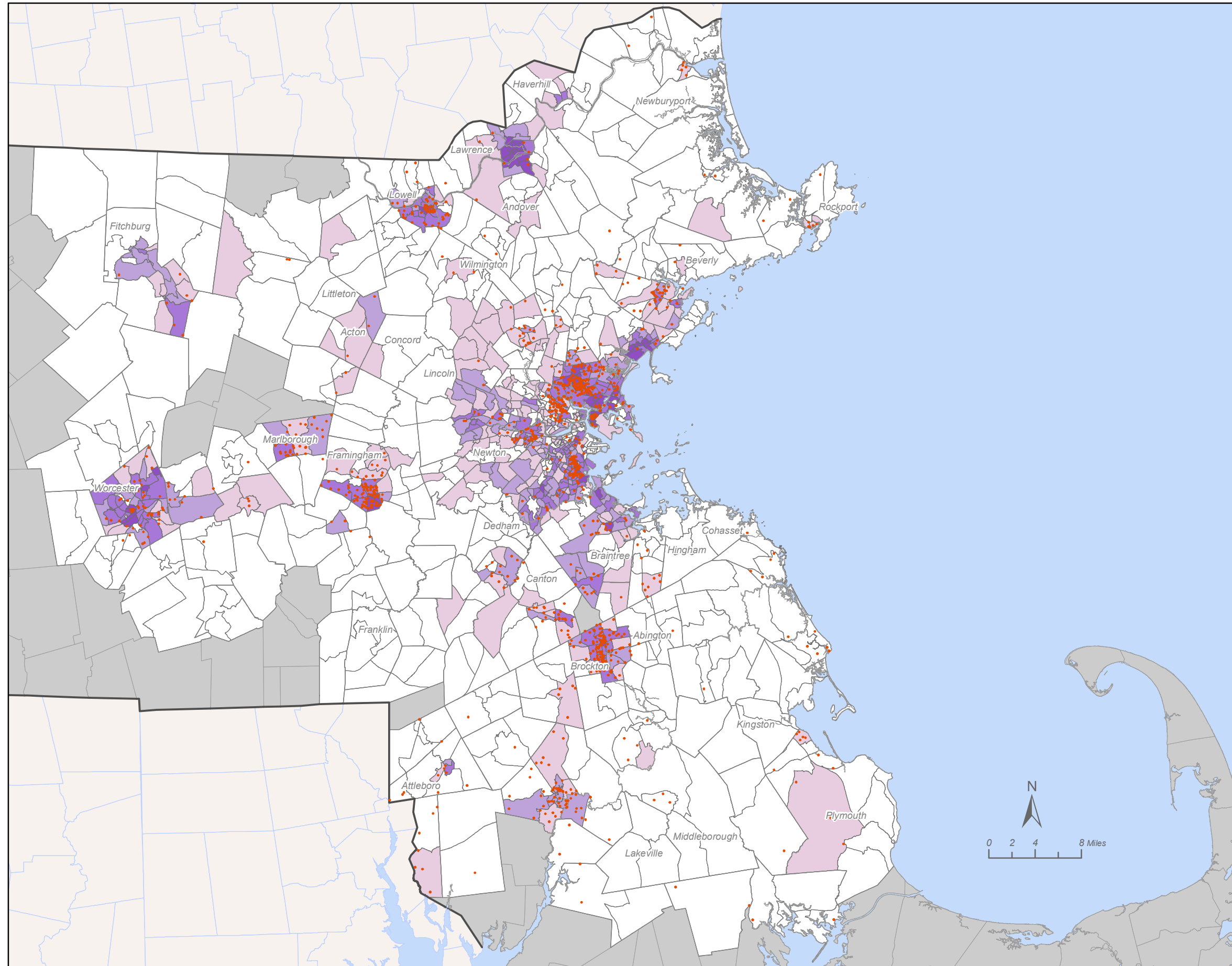English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
☐ > 15 to 30 percent
☐ > 30 percent

☐ Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

N

0 2 4   8 Miles

MBTA TITLE VI REPORT: 2014

Page intentionally blank

FIGURE 4b
MBTA Title VI Report

Limited English Proficiency:
Portuguese Speakers:
Detailed Map

● Portuguese speakers who speak
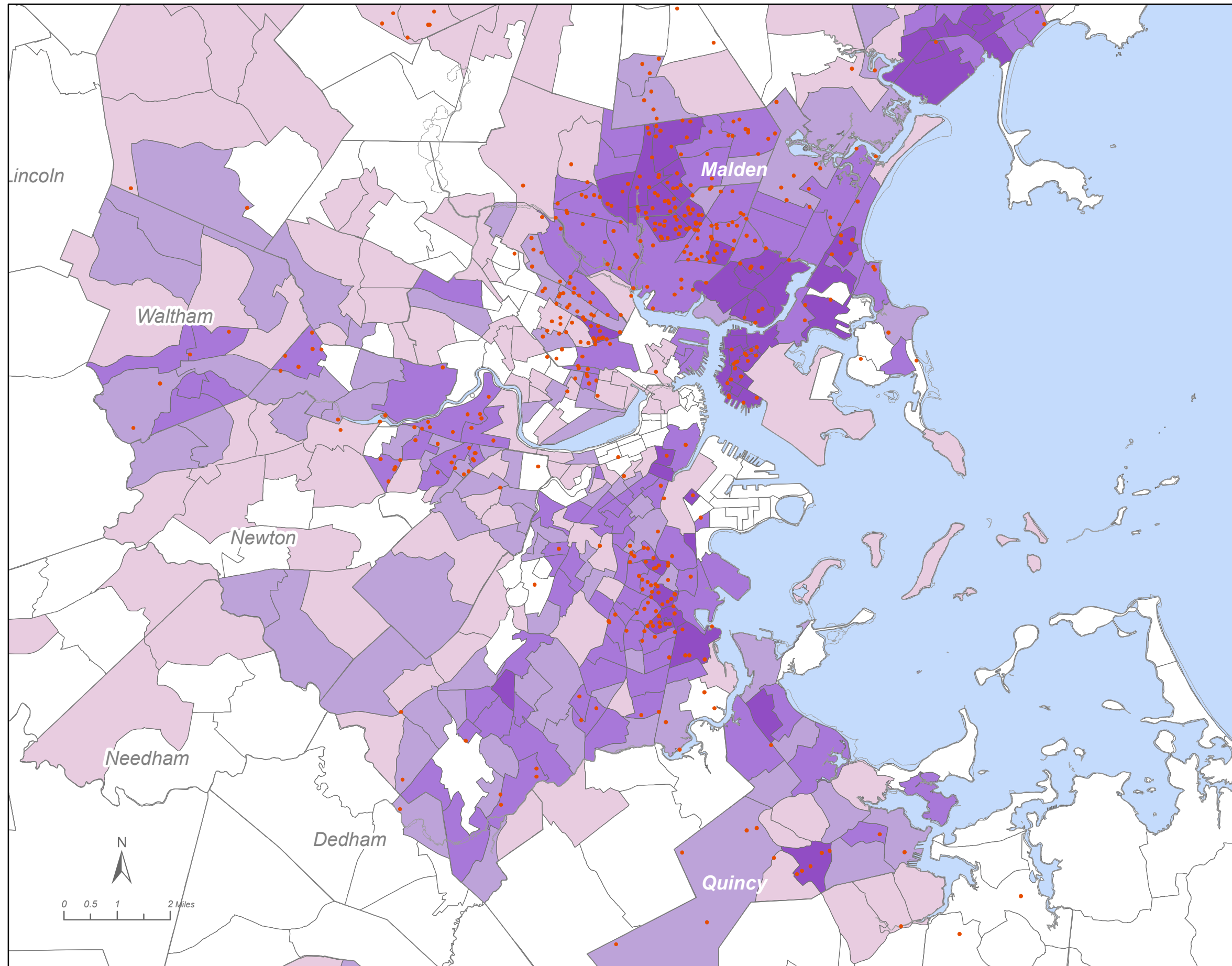English "less than very well"
(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

5 percent or less
> 5 to 9.67 percent
> 9.67 to 15 percent
> 15 to 30 percent
> 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

Lincoln

Malden

Waltham

Newton

Needham

Dedham

Quincy

N

0   0.5   1   2 Miles

Page intentionally blank

FIGURE 5a
MBTA Title VI Report

Limited English Proficiency:
French Creole Speakers

● French Creole speakers who
speak English 'less than very well'
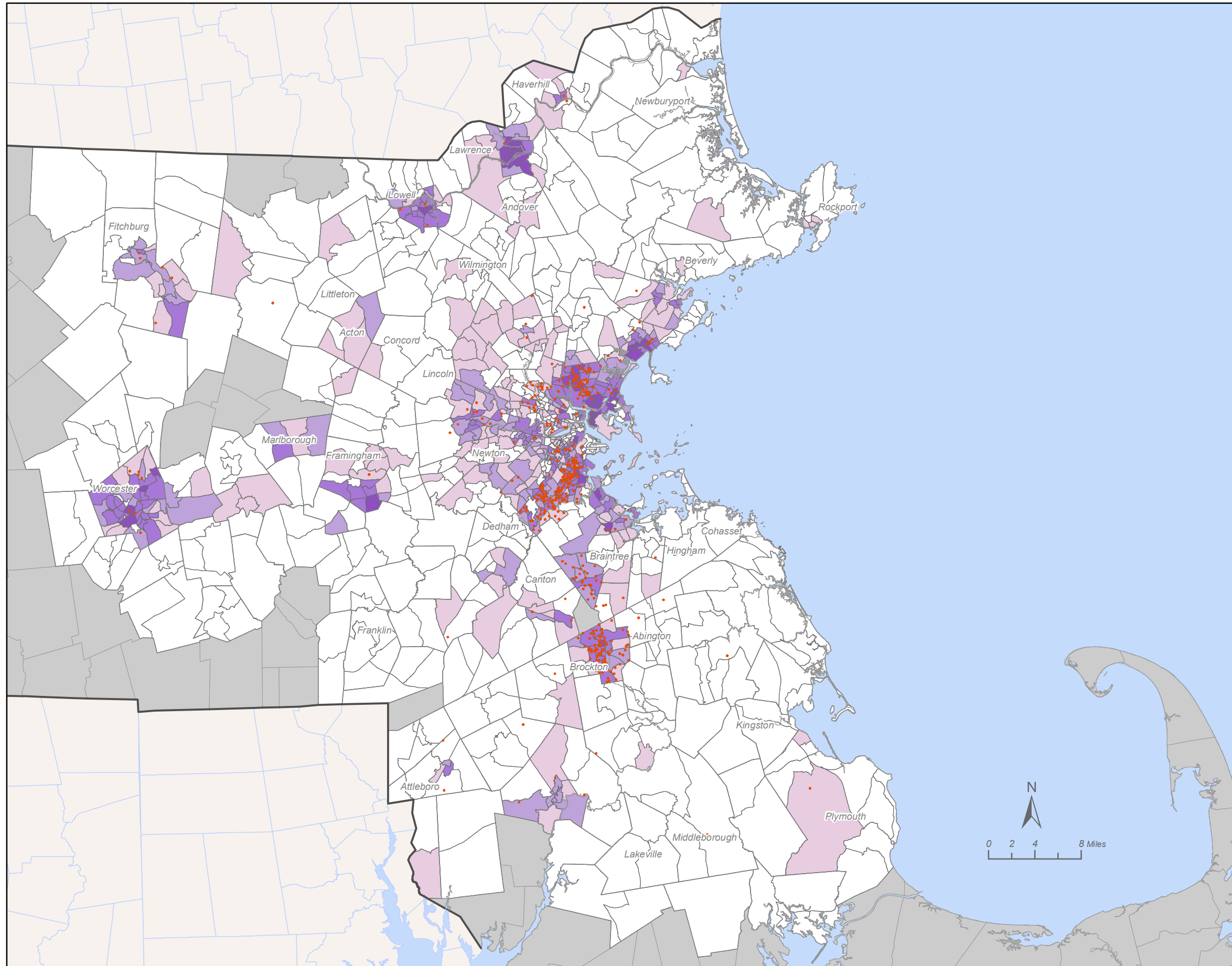(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
☐ > 15 to 30 percent
☐ > 30 percent

☐ Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

N

0 2 4   8 Miles

MBTA TITLE VI REPORT: 2014

Page intentionally blank

FIGURE 5b
MBTA Title VI Report

Limited English Proficiency:
French Creole Speakers:
Detailed Map

● French Creole speakers who speak
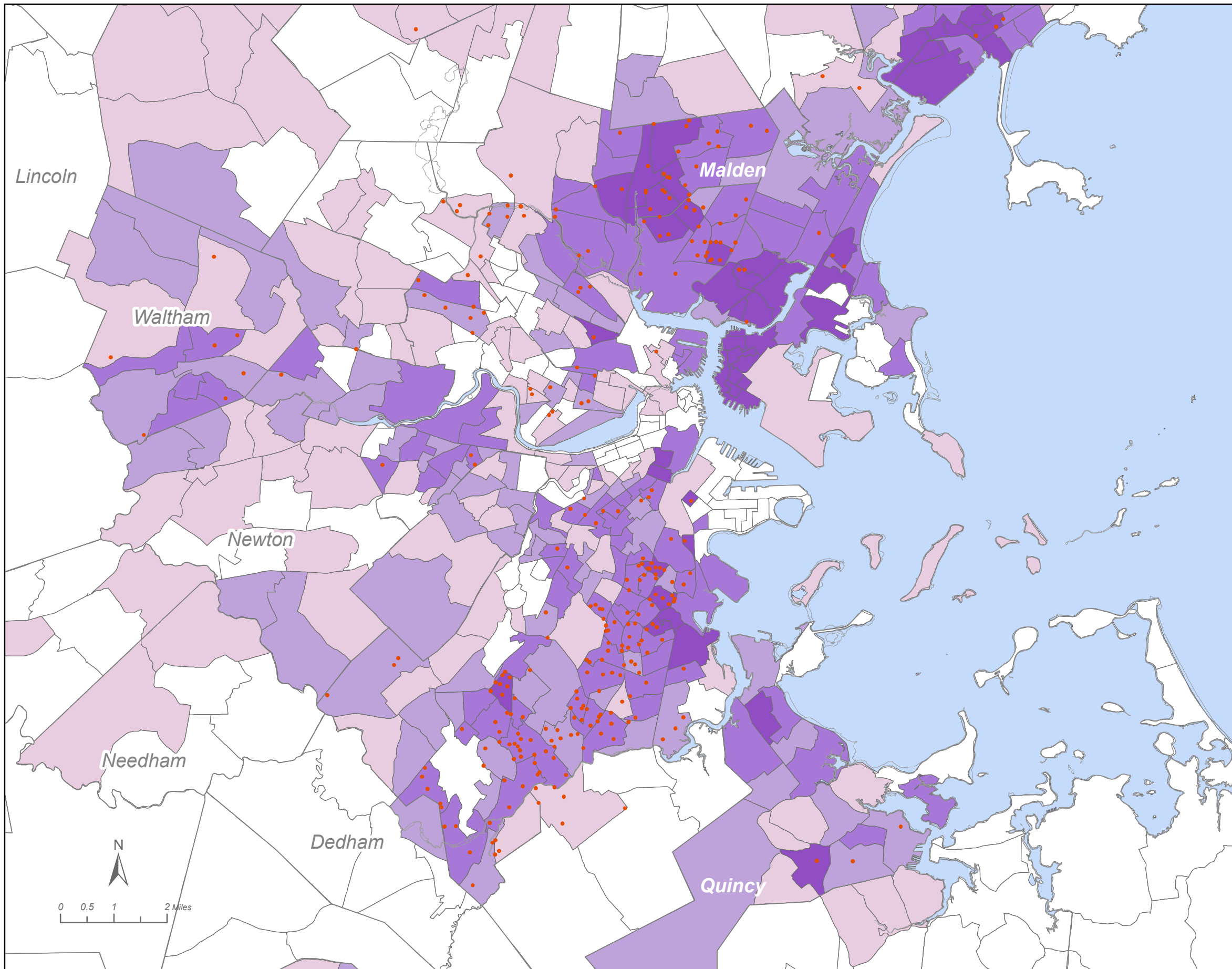English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
☐ > 15 to 30 percent
☐ > 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

Lincoln

Waltham

Malden

Newton

Needham

Dedham

Quincy

N

0   0.5   1   2 Miles

MBTA TITLE VI REPORT: 2014

Page intentionally blank

FIGURE 6a
MBTA Title VI Report

Limited English Proficiency:
Chinese Speakers

● Chinese speakers who speak
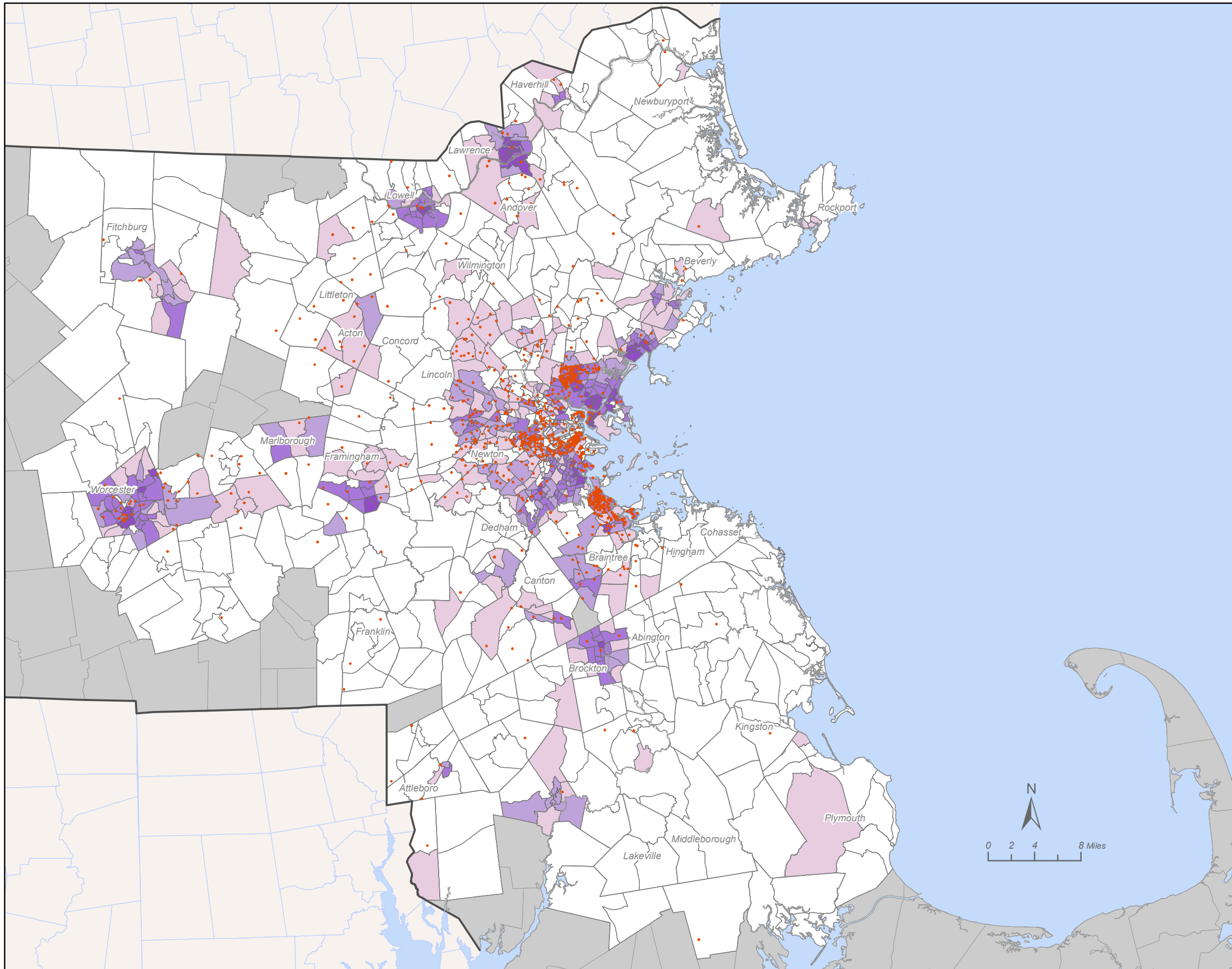English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

- 5 percent or less
- > 5 to 9.67 percent
- > 9.67 to 15 percent
- > 15 to 30 percent
- > 30 percent

- Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

N

0 2 4   8 Miles

MBTA TITLE VI REPORT: 2014

Page intentionally blank

FIGURE 6b
MBTA Title VI Report

Limited English Proficiency:
Chinese Speakers:
Detailed Map

● Chinese speakers who speak
English "less than very well"
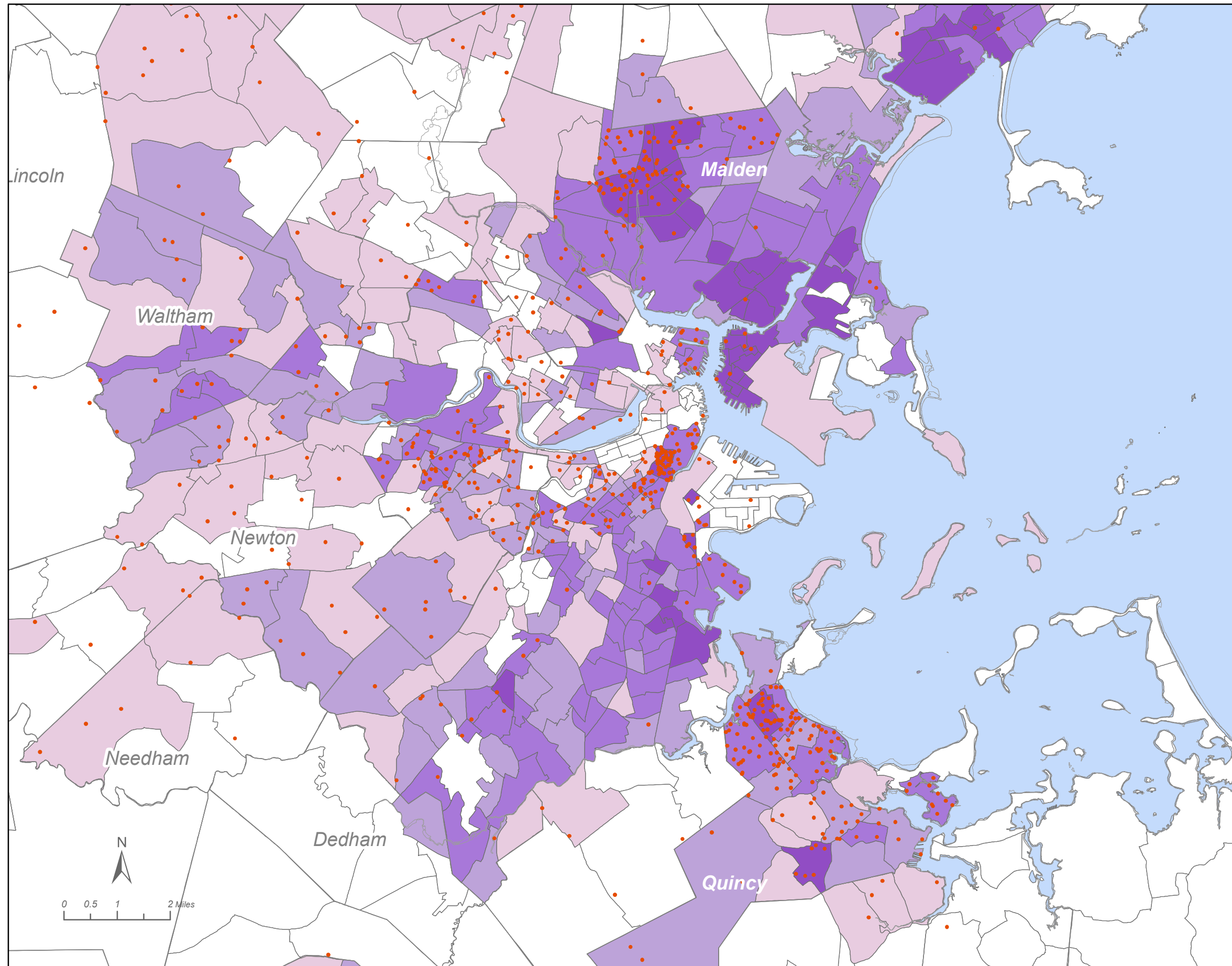
(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

- [ ] 5 percent or less
- [ ] > 5 to 9.67 percent
- [ ] > 9.67 to 15 percent
- [ ] > 15 to 30 percent
- [ ] > 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

Lincoln

Waltham

Newton

Needham

Dedham

Malden

Quincy

N

0   0.5   1   2 Miles

Page intentionally blank

FIGURE 7a
MBTA Title VI Report

Limited English Proficiency:
Vietnamese Speakers

● Vietnamese speakers who speak
English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

5 percent or less
> 5 to 9.67 percent
> 9.67 to 15 percent
> 15 to 30 percent
> 30 percent

Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

N

0 2 4   8 Miles

Page intentionally blank

FIGURE 7b
MBTA Title VI Report

Limited English Proficiency:
Vietnamese Speakers:
Detailed Map

● Vietnamese speakers who speak
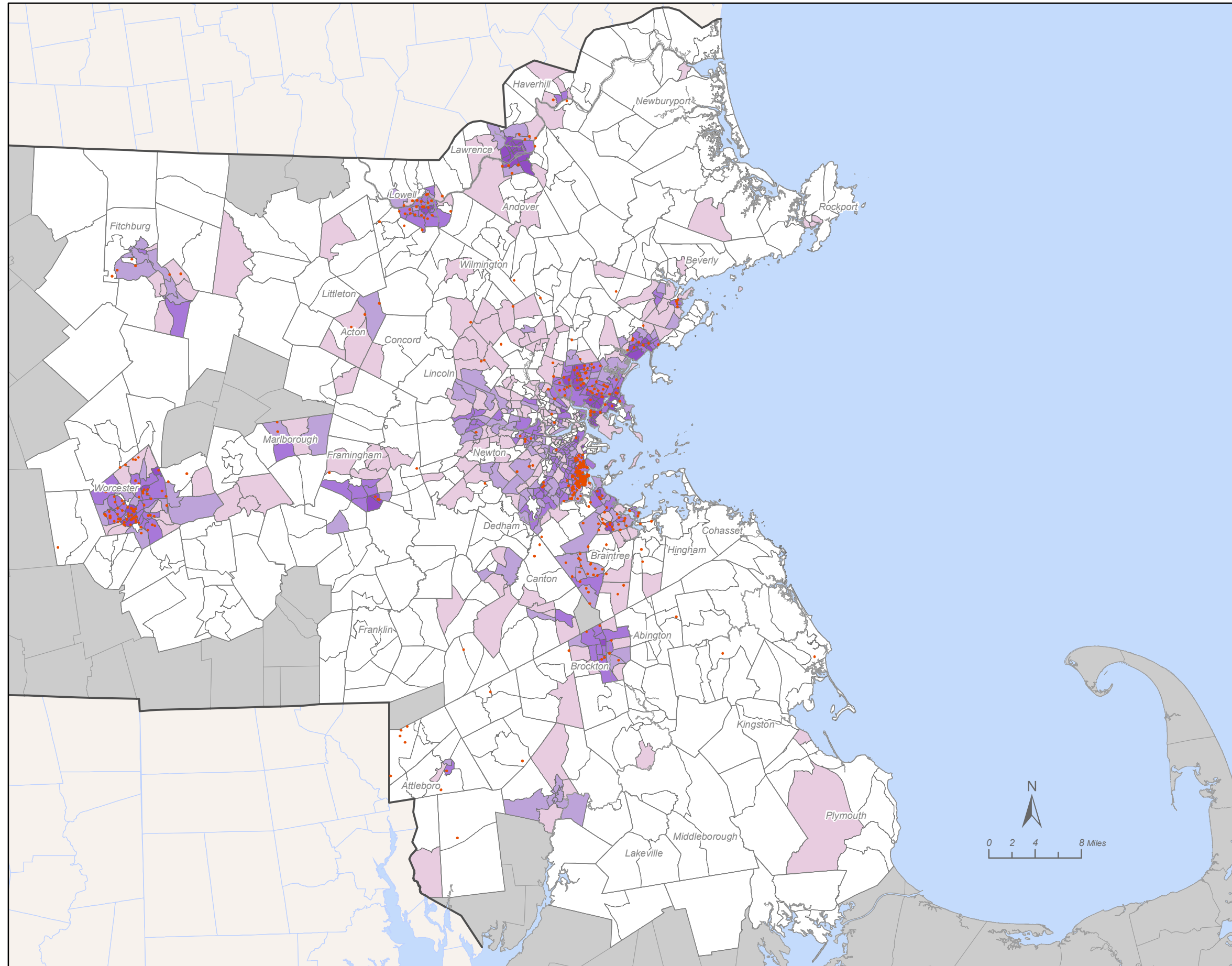English "less than very well"

(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"

☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
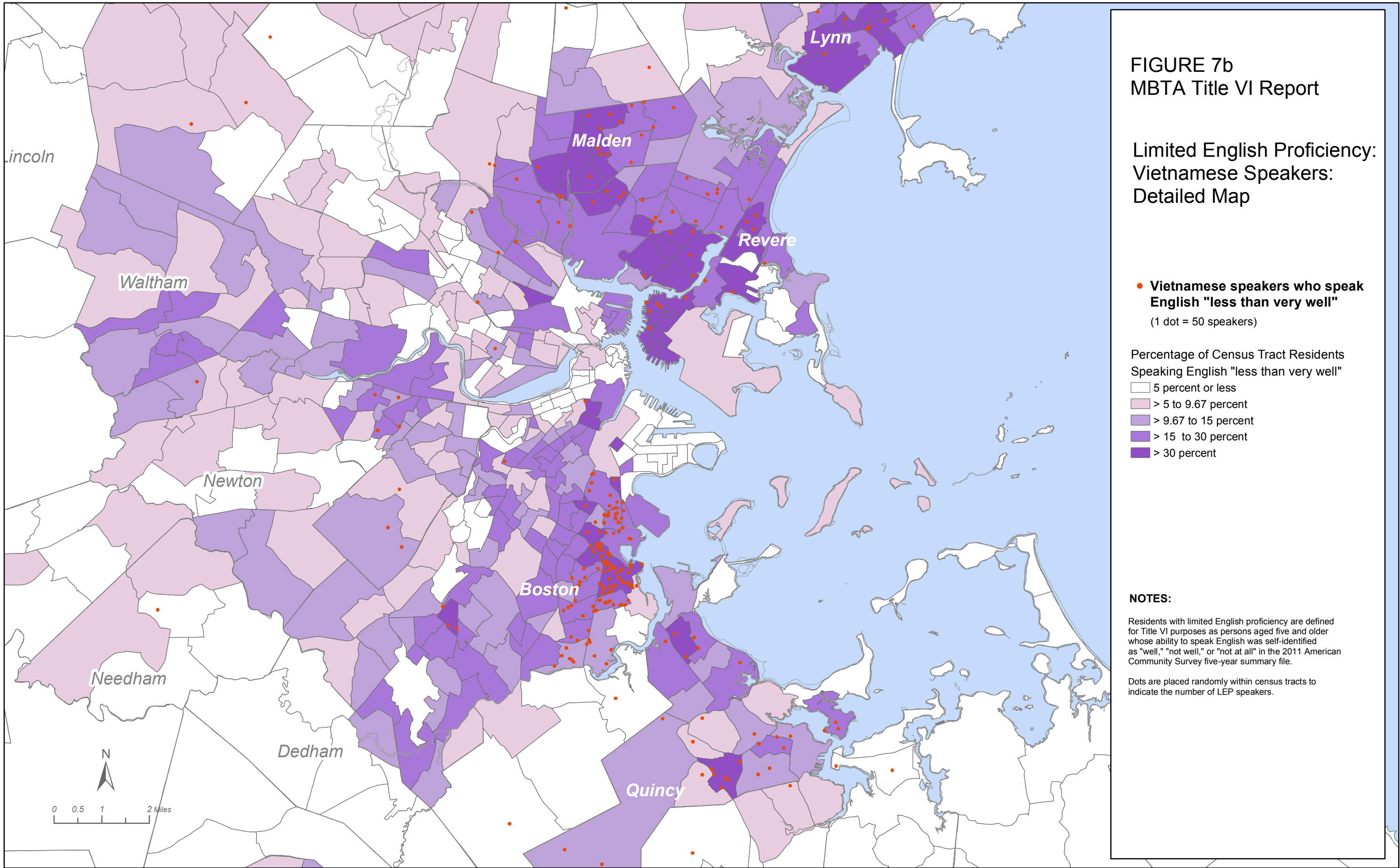☐ > 15 to 30 percent
☐ > 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

MBTA TITLE VI REPORT: 2014

Page intentionally blank

Portuguese-Speaking LEP Populations

The Portuguese- or Portuguese Creole-speaking population is the second largest in the MBTA service area. Portuguese, including Portuguese Creole, is the top language of the LEP populations of Brockton, Framingham, and Somerville, and is spoken by significant proportions of the LEP populations of other cities in the Boston metropolitan area and in the Merrimack River Valley.

Table 2
Representation of the Portuguese-Speaking Population by Municipality

LEP Representation	Municipality
Portuguese speakers constitute the largest group in the LEP population	Brockton Framingham Somerville
Portuguese speakers are a significant proportion in the LEP population	Boston Chelsea Everett Lawrence Lowell Malden Quincy Revere

French Creole–Speaking LEP Populations

French Creole is not the predominate language spoken by LEP people in any individual municipality, but it is spoken by significant proportions of LEP people in some of the municipalities within the MBTA service area.

Table 3
Representation of the French Creole–Speaking Population by Municipality

LEP Representation	Municipality
French Creole speakers constitute the largest group in the LEP population	None
French Creole speakers are a significant proportion in the LEP population	Boston Brockton Cambridge Everett Lowell Malden Somerville Waltham

Chinese-Speaking LEP Populations

Chinese is the top language of LEP people in several municipalities that are adjacent to Boston, and it is a significant proportion of the LEP languages in Boston and some of its suburbs.

Table 4
Representation of the Chinese-Speaking Population by Municipality

LEP Representation	Municipality
Chinese speakers constitute the largest group in the LEP population	Brookline Cambridge Malden Quincy
Chinese speakers are a significant proportion in the LEP population	Boston Framingham Somerville Waltham Worcester

Vietnamese-Speaking LEP Populations

Vietnamese is not one of the top LEP languages in any municipality in the MBTA service area; however, there are significant proportions of LEP people who speak Vietnamese throughout the MBTA service area.

Table 5
Representation of the Vietnamese-Speaking Population by Municipality

LEP Representation	Municipality
Vietnamese speakers constitute the largest group in the LEP population	None
Vietnamese speakers are a significant proportion in the LEP population	Boston Brockton Chelsea Everett Fitchburg Lawrence Lowell Lynn Malden Quincy Revere

Finally, Figure 8 presents the combined distribution of individuals who speak languages at home other than the top six languages statewide. The number of these individuals in each city or town is also identified by the language spoken. Mon-Khmer (Cambodian) speakers are the largest group of LEP people in Lowell and the second-largest group in Lawrence and Lynn.

Massachusetts Department of Education English Language Learner Data

The MBTA obtained Massachusetts Department of Education English Language Learner data for 2011 for the school districts within the MBTA service area as a secondary representative sample of the LEP population in the MBTA service area. Although the school population does not have a one-to-one correlation with the overall population of a municipality, data on the languages that students speak can give additional insight into language composition and proficiency and the areas where assistance is likely to be needed. English language learners account for approximately 8.1 percent of the elementary, middle, and senior high school population in the area, numbering 67,567 of the total student population of 833,654.

Page intentionally blank

Other LEP Languages:

Municipality/Language*	No. Speakers	% of Municipality Population
Boston:		
Russian	3,645	0.6%
French	2,940	0.5%
African languages	2,106	0.4%
Arabic	1,455	0.2%
Italian	1,293	0.2%
Brookline:		
Russian	1,012	1.8%
Lowell:		
Mon-Khmer, Cambodian	6,563	6.7%
Lynn:		
Mon-Khmer, Cambodian	1,709	2.0%
Newton:		
Russian	1,285	1.6%
Revere:		
Arabic	1,099	2.3%
Worcester:		
African languages	2,196	1.3%

*City or town name shown in black on map.

FIGURE 8a
MBTA Title VI Report

Limited English Proficiency: Speakers of Languages Other than Top 5

● **Speakers of other languages (not top 5) who speak English "less than very well"**
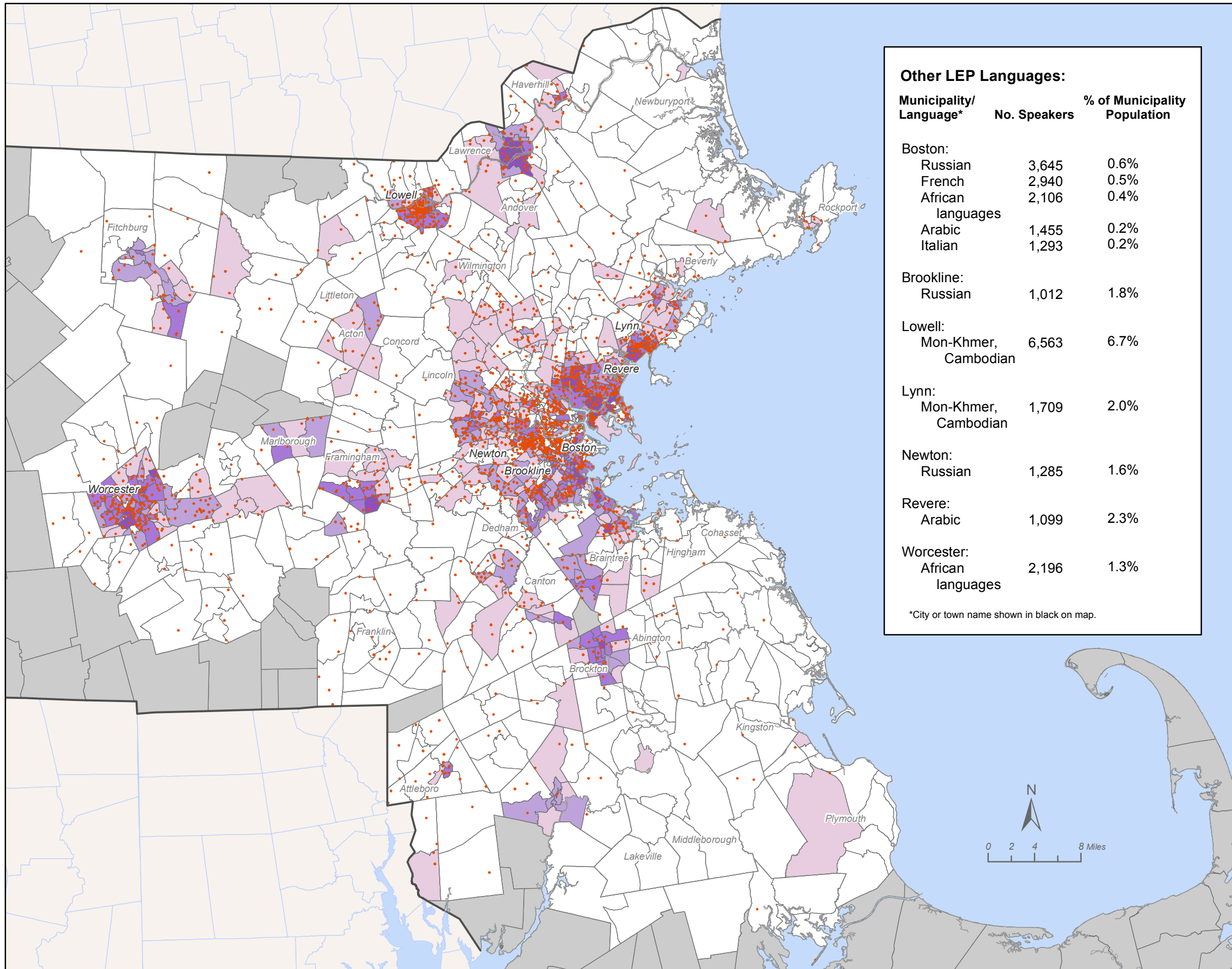(1 dot = 50 speakers)

Percentage of Census Tract Residents Speaking English "less than very well"

- ☐ 5 percent or less
- ☐ > 5 to 9.67 percent
- ☐ > 9.67 to 15 percent
- ☐ > 15 to 30 percent
- ☐ > 30 percent

- ☐ Town not within MBTA service area

NOTES:

Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as "well," "not well," or "not at all" in the 2011 American Community Survey five-year summary file.

Dots are placed randomly within census tracts to indicate the number of LEP speakers.

N

0 2 4 8 Miles

Page intentionally blank

FIGURE 8b
MBTA Title VI Report

Limited English Proficiency:
Speakers of Languages
Other than Top 5:
Detailed Map

● Speakers of other languages
(not top 5) who speak
English "less than very well"
(1 dot = 50 speakers)

Percentage of Census Tract Residents
Speaking English "less than very well"
☐ 5 percent or less
☐ > 5 to 9.67 percent
☐ > 9.67 to 15 percent
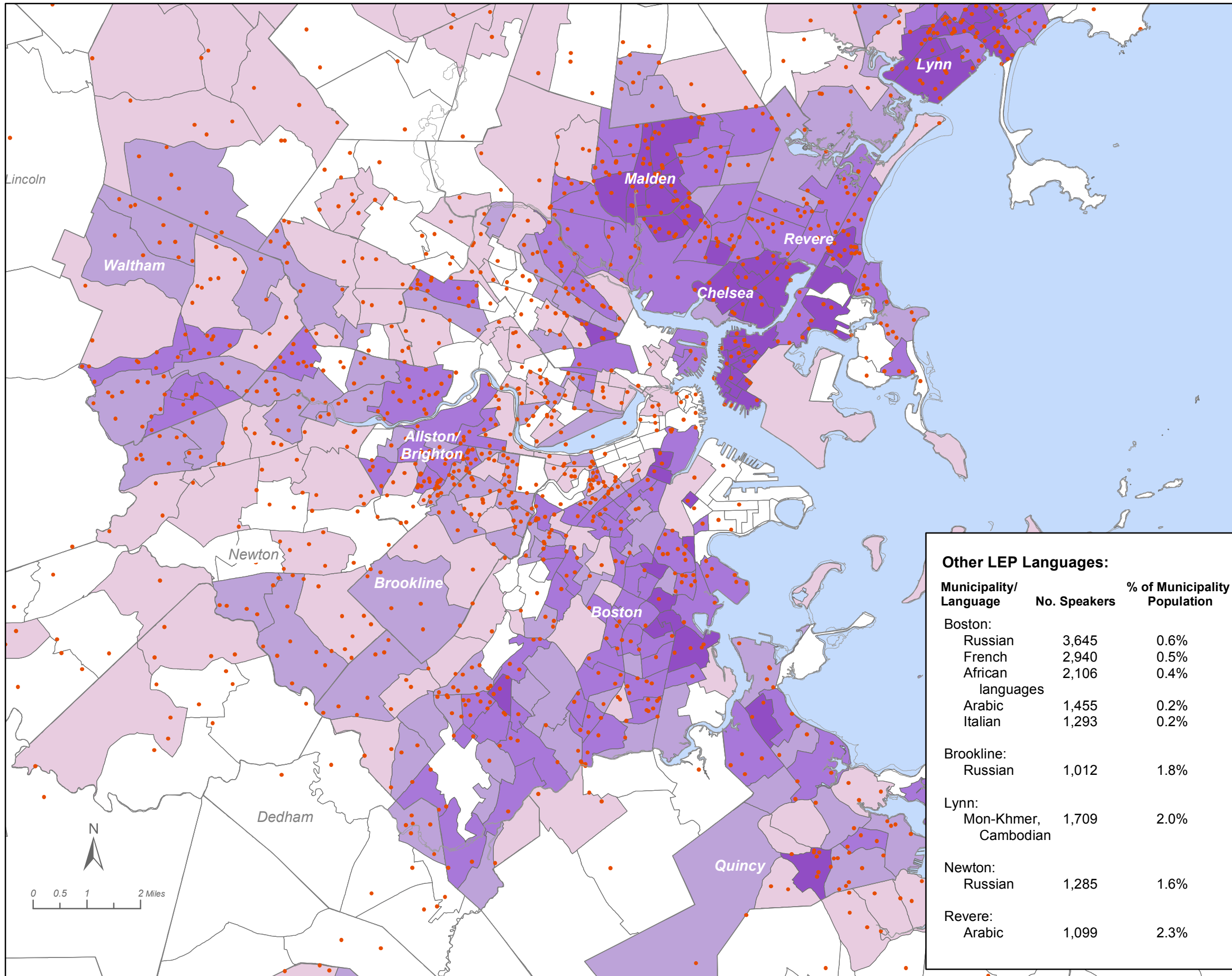☐ > 15 to 30 percent
☐ > 30 percent

NOTES:

Residents with limited English proficiency are defined
for Title VI purposes as persons aged five and older
whose ability to speak English was self-identified
as "well," "not well," or "not at all" in the 2011 American
Community Survey five-year summary file.

Dots are placed randomly within census tracts to
indicate the number of LEP speakers.

Other LEP Languages:

Municipality/ Language	No. Speakers	% of Municipality Population
Boston:		
Russian	3,645	0.6%
French	2,940	0.5%
African languages	2,106	0.4%
Arabic	1,455	0.2%
Italian	1,293	0.2%
Brookline:		
Russian	1,012	1.8%
Lynn:		
Mon-Khmer, Cambodian	1,709	2.0%
Newton:		
Russian	1,285	1.6%
Revere:		
Arabic	1,099	2.3%

Lincoln

Lynn

Malden

Revere

Waltham

Chelsea

Allston/ Brighton

Newton

Brookline

Boston

Dedham

Quincy

N

0   0.5   1   2 Miles

Page intentionally blank

The Department of Education (DOE) data disaggregate languages much more than the US Census data do. The DOE data include "Chinese," "Mandarin Chinese," "Canton Dialect," "Taiwanese," "Hakka Dialect," "Fukien," and "Shanghai Dialect," which are the spoken dialects and languages of Chinese, while the US Census includes only one category—"Chinese." Further, the US Census category "Portuguese" is disaggregated as "Portuguese" and "Cape Verdean (Portuguese Creole)" in the DOE data. For Chinese and Portuguese, the MBTA has aggregated the language variants for purposes of comparing results to the ACS-based analysis. It should be noted, however, that the information about the different mix of languages and dialects that comprise the Portuguese and Chinese categories in the DOE data is very important with respect to targeting language assistance.

The Massachusetts DOE English Language Learner (ELL) data confirm the results of the analysis of the US Census ACS 2011 five-year summary data. The top English language learner language category is Spanish, with 35,261 students in the service area. This language group also represents 52.19 percent of all English language learners in the MBTA service area. The top five languages in the DOE's ELL data are the same as the top five languages in the ACS-based analysis. Further, these top five languages have concentrations in the MBTA service area that are comparable to concentrations in the ACS 2011 data.

The DOE English language learner statistics for the MBTA's service area are:

- Spanish (35,261)
- Portuguese/Creole (7,146)
- Chinese (3,462)
- Haitian Creole (French Creole) (3,395)
- Vietnamese (2,705)
- Khmer (Cambodian) (2,347)
- Arabic (1,414)
- Russian (878)
- Somali (616)
- Albanian (532)
- Korean (527)
- French (496)
- Japanese (328)
- Urdu (305)
- Gujarati (297)
- Nepali (291)
- Twi (290)
- Swahili (283)

- Hindi (230)
- Polish (225)

Qualitative Analysis Techniques

In addition to performing the quantitative analyses discussed above, the MBTA continues to refine its understanding of the locations of LEP populations through qualitative analyses. The MBTA works with community-based organizations (CBOs), as well as state legislators and other government entities or interested parties, to identify LEP populations that may need translation services for specific programs or activities. The MBTA conducts outreach to CBOs that work with LEP populations, such as neighborhood community service centers, community development corporations, and ethnic and cultural organizations. These organizations provide information that is not included in the census or state and local resources, such as the existence of pockets of the LEP populations relative to specific projects or public participation efforts, population trends, and what services are most frequently sought by the LEP population. Many of these organizations have resources that include language assistance, neighborhood knowledge, and expertise useful in communications with residents and customers. The MBTA's experience in this area shows that the greatest need for language assistance is in Spanish, but that there is also a need for assistance in a diverse range of primary languages, including Chinese, Haitian Creole, Portuguese, and Vietnamese.

Conclusions for Factor 1

The MBTA has used quantitative, qualitative, and spatial analyses to estimate the total number and proportion of limited-English-proficient (LEP) people in its service area and to identify areas that have high concentrations of LEP people. While the MBTA has identified 24 "safe harbor" languages using US Census data, the top five languages— Spanish, Portuguese and Portuguese Creole, Chinese, French Creole, and Vietnamese—represent more than 72 percent of the total LEP population. The Massachusetts DOE's ELL data confirms that these top five languages represent the most commonly spoken languages of the limited-English-proficiency population in the MBTA service area.

Factor 2: The Frequency of Contact

The FTA requires that the MBTA analyze the frequency of contact that the agency has with people with limited English proficiency. The MBTA used the following data and analysis methods to evaluate the frequency with which LEP individuals come into contact with the MBTA:

- Evaluation of Customer Communications Call Center metrics
- Evaluation of website browser primary language requests
- Analysis of paratransit records

Customer Communications Call Center

The Customer Communications Call Center houses a bilingual staff; each person is bilingual in English and at least one of several languages, including Spanish, Haitian French Creole, Cape Verdean Creole, and both Cantonese and Mandarin Chinese. The call center provides telephone translation service in all of those languages, and also functions as an in-house document translation center.

In calendar year 2013, the Customer Communications Call Center noted that there were 7,829 direct customer calls in Spanish. For a major planned service interruption, telephone services were requested and provided in Mandarin Chinese and in Cantonese Chinese. During the same major planned service interruption, a written translation was requested and provided in Spanish. While the Customer Communications Call Center had received requests for Haitian French Creole translation in previous years, there were no requests in 2013.

Website Analytics Based on Preferred Language and Locale Settings

The MBTA is able to distinguish between categories of visitors to its website by the language that the Web browser requests as its primary language. Data from the MBTA website analytics for calendar year 2013 indicate that the overwhelming majority of visits (98.3 percent) to the MBTA's website are on browsers that request English as the primary language. The next two most commonly requested languages are Spanish and Chinese, with approximately 0.4 percent of annual site visitors each, followed by German, French, Korean, Japanese, and Portuguese. This ranking reveals a different preference of LEP persons using this particular form of communication than is expected from the population data from the ACS and from the Massachusetts DOE's ELL data sets. One potential reason is that the website data will reveal preferences of people who live outside of the MBTA's service area, including visitors to the region who are interested in using public transit as part of their transportation. This may be the case for German and French having higher percentages in this particular data set than in the previous data sets.

Table 6
Number and Percentage of Visits
by the Browser Setting for Preferred Language
during Visits to the MBTA Website

Language	Number of Visits	Percentage of Visits
English	29,168,604	98.3%
Spanish	133,506	0.4%
Chinese	115,623	0.4%
German	49,483	0.2%
French	45,624	0.2%
Korean	41,767	0.1%
Japanese	33,866	0.1%
Portuguese	29,641	0.1%
Russian	16,719	0.1%
Italian	11,452	0.0%
Arabic	9,002	0.0%
Dutch	7,533	0.0%
Turkish	4,287	0.0%
Swedish	4,164	0.0%
Danish	2,634	0.0%
Afrikaans	1,470	0.0%
Polish	1,409	0.0%
Catalan	1,347	0.0%
Albanian	1,041	0.0%
Greek	980	0.0%
Finnish	980	0.0%
Total Visits	**29,681,132**	**100.0%**

MBTA Employee Survey

In 2011–2012, the MBTA conducted a survey of its bus operators and customer service agents (CSAs), who are often the first contact with the MBTA for people with limited English proficiency, to understand how frequently they engage with LEP people. This survey focused on the:

- Frequency that frontline staff encountered LEP customers
- Ways in which staff communicated with LEP passengers
- Suggestions that staff had to better serve LEP people

Findings

The MBTA received 131 valid survey responses. Of the respondents, 98 percent of bus operators and CSAs reported having at least one encounter with an LEP customer, and 81 percent of the respondents reported encountering LEP customers often. A significant number of frontline staff reported the ability to communicate in Spanish and assist Spanish-speaking LEP passengers directly.

To communicate with LEP passengers when there is a language barrier, bus operators and CSAs used gestures or informal sign language, pointed at maps, or asked other passengers for assistance with interpreting. When communication is difficult, LEP passengers are sometimes waved through and therefore given a free trip. At other times, how to take advantage of the discounted CharlieCard fare is not explained, and LEP passengers end up paying the higher CharlieTicket fare.

Bus operators and CSAs said that they would be helped by practical foreign language materials for use in the field, such as cards that contain basic information and/or useful phrases in different languages. Such cards would be particularly useful for describing the fare structure, the difference between CharlieCards and CharlieTickets, and how to use the fare vending machines, fare gates, validators, and bus fareboxes. Training was also mentioned as a way to provide assistance to staff in learning a second language and a common approach on how to communicate with LEP customers. Finally, certain bus routes and stations were identified as being locations where better signage could assist LEP customers.

Paratransit (THE RIDE) Records

According to the MBTA's paratransit contractors, less than 1 percent of all paratransit riders need translation assistance.

Conclusions for Factor 2

Though LEP people represent a small percentage of all riders on the MBTA system, significant numbers of Spanish-speaking LEP customers request translation services through MBTA customer information channels, including the website and customer communications call center. Many frontline staff members indicated that they used their personally developed abilities in Spanish to communicate directly with Spanish-speaking passengers without further aid. Furthermore, frontline staff members who interact with customers on a daily basis have indicated areas where the MBTA can do better in directly serving the LEP population, including staff training, signage, and opportunities to collaborate in the development of language materials used in the field.

Factor 3: The importance to LEP persons of the program, activity, or service provided by the MBTA

The MBTA performed a quantitative analysis using the results of interviews performed by Boston Region MPO staff, surveys of bus operators and CSAs, and responses from the MBTA's Rider Oversight Committee (ROC) to identify issues that LEP customers encountered while riding on the MBTA. This analysis showed the services that were deemed the most critical to LEP persons: fares and tickets, routes and schedules, and safety and security. These areas were chosen because language barriers in these areas could limit a person's ability to fully benefit from MBTA services or, in some cases, they could place a person in physical danger.

The quantitative analysis indicated that:

- MBTA programs and services are very important to LEP people, many of whom are transit dependent. A cross-tabulation of the data for zero-vehicle households and the ability to speak English using the 2008–2012 five-year public-use microdata sample (PUMS) shows that 20 percent of the people who speak English "less than very well" live in zero-vehicle households. Further, this percentage increases to 27 percent when the data are limited to people who speak English "less than well.

- LEP customers experience frustrations similar to those of other MBTA riders, but are at risk of experiencing specific difficulties if they are unable to find assistance from MBTA staff (the survey results from Factor 2 show that MBTA staff do not often have difficulty assisting LEP customers). LEP customers in particular are susceptible to having problems when something unusual happens or when a service is changed to respond to an incident, and only an operator's audio announcement is made. Examples of this are when a bus or train switches to express service or drop-off only, or when a bus replacement service is deployed. LEP customers could potentially become endangered or lost if they are unable to understand emergency announcements.

- Finally, LEP customers often rely on traveling companions, such as family members or friends, to use the MBTA.

Conclusions for Factor 3

From the results of the quantitative analysis, it is apparent that the MBTA has an important role to play in the lives of people with limited proficiency in English, many of whom are transit dependent. Further, staff members familiar with riders with limited English proficiency have noted that riders who have difficulty communicating in English particularly struggle with respect to receiving correct information on fares and tickets, routes and schedules, and safety and security.

Factor 4: The Resources Available to the MBTA and Costs of Providing a Program, Activity, or Service

The fourth and final factor looks at associated costs and resources available to the MBTA to provide language assistance services considering the language needs identified in Factor 3 in the context of the MBTA's available and projected resources.

The MBTA in-house resources available to departments in meeting the needs of LEP customers include:

- Machine-translated content for the MBTA's website via Google Translate with Spanish, Chinese, Portuguese, Italian, and French highlighted on the MBTA' home page. Google's machine-based translation is also able to provide translations for all of the "safe harbor" languages in the MBTA's service area.

- Trained bilingual staff in the Customer Communications and Marketing Department fluent in Spanish, Haitian French Creole, Cape Verdean Creole, and both Cantonese Chinese and Mandarin Chinese.

- On-demand translation and interpretation service contracts for interpretation at meetings, and interpretation and translation of written materials.

- MBTA and MassDOT employee training programs for new hires and existing employees, which includes modules on Title VI Responsibilities, LEP Policies and Procedures, and Anti-discrimination and Harassment Prevention.

- Established communications and interactions with a number of community organizations in service activities, community relations, and planning efforts. Many of these community organizations directly serve LEP households and have working knowledge of neighborhood conditions and specific needs. They can be important resources in communicating with LEP individuals and engaging minority and low-income groups in MBTA policy-making and planning initiatives.

Conclusions for Factor 4

The MBTA maintains in-house resources for providing language services to the LEP community. It also has on-demand access to resources for interpretation at meetings and for translation of written materials. Both of these factors, combined with interactions and relationships that the MBTA has with community-based organizations that serve LEP communities, allow the MBTA to serve the LEP community with appropriate language services.

Concluding Remarks

The MBTA is committed to providing meaningful access to LEP persons. Given the results of the four-factor analysis, the MBTA will continue to place a premium on providing language access via oral and electronic (website) channels. The MBTA will focus on enhanced language access for speakers of Spanish, who are the majority of LEP persons with whom the MBTA comes into contact. The MBTA will continue its efforts in enhancing its language services to the speakers of Portuguese, Chinese (Mandarin and Cantonese), Haitian French Creole, and Vietnamese, who account for significant concentrations of LEP persons in the MBTA service area. The MBTA will provide language assistance upon request for all languages meeting the "safe harbor" threshold.

The remainder of this document describes:

- Methods and measures the MBTA uses to communicate with customers with limited proficiency in English
- Training programs for educating staff about the Authority's Title VI obligations, including providing accessible service to customers who are not proficient in English
- Methods the Authority uses to provide notice to the public of the Authority's Title VI obligations, including providing language assistance to customers who are not proficient in English
- MBTA's plans for monitoring and updating the Language Assistance Plan

II. Language Assistance Measures

Language assistance services available at the MBTA to minimize barriers for transit service access to customers with limited proficiency in English include the following oral and written assistance:

- The MBTA Customer Communications Call Center is the Authority's centralized customer information/feedback response service. The center is currently staffed by 23 employees, of whom 13 are bilingual. The Center receives, on average, approximately 900 Spanish-speaking callers per month. Language capabilities at the Center, in addition to English and Spanish, are Haitian French Creole, Cape Verdean Creole, and Cantonese and Mandarin Chinese. In addition to providing telephone interpreter services, the Center's staff is available to provide translation or flyers and notices for MBTA departments. Departments can request translation assistance at 617-222-3200.

- Subway station announcements provide service and safety information in Spanish orally and visually via LED signs at stations.

- Safety and security information, including wayfinding, is provided at stations using universal symbols.

- Automated fare kiosks provide fare media and information in Spanish and Chinese, in addition to English.

- The MBTA website utilizes Google Translate to provide trip-planning, schedules, and information on how to use the MBTA's system in multiple languages. Spanish, Chinese, Portuguese, Italian, and French are highlighted on the MBTA's home page. Google's machine-based translation is also able to provide translations for all of the "safe harbor" languages in the MBTA's service area.

- Major-service-change and fare-change information is distributed in multiple languages, including Spanish, Portuguese, Chinese, Haitian Creole, Cape Verdean Creole, and Vietnamese.

- The MBTA Transit Police, in fulfilling a policy of quick and courteous response to all persons on a 24-hour basis, has contracted with on-call vendor Language Line Services to provide interpreter services. All officers, including Transit Police dispatchers, have 24-hour access to the service, which provides immediate translation service in more than 170 languages.

- In addition, the MBTA Transit Police have a number of police officers able to communicate in multiple languages. At present, 16 officers on staff are able to speak Spanish. Other language capabilities within the department are Italian, French, Haitian Creole, Vietnamese, Portuguese, Chinese (Cantonese and Toisanese), and American Sign Language.

- Brochures and notices of Title VI rights and complaints procedures are translated in multiple languages.

- MassDOT instituted an employee development/education program of MassDOT University, in which MBTA personnel are invited to participate. A pilot language education training was offered, beginning in the fall of 2011, using Rosetta Stone software and laptop computers. The program was oversubscribed, with participants selected by lottery. It is expected that the language training program will continue, given the level of interest. The program offers language training modules for Spanish, Portuguese, and Chinese/Mandarin.

- Service diversion notices are posted in Spanish and other languages, as appropriate.

- Interpretation and translated materials are offered at community public meetings, as appropriate.

- MBTA departments may obtain work orders with private vendors that provide translation services. A list of translation firms and their rates has been compiled by the MassDOT Community Affairs Office and is attached. MBTA staff are advised to make arrangements for translator services at least five business days prior to an event.

- The MBTA, through the MassDOT Community Affairs Office, provides outreach, including notice and press information using local media. Among the prominent media publications serving minority and non-English-speaking communities are *El Mundo*, *El Planeta*, *Mattapan Reporter*, *Haitian Reporter*, *Sampan*, and *The Banner*.

- The Office of Diversity and Civil Rights (ODCR) provides technical assistance and guidance for all departments on Title VI issues, including language assistance in serving LEP customers. Information and general assistance is available through ODCR at 617-222-3305.

Vital Materials for Translation

Vital materials are defined as information or documents that are critical for accessing MBTA services, programs, and activities, and they are prioritized for translation and distribution. The MBTA has identified the following vital documents and materials:

- Communications affecting health and safety

- Security announcements and signage

- Emergency related public announcements

- Materials regarding Title VI rights and complaint procedures

- Basic critical customer information on how to use and access the MBTA system such as ticket/pass purchase instruction

- Information and notices affecting a rider's ability to access and use the system safely and effectively (for example, major station changes, renovations, and permanent major changes in fares, service, or service routes)

Other Materials

Other materials considered non-vital may be translated by MBTA departments if the four-factor analysis indicates the appropriateness of such action. Examples of non-vital materials are:

- Planning studies and reports

- Budget reports including capital investment program
- General advertisements
- General announcements
- Publications of Authority policies and procedures

III. Training Programs for MBTA Personnel

The following section provides a summary outline of the human resource training programs that the MBTA has in place. All include a reference to the Authority's Title VI obligations, including providing access to service for customers with limited proficiency in English. Each Title VI element of the training extended to employees is facilitated with the overall goal of informing, supporting, and providing the necessary information, tools, and guidance in understanding and appreciating the Title VI requirements.

New-Hire Orientation

The MBTA's Human Resources Department provides orientation training for all new MBTA employees. Included within the orientation is a presentation by the Office of Diversity and Civil Rights of the Authority's policies and obligations to promote fairness, diversity, and inclusion for all employees and customers to ensure compliance with federal and state civil rights laws and regulations.

The Title VI element of the presentation by ODCR is primarily focused on providing information regarding staff responsibilities, including the need to provide appropriate language services that eliminate barriers to transit service access for MBTA customers. New hires are trained in the importance of being professional, sensitive, and responsive and the need to treat all customers with equal respect regardless of language capacity.

Anti-Discrimination and Harassment Prevention (ADHP)

The MBTA's Anti-Discrimination and Harassment Prevention training focuses on civil rights and MBTA policies. One goal of the training is to have employees gain an understanding of supervisors' responsibilities, employees' rights and responsibilities, and customers' rights under the laws and MBTA policies. Another goal is to develop skills and best practices for focusing on legitimate reasons for all employment decisions, and accountability regarding the same; to review best practices for maintaining excellence in customer service; and to learn when to seek assistance and/or partner with ODCR and/or other appropriate representatives at the MBTA.

This mandatory training is offered in separate sessions for supervisors and non-supervisory employees. Managers and supervisors are required to take the training every two years; all frontline employees must complete the one-day training every three

years. The training includes a discussion of workplace scenarios, including interactions with customers who are unable to speak English.

Training of Customer Service Representatives

The objective of this training is to help Customer Service Representatives (CSRs) raise their awareness of the policies and procedures regarding Title VI requirements. CSRs are employees who operate the MBTA's Customer Communications Call Center.

This training provides CSRs with the necessary awareness and best-practice skills for providing excellent customer service. Representatives learn the LEP policies and procedures for working with customers with limited English language skills. Employees are also taught how to identify Title VI violations. In addition, this training raises their understanding and sensitivity to their responsibilities in helping to provide meaningful access to information and services to all customers.

Training Area Supervisors and Superintendents

The purpose of this training is to provide an understanding to supervisors of Title VI, LEP, and Anti-Discrimination, and Harassment Prevention laws. Supervisors learn about customer rights under the laws, regulations, and MBTA policies and procedures.

This training provides practical tips and tools for supervisors to develop best-practice skills in areas of Title VI LEP, anti-discrimination, and harassment prevention regulations. Participants gain hands-on experience in how to recognize and handle caution areas, the rules for maintaining a discrimination-free workplace, and an awareness of the LEP customer environment.

"How Can I Help You Today?" Customer Service Training

All frontline MBTA Operations employees, including crew members and ticketing agents operating the MBTA commuter rail system, are required to complete customer service training. The one-day training program provided by the MBTA Human Resources Department includes a module on confronting stereotypes and on employee obligations with regard to Title VI, including tools and materials for communication with customers who have limited English proficiency.

All the training programs mentioned above include:

1) A summary of responsibilities under the LEP guidance

2) A summary of the MBTA's Language Assistance Plan

3) A summary of the Four-Factor Analysis of language assistance needs prepared by the MBTA (Number of LEP persons, frequency of contact, importance of program, and cost factor)

4) A description of the language assistance services made available by the MBTA and how staff can access these services

Media resources available to be used in MBTA training programs include:

1) LEP videos accessed on the FTA's website, including www.lep.gov

2) Links to policy information, including webinars produced by the FTA's Office of Civil Rights, available at www.fta.dot.gov/civilrights/12328.html

3) Best practices in engaging LEP customers, available at www.fhwa.dot.gov/hep/lowlim

---

IV. Providing Notices to LEP Persons

The MBTA incorporates multiple methods and media in communicating with its customers and the general public. These include:

- Public meetings and hearing notices.

- Postings on www.mbta.com and www.massdot.state.ma.us/.

- Postings on the Boston Region Metropolitan Planning Organization's website and via email distribution.

- Distribution through community-based neighborhood organizations including those serving or representing minority and low-income groups. (A listing of these organizations is included in the MBTA's Public Participation Plan.)

- Customer Communications Call Center phone line.

- Transit Police dispatch phone line.

- Press releases, including distribution to outlets serving minority and low-income neighborhoods (for example, to the publications *El Mundo, Bay State Banner, El Planeta, Mattapan Reporter, Sampan,* and *Haitian Reporter*).

- Brochures available in multiple languages (English, Spanish, Chinese, Portuguese, Haitian Creole, and Italian, informing customers of their Title VI rights and the MBTA's complaint process.

- Station audiovisual messages in Spanish.

V	Monitoring and Updating the Language Assistance Plan

The MBTA has designated the Office of Diversity and Civil Rights to provide oversight and coordination of the implementation of the LEP Policy and Procedure. ODCR directs the ongoing monitoring and periodic assessment of the LEP Plan's effectiveness with assistance of the interdepartmental MBTA Title VI Working Group and technical assistance from the Central Transportation Planning Staff (CTPS).

ODCR, on an ongoing basis, will review the effectiveness of the LEP Plan using the following strategies:

- Solicit direct feedback from community-based organizations by distributing a questionnaire or holding focus group sessions on methods of communicating with LEP households;

- Assess the demographic composition of the MBTA service area using the most current census data or data collected from community organizations;

- Measure the actual frequency of contact by LEP persons by collecting information from the Customer Care Call Center, the MBTA website translation, and frontline operations staff interviews;

- Partnership with other Boston-region organizations and participation in regional forums and events focused on issues of diversity and social equity. Such regional collaborations include the MetroFuture planning workshops and task forces headed by the Metropolitan Area Planning Council.

- The MBTA will make changes to this Language Assistance Plan as needed, but at a minimum every three years. The three-year update will coincide with the MBTA's Title VI Program submittal to the Federal Transit Administration.

Table 7 shows the MBTA's Language Access Implementation Schedule.

TABLE 7
Language Access Implementation Schedule
Updated April 2014

Activity/Task	Responsibility	FY 12	FY 13	FY 14	FY 15	FY 16	FY 17	Status
1. Identification of LEP Individuals Who Need Language Assistance								
A. Update the number and proportion of LEP Persons	Planning and Development	X		X			√	Updated April 2014
B. Update frequency of Contact Data	Operations, Customer Communication Center, Transit police	X		X			√	Updated 2014
C. Update inventory/information from Community-based organizations	Marketing, Community Affairs, ODCR	X	X	X	√	√	√	Ongoing
2. Provision of Language Assistance Measures								
A. Post Notice of Rights at Service Locations								
i. Charlie Store and The RIDE Eligibility Center	Marketing, The RIDE Paratransit Office		X	-	-	-	-	Charlie Store, September 2012; RIDE Eligibility Center, (opening) October 2012
ii. Central Subway Stations	Marketing, Operations		X	-	-	-	-	September 2012
iii. Commuter Rail Stations	Marketing, Commuter Rail Operations			√	√	-	-	Will be posted with new materials at change-over to new Commuter Rail Operator
iv. Ferry Terminals	Marketing, Contracted Service Operations			√	√	-	-	Scheduled for Longwharf, Hingham, Hull, and Logan
v. Buses								
a. MBTA Major Bus Terminals	Marketing, Operations		X	X	-	-	-	Update as needed
vi. Federal Funding Subrecipients	Planning and Development	X	-	-	-	-	-	Ongoing monitoring
B. Communications Affecting Health, Safety, and Security								
i. Audio Announcements	Marketing, Operations	X	-	√	-	-	√	Update as needed
ii. Signage	Marketing, Operations	X	-	√	-	-	√	Signage in international symbols; update as needed
C. Notices and Information affecting a rider's ability to access and use the system safely and effectively								
i. Fare and Major Service Changes	Marketing, Planning and Schedules, Operations	X	-	-	-	-	-	Update as needed
ii. The RIDE Guide	The RIDE Paratransit Office		X	X	√	√	√	Update as needed
iii. Accessibility at the MBTA guide	Office of System-wide Access		X					Update as needed
iv. Fare payment instructions	Revenue, Marketing	X	-	-	-	-	-	Kiosk information in Spanish and Chinese
v. Ticket vending machines with multilingual functions	Revenue, ITD	X	-	-	-	-	-	Fare vending machines offer instructions in English, Spanish, and Chinese
vi. Public service announcements	Operations, Marketing	X	-	-	-	-	-	Public service announcements are made in English and Spanish
vii. Service diversion/disruption announcements	Operations, Design and Construction, Marketing	X	-	-	-	-	-	Service diversion/disruption announcements are made in English and Spanish
viii. Translated information on website	ITD, Relevant Department	X	-	-	-	-	-	Website utilizes Google Translate; translated versions of outreach materials for fare increase and service changes posted in six languages
ix. Translated electronic signs	ITD, Operations, Marketing	X	-	-	-	-	-	Messages provided in Spanish

TABLE 7
Language Access Implementation Schedule
Updated April 2014

Activity/Task	Responsibility	FY 12	FY 13	FY 14	FY 15	FY 16	FY 17	Status
3. Public Participation in the Decision-Making Process								
A. Translate meeting notices and press releases	Marketing, Community Affairs	X	√	√	√	√	√	As needed; languages for translation selected on the basis of the four-factor analysis
B. Provide interpreters at public meetings	Community Affairs, Relevant Department	X	√	√	√	√	√	As needed / upon request; languages for translation selected on the basis of the four-factor analysis
4. Training Staff								
A. Identify resources for communicating with LEP persons	ODCR	X		X		√		Updated 2014
B. Design LEP training for staff	ODCR	X		X		√		Update as needed
C. Implement LEP training	ODCR, Human Resources	X	-	-	-	-	-	Ongoing
5. Monitoring and Updating the LEP Plan								
A. Establish a process to obtain feedback on language assistance measures	ODCR	X	-	-	-	-	-	Ongoing
B. Obtain feedback from community-based organizations and agency staff	ODCR	X	-	X	-	-	√	Ongoing
C. Assessment of LEP Activities	ODCR	X	-	X	-	-	√	Ongoing
D. Update language assistance plan based on feedback and assessment	ODCR	X		X			√	Ongoing

X = Completed
√ = Target Completion
- = Ongoing (Completed & Maintain)

Translation Firms and Rates

Vendor	Services	Routine Services	Expedited Service
Baystate Interpreters, Inc.	Interpretation Services	$75.00 per hr.	$80.00 per hr.
Baystate Interpreters, Inc.	Translation Services	$.30 per word	$.30 per word.
Baystate Interpreters, Inc.	Telephonic Interpretation Services	$.025 per min.	$.025 per min.
Baystate Interpreters, Inc.	Simultaneous Interpretation Services	$80.00 per hr.	$80.00 Per hr.
Baystate Interpreters, Inc.	Voice Over Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Interpretation Services	$65/hr.	$65/hr.
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Translation Services	$0.40/word	$0.50/word
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Telephonic Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Simultaneous Interpretation Services	N/A	N/A
Cambodian Mutual Assistance Association of Greater Lowell, Inc.	Voice Over Services	$65/hour	$65/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Interpretation Services	$85.00/hour	$85.00/hour
Catholic Charitable Bureau of the Archdiocese of Boston	Translation Services	$0.35/word	$0.40/word
Catholic Charitable Bureau of the Archdiocese of Boston	Telephonic Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Simultaneous Interpretation Services	N/A	N/A
Catholic Charitable Bureau of the Archdiocese of Boston	Voice Over Services	N/A	N/A
Central MA Area Health Education Center	Interpretation Services	$60.00/hr	$70.00/hr
Central MA Area Health Education Center	Translation Services	$0.44/word	$0.52/word
Central MA Area Health Education Center	Telephonic Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Simultaneous Interpretation Services	N/A	N/A
Central MA Area Health Education Center	Voice Over Services	N/A	N/A
Centro Latino, Inc.	Interpretation Services	$75.00 per hour	$85.00 per hour
Centro Latino, Inc.	Translation Services	$0.40 per word	$0.50 per word
Centro Latino, Inc.	Telephonic Interpretation Services	N/A	N/A
Centro Latino, Inc.	Simultaneous Interpretation Services	N/A	N/A
Centro Latino, Inc.	Voice Over Services	N/A	N/A
CETRA, Inc.	Interpretation Services	$102/hour	$153/hour
CETRA, Inc.	Translation Services	$0.24/word	$0.36/word
CETRA, Inc.	Telephonic Interpretation Services	n/a	n/a
CETRA, Inc.	Simultaneous Interpretation Services	$114/hour for interp	$171/hour for interpre
CETRA, Inc.	Voice Over Services	$139.50/hour	$209.25
Corporate Translation Services, Inc.	Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Translation Services	$0.45	*Per word rate + 15%
Corporate Translation Services, Inc.	Telephonic Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Corporate Translation Services, Inc.	Voice Over Services	n/a	n/a
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Interpretation Services	$85.00 Per Hour	$95.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Translation Services	$0.50 Per Word	$0.70 Per Word
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Telephonic Interpretation Services	$1.15 Per Minute	$1.15 Per Minute
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Simultaneous Interpretation Services	$175.00 Per Hour	$185.00 Per Hour
Cross Cultural Communication Systems, Inc. (CCCS) SOMWBA AM	Voice Over Services	N/A	N/A
Eduardo Berinstein Translations LLC	Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Translation Services *	$.30/word	$.35/word
Eduardo Berinstein Translations LLC	Telephonic Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Simultaneous Interpretation Services	n/a	n/a
Eduardo Berinstein Translations LLC	Voice Over Services *	$100/hour	$150/hour
GlobalVision International, Inc.	Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Translation Services	*$75/hr, ~*18c - ~*3	*$100/hr, ~*24c/word
GlobalVision International, Inc.	Telephonic Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Simultaneous Interpretation Services	n/a	n/a
GlobalVision International, Inc.	Voice Over Services **	$1000 for first 5min	$1300 for first 5min, $
Interpreters and Translators, Inc.	Interpretation Services	$90.00/per hour	$90.00/per hour
Interpreters and Translators, Inc.	Translation Services	.29/per word	.38/per word
Interpreters and Translators, Inc.	Telephonic Interpretation Services	$2.00/per minute	$2.00/per minute
Interpreters and Translators, Inc.	Simultaneous Interpretation Services	n/a	n/a
Interpreters and Translators, Inc.	Voice Over Services	n/a	n/a
Interpreters Associates, Inc.	Interpretation Services	75.00/hr 2 hr min	95.00/hr 2 hr min
Interpreters Associates, Inc.	Translation Services	0.50/word	0.95/word
Interpreters Associates, Inc.	Telephonic Interpretation Services	n/a	n/a
Interpreters Associates, Inc.	Simultaneous Interpretation Services	150.00/pp	190.00/pp
Interpreters Associates, Inc.	Voice Over Services	n/a	n/a
JTG, inc.	Interpretation Services	n/a	n/a
JTG, inc.	Translation Services	$75/hour or 0.28/wo	20% surcharge for pro
JTG, inc.	Telephonic Interpretation Services	n/a	n/a
JTG, inc.	Simultaneous Interpretation Services	n/a	n/a
JTG, inc.	Voice Over Services	n/a	n/a

Language Bridge, LLC	Interpretation Services	$$75 per hour	$$75 per hour
Language Bridge, LLC	Translation Services	$0.35 per word	$0.45 per word
Language Bridge, LLC	Telephonic Interpretation Services	n/a	n/a
Language Bridge, LLC	Simultaneous Interpretation Services	n/a	n/a
Language Bridge, LLC	Voice Over Services	n/a	n/a
Language Connections		Incorrect	
Language Line Services, Inc.	Interpretation Services	n/a	n/a
Language Line Services, Inc.	Translation Services	$0.35/word	$0.40/word
Language Line Services, Inc.	Telephonic Interpretation Services	$0.79/minute	$0.79/minute
Language Line Services, Inc.	Simultaneous Interpretation Services	n/a	n/a
Language Line Services, Inc.	Voice Over Services	$150/hour	$150/hour
LONE STAR INTERPRETERS LLC	Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Translation Services	$0.12/word	$0.14/word
LONE STAR INTERPRETERS LLC	Telephonic Interpretation Services	$0.63/min	$0.63/min
LONE STAR INTERPRETERS LLC	Simultaneous Interpretation Services	N/A	N/A
LONE STAR INTERPRETERS LLC	Voice Over Services	$12/prompt	$14/prompt
Mario R. Martinez	Interpretation Services	N/A	N/A
Mario R. Martinez	Translation Services	0.058	0.084
Mario R. Martinez	Telephonic Interpretation Services	N/A	N/A
Mario R. Martinez	Simultaneous Interpretation Services	N/A	N/A
Mario R. Martinez	Voice Over Services	N/A	N/A
Patricio Endara	Interpretation Services	$55.00 per hour	$60.00 per hour
Patricio Endara	Translation Services	$0.23 per word	$0.30 per word
Patricio Endara	Telephonic Interpretation Services	$1.00 per minute	$1.25 per minute
Patricio Endara	Simultaneous Interpretation Services	N/A	N/A
Patricio Endara	Voice Over Services	N/A	N/A
Qwest Communications Corporation	Interpretation Services	N/A	N/A
Qwest Communications Corporation	Translation Services	N/A	N/A
Qwest Communications Corporation	Telephonic Interpretation Services	$ 0.95 per minute –	$ 0.95 per minute – a
Qwest Communications Corporation	Simultaneous Interpretation Services	N/A	N/A
Qwest Communications Corporation	Voice Over Services	N/A	N/A
Rapport International, LLC	Interpretation Services	$150 per hour	$185 per hour
Rapport International, LLC	Translation Services	.34 per word	.38 per word
Rapport International, LLC	Telephonic Interpretation Services	$2 per minute	$2 per minute
Rapport International, LLC	Simultaneous Interpretation Services	N/A	N/A
Rapport International, LLC	Voice Over Services	N/A	N/A
TransFluenci, LLC	Interpretation Services	$75 per hour	$75 per hour
TransFluenci, LLC	Translation Services	.28 per word	.28 per word
TransFluenci, LLC	Telephonic Interpretation Services	N/A	N/A
TransFluenci, LLC	Simultaneous Interpretation Services	N/A	N/A
TransFluenci, LLC	Voice Over Services	N/A	N/A
WorldWide Interpreters, Inc		Incorrect	