



Background

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](#) 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.

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 to identify the languages most frequently encountered in its service area:

- Primary: Spanish
- [Safe Harbor](#) 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 are Spanish speakers with limited English proficiency.

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 that ATP can implement to improve its level of service to LEP customers.

Another critical factor in providing access to ATP’s customers is ensuring that all information – print or digital – is accessible and readable for customers. ATP aims to follow [federal plain language guidelines](#) 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](#) by providing digital information, including documents, presentations, and social media content, in an accessible format. ATP is required under [Title II of the Americans with Disabilities Act](#) to 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).

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 through implementing recommended actions included in ATP’s Title VI Program Plan and by adopting additional best practices. The table on the next page summarizes the results of the comparison and the recommendations, and the detailed results are available in the full audit report.



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.



Recommendations

We issued four recommendations to help ATP improve the level of language access and accessibility services it provides to customers.

Management agreed with the recommendations and plans to implement corrective actions by June 2025.

ATP Internal Audit Team

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Area of Focus	What ATP is Doing Well	How ATP Can Improve
Interpretation Services	<ul style="list-style-type: none"> • 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 • ATP offers live Spanish interpretation via Zoom at Community Advisory Committee meetings • ATP announces at that start of board meetings that interpretation services are available upon request 	<ul style="list-style-type: none"> • ATP should estimate the costs for implementing a telephone language line – a phone service for interpretation assistance • ATP should estimate the costs of providing ASL and non-English language interpretation services at Board meetings <p>ATP should put together a list of bilingual or multilingual staff readily available to provide interpretation assistance</p>
Website Content	<ul style="list-style-type: none"> • ATP’s website provides translation of site content into eight languages • ATP offered a virtual survey for the January – March 2024 virtual open house event that was available in all languages offered using Google Translate <p>ATP uses a variety of tools to create accessible web content that meets WCAG 2.1 requirements</p>	<ul style="list-style-type: none"> • ATP should estimate the costs of using a qualified human translator to review all web content that is machine translated • ATP should estimate the costs of creating and maintaining a separate Spanish website for the organization
Media Outreach	<ul style="list-style-type: none"> • ATP published ads in English, Spanish, and Korean for the January – March 2024 open house events. • 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 	<ul style="list-style-type: none"> • 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 • ATP should explore how to incorporate non-English language social channels as part of its social media strategy moving forward
Translation Services	<ul style="list-style-type: none"> • ATP’s Notice to Beneficiaries and Title VI complaint procedures and forms are available in all safe harbor languages • ATP provides some public reports in English and Spanish • At the January – March 2024 open house events, ATP provided the written survey for attendees to fill out in Spanish and English 	<ul style="list-style-type: none"> • 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 • ATP should estimate costs of providing tablets or laptops at outreach events for access to materials and surveys in languages other than English
Readability and Accessibility	<ul style="list-style-type: none"> • ATP uses contracted staff to produce accessible public reports, both in English and Spanish • ATP uses online tools, like CommonLook PDF, to validate compliance with Section 508 	<ul style="list-style-type: none"> • 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