

As a recipient of federal assistance, ATP will be required to take reasonable steps to ensure persons with limited English proficiency (LEP) have access to transit services, programs, and initiatives. ATP’s Title VI Program Plan<sup>1</sup> details the organization’s activities designed to comply with Title VI of the Civil Rights Act, which provides that:

*No person in the United States shall, on the ground 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.*<sup>2</sup>

The Title VI plan includes ATP’s language access plan, which relied upon information and analysis from the Capital Metropolitan Transportation Authority (CapMetro) language access plan, released in 2021. CapMetro completed a four-factor analysis<sup>3</sup> to identify the languages most frequently encountered in its service area:

- Primary: Spanish
- Safe Harbor<sup>4</sup> or additional languages: Arabic, Burmese, Chinese (Mandarin), French, Korean, Pashto, Punjabi, Telugu, and Vietnamese

According to this analysis, 9% of the population of Travis County (see Appendix A) are Spanish speakers with limited English proficiency. Individuals are considered LEP if English is not their primary language and they have a limited ability to read, write, speak, or understand English.

ATP’s language access plan includes a list of language assistance measures that ATP plans to implement to provide access to information and services to its LEP customers. It also includes a list of recommended actions (see Appendix B) that ATP can implement to improve its level of service to its LEP customers.

Another critical factor in providing access is ensuring that all information – print or digital – is accessible and readable. ATP aims to follow federal plain language guidelines<sup>5</sup> for all public engagement communication. The federal government defines plain language as communication that can be understood by an individual the first time they read or hear it. ATP aims to comply with Section 508 of the Rehabilitation Act of 1973<sup>6</sup> by providing digital information – documents, presentations, and social media content – in an accessible format. ATP is required under Title II of the Americans with Disabilities Act (ADA)<sup>7</sup> to



Exhibit 1: ATP Title VI Program Plan, July 2022

<sup>1</sup> ATP prepared the [Title VI Program Plan](#) in compliance with [Title 49 Code of Federal Regulations Part 21](#) and the [Federal Transit Administration \(FTA\) Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”](#).

<sup>2</sup> The Civil Rights Act of 1964, as amended, 42 U.S.C. §2000d, et seq (“[Title VI](#)”).

<sup>3</sup> The [Department of Transportation Policy Guidance Concerning Recipient’s Responsibilities to LEP Persons](#) describes a four-factor analysis to be used by recipients to assess language needs and decide what steps they can take to increase access to their services.

<sup>4</sup> [FTA Circular 4702.1B](#) defines “safe harbor” languages as “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.”

<sup>5</sup> [Federal plain language guidelines](#) were established for the [Plain Writing Act of 2010](#) to guide agencies on how to write clearly.

<sup>6</sup> [Section 508 \(Federal Electronic and Information Technology\) of the Rehabilitation Act of 1973](#).

<sup>7</sup> In April 2024, the U.S. Department of Justice issued a [final rule](#) in the Federal Register under Title II of the ADA to improve web and mobile application access for people with disabilities. Transit agencies will have three years to comply with this rule.

provide web and mobile application access for people with disabilities. ATP aims to meet these requirements by following the Web Content Accessibility Guidelines (WCAG 2.1)<sup>8</sup>.

For this audit, we compared ATP’s current goals and activities related to language access and accessibility to federal requirements and industry best practices. Overall, ATP is meeting the language access needs of Austin by providing language access and accessibility services that meet federal requirements and the goals that ATP set out in its language access plan. We also identified areas where ATP can improve services to increase access by implementing recommended actions management set forth in ATP’s Title VI Program Plan and by adopting additional best practices. The table below summarizes the results of that comparison, and the full results are detailed starting on the next page.

Area of Focus	What ATP is Doing Well	How ATP Can Improve
Interpretation Services	<ul style="list-style-type: none"> <li>• ATP held five in-person and one virtual open house scoping events in January – March 2024. ATP offered on-site Spanish interpretation at the in-person events</li> <li>• ATP offers live Spanish interpretation via Zoom at Community Advisory Committee meetings</li> <li>• ATP announces at that start of board meetings that interpretation services are available upon request</li> </ul>	<ul style="list-style-type: none"> <li>• ATP should estimate the costs for implementing a telephone language line – a phone service for interpretation assistance</li> <li>• ATP should estimate the costs of providing ASL and non-English language interpretation services at Board meetings</li> <li>• ATP should put together a list of bilingual or multilingual staff readily available to provide interpretation assistance</li> </ul>
Website Content	<ul style="list-style-type: none"> <li>• ATP’s website provides translation of site content into eight languages</li> <li>• ATP offered a virtual survey for the January – March 2024 virtual open house event that was available in all languages offered using Google Translate</li> <li>• ATP uses a variety of tools to create accessible web content that meets WCAG 2.1 requirements</li> </ul>	<ul style="list-style-type: none"> <li>• ATP should estimate the costs of using a qualified human translator to review all web content that is machine translated</li> <li>• ATP should estimate the costs of creating and maintaining a separate Spanish website for the organization</li> </ul>
Media Outreach	<ul style="list-style-type: none"> <li>• ATP published ads in English, Spanish, and Korean for the January – March 2024 open house events.</li> <li>• ATP made six social media posts advertising the January – March 2024 open house events, which were repeated across all social media accounts but were made in English only</li> </ul>	<ul style="list-style-type: none"> <li>• ATP should attempt to identify an outreach source for each of the most frequently encountered languages in its service area, and aim to share details about public outreach events in each of these languages</li> <li>• ATP should explore how to incorporate non-English language social channels as part of its social media strategy moving forward</li> </ul>
Translation Services	<ul style="list-style-type: none"> <li>• ATP’s Notice to Beneficiaries and Title VI complaint procedures and forms are available in all safe harbor languages</li> <li>• ATP provides some public reports in English and Spanish</li> <li>• At the January – March 2024 open house events, ATP provided the written survey for attendees to fill out in Spanish and English</li> </ul>	<ul style="list-style-type: none"> <li>• ATP should estimate costs of developing and implementing a process to address the backlog of documents to be translated into Spanish and, moving forward, to translate all vital documents into Spanish and select vital documents into all safe harbor languages</li> <li>• ATP should estimate costs of providing tablets or laptops at outreach events for access to materials and surveys in languages other than English</li> </ul>
Readability and Accessibility	<ul style="list-style-type: none"> <li>• ATP uses contracted staff to produce accessible public reports, both in English and Spanish</li> <li>• ATP uses online tools, like CommonLook PDF, to validate compliance with Section 508</li> </ul>	<ul style="list-style-type: none"> <li>• ATP should estimate costs of developing and implementing a process to address the backlog of documents to be brought into compliance with Section 508 and, moving forward, ensure that all public documents released by ATP are Section 508 compliant proactively/in real time</li> </ul>

<sup>8</sup> The [WCAG 2.1](#) are the internationally recognized standard for web content and mobile app accessibility under Title II of the ADA.

ATP’s Title VI Plan describes planned assistance measures related to interpretation services, listed in bold below. We evaluated ATP’s current activities according to this plan and assessed ATP’s progress under each bolded measure:

- **Providing on-site Spanish speaking interpretations at events.** ATP conducted five in-person and one virtual open house scoping events in January to March 2024. ATP offered on-site Spanish interpretation at the in-person events. This service increased access for Spanish speakers to participate in the events, understand the materials on display (which were only in English), and fill out the requested survey.

A telephone language line is a phone service for interpretation assistance that can be used when there is a need for interpreters for languages that no ATP staff can speak

ATP management stated they have considered using a telephone language line at outreach events. CapMetro and the City of Austin both currently use a phone language line service. In FY23, CapMetro’s Language Line had more than 31,000 minutes of use, only 1,000 minutes of which were for languages other than Spanish. It cost CapMetro just over \$18,000 to operate, and around \$800 of that was spent on languages other than Spanish. ATP management said this tool has not been researched to determine potential costs.



**Exhibit 2: Photo of Spanish interpretation services at the Baker Center Open House in February 2024**

- **Offering interpreters by request for public meetings, public hearings, or board meetings.** ATP offers live Spanish interpretation via Zoom at Community Advisory Committee meetings, which increases access for Spanish speakers to participate in meetings. To increase access for non-hearing participants, ATP offers automatic closed captioning during Board Meetings. Other interpretation services for Board Meetings are available upon request. However, this process may prevent some individuals from participating in meetings if they do not know they need to request interpretation services ahead of time or are unable to request them.

Best practices recommend enhancing language access through interpretation services by identifying how they should be delivered (in person or remotely) and by whom: bilingual or multilingual staff, professional interpreters, or volunteers. Best practice also encourages agencies to maintain a list of bilingual or multilingual staff who can be called upon for interpretation services. These practices can help an organization more effectively create a

comprehensive plan and budget for providing language assistance measures by knowing how and when it wants to provide services, and what services it can provide in-house or provided through outside assistance.

ATP's Title VI plan also includes a recommendation to specifically budget for additional language assistance measures that ATP could implement to improve the level of accessibility ATP provides to LEP customers:

- **Develop budget plans to monitor and plan for translation and interpretation expenses to increase access and inclusion at ATP board meetings and events.** Best practice guidance recommends that organizations develop budgetary practices to estimate costs for implementing language access assistance measures.

The amount of funding needed for language assistance can vary over time based on things like changing demographics, cost of third-party services, and different types of interactions with customers. This proactive approach to budgeting for assistance measures allows organizations to adequately plan for and support implementation of assistance measures, rather than relying on other parts of the organization budget to cover those costs.

*We recommend that ATP conduct an assessment to estimate the costs of:*

- *implementing a language line or establishing an agreement with the City of Austin or CapMetro to use their language line services, and*
- *providing ASL and or non-English language interpretation service at Board meetings.*

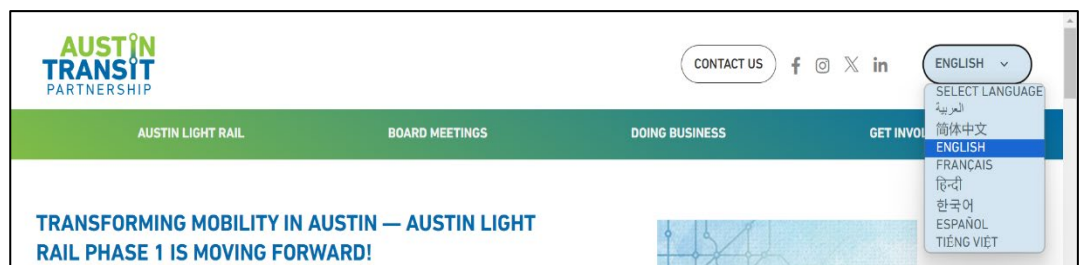
*ATP should budget for those costs in the future to improve access to information and services for its customers.*

*ATP should compile a list of bilingual or multilingual ATP staff that are able and willing to serve as community interpreters and share that list with all ATP staff with guidance on how and when to use these interpretation services.*

## Website Content

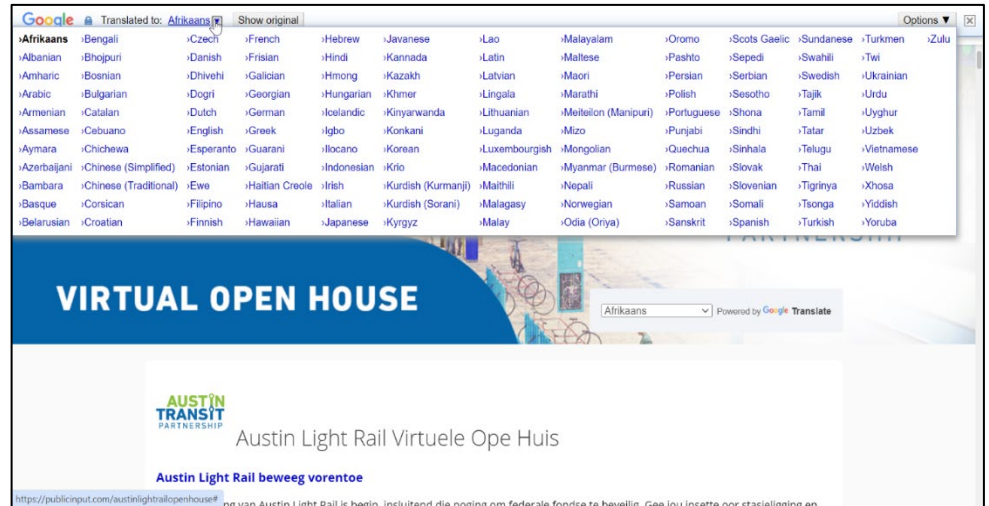
ATP's Title VI Plan describes one planned assistance measure related to translation of website content, listed in bold below. We evaluated ATP's current activities according to this plan and assessed ATP's progress under each bolded measure:

- **Providing Google Translate on the ATP website, allowing translations for most content.** ATP's website provides translation of site content into eight languages – Arabic, Chinese, English, French, Hindi, Korean, Spanish, and Vietnamese. This translation is available real-time via a menu at the top of the website. ATP's web accessibility tool, UserWay, also provides accessibility tools in additional languages.



**Exhibit 3: Google Translate tool at the top of ATPTX.org with eight language options**

ATP offered a virtual survey for the January to March 2024 virtual open house event that was available online throughout the duration of the outreach events. The questionnaire was available in all languages available using Google Translate, increasing access to the survey for individuals with limited English proficiency.



**Exhibit 4: The virtual open house survey, available in all languages available using Google Translate**

ATP’s Title VI plan also includes a recommendation, **bolded below**, for website materials and content that ATP could implement to improve the level of accessibility provided to customers:

- **Ensure that all website materials and content is in a form that can be translated using online tools, upload documents in original form and not scanned, and use pictograms as necessary instead of printed text.** While this recommendation is focused on translation services, ATP’s efforts related to creating accessible web content that meets WCAG 2.1 requirements also address this recommendation. ATP uses accessibility tools like [Sim Daltonism](#) for images, and [Colour Contrast Analyzer](#) or [WebAIM](#) for text. Sim Daltonism simulates live previews of documents, photos, and other materials for various color blindnesses. Colour Contrast Analyzer and WebAIM provide ratings of contrast performance, according to WCAG 2.1 levels of accessibility conformance. ATP staff strives for level AA or AAA minimum conformance, with level AAA being the highest level of conformance with WCAG 2.1 requirements. In Spring 2024, ATP engaged its public information consultant to evaluate ATP’s efforts towards compliance with the WCAG 2.1 requirements. The results of that review will be incorporated into ATP’s processes moving forward.

Federal government best practices for digital engagement recommend against the use of machine or automatic translations as the sole solution for meeting users’ language needs. Agencies that use automatic translations should have all translations checked by a qualified human translator.<sup>9</sup> Additionally, best practices recommend that agencies provide separate multilingual websites to provide a complete experience for LEP users.<sup>10</sup> To provide the best service to LEP users via multilingual websites, best practice says an organization should:

<sup>9</sup> Digital.gov, [Introduction to Translation Technology](#).

<sup>10</sup> Digital.gov, [Top 10 Best Practices for Multilingual Websites](#).

- Enable users to easily find the multilingual website via prominent access on the English site.
- Use a stand-alone, dedicated URL for marketing and search engine optimization purposes.
- Ensure that the multilingual website provides a comparable user experience to the English site.
- Provide similar digital features and functionality on the multilingual websites as available on the English site.
- Understand the cultural considerations of the target audience and provide a website experience to achieve an emotional connection with the audience.
- Ensure that the multilingual website gets the same maintenance as the English site.

As part of the cost assessment recommended above, we recommend that ATP also estimate the costs of:

- using a qualified human translator to review all ATP web content that is machine translated into Spanish and other safe harbor languages,
- creating and maintaining a Spanish version of the ATP website.

## Media Outreach

ATP’s Title VI Plan describes one planned assistance measure related to media outreach for language access, listed in bold below. We evaluated ATP’s current activities according to this plan and assessed ATP’s progress under each bolded measure:

- **Posting public meeting notices in foreign language newspapers to reach LEP populations and tapping into Community Based Organizations for assistance in outreach to LEP populations and language assistance.** ATP aims to communicate information about public outreach events in English, Spanish, Vietnamese, and Korean. ATP published ads in English, Spanish, and Korean for the January to March 2024 open house events. The sources previously used for Korean and Vietnamese outreach have ceased operations, and ATP management has been working to identify new partners to provide outreach assistance in Korean or Vietnamese. ATP should work with local community groups to share project and event information with other targeted language groups in Austin, as well.

9% of the population in Travis County are Spanish speakers with limited English proficiency, according to ATP’s Title VI Program Plan.



Exhibit 5: ATP open house advertisement posted in Korean news source Konnect News on January 19, 2024, per the [ATP Scoping Report](#).

During the January to March 2024 open house events, ATP made six social media posts, repeated across all social media accounts, in reference to the open houses and the virtual open house available online. See Appendix C for screenshots of each of these posts, taken from ATP’s X account. All these posts were made in English, which limited ATP’s effectiveness in reaching individuals with limited English proficiency on social media.

In addition, a survey of community-based organizations by CapMetro found that CapMetro users do not get their information on CapMetro from print, tv, or radio media, but prefer to get information through social media. ATP currently uses social media accounts on X, Instagram, LinkedIn, and Facebook to advertise outreach events, but does not appear to have a large presence on any of these platforms. ATP has contracted a communications firm to develop a social media strategy.

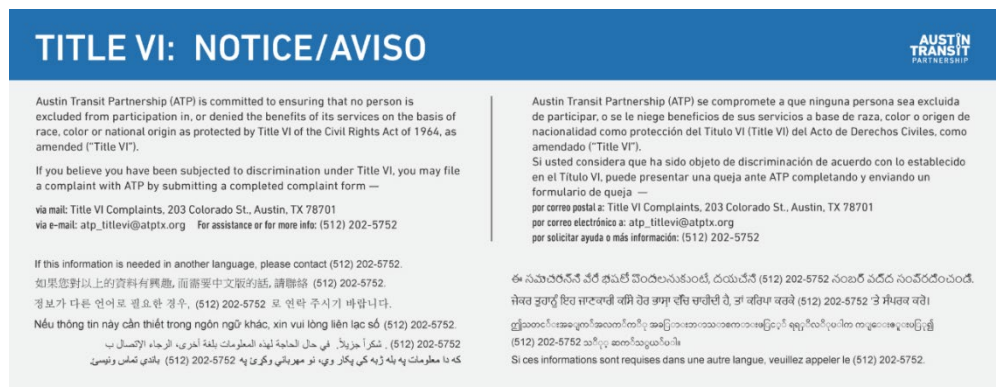
*We recommend that ATP attempt to identify an outreach source – news outlet, community groups, affinity group – for each of the most frequently encountered languages in its service area, and aim to share details about public outreach events in each of these languages.*

*ATP should ensure that language access is included as part of its social media strategy moving forward.*

 Translation Services

ATP’s Title VI Plan describes planned assistance measures related to translation of public materials, listed in bold below. We evaluated ATP’s current activities according to this plan and assessed ATP’s progress under each bolded measure:

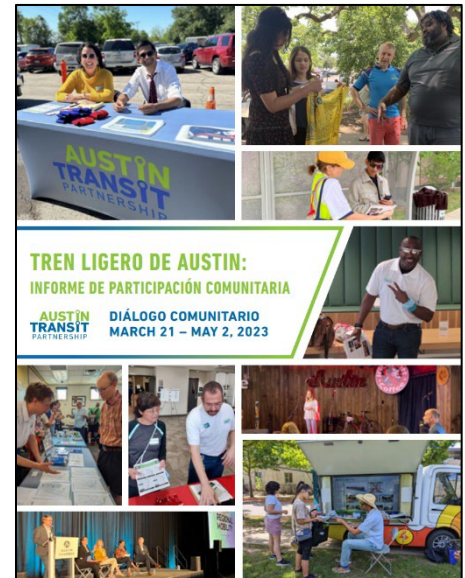
- **Providing Notice to Beneficiaries and Title VI complaint procedures and forms in all Safe Harbor Languages.** ATP’s Notice to Beneficiaries and Title VI complaint procedures and forms are available in all safe harbor languages, which increases access to this information for individuals with limited English proficiency.



The screenshot shows a blue header with the text "TITLE VI: NOTICE/AVISO" and the Austin Transit Partnership logo. Below the header, there are four columns of text in different languages: English, Spanish, Vietnamese, and Chinese. Each column provides information about ATP's commitment to non-discrimination and instructions on how to file a complaint or request assistance. The English text includes contact information for Title VI Complaints at 203 Colorado St., Austin, TX 78701, and email atp\_titlevi@atptx.org. The Spanish text is a direct translation of the English text. The Vietnamese and Chinese text provide the same information in their respective languages.

Exhibit 6: ATP’s Title VI Notice, <https://www.atptx.org/title-vi/>

- **Creating Spanish translations for some informational brochures and marketing materials.** ATP management said they aim to provide public materials in English and Spanish. For example, reports like the Austin Light Rail Implementation Plan, the Spring 2023 Community Engagement Report, and the Scoping Report are available in English and Spanish on ATP’s website.



**Exhibit 7: Spanish versions of the Austin Light Rail Implementation Plan and Spring 2023 Community Engagement Report, available on <https://www.atptx.org/>**

ATP uses a language translation service provider which has a “library” of terms and phrases unique to Project Connect and transit, which helps facilitate quicker and less costly translation of more challenging technical terms.

- **Providing on-site Spanish speaking translations.** At the January to March 2024 open house events, ATP provided the written survey for attendees to fill out in Spanish and English. The flyer marketing the open house events was also printed in Spanish and English. This increased access to information and the ability to provide on-site feedback via the survey for Spanish speakers.

ATP management said they have considered having tablets or laptops available at outreach events to increase access for all attendees to fill out the online survey in their preferred language, to include individuals who speak safe harbor languages which are currently not served at outreach events. Management said this tool has not been researched to determine potential costs.



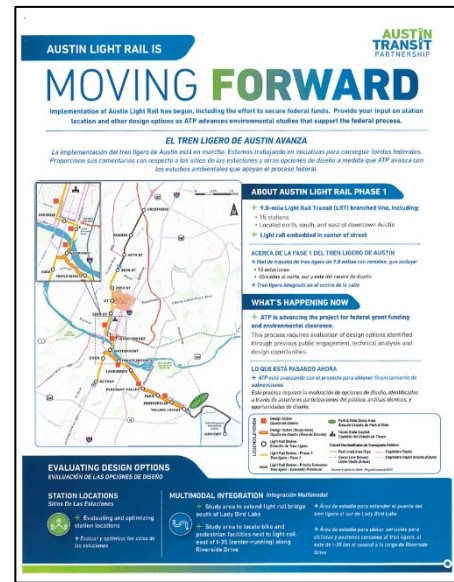
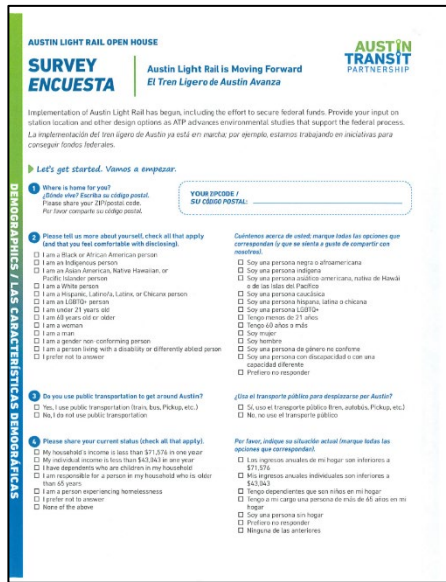


Exhibit 8: Spanish versions of the survey and marketing flyer for the January - March 2024 open house events.

- Providing Spanish translations and pictograms on-board vehicles, on ticket vending machines, and at bus stops and stations. The Architecture and Urban Design team has developed draft guidelines for station design that use research and precedents to provide guidance for navigation, ticketing, and real time information zones or locations at stations and surrounding areas that are most conducive to intuitive wayfinding. This guidance can be adapted as more information about messaging, languages, tone, and graphics is determined as the program advances. Management asserts next step in this process is for ATP leadership to establish policies to define and provide broad language access and accessibility at future stations and on-board future light rail vehicles.

The CapMetro language access plan, adopted as part of ATP's Title VI Program Plan includes details on the information and documents to be provided in various languages to riders on-board and at stations. Moving forward, ATP leadership should evaluate whether they will adopt CapMetro's practices related to language access and operations, or define new goals and practices specific to Austin Light Rail.

ATP's Title VI plan also includes recommendations<sup>11</sup> for additional assistance measures that ATP could implement to improve the level of accessibility ATP provides to LEP customers:

<sup>11</sup> The Title VI Program Plan includes an assistance measure related to Spanish translation during construction. We did not evaluate this measure at this time since this is an activity that will be implemented when ATP enters the construction phase of the project.

- **Translate all vital documents into primary and safe harbor languages.** CapMetro’s language access plan, used by ATP to support the development of ATP’s plan, has a list of vital and non-vital documents and includes guidance on the languages into which those records should be translated.

**Table 11: Vital Documents Guidance**

Document	Languages	Vital Document?
Title VI Public Notice	All Safe Harbor Languages	Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages	Yes
Notice of Free Language Assistance	All Safe Harbor Languages	Yes
General Promotional Materials (such as FAQs or other materials that provide direction on how to access services and public meeting notices)	Spanish and Safe Harbor Languages as funding permits	Depends on content
Public Meeting and Hearing Notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
“Participation” or “Intake” forms (such as Americans with Disabilities Act (ADA) Determination letter and appeal forms, and incentive forms)	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Ridership and/or Customer Satisfaction Surveys	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Legal Notices, construction notices, or environmental findings notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Depends on content

Source: Capital Metro, 2021.

**Exhibit 9: A list of vital and non-vital documents and guidance on translation, CapMetro language access plan**

Staff noted a common challenge to translating public materials is that there is not always sufficient time to complete document translations and accessibility checks prior to publishing documents. To create a translation of an English document, ATP staff noted that a proper translation needs more than just the text translated. Documents often need to be reformatted after text is translated since the languages often take up different amounts of physical space on pages.

As a result of these challenges, ATP currently has a backlog list of documents from 2022 through the current year that need to be translated into Spanish and not all reports currently produced by ATP are being translated into Spanish. For example, the Budget report was not translated into Spanish in prior years or for FY25. A repeat item on this list is the ATP Board Brief, produced monthly for the ATP Board and the public. This monthly report serves as a primary medium to communicate with the public on project progress from ATP, CapMetro, and the City of Austin. As of July 2024, the Board Brief is only being produced in English each month. To increase access to the 9% of the population in Travis County that are Spanish speakers with limited English proficiency<sup>12</sup>, ATP should prioritize translating new reports produced into Spanish and providing Spanish translations for past versions on the ATP website.

<sup>12</sup> See appendix A for detailed LEP data for Travis County from the ATP Title VI Program Plan.

- **Develop budget plans to monitor and plan for translation.** ATP staff noted cost as an impediment to providing adequate translation services. For example, the estimated total cost of translating ATP’s backlog list of documents is \$14,000. As noted above, best practice guidance recommends that an organization develop budgetary practices to estimate costs specific to implementing language access activities and not rely on other parts of the organization’s budget to cover language access costs.

As part of the cost assessment recommended above, we recommend that ATP also estimate the costs of:

- *developing and implementing a process to address the backlog of documents to be translated into Spanish and, moving forward, to translate all vital documents into Spanish and select vital documents into all safe harbor languages,*
- *providing tablets or laptops at outreach events for access to materials and surveys in languages other than English, and*
- *produce display boards for outreach events in Spanish.*



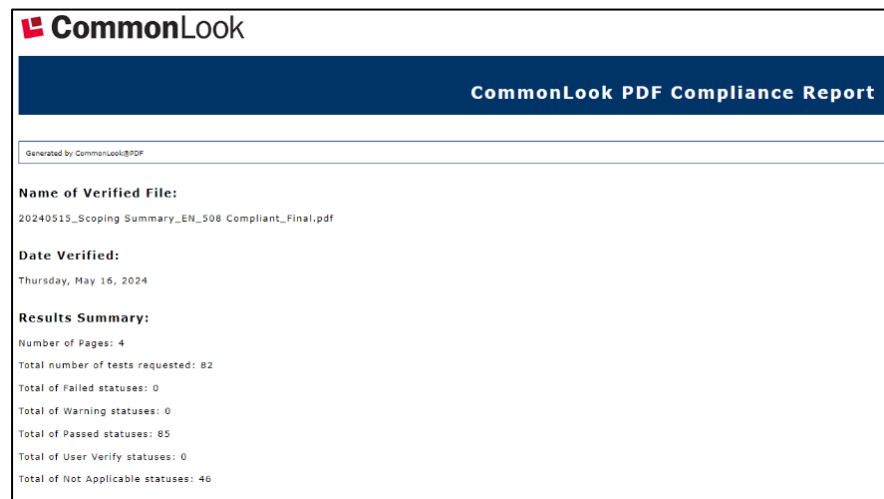
## Readability and Accessibility

Information is readable and accessible when users can easily:

- find what they need
- understand what they find, and
- use what they find to meet their needs.

While ATP’s Title VI Plan does not include specific activities or goals related to readability and accessibility of print and digital information, ATP management stated they aim to provide information in plain language and make digital and online information accessible for people with disabilities. ATP aims to provide public information at a Grade 8 reading level and adjust this goal according to the intended audience. ATP uses an online tool called Hemmingway to measure drafted materials against most plain language standards

Currently, public reports produced by contracted staff for ATP meet Section 508 compliance, in both English and Spanish. ATP uses online tools, like CommonLook PDF, to validate compliance with Section 508. The English and Spanish versions of the Scoping Summary Report released in May 2024 were validated as Section 508 compliant using this tool.



**Exhibit 10: CommonLook PDF Compliance Report for the English Scoping Summary Report showing all test results as “passed”**

Management said it does not currently have a formal process in place to ensure all reports produced in-house are compliant with Section 508. For example, the ATP Board Brief, produced monthly for the ATP Board and the public, is not currently formatted for complete Section 508 compliance. To increase access to reports intended to inform the public about

ATP activities and Project Connect, ATP should prioritize formatting new reports produced for Section 508 compliance and updating past versions on the ATP website.

*As part of the cost assessment recommended above, we recommend that ATP also estimate the costs of:*

- *developing and implementing a formal process to address the backlog of documents to be brought into compliance with Section 508 and, moving forward, to ensure that all public documents released by ATP are Section 508 compliant proactively/in real time.*

## Appendix A: Limited English Proficiency Data for Travis County

The ATP Title VI Program plan used information and analysis conducted by CapMetro to support development of ATP's language access plan. CapMetro completed a four-factor analysis to identify the languages most frequently encountered in its service area. The table below shows the percentage of limited English-speaking households in Travis County.

Travis County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
<b>Total:</b>	1,170,348		
<b>Speak only English</b>	806,078	68.88%	
<b>Spanish:</b>	265,593		
Speak English "very well"	159,876		
Speak English less than "very well"	105,717	9.03%	29.02%
<b>Punjabi:</b>	1,164		
Speak English "very well"	167		
Speak English less than "very well"	997	0.09%	0.27%
<b>Nepali, Marathi, or other Indic languages:</b>	2,894		
Speak English "very well"	1,754		
Speak English less than "very well"	1,140	0.10%	0.31%
<b>Other Indo-European languages:</b>	2,209		
Speak English "very well"	1,076		
Speak English less than "very well"	1,133	0.10%	0.31%
<b>Telugu:</b>	4,602		
Speak English "very well"	3,433		
Speak English less than "very well"	1,169	0.10%	0.32%
<b>Chinese (incl. Mandarin, Cantonese):</b>	12,584		
Speak English "very well"	8,605		
Speak English less than "very well"	3,979	0.34%	1.09%
<b>Korean:</b>	3,422		
Speak English "very well"	1,863		
Speak English less than "very well"	1,559	0.13%	0.43%
<b>Vietnamese:</b>	9,956		
Speak English "very well"	5,080		
Speak English less than "very well"	4,876	0.42%	1.34%
<b>Arabic:</b>	7,782		
Speak English "very well"	5,504		
Arabic Speak English less than "very well"	2,278	0.19%	0.63%
<b>Yoruba, Twi, Igbo, or other languages of Western Africa:</b>	3,041		
Speak English "very well"	2,005		
Speak English less than "very well"	1,036	0.09%	0.28%
<b>Swahili or other languages of Central, Eastern, and Southern Africa:</b>	2,171		
Speak English "very well"	1,132		
Speak English less than "very well"	1,039	0.09%	0.29%

Source: ACS, 2018 one-year sample Table B16001.

## Appendix B: ATP Title VI Program Plan – Planned Language Assistance Measures and Recommended Measures

### Providing Language Assistance Measures

ATP is committed to providing meaningful access to information and services to its LEP customers. Along with enabling persons who do not speak English very well to navigate the system with the same ease as the general population, it is necessary to provide a meaningful opportunity for LEP persons to participate in the public comment process for planning activities and major capital projects. Specific methods pertaining to outreach will be discussed in ATP's Public Participation Plan that is under development and will be added to the Title VI Program Plan. Currently, the primary tools ATP will implement include the following:

- Providing Notice to Beneficiaries and Title VI complaint procedures and forms in all Safe Harbor Languages.
- Providing Google Translate on the ATP website, allowing translations for most content.
- Providing on-site Spanish speaking translations and interpreting in a variety of settings.
- Making resources available for any staff to address language assistance needs for any language.
- Offering interpreters by request for public meetings, public hearings, or board meetings.
- Posting public meeting notices in foreign language newspapers to reach LEP populations.
- Providing Spanish translations and pictograms on board vehicles, on Ticket Vending Machines, at bus stops and at stations.
- Producing Spanish language video content.
- Creating Spanish translations for some informational brochures and marketing materials.
- Tapping into Community Based Organizations for assistance in outreach to LEP populations and language assistance.

The following are recommendations that would improve the level of service that ATP provides to its LEP customers and that can be implemented over time as budget and staff permits.

1. Strengthen Title VI awareness through internal training for all staff and integrate an understanding of Title VI across ATP.
2. Create standard processes and informational materials for ATP to utilize as a resource when interacting with the public.
3. Develop demographic analyses that connect Title VI, LEP, and project areas.
4. Translate all vital documents into primary and safe harbor languages.
5. Ensure construction, detour, and other courtesy notices are translated into Spanish, when feasible, and all other languages as determined by analysis of location.
6. Ensure that all website materials and content is in a form that can be translated using online tools, upload documents in original form and not scanned, and use pictograms as necessary instead of printed text.
7. Develop budget plans to monitor and plan for translation and interpretation expenses to increase access and inclusion at ATP board meetings and events.
8. Hold Title VI and LEP training for all new hires.
9. Create training plan around Title VI and diversity, equity, and inclusion, to proactively engage staff.

Source: [ATP Title VI Program Plan](#), pg 11-12

Appendix C: ATP X posts, made by @ATP\_org, for the January – March 2024 open house events

**Austin Transit Partnership** @ATP\_org Follow

Austin Light Rail is moving forward. ATP is advancing comprehensive studies to support the federal process and secure federal funds. Share your input on station location and other design options. Register here: [atpx.org/events/](https://atpx.org/events/)

**OPEN HOUSE: Austin Light Rail is Moving Forward**



4:46 PM · 1/29/24 From Earth · 1.6K Views

8 Reposts 2 Quotes 10 Likes 1 Bookmark

**Austin Transit Partnership** @ATP\_org Follow

✔ Take our survey to share your thoughts on the design options and station locations of Austin Light Rail and contribute to our comprehensive studies of the proposed project. [publicinput.com/austinlineai...](https://publicinput.com/austinlineai...)



2:41 PM · 2/2/24 From Earth · 957 Views

5 Reposts 5 Likes 1 Bookmark

**Austin Transit Partnership** @ATP\_org Follow

Thanks to those who made it to the first February Open House event at UT! It's not too late to attend and share your input into Austin Light Rail station locations and design. Register here: [atpx.org/events/](https://atpx.org/events/)



5:15 PM · 2/6/24 From Earth · 403 Views

1 Repost 3 Likes

**Austin Transit Partnership** @ATP\_org Follow

Our virtual Open House is today at 5:30 p.m. Hear more about Austin Light Rail and share your input into station locations and design. Please register here: [bit.ly/30THc4Z](https://bit.ly/30THc4Z)



3:34 PM · 2/22/24 From Earth · 637 Views

3 Reposts 1 Quote 3 Likes

**Austin Transit Partnership** @ATP\_org Follow

Join ATP's last two Open Houses to share your input on Austin Light Rail station locations and design options. Register here: [atpx.org/events/](https://atpx.org/events/)




4:26 PM · 2/26/24 From Earth · 483 Views

3 Reposts 4 Likes

**Austin Transit Partnership** @ATP\_org Follow

If you missed ATP's Open Houses, you can still share your input on the design options and station locations of Austin Light Rail. The virtual survey is open until March 5, 11:59 pm. [publicinput.com/austinlineai...](https://publicinput.com/austinlineai...)



3:19 PM · 2/29/24 From Earth · 283 Views

1 Quote 1 Like

## ATP Management Action Plan

Recommendation	Management Action Plan	Proposed Implementation Date	Responsible Party
<p><b><i>Recommendation 1:</i></b>  <i>ATP should conduct an assessment to estimate the costs of:</i></p> <ul style="list-style-type: none"> <li><i>i. implementing a language line or establishing an agreement with the City of Austin or CapMetro to use their language line services,</i></li> <li><i>ii. providing ASL and or non-English language interpretation service at Board meetings,</i></li> <li><i>iii. using a qualified human translator to review all ATP web content translated into Spanish and other safe harbor languages,</i></li> <li><i>iv. creating and maintaining a Spanish version of the ATP website,</i></li> <li><i>v. developing and implementing a process to address the backlog of documents to be translated into Spanish and, moving forward, to translate all vital documents into Spanish and select vital documents into all safe harbor languages,</i></li> <li><i>vi. providing tablets or laptops at outreach events for access to materials and surveys in languages other than English,</i></li> <li><i>vii. produce display boards for outreach events in Spanish, and</i></li> <li><i>viii. developing and implementing a process to address the backlog of documents to be brought into compliance with Section 508 and, moving forward, to ensure that all public documents released by ATP are Section 508 compliant proactively/in real time.</i></li> </ul> <p><i>ATP should budget for those costs in the future to improve access to information and services for its customers.</i></p>	<p>ATP will assess the costs related to this recommendation to evaluate the implementation of enhanced services. ATP will improve compliance with Section 508.</p>	<p>June 2025</p>	<p>Communications Services</p>



Recommendation	Management Action Plan	Proposed Implementation Date	Responsible Party
<p><b>Recommendation 2:</b>  ATP should compile a list of bilingual or multilingual ATP staff that are willing to serve as community interpreters and share that list with all ATP staff with information on how and when to use those interpretation services.</p>	ATP will develop a process to identify skilled language staff aligned with a position in the organization who could be utilized for translation services as needed. Given the size of the organization’s workforce, ATP also will continue to utilize contractual services as a primary service given the size of the organization.	June 2025	Human Resources
<p><b>Recommendation 3:</b>  ATP should identify an outreach source – news outlet, community groups, affinity group – for each of the most frequently encountered languages in its service area, and aim to send out about public outreach events in each of these languages.</p>	ATP will maintain a list of applicable outlets and update information regularly based on data and industry trends.	December 2024	Communications Services
<p><b>Recommendation 4:</b>  ATP should explore how to incorporate non-English language social channels as part of its social media strategy moving forward.</p>	ATP will develop a social media strategy that includes consideration for non-English language social channels.	March 2025	Communications Services



## Objective

The objective of this audit was to determine if ATP's public communications sufficiently meet the language and accessibility needs of the Austin community.



## Scope

The scope of this audit was ATP's current and planned communications and outreach activities related to language access and accessibility.



## Methodology

To complete this audit, we performed the following steps:

- Interviewed ATP staff from the Communications, Community Engagement, and Architecture and Urban Design teams to understand current and planned activities related to language access and accessibility of ATP's communications and outreach,
- Reviewed ATP's Title VI Program Plan to understand current and planned activities related to providing access to ATP's materials for individuals with limited English proficiency,
- Reviewed federal regulations and industry best practices related to translation of public materials, interpretation services, readability and accessibility of print and digital materials, translation and accessibility of website content, and media outreach for individuals with limited English proficiency,
- Compared ATP's current and planned activities with best practices to identify actions that ATP could implement to improve the level of accessibility ATP provides to all customers,
- Evaluated information technology and fraud risks related to language and accessibility in public communications and outreach, and
- Evaluated internal controls related to ATP's: information and communication.



## Standards

*This audit was conducted in accordance with the standards promulgated by the Institute of Internal Auditors (Standards). These Standards encompass such matters as independence, objectivity, proficiency, due professional care, the scope and performance of work activities, and management of the internal auditing function. We believe that our work provides a reasonable basis for the reported issues, conclusions, and recommendations.*