

Pittsburgh Regional Transit Language Assistance Plan

Providing Access to Pittsburgh Regional Transit Programs and Services for Limited English Proficiency Persons

Executive Summary

Port Authority of Allegheny County d/b/a Pittsburgh Regional Transit (PRT or Agency) has implemented a Language Access Plan (LAP or Plan), recognizing the importance of effective communication with a diverse community of individuals, including those who are not fluent in English. Those individuals, who may have a limited ability to read, write, speak, or understand English, are considered limited English proficient (LEP persons), and the purpose of the Agency's LAP is to document its efforts to ensure that LEP persons have meaningful access to PRT's public transportation system

Language can be a barrier for LEP individuals to access important benefits or services, understand and exercise important rights, comply with applicable responsibilities, or understand other information regarding federally assisted programs or activities. PRT, as a recipient of federal funding assistance and in its efforts to be a transit system accessible to all individuals and communities in its service area, has an obligation to reduce language barriers that can preclude meaningful access by LEP persons to the important services we provide. PRT's Plan can help provide a wide range of individuals with meaningful access to the services the agency provides, broadening the availability of critical transportation services to individuals in our community as well as ensuring inclusivity systemwide.

The Plan may be used as guidance for PRT employees to improve communications and to provide meaningful access and accessibility to all the services provided by the Agency. It is also intended to be a Plan that is regularly reviewed and updated to reflect the changing needs of the communities and individuals that PRT serves.

Vision Statement

PRT is committed to providing meaningful access to equitable, timely and quality language assistance services to LEP individuals so that all individuals residing in the PRT service area of Allegheny County can obtain meaningful and current information about service, projects and programs offered by the Agency. PRT will continuously seek to improve and expand the services it provides to enable LEP persons to communicate with the Agency.

Introduction

PRT provides public transportation services within Allegheny County, including the City of Pittsburgh, in Southwest Pennsylvania. These services include 96 bus routes (three of which are fixed guideways, and run exclusively on bus-only roads), three light rail routes, and two inclined planes (funiculars), one of which is operated by an outside entity. PRT also sponsors the ACCESS paratransit program, which provides door-to-door, advance reservation, shared ride service which is contracted through a third-

party provider. These services are all supported by about 7,000 transit stops and stations, over 700 shelters, 51 Park and Ride lots, 123 locations where customers can purchase fare cards and tickets, and various operational centers including one light rail center, four bus garages, one heavy maintenance bus facility, and one general maintenance facility.

Overview

PRT conducted analysis and prepared an implementation plan, which forms the Agency's Plan. This Plan is in place to meet the requirements of Title VI of the Civil Rights Act of 1964 concerning access to services for LEP persons. This Plan also responds to Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000). This Order directs recipients of federal funding to take reasonable steps to ensure that LEP persons have meaningful access to programs and activities receiving federal funding assistance. Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. Finally, Federal Transit Administration (FTA) Circular 4702.1B require recipients of federal transit funding assistance to take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for LEP persons.

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. PRT most recently updated its Four-Factor Analysis as part of the Agency's 2022 Title VI Program Update. Consistent with this analysis, PRT has developed a LAP to help identify reasonable steps for providing language assistance to LEP persons who wish to access public transit services provided by PRT. PRT regularly evaluates the need for language assistance and the type(s) of language assistance necessary to ensure that LEP persons within PRT's service area obtain meaningful access to the Agency's programs and services. A continual evaluation of both the internal and external processes utilized by PRT to evaluate and address the needs of LEP persons helps to improve upon overall access to the information, programs and services provided by the Agency.

PRT's LAP details current policies and procedures utilized to identify a person who may need language assistance and the specific language assistance that is needed, points and types of contact the Agency may have with LEP persons, ways in which language assistance will be provided, training staff to properly identify when assistance is required and to respond accordingly, identifying which Agency documents and information are vital for access to services, translating Agency materials necessary to access services, providing appropriate notices that translated materials and interpreter services are available to LEP persons, how to notify LEP persons that assistance is available, developing relationships with community partners to identify when LEP needs exist or increase in need, and how to track and document information required for future LAP plan updates.

To prepare this plan, PRT used the Four-Factor LEP Analysis in order to determine how to provide meaningful access (or improve access). PRT further updated its Four-Factor Analysis as part of this LAP. This updated analysis helps inform the Agency's Public Participation Plan. The Four-Factor Analysis includes the following:

1. The number or proportion of LEP persons eligible to be served or likely to be

encountered by PRT;

2. The frequency with which LEP persons encounter PRT programs, activities or services;

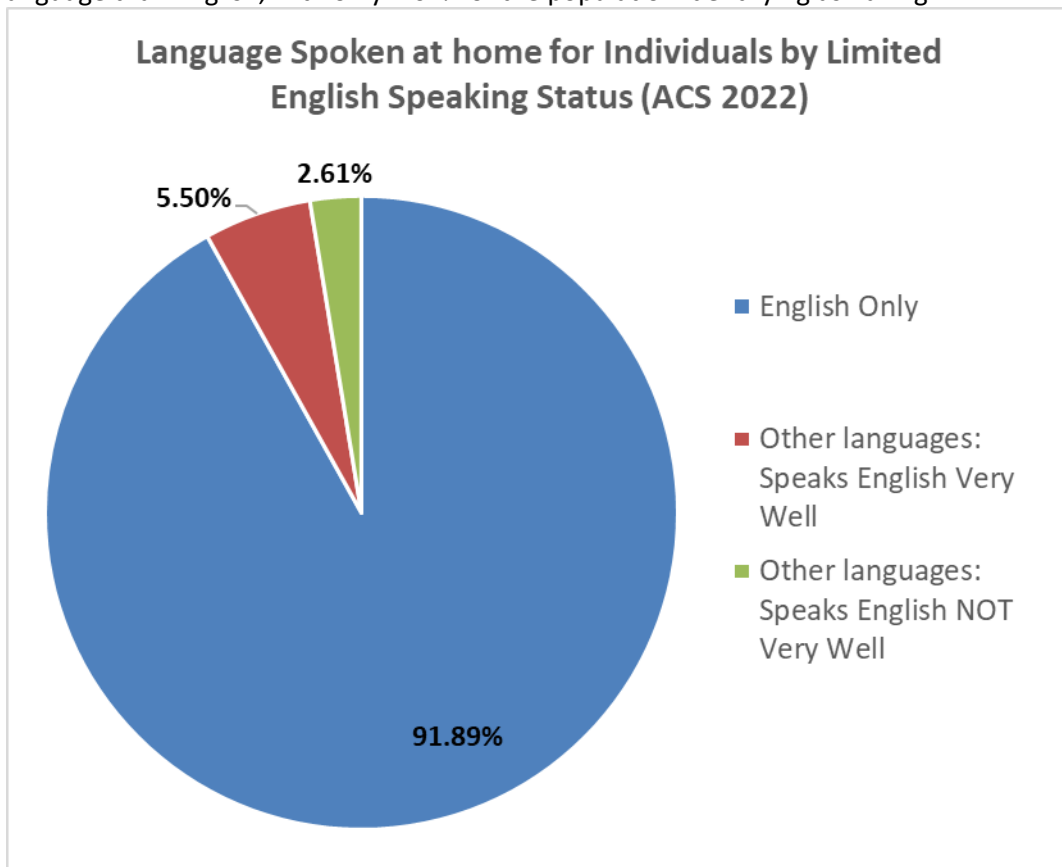
3. The nature and importance of the program, activity, or service provided by PRT to the LEP population;

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

SUMMARY OF TITLE VI – FOUR FACTOR ANALYSIS FOR LANGUAGE ASSISTANCE PLAN

Factor 1- The number or proportion of LEP persons eligible to be served or likely to be encountered by PRT.

Allegheny County, including PRT’s service area, has a very small population of LEP persons. The following comprise the languages spoken at home of residents of Allegheny County as of the 2022 American Community Survey (ACS 2022). In Allegheny County, 8.11% of the population has a different primary language than English, with only 2.61% of the population identifying as having LEP.



According to ACS 2022, the means of transportation to work by language spoken at home and ability to speak English is below. Though only 2.61% people in Allegheny County identify as LEP, as per the table below, of persons relying on public transportation for commuting to work, 3.53% reported as LEP. Moreover, countywide, only 8.11% people identified as having a different primary language other than English, whereas among the public transportation commuters the number was 12.2%. So, it can be

observed that, public transportation users in Allegheny County have a higher proportion of non-English speakers and LEP persons than the county population in general.

	Workers 16 years and over in Allegheny County	Percent of working population in the County	Workers using Public transportation (excluding taxicab):	Percent of total public transportation users in County
Total:	706,541		44,904 (6.36% of total)	
Speak only English	656,280	92.9%	39,406	87.8%
Speak Spanish:	10,596	1.5%	1,186	2.6%
Speak English "very well"	7,955	1.1%	866	1.9%
Speak English less than "very well"	2,641	0.4%	320	0.7%
Speak other languages:	39,665	5.6%	4,312	9.6%
Speak English "very well"	29,144	4.1%	3,047	6.8%
Speak English less than "very well"	10,521	1.5%	1,265	2.8%

A summary of the number of individuals using each language, without speaking English "very well," can be found in the following table, which is based on the 2022 census tract data:

Primary Language		Number of People in Allegheny County	Estimated Number of People Served by PRT (6.36%)	Estimated Percentage of Total PRT Service Population
English Only		1,077,152	68,507	91.89%
Other Language - Speak English Very Well	Spanish	15,297	973	4.19%
	Other	49,128	3,125	1.30%
Other Language - Speak English NOT Very Well	Nepali, Marathi, or other Indic languages	5,601	356	0.478%
	Spanish	4,890	311	0.417%
	Chinese (incl. Mandarin, Cantonese)	4,832	307	0.412%
	Other languages of Asia	2,268	144	0.193%
	Italian	1,511	96	0.129%

Arabic	1,202	76	0.103%
Russian	1,190	76	0.102%
French (incl. Cajun)	1,177	75	0.100%
Korean	1,032	66	0.088%
Hindi	926	59	0.079%
Japanese	868	55	0.074%
Telugu	748	48	0.064%
Ukrainian or other Slavic languages	656	42	0.056%
Swahili or other languages of Central, Eastern, and Southern Africa	514	33	0.044%
Vietnamese	429	27	0.037%
Portuguese	339	22	0.029%
Gujarati	330	21	0.028%
Bengali	329	21	0.028%
Malayalam, Kannada, or other Dravidian languages	296	19	0.025%
Tamil	289	18	0.025%
Yoruba, Twi, Igbo, or other languages of Western Africa	239	15	0.020%
Hebrew	209	13	0.018%
German	132	8	0.011%
Thai, Lao, or other Tai-Kadai languages	122	8	0.010%
Urdu	104	7	0.009%
Yiddish, Pennsylvania Dutch or other West Germanic languages	82	5	0.007%
Amharic, Somali, or other Afro-Asiatic languages	66	4	0.006%
Tagalog (incl. Filipino)	59	4	0.005%
Greek	53	3	0.005%
Serbo-Croatian	51	3	0.004%
Ilocano, Samoan, Hawaiian, or other	35	2	0.003%

Austronesian languages			
Punjabi	24	2	0.002%
Persian (incl. Farsi, Dari)	15	1	0.001%
Other Indo-European languages	0	-	0.000%
Polish	0	-	0.000%
Other and unspecified languages	0	-	0.000%
Haitian	0	-	0.000%
Hmong	0	-	0.000%
Armenian	0	-	0.000%
Khmer	0	-	0.000%
Navajo	0	-	0.000%
Other Native languages of North America	0	-	0.000%

The “Estimated Percentage of PRT’s Service Population” column on the far right of the preceding table calculates, based upon available information and using 6.36% of the population of each language group, the percentage of each language group using PRT’s services and determines that only approximately 2.61% of the total customers using PRT’s services do not speak English as their primary language. This 6.36% value is the current utilization rate of PRT’s services by the entire population of Allegheny County (meaning 6.36% of the population of the county uses public transportation).

Factor 2- The frequency with which LEP persons encounter Pittsburgh Regional Transit programs, activities or services.

PRT conducted a Fare survey in 2022 asking its riders what language they primarily speak. This survey had over five thousand respondents, of which only 53 identified as not having English as a primary language and of them 40 identified as LEP. This means 1.06% of all respondents were not primary English speakers and 0.8% were LEP. The survey responses were somewhat similar to demographic data collected by 2022 American Community Survey, which showed 2.6% of the population as not speaking English well.

PRT had an average weekday ridership of 118,081 in FY2023. Using the percentages of those speaking other languages shown in the survey, the estimated total number of PRT riders primarily speaking each language is as follows in the below table:

Language Spoken at Home (LEP, unless noted otherwise)	PRT Survey Respondents*	Percentage Inferred Total PRT Riders	Inferred Total PRT Riders
English Only	4970	98.94%	58,418

Italian (Italiano)	1	0.02%	12
Chinese - Cantonese (廣東話)	3	0.06%	36
Spanish (Español)	38	0.76%	447
Arabic (العربية)	2	0.04%	24
French (Français)	2	0.04%	24
Nepali (नेपाली)	1	0.02%	12
Vietnamese (Tiếng Việt Nam)	4	0.08%	47
Chinese - Mandarin (國語)	1	0.02%	12
Portuguese (Português)	1	0.02%	12

Over-the-Phone Interpreter Services

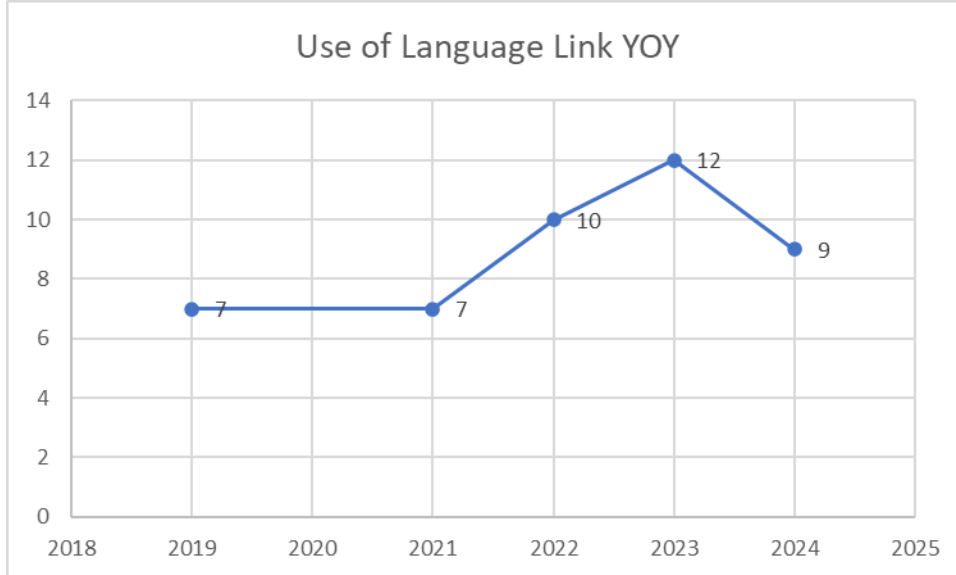
PRT has used over-the-phone interpreter services with CTS LanguageLink as its primary method of providing assistance to LEP persons for accessing transit service dating back to at least the year 2015. On its website, and on PRT schedules, and other customer service documents available through the customer service center, a language block is provided directing persons from two key languages to contact PRT’s Customer Service Line for assistance in their language. The languages listed in the language block on the documents provided are Spanish and Chinese. PRT’s records providing telephone interpreter services are a reliable and accurate resource to document interactions with riders requiring language assistance.

From January 2019 to January 2023, PRT received only 45 total calls that required use of Language Link interpreters to provide riders information in other languages. A summary of these calls by language type is set forth below:

	Spanish	Chinese	Arabic	Swahili	Pashto	French	Nepali
2019	4	1	1	0	0	1	0
2020	0	0	0	0	0	0	0
2021	6	0	0	1	0	0	0
2022	9	0	0	0	1	0	0
2023	10	0	2	0	0	0	0
2024	8	0	0	0	0	0	1

During the timeframe from January 1, 2019, to January 1, 2024, the total number of calls received by the Customer Service Center was 1,411,883 using available data from January 1, 2019, through January 1, 2024, 45 calls requiring translation services comprised only 0.001% of the total Customer Service Center call volumes over this same period. Below is the year-over-year total number of calls that needed translation services. There has been an upward trend since 2020.¹

¹In November 2023, PRT implemented a Spanish IVR option through the customer service call center and recorded announcements at select light rail stations including downtown Pittsburgh began in December 2023. PRT anticipates an increase in call volume and other communications as riders begin to more frequently use this option.



Based on the results of the Census data, PRT’s rider survey, and the Customer Service Center calls, the proportion of LEP persons eligible to be served or likely to be encountered by PRT and the frequency with which LEP persons come into contact with PRT (Factors 1 and 2) is so low that no language meets the baseline requirement for translating vital documents by PRT. Vital documents may include; consent and complaint forms, intake and application forms, written notices of rights, notice of denials, losses, or decreases in benefits or services and notice of person’s rights under Title VI.

These data are summarized below for the last 3 years or otherwise noted:

SPANISH ONLY SPEAKERS:

Method of Interaction	Percent of Riders Estimated	Total Riders Estimated (for multiplying, total is 58,418)
2022 ACS Census Data	0.7%	320
PRT Rider Survey	0.76%	447
Board Meetings	3.3%	1928
Customer Service Call Volume	0.003%	175

Per the above chart, PRT is confident that it is still within the Safe Harbor Provision, which states:

“...if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.” (FTA Circular C 4702.1B Chap III-9).

Based on this analysis, the largest population of other language speakers not speaking English very well would-be persons whose primary language is Nepali (or other Indic languages), Spanish or Chinese. Persons in both categories are far less than the Safe Harbor threshold as neither of these

groups are close to meeting the 5% or 1,000-person level, even within a reasonable margin of error. Therefore, at this time, PRT does not plan to regularly translate its vital documents into other languages as a matter of course.

The above analyses were done at a county level. When looked at on a Census Tract level, some tracts did exceed the 5% threshold for their LEP population. These tract locations and the LEP population primary language are listed below:

Tract Location	Language	Percent of Tract LEP Population
Terrace Village, Pittsburgh	Arabic	5%
Overbrook	Chinese (incl. Mandarin, Cantonese)	6%
Wilkinsburg	Korean	7%
Whitehall	Other Indo-European languages	10%
Baldwin	Other Indo-European languages	6%
Marshall-Shadeland, Pittsburgh	Spanish	7%
McKeesport – Tract 1	Spanish	7%
Clairton	Spanish	7%
McKeesport – Tract 2	Spanish	6%
Bluff, Pittsburgh	Spanish	6%
Beltzhoover and Bon Air, Pittsburgh	Spanish	6%

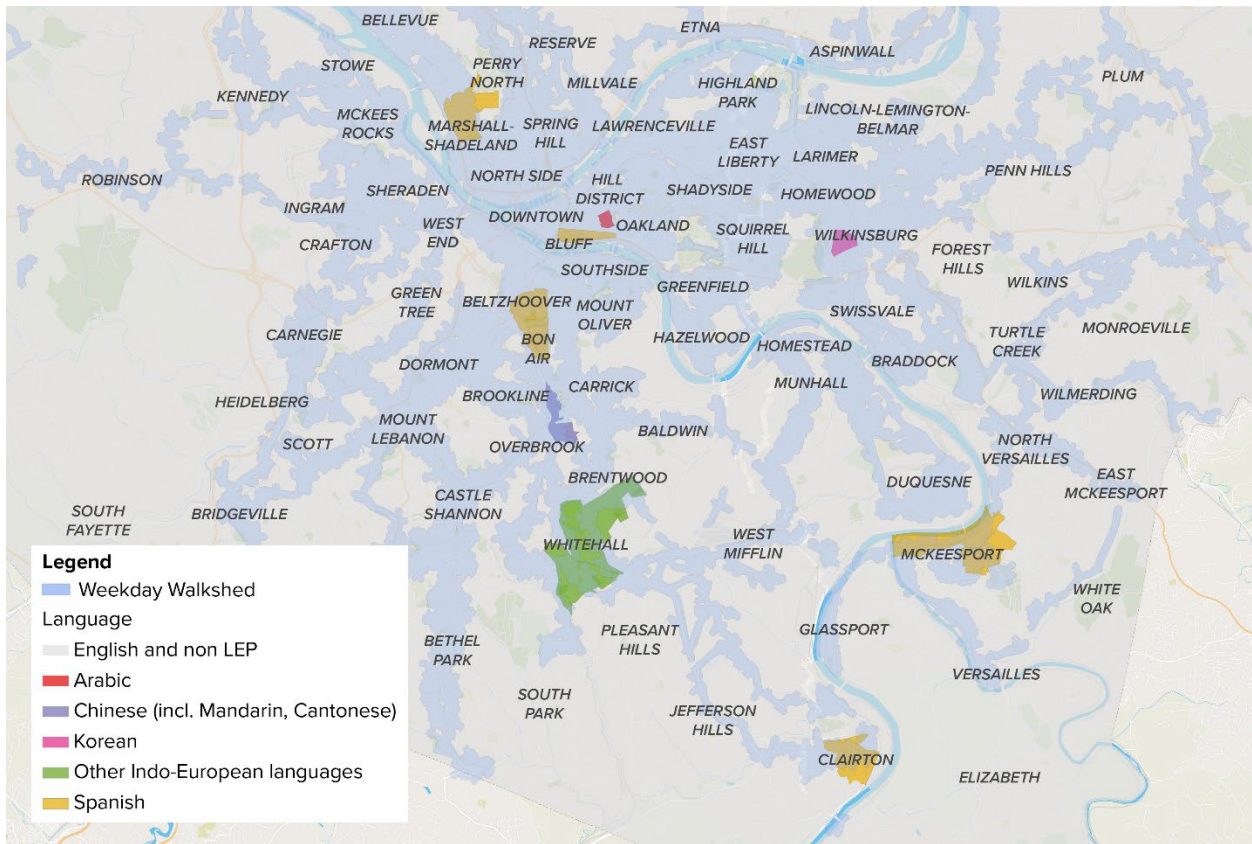


Fig: Map showing location of census tracts with LEP population over the 5% threshold

However, as the diversity of Allegheny County continues to grow, PRT will annually track LEP persons by language and begin to provide regular translation of vital documents for a particular language-speaking group if supported by the Four Factor analysis. DOT LEP Guidance notes that providing public transportation access to LEP persons is crucial. A denial or delay of access to such services could have serious or even life-threatening implications for LEP populations. An LEP persons inability to utilize public transportation effectively may adversely affect their ability to access health care, education, or employment.

PRT recognizes the significance of transit services and will continue to review the language assistance needs of the communities the Agency serves in Allegheny County and will determine the need to translate vital documents on a case-by-case basis with due consideration given to individual and community group requests for such translation of vital documents. A representative from each division at PRT will meet semi-annually to discuss emerging LEP needs throughout the system and develop additional measures that will increase and enhance communications with LEP populations.

Factor 3- The nature and importance of the program, activity, or service provided by Pittsburgh Regional Transit to the LEP population.

The providing of public transportation by PRT is an important service, and PRT strives to ensure service to LEP persons even though the number of such persons is small in PRT’s service area. PRT will continue to seek to provide services that are accessible to all persons within Allegheny County and will perform

outreach to better understand the population it serves and the best ways in which to communicate with such population, including means that go beyond legal and regulatory requirements and could include targeted programs and communications such as marketing and outreach programs for capital projects that may disrupt services in neighborhoods and communities that PRT is aware have higher LEP populations.

Factor 4- The resources available to Pittsburgh Regional Transit for LEP outreach, marketing and materials as well as the costs associated with that outreach.

Consistent with the above and PRT's continued willingness and desire to provide language assistance to LEP populations even when there may not be a federal legal requirement to do so, PRT has developed a Spanish version of its 'Rider 101' brochure, which was disseminated to two known Spanish-speaking communities (Beechview and Brookline neighborhoods) in the City of Pittsburgh. Additionally, a significant portion of PRT's website can be translated into a variety of languages, including transit schedule information and Title VI complaint information. PRT has also posted banners in all revenue vehicles advising "For help with Pittsburgh Regional Transit Services in your language, call (412) 442-2000," in English, Spanish and Chinese.

As noted above, PRT contracts with CTS LanguageLink interpreter services. CTS LanguageLink is a full-service multi-lingual communication agency that is headquartered in Vancouver, Washington. The agency provides interpretation services in over 240 languages and various dialects. CTS LanguageLink services are available 24 hours per day, 7 days per week, 365 days per year. CTS LanguageLink Interpreter Services are available to PRT Customer Service staff by calling 1-877-963-7466. PRT Customer Service representatives receive training for CTS LanguageLink services as part of their new hire orientation and training requirements. Ipads loaded with the Google Translate app to assist with live in person conversation with customers who do not speak English are provided to Service Center employees to further assist customers with language translation needs.

In addition to Language Link and Google translation services, PRT provides a Spanish IVR option through the customer service call center and provides recorded announcements at select light rail stations, including downtown Pittsburgh stations, and in areas identified as having a greater Spanish speaking LEP need to inform riders that a Spanish option is available for assistance by contacting Pittsburgh Regional Transit customer service.²

PRT's marketing division offers the following Public Relations programs or services in support of riders and customers with LEP needs; hosting a community meeting with Spanish translation live in communities where meaningful engagement is necessary for providing feedback or assistance with services offered by the Agency, press releases and meeting materials in support of such meetings offered will be issued and produced in Spanish. Spanish language materials will be issued for home mailers when Agency projects will significantly impact riders in communities where greater LEP needs have been identified. PRT will produce a "how to ride" video that will be offered in up to 10 different languages for use with specific refugee populations and PRT's primary non-English speaking populations (determined through Equity analysis/Census).

² In November 2023, PRT implemented a Spanish IVR option through the customer service call center and recorded announcements at select light rail stations including downtown Pittsburgh began in December 2023. PRT anticipates an increase in call volume and other communications as riders begin to use this option.

The Board of PRT conducts its public meetings in accordance with applicable law to provide a reasonable opportunity for members of the public to comment on matters of concern. If members of the public desire to address PRT's Board at a public meeting in a language other than English, and if PRT receives a request for a language translation accommodation from a registered speaker to translate the meeting into a language other than English, PRT will try to reasonably accommodate the request with a translator at the requested meeting. If PRT is unable to accommodate a request for a language translation accommodation due to timing of receipt of request or lack of an available translator, the registered speaker may address the PRT Board in their spoken language, and PRT will translate post-meeting and make the comments part of record/meeting minutes. PRT will also have iPads available at the meeting sign-in table with Google translation for use by those who may need translation at meeting.

Additionally, an LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by PRT. Informal interpreters may include family members, friends, legal guardians, service provider representatives, or advocates of the LEP person.

PRT has assessed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated on a case-by-case basis if a request has been made, and taking an inventory of available organizations that could be partnered with for outreach and translation efforts. In addition to the above measures, PRT maintains access to a LanguageLink translation services to facilitate communication with LEP persons.

As set forth above, and while PRT falls within the Safe Harbor Provision, meaning it has no current legal obligation to translate vital documents or provide its services in certain languages other than English, PRT will continue to provide limited translation of documents from English to Spanish in areas identified through the Four Factor Analysis as having a greater Spanish speaking LEP need. PRT will also continue to review the language assistance needs of the communities the Agency serves in Allegheny County and will determine the need to translate vital documents on a case-by-case basis with due consideration given to individual and community group requests for such translation of vital documents.

PRT will also continue to seek to provide services that are accessible to all persons within Allegheny County and will perform outreach to better understand the population it serves and the best ways in which to communicate with such population, including means that go beyond legal and regulatory requirements and could include targeted programs and communications such as marketing and outreach programs for capital projects that may disrupt services in neighborhoods and communities that PRT is aware have higher LEP populations.

ANALYSIS AND RECOMMENDATIONS

Language Assistance Measures

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which PRT staff may respond to LEP persons, whether in person, by telephone, or in writing.

PRT contracts with CTS LanguageLink interpreter services. CTS LanguageLink is a full-service multi-lingual communication agency that is headquartered in Vancouver, Washington. The agency provides

interpretation services in over 240 languages and various dialects. CTS LanguageLink services are available 24 hours per day, 7 days per week, 365 days per year. CTS LanguageLink Interpreter Services are available to PRT Customer Service staff by calling 1-877-963-7466. PRT Customer Service representatives receive training in the use of CTS LanguageLink services as part of their new hire orientation and training requirements. When an interpreter is needed, in person or on the telephone, customer service staff will attempt to connect the requestor to LanguageLink to make interpretation services available to the requestor. iPads loaded with the Google Translate app to assist with live in person conversation with customers who do not speak English are provided to Service Center employees to further assist customers with language translation needs.

PRT will provide an interpreter to an LEP person if they request language assistance and it is evident that such assistance is needed during interactions with customer service representatives, at community meetings located in communities where a greater level of LEP needs have been identified and community feedback or participation is requested by PRT in order for meaningful interaction to occur.

PRT will provide a language block on printed materials including but not limited to construction notices, service and other notices posted at PRT locations and if an LEP person asks for language assistance and PRT determines that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance using LanguageLink Translation services through PRT's customer service department.

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Additionally, an LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by PRT. Informal interpreters may include family members, friends, legal guardians, service provider representatives, or advocates of the LEP person.

If available and applicable, bilingual PRT staff will provide language services to LEP persons upon request. If translation services are provided by bilingual PRT staff, PRT staff will take reasonable steps to ensure that staff provides interpretative services at a level of fluency, comprehension and confidentiality appropriate to the specific nature, type, and purpose of information at issue.

PRT will periodically assess client needs for language assistance based on requests for interpreters and/or translation.

Current Outreach and Communication Strategies

Several measures have been utilized to date by PRT to identify and address the needs of LEP persons. Current strategies utilized by PRT to help identify and address the needs of LEP persons in the Agency's service area include:

- Examining prior record requests for verbal language assistance from past meetings and events to anticipate the potential need for verbal language assistance at upcoming meetings. Records review is done by individual department based upon the expected level of community engagement or involvement in areas where LEP persons have been identified.
- Providing, on request, Interpreter services to include translated verbal conversation and/or written materials, which may include community mailings to individuals or a community representative as determined after review of the LEP needs of the community where mailings are being sent or meetings are being held.
- Translating printed materials, when necessary, for conducting PRT business or accessing PRT programs and services. Review of prior translated material requests is done by department based upon the expected level of community involvement in areas where LEP persons have been identified.
- Reviewing and responding to requests for translated PRT written materials from individuals or a community representative to determine what additional steps should be taken to ensure meaningful access to programs and services.
- Assessing LEP needs at PRT sponsored workshops or conferences through public engagement by staff to include the request for the participant to complete a sign-in sheet for attendance, staff greeting participants and briefly speaking with each event attendee by asking a question that requires a full sentence reply. This measure may assist PRT staff to identify future LEP needs at PRT sponsored workshops, events and conferences.
- Providing presentations in translated languages based upon the expected level of community engagement or involvement in areas with identified LEP persons or at the request of community representatives or service organizations.
- Monitoring the type of request and frequency of LEP needs presented to PRT Customer Service Department to determine if increased or additional needs are being identified and what steps are taken to address any LEP needs that are presented. Documentation is required by PRT of both internal and external requests for verbal and written translated communications and is maintained by customer service or by individual department when appropriate.
- Convening or seeking input from stakeholder advisory groups, interagency groups, and neighborhood forums to supplement public engagement and other outreach techniques utilized by PRT on projects identified in limited LEP communities.

- Consulting with organizations that serve and work with LEP communities to obtain an accurate assessment of the existing and emerging LEP communities located in the PRT service area.
- Providing survey and feedback opportunities in multiple languages translated upon request by individuals, community-based organizations, and service providers.
- Translating in-person or virtual briefings upon request with advance notification to the Agency by individuals, community-based organizations, and service providers.
- Translating telephone and walk-up customer service inquiries made to PRT's Customer Service Center through CTS LanguageLink interpreter service assistance.
- PRT will document language assistance requests received throughout the Agency with the Deputy Chief Human Resources and OEO Officer or their respective designee.

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Implementing Language Assistance Policies and Procedures

PRT is in the process of further evaluating, implementing, and defining the following LAP internal policies and procedures which have been identified as priority goals for implementation. These steps are in addition to, or are to be considered the preliminary stages of, further policies and procedures. The implementation of these steps is based upon the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the PRT service area. These measures will be given priority consideration of implementation as additional funding and resources required to implement these measures are identified.

- Census Bureau's "I Speak Cards" to be located at an easily accessible and identifiable location at PRT's Downtown Service Center waiting area.
- Language conversion is currently available on PRT's website to include 109 languages. PRT will continue to monitor available resources and will regularly identify and update additional language conversation opportunities for information accessed on PRT's website and other PRT social media outlets including but not limited to Facebook and X.
- CTS LanguageLink Service will be provided and utilized by staff when an interpreter is needed, in person or on the telephone. Opportunities to expand training for current PRT staff will be explored. CTS LanguageLink Service contact information shall be furnished to PRT staff and posted in appropriate workplace communication notification areas. Agency employees will be provided with updated communications that include contact information for both internal and external language assistance requests. In addition, Ipads loaded with the Google Translate app to assist with live in person conversation with customers who do not speak English are provided to Service Center employees to further assist customers with language translation needs.

- PRT will seek to identify multilingual staff who may be willing or able to aid at PRT sponsored community workshops and events. PRT will provide buttons/nametags that identify multilingual staff and volunteers at PRT sponsored community events and outreach programs.
- PRT Division Chiefs will identify key public-facing representatives of each division to meet and discuss new or emerging LEP needs semi-annually. Meetings will be coordinated by the Deputy Chief Human Resources and OEO Officer or their designee for consideration of any emerging needs or plan updates.

Staff Training

The following training will be provided to PRT customer service personnel:

- Comprehensive training and support to provide customers with language assistance through the use of CTS LanguageLink Conference Services.
- Information on the Title VI Policy and LEP responsibilities and Language Assistance Plan policies.
- Description of language assistance services offered to the public and the technology available to provide these services.
- Documentation of language assistance requests that will be prepared in a monthly report provided to the Office of Equal Opportunity.
- How to handle and document a potential Title VI / LEP complaint received through the customer service department.

CONCLUSION

PRT offers a variety of transportation programs and services throughout Allegheny County, located in Southwest Pennsylvania. PRT's service area includes the City of Pittsburgh, which has been identified as the 68th-largest city in the United States and as the second-most heavily populated city in Pennsylvania. PRT seeks to provide meaningful access to all its products, programs and services to all riders in this population. Although PRT has identified a small number of LEP persons within its service area, the Agency has implemented a comprehensive LAP, where reasonable steps are taken to meet or exceed the minimum mandated requirements necessary to provide language assistance to limited English proficient persons in its service area. The success of this plan relies on identifying both internal and external strategies and dedicated funding resources that will allow the Agency to strengthen and implement policies and procedures which significantly contribute to LEP persons gaining meaningful access to its programs and services.

Evaluation of both the internal and external processes utilized by PRT to meet or exceed the needs of LEP persons on a regular basis provides an opportunity to improve upon access to all PRT products, programs and services for all riders. PRT will continue to track the activity and usage of its services by LEP persons and requests for assistance from Customer Service and Operator staff, and record information from passenger surveys which will help to identify the language spoken by passengers and their need for assistance. PRT will continue to identify, implement and improve upon the above referenced policies needed to continue to provide effective and meaningful communications with LEP persons. Additionally, PRT will maintain regular, consistent, and effective communications with local governments in its service area, community stakeholders and organizations, service providers, community representatives and

individuals to assist with identifying changing or emerging LEP needs. The outcome of these communications is expected to significantly benefit overall access to PRT services by LEP persons.

Dissemination of the Pittsburgh Regional Transit Language Assistance Plan Internal and External Access

PRT will include the LAP plan on the PRT website (www.rideprt.org) together with its Title VI Policy and Complaint Procedures. The PRT Notice of Rights under Title VI to the public is available in the PRT Downtown Service Center and on all PRT vehicles along with the “I Speak” Banner directing LEP persons to contact PRT Customer Service Department for assistance in English, Spanish and Chinese. Any person, including social service, non-profit and law enforcement agencies, along with other community partners with internet access will be able to access the plan through the PRT website. Copies of the LAP Plan will be provided upon request. Individuals requiring language assistance may obtain copies and/ or translations of the plan upon request.

LAP version issued and effective _____, 2024. Administratively issued by PRT’s Office of the Chief Executive.

Any questions or comments regarding Pittsburgh Regional Transit’s Language Assistance Plan should be directed to the Pittsburgh Regional Transit Deputy Chief HR Officer and OEO:

Eric Wells

Deputy Chief Human Resources and OEO Officer

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Weekdays
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Weekends and holidays
8AM - 4:30PM

Website: www.rideprt.org