



# Language Assistance Plan

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



**Massachusetts Bay  
Transportation Authority**

MAY 2023

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## Introduction

The purpose of the MBTA's Title VI Program is to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This includes taking reasonable steps to provide meaningful access to programs and services for people with limited English proficiency.

Meaningful access goes beyond offering translation and interpretation services to limited-English-proficient (LEP) riders. It also includes informing customers and potential customers how to request language assistance. This assistance is available beyond simply riding the network, The MBTA encourages public input and engagement on projects, reaches out to understand community impacts, and tries to work with the feedback received to operate effectively.

This Language Assistance Plan (LAP) is monitored on an ongoing basis and is updated every three years to improve its effectiveness in accordance with federal regulations, and according to the changing needs of the region's diverse communities.

### **The Federal Transit Administration (FTA) defines LEP individuals as:**

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

The MBTA uses this definition, decennial US Census data, the US Census American Community Survey (ACS), feedback from project management staff as well as front line operations staff, and additional local information such as information from community-based organizations (CBOs), to update the Language Assistance Plan.

The US Department of Transportation guidance outlines four factors that agencies should apply to the various kinds of contacts they have with the public to assess language needs and decide

what reasonable steps they should take to ensure meaningful access for LEP persons:

- 1. LEP Population Size:** The number or proportion of LEP persons likely to be served in our programs. This includes:
  - a. How LEP persons interact with our programs, activities, and services;
  - b. Identification of LEP communities and assessment of LEP persons from each language group to determine appropriate language services for each group;
  - c. The literacy skills of LEP populations in their native languages to determine whether translation of documents will be an effective practice; and
  - d. Whether LEP persons are underserved due to language barriers.
- 2. Frequency of Contact:** The frequency with which LEP persons come into contact with our programs, activities, and services. This includes, but is not limited to, assessments of:
  - a. Pass and ticket purchases
  - b. Website usage statistics
  - c. Public meeting participation
  - d. Customer service interactions
  - e. Survey responses
- 3. Importance:** The nature and importance of the program, activity, or service provided to people's lives. This is informed through:
  - a. Feedback from LEP groups about effective means of providing meaningful information about services, programs, and public outreach
  - b. Information obtained from public, facilitated meetings with LEP persons and stakeholders
  - c. Analysis of surveys to determine the needs of LEP persons respective to different regions and communities
  - d. Analysis of programs, activities, and services to ensure they are providing meaningful access to LEP persons
- 4. Resources:** The resources available for LEP outreach and the costs associated with that outreach. This means addressing cost and resource issues by investigating:
  - a. Technological advances
  - b. Reasonable business practices
  - c. The sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations, and federal agencies

The first two of the four factors are used to identify individuals who need language assistance. The third factor determines what needs to be translated, and the fourth factor identifies translation resources and costs. The MBTA has followed FTA guidance in completing a four-factor analysis to identify and document the number and geographic distribution of potential LEP customers within the MBTA's 176-municipality service area and to evaluate the need for language assistance.

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# I. Four Factor Analysis of LEP individuals for whom language assistance may be needed

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

### Quantitative Analysis

Data from the 2016–2020 ACS five-year Public Use Microdata Sample were used to analyze the number of LEP persons living in the MBTA service area. The US Census tables titled “Language Spoken at Home” and “Ability to Speak English for the Population 5 Years and Over” were used to estimate the number of people with limited English proficiency for Public Use Microdata Areas (PUMAs) within Massachusetts. PUMAs are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. To calculate the number of people with limited English proficiency the counts of people who self-reported as speaking English less than “very well” were summed.

The MBTA has two overlapping service areas: the commuter rail service area, which is 176 municipalities that have access to MBTA commuter rail service, and the core service area, which is 59 municipalities that have access to MBTA bus and rapid transit service in addition to commuter rail service. The US Census tables used for this analysis provide data by PUMA, not by municipality. PUMAs can consist of multiple municipalities, so PUMAs were assigned to service areas as follows:

- For the commuter rail service area, all PUMAs with any geographic overlap with the service area were included. Forty-three out of the 52 PUMAs in Massachusetts met this definition.
- For the core service area, PUMAs in which at least 15 percent of the geographic area overlaps with the service area were included. Twenty-four PUMAs met this definition.

This analysis will use the commuter service area in its evaluation of LEP populations since it consists of all municipalities covered in both service areas.

The total LEP population in the PUMAs of the commuter rail service area is 525,949 people, or approximately 9.2 percent of the total population age five or older. The largest single group of people with limited English proficiency is composed of Spanish speakers, who represent 39.4 percent of the LEP population in the commuter rail service area. Approximately 207,242 people in the service area are Spanish speakers with limited English proficiency.

## Top Five Languages

Table 1 shows the top five language groups among people with limited English proficiency in the commuter rail service area.

**Table 1**  
**Top Five Language Groups in the MBTA Commuter Rail Service Area**

Language	2020 LEP Speakers	Percentage of Total Population	Percentage of LEP Population
Spanish	207,242	3.63%	39.4%
Chinese	65,840	1.15%	12.5%
Portuguese	61,146	1.07%	11.6%
Haitian	37,820	0.66%	7.2%
Vietnamese	24,336	0.43%	4.6%

LEP = Limited English Proficiency.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

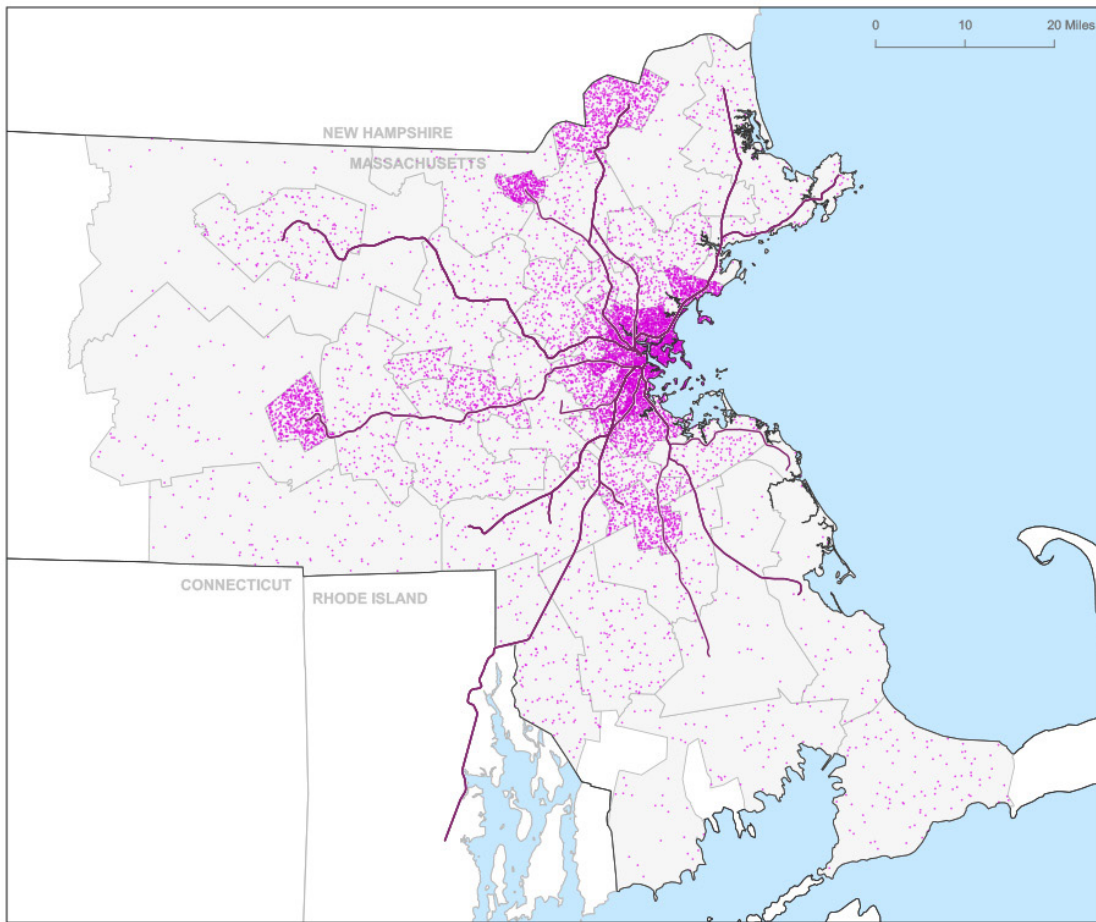
Given that the majority of individuals with limited English proficiency in the MBTA service area belong to one of these top five language groups, further details about each of these language groups are provided below. Additional language groups beyond the top five are also identified.

The Central Transportation Planning Staff mapped the ACS data to provide a geographic representation of where concentrations of people with limited English proficiency live and to show the languages spoken at home in those areas. Figures 1-A and 1-B show the concentrations by PUMA, regardless of the language spoken at home, in the commuter rail and core service areas, respectively. The core service area is where the majority of MBTA transit services are located, and most of the areas with the highest concentrations of LEP persons are urban areas.

To identify locations containing large concentrations of people with limited English proficiency who speak the top five languages, PUMAs were selected that had an overall LEP population larger than five percent of the total population and where any of the top five language groups comprised more than 25 percent of the PUMA's LEP population, or more than 1,000 persons. The maps and tables below show that some languages are spoken primarily in and around Boston, while others are more broadly distributed.


Figures 2-A through 6-B show the concentrations of people in the commuter rail and core service areas whose primary language is one of the top five languages and who have limited English proficiency. The figures highlight the PUMAs with the largest concentrations of these populations. Tables 2 through 6 list these PUMAs and provide the number of speakers of these languages with limited English proficiency and their percentage of the total population and LEP population in each PUMA.





**FIGURE 1-A  
MBTA Language  
Assistance Plan**

**People with Limited English Proficiency in the MBTA Commuter Rail Service Area**

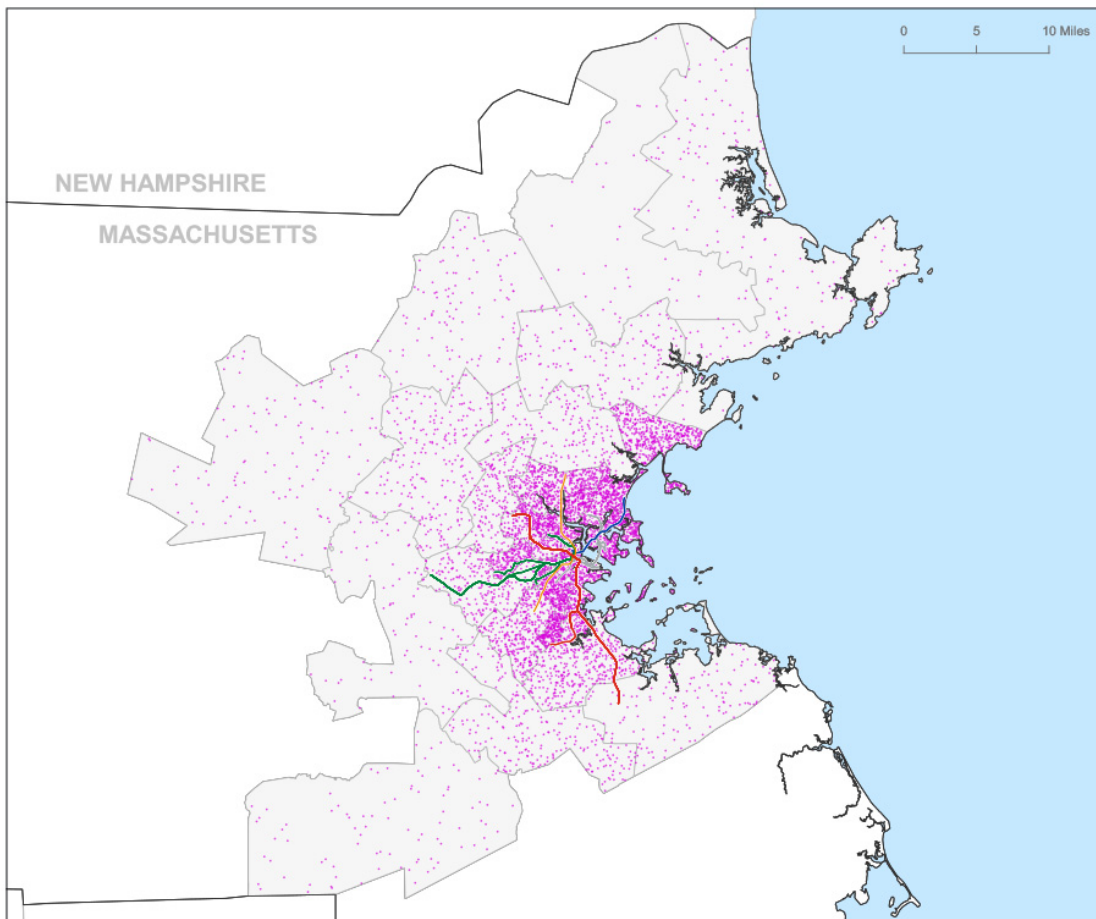
 All speakers who speak English "less than very well" (1 dot = 50 speakers)

Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs with any geographic overlap with the MBTA's 176-municipality commuter rail service area contribute to LEP summaries for the extended service area.


Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's commuter rail service area is 9.2 percent.



**FIGURE 1-B  
MBTA Language  
Assistance Plan**

**People with Limited English Proficiency in the MBTA Core Service Area**

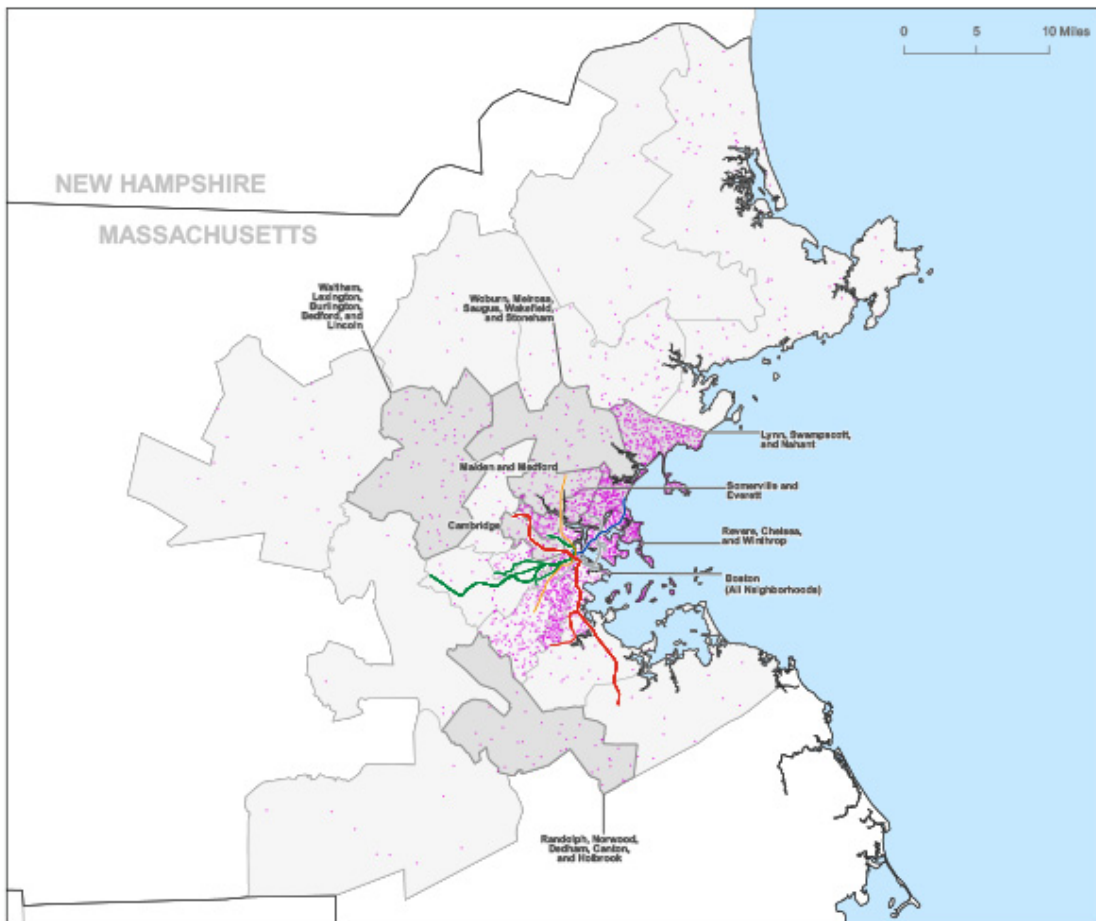
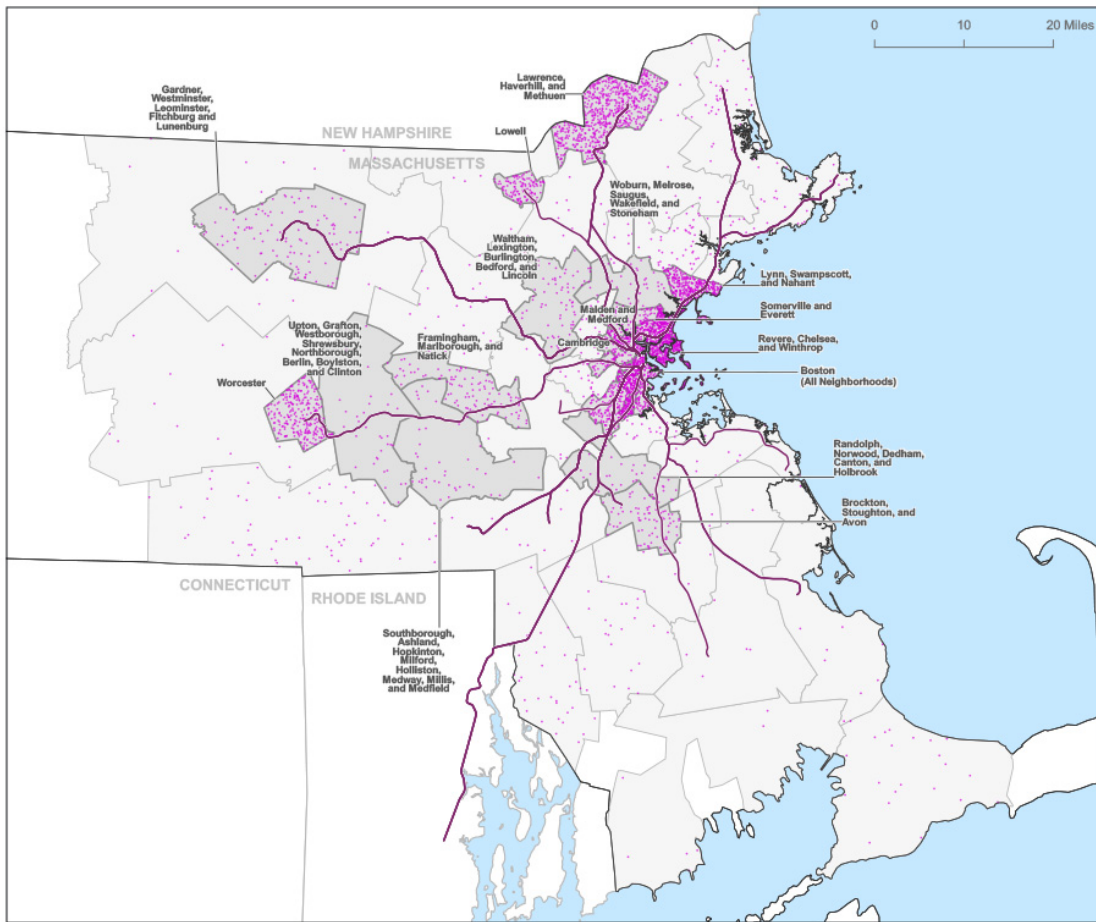
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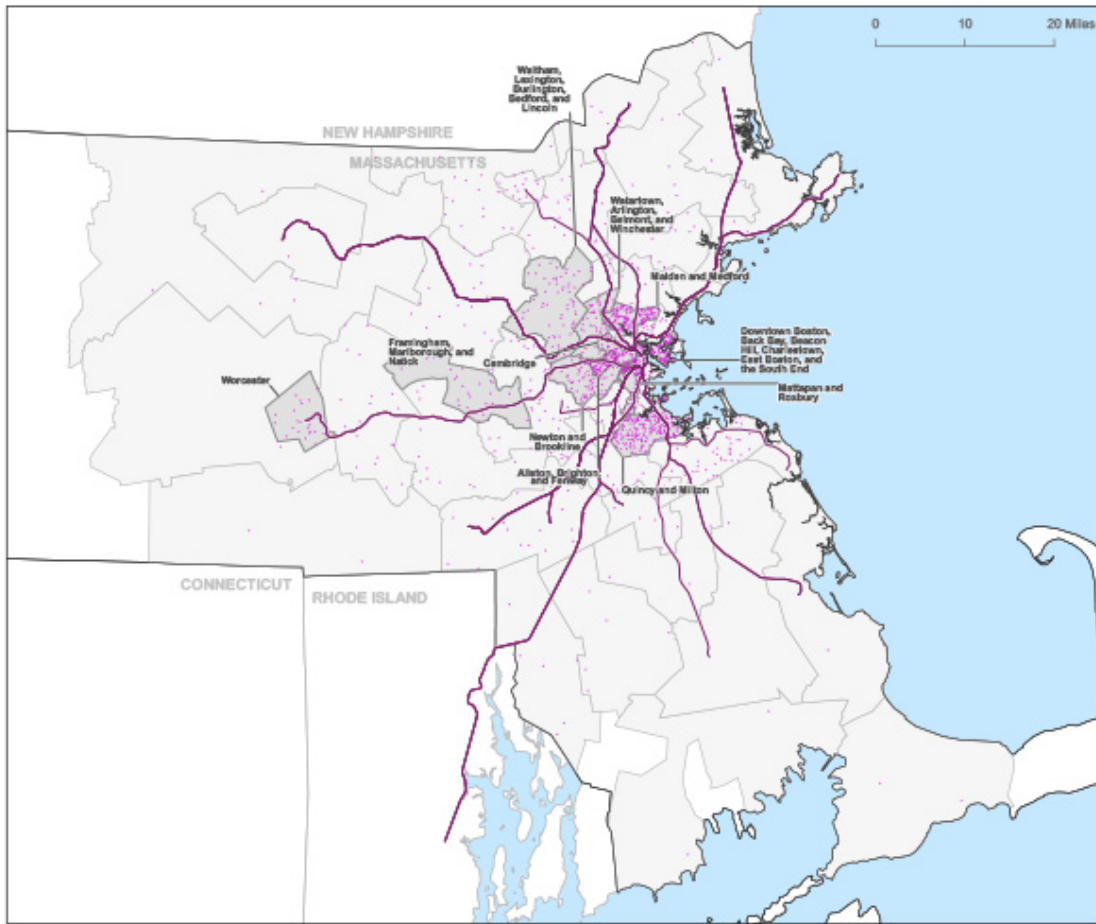
Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs where at least 15 percent of the geographic area of the PUMA is within the MBTA's 59-municipality core service area contribute to LEP summaries for the core service area.

Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's extended service area is 10.5 percent.









**FIGURE 3-A**  
**MBTA Language Assistance Plan**

**Chinese-speaking People with Limited English Proficiency in the MBTA Commuter Rail Service Area**

-  Chinese speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Chinese-speaking populations

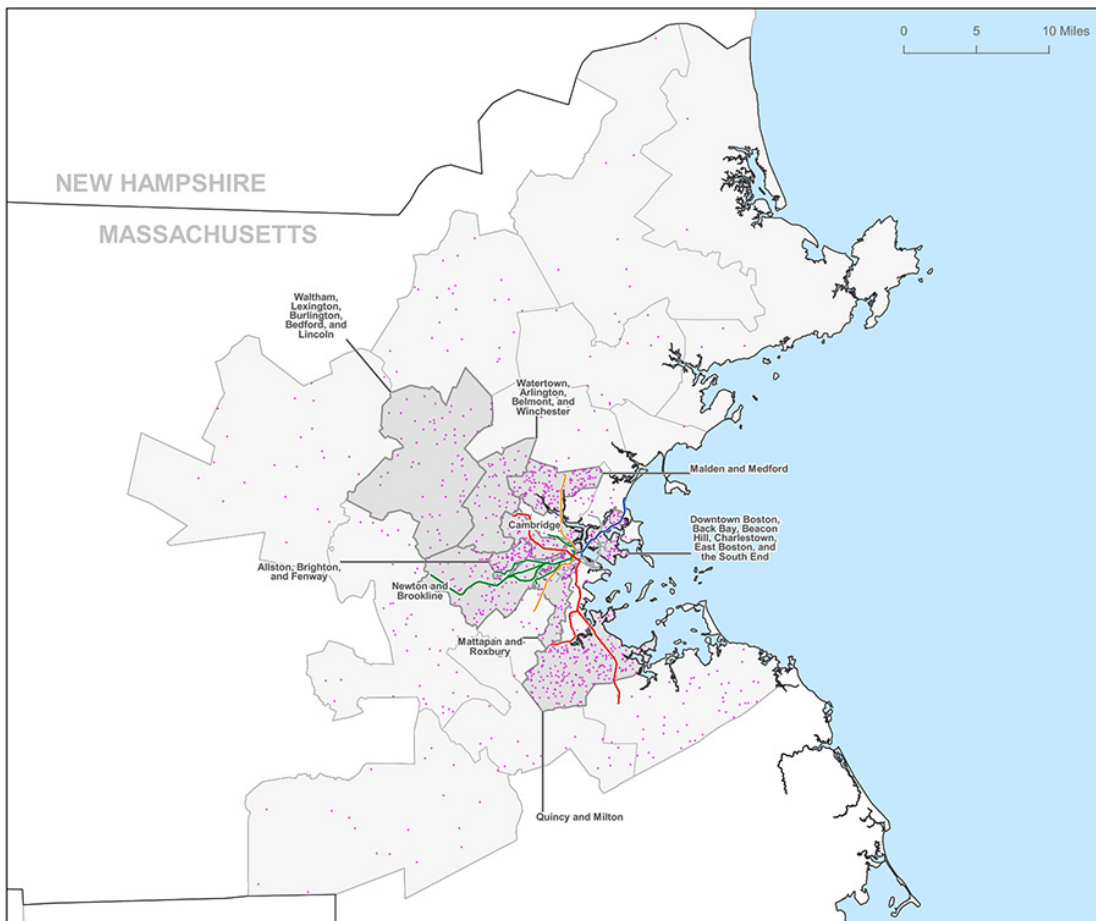
Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Chinese-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs with any geographic overlap with the MBTA's 175-municipality commuter rail service area contribute to LEP summaries for the extended service area.



Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's commuter rail service area is 9.2 percent.



**FIGURE 3-B**  
**MBTA Language Assistance Plan**

**Chinese-speaking People with Limited English Proficiency in the MBTA Core Service Area**

-  Chinese speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Chinese-speaking populations

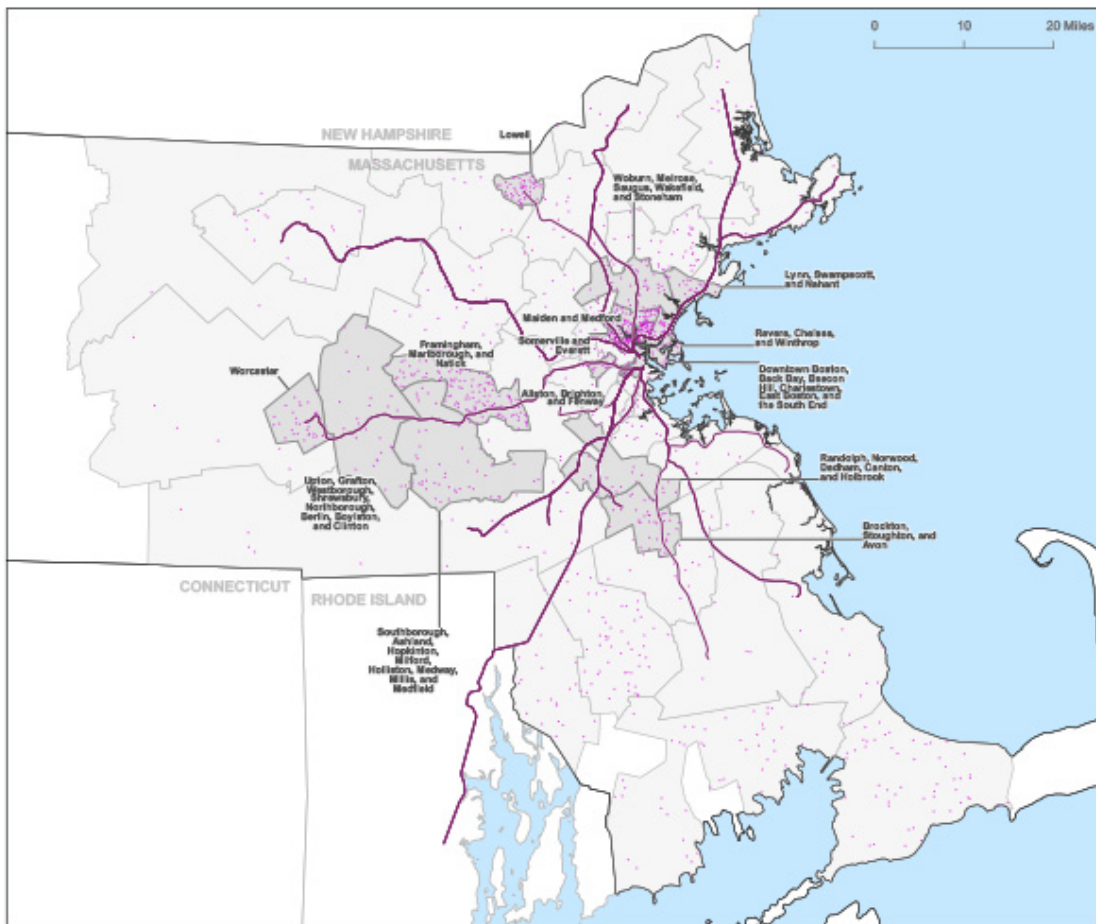
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Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs where at least 15 percent of the geographic area of the PUMA is within the MBTA's 59-municipality core service area contribute to LEP summaries for the core service area.

Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's extended service area is 10.5 percent.



**FIGURE 4-A**  
**MBTA Language Assistance Plan**

**Portuguese-speaking People with Limited English Proficiency in the MBTA Commuter Rail Service Area**

- Portuguese speakers who speak English "less than very well" (1 dot = 50 speakers)
- Significant Portuguese-speaking populations

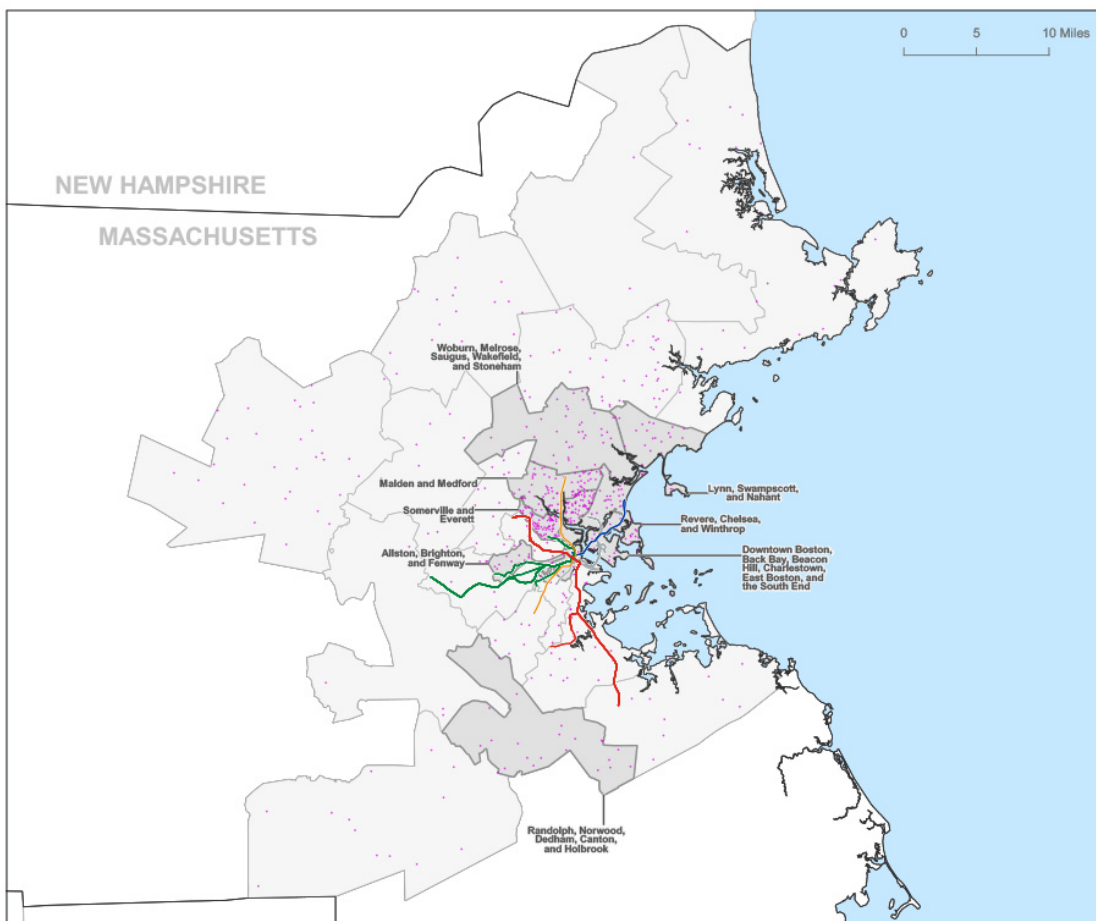
Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Portuguese-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs with any geographic overlap with the MBTA's 175-municipality commuter rail service area contribute to LEP summaries for the extended service area.

Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's commuter rail service area is 9.2 percent.



**FIGURE 4-B**  
**MBTA Language Assistance Plan**

**Portuguese-speaking People with Limited English Proficiency in the MBTA Core Service Area**

- Portuguese speakers who speak English "less than very well" (1 dot = 50 speakers)
- Significant Portuguese-speaking populations

Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

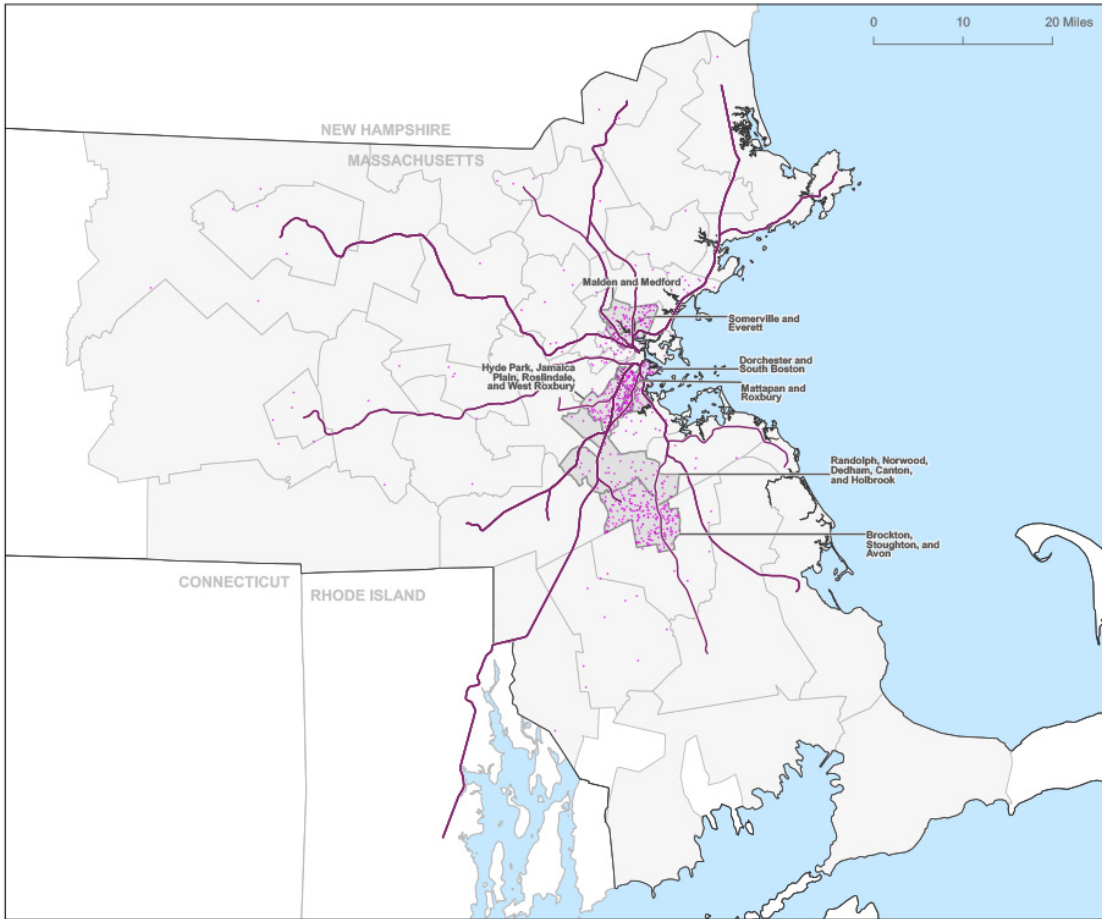
This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Portuguese-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs where at least 15 percent of the geographic area of the PUMA is within the MBTA's 59-municipality core service area contribute to LEP summaries for the core service area.

Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.



The percentage of people with limited English proficiency in the MBTA's extended service area is 10.5 percent.





**FIGURE 5-A**  
**MBTA Language Assistance Plan**

**Haitian-speaking People with Limited English Proficiency in the MBTA Commuter Rail Service Area**

-  Haitian speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Haitian-speaking populations

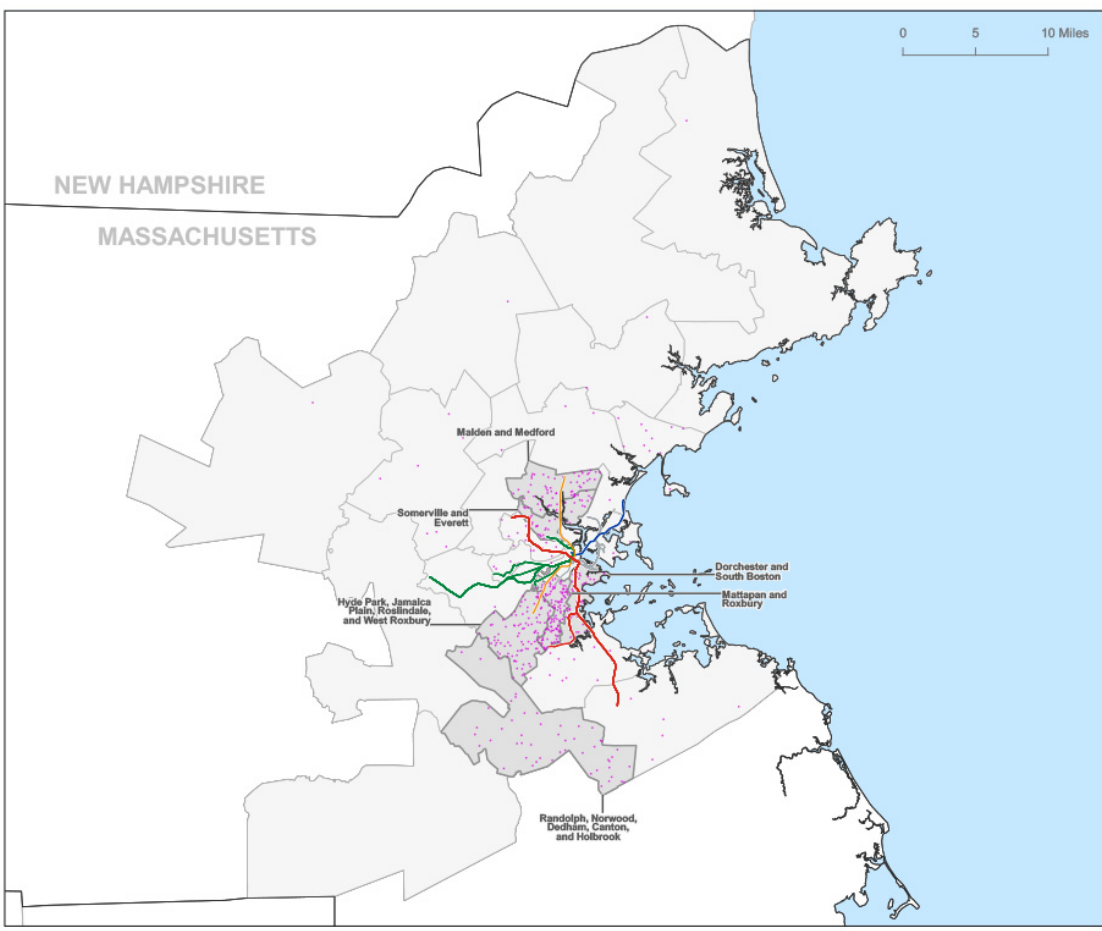
Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Haitian-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs with any geographic overlap with the MBTA's 176-municipality commuter rail service area contribute to LEP summaries for the extended service area.



Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's commuter rail service area is 9.2 percent.



**FIGURE 5-B**  
**MBTA Language Assistance Plan**

**Haitian-speaking People with Limited English Proficiency in the MBTA Core Service Area**

-  Haitian speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Haitian-speaking populations

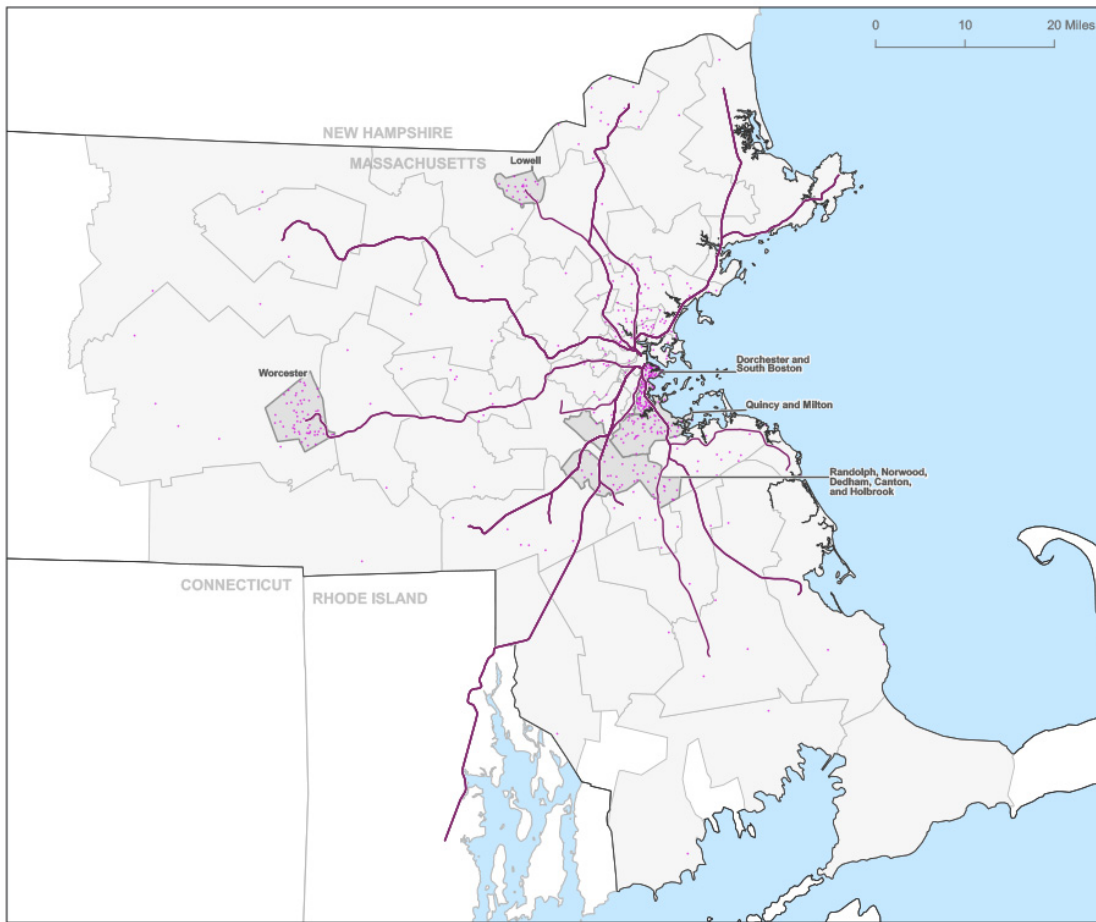
Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Haitian-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs where at least 15 percent of the geographic area of the PUMA is within the MBTA's 59-municipality core service area contribute to LEP summaries for the core service area.



Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's extended service area is 10.5 percent.



**FIGURE 6-A**  
**MBTA Language Assistance Plan**

**Vietnamese-speaking People with Limited English Proficiency in the MBTA Commuter Rail Service Area**

-  Vietnamese speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Vietnamese-speaking populations

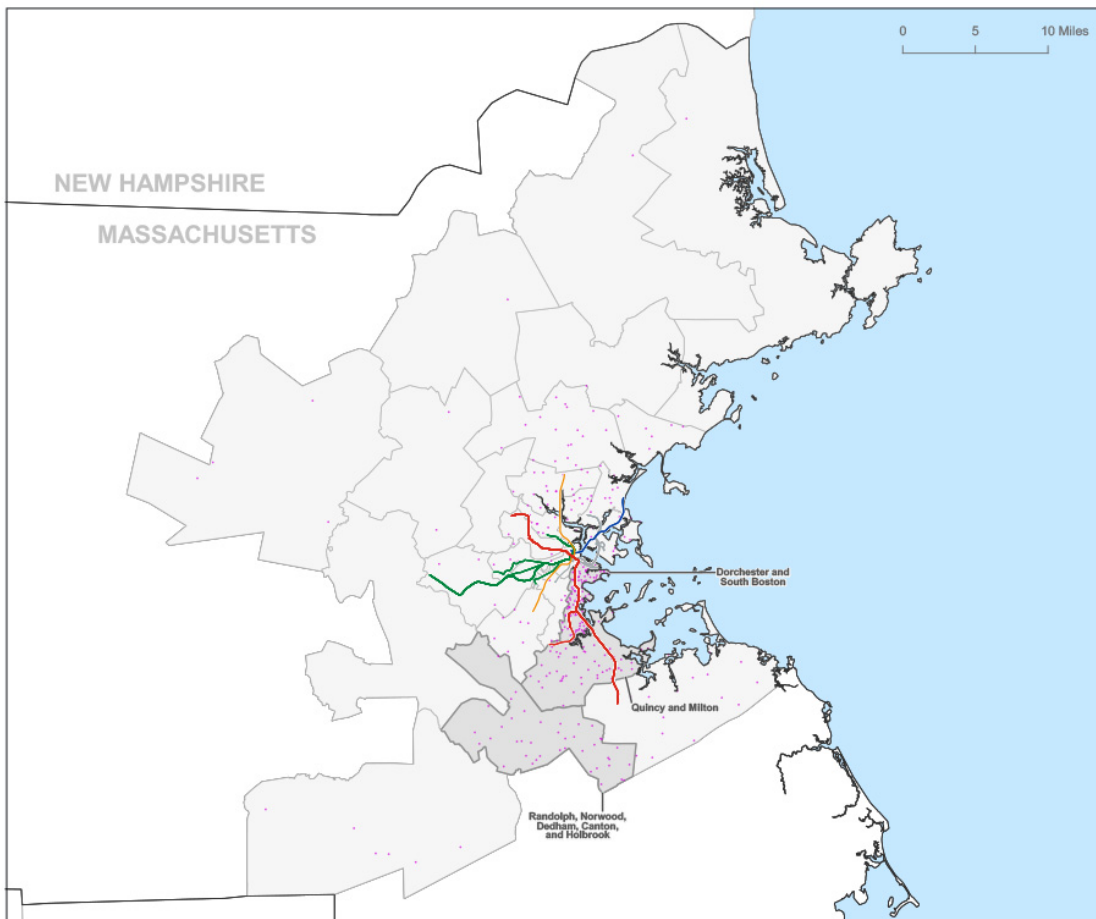
Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Vietnamese-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs with any geographic overlap with the MBTA's 176-municipality commuter rail service area contribute to LEP summaries for the extended service area.



Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of people with limited English proficiency in the MBTA's commuter rail service area is 9.2 percent.



**FIGURE 6-B**  
**MBTA Language Assistance Plan**

**Vietnamese-speaking People with Limited English Proficiency in the MBTA Core Service Area**

-  Vietnamese speakers who speak English "less than very well" (1 dot = 50 speakers)
-  Significant Vietnamese-speaking populations

Residents with limited English proficiency are defined for Title VI purposes as persons aged five and older whose ability to speak English was self-identified as less than "very well" in the 2020 American Community Survey five-year Public Use Microdata Samples.

This map shows where the LEP population is more than five percent of the total population of a PUMA and where the Vietnamese-speaking population is either more than 1,000 individuals or more than 25 percent of the PUMA's LEP population.

Public Use Microdata Areas (PUMAs) are non-overlapping geographic areas defined by the US Census Bureau that contain no fewer than 100,000 people. PUMAs where at least 15 percent of the geographic area of the PUMA is within the MBTA's 59-municipality core service area contribute to LEP summaries for the core service area.

Dots are placed randomly within PUMAs to indicate the number of people with limited English proficiency.

The percentage of LEP persons in the MBTA's core service area is 10.5 percent.

## Spanish

**Table 2**  
**Spanish-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Spanish-speaking LEP Population	Spanish-speaking LEP Population — Percentage of Total Population	Spanish-speaking LEP Population — Percentage of LEP Population
701	Lawrence, Haverhill, and Methuen	CR	34,399	17.70%	91.3%
3306	Revere, Chelsea, and Winthrop	Core	21,609	19.20%	74.2%
3302	Downtown Boston, Back Bay, Beacon Hill, Charlestown, East Boston, and the South End	Core	19,729	12.10%	61.5%
704	Lynn, Swampscott, and Nahant	Core	17,798	15.80%	70.9%
300	Worcester	CR	13,852	7.50%	47.9%
3304	Mattapan and Roxbury	Core	13,314	9.40%	52.0%
3305	Hyde Park, Jamaica Plain, Roslindale, and West Roxbury	Core	8,551	6.00%	45.8%
507	Somerville and Everett	Core	8,393	6.60%	37.2%
502	Lowell	CR	5,969	5.40%	30.5%
301	Gardner, Westminister, Leominster, Fitchburg, and Lunenburg	CR	5,759	4.70%	67.6%
504	Framingham, Marlborough, and Natick	CR	5,728	3.90%	32.0%
3303	Dorchester and South Boston	Core	5,655	4.60%	29.7%
4000	Brockton, Stoughton, and Avon	CR	4,054	3.10%	17.9%
503	Waltham, Lexington, Burlington, Bedford, and Lincoln	Core	3,452	2.40%	28.8%
508	Malden and Medford	Core	3,270	2.70%	14.7%
3301	Allston, Brighton, and the Fenway	Core	2,808	2.40%	18.7%
2400	Southborough, Ashland, Hopkinton, Milford, Holliston, Medway, Millis, and Medfield	CR	2,093	1.70%	28.2%
506	Cambridge	Core	1,920	1.60%	20.7%
303	Upton, Grafton, Westborough, Shrewsbury, Northborough, Berlin, Boylston, and Clinton	CR	1,819	1.50%	22.9%
2800	Woburn, Melrose, Saugus, Wakefield, and Stoneham	Core	1,742	1.20%	21.0%
3602	Randolph, Norwood, Dedham, Canton, and Holbrook	Core	1,729	1.40%	15.1%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.



## Chinese

The Chinese-speaking population is the second largest LEP population in the MBTA's service area.<sup>1</sup> The largest numbers of Chinese-speaking people with limited English proficiency are in Boston, Malden, and Quincy.

**Table 3**  
**Chinese-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Chinese-speaking LEP Population	Chinese-speaking LEP Population — Percentage of Total Population	Chinese-speaking LEP Population — Percentage of LEP Population
3603	Quincy and Milton	Core	11,241	9.2%	54.8%
3302	Downtown Boston, Back Bay, Beacon Hill, Charlestown, East Boston, and the South End	Core	7,674	4.7%	23.9%
508	Malden and Medford	Core	7,387	6.2%	33.1%
3301	Allston, Brighton, and the Fenway	Core	5,547	4.7%	36.9%
3400	Newton and Brookline	Core	3,484	2.4%	32.8%
503	Waltham, Lexington, Burlington, Bedford, and Lincoln	Core	3,159	2.2%	26.4%
506	Cambridge	Core	2,368	2.0%	25.5%
505	Watertown, Arlington, Belmont, and Winchester	Core	2,162	1.7%	25.4%
3304	Mattapan and Roxbury	Core	1,342	1.0%	5.2%
504	Framingham, Marlborough, and Natick	CR	1,334	0.9%	7.5%
300	Worcester	CR	1,250	0.7%	4.3%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

## Portuguese

The Portuguese-speaking population is the third largest LEP population in the MBTA's service area. The largest numbers of Portuguese-speaking people with limited English proficiency are in Framingham and Somerville.

**Table 4**  
**Portuguese-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Portuguese-speaking LEP Population	Portuguese-speaking LEP Population — Percentage of Total Population	Portuguese-speaking LEP Population — Percentage of LEP Population
504	Framingham, Marlborough, and Natick	CR	7,168	4.8%	40.0%
507	Somerville and Everett	Core	6,741	5.3%	29.9%
508	Malden and Medford	Core	3,461	2.9%	15.5%
502	Lowell	CR	2,756	2.5%	14.1%

<sup>1</sup> The data on Chinese speakers includes Mandarin, Cantonese, and Min Nan Chinese.

**Table 4 (continued)**  
**Portuguese-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Portuguese-speaking LEP Population	Portuguese-speaking LEP Population — Percentage of Total Population	Portuguese-speaking LEP Population — Percentage of LEP Population
2400	Southborough, Ashland, Hopkinton, Milford, Holliston, Medway, Millis, and Medfield	CR	2,420	1.9%	32.6%
3306	Revere, Chelsea, and Winthrop	Core	2,412	2.1%	8.3%
4000	Brockton, Stoughton, and Avon	CR	2,128	1.6%	9.4%
2800	Woburn, Melrose, Saugus, Wakefield, and Stoneham	Core	1,981	1.3%	23.9%
300	Worcester	CR	1,802	1.0%	6.2%
303	Upton, Grafton, Westborough, Shrewsbury, Northborough, Berlin, Boylston, and Clinton	CR	1,402	1.2%	17.6%
3301	Allston, Brighton, and the Fenway	Core	1,113	0.9%	7.4%
3302	Downtown Boston, Back Bay, Beacon Hill, Charlestown, East Boston, and the South End	Core	1,065	0.7%	3.3%
3602	Randolph, Norwood, Dedham, Canton, and Holbrook	Core	1,065	0.9%	9.3%
704	Lynn, Swampscott, and Nahant	Core	1,027	0.9%	4.1%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

## Haitian

The Haitian-speaking population is the fourth-largest LEP population in the MBTA's service area.<sup>2</sup> The largest numbers of Haitian-speaking people with limited English proficiency are in Boston and Brockton.

**Table 5**  
**Haitian-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Haitian-speaking LEP Population	Haitian-speaking LEP Population — Percentage of Total Population	Haitian-speaking LEP Population — Percentage of LEP Population
4000	Brockton, Stoughton, and Avon	CR	11,141	8.6%	49.1%
3304	Mattapan and Roxbury	Core	6,273	4.4%	24.5%
3305	Hyde Park, Jamaica Plain, Roslindale, and West Roxbury	Core	4,893	3.4%	26.2%
508	Malden and Medford	Core	2,825	2.4%	12.7%
3602	Randolph, Norwood, Dedham, Canton, and Holbrook	Core	2,526	2.0%	22.1%
3303	Dorchester and South Boston	Core	2,481	2.0%	13.0%
507	Somerville and Everett	Core	1,999	1.6%	8.9%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

<sup>2</sup> Haitian is also known as Haitian Creole or French Creole.

## Vietnamese

The Vietnamese-speaking population is the fifth-largest LEP population in the MBTA's service area. The largest numbers of Vietnamese-speaking people with limited English proficiency are in Boston, Quincy, and Worcester.

**Table 6**  
**Vietnamese-speaking LEP Populations**

PUMA	PUMA Name	Service Area	2020 Vietnamese-speaking LEP Population	Vietnamese-speaking LEP Population — Percentage of Total Population	Vietnamese-speaking LEP Population — Percentage of LEP Population
3303	Dorchester and South Boston	Core	5,800	4.7%	30.5%
300	Worcester	CR	3,167	1.7%	10.9%
3603	Quincy and Milton	Core	2,650	2.2%	12.9%
3602	Randolph, Norwood, Dedham, Canton, and Holbrook	Core	2,029	1.6%	17.7%
502	Lowell	CR	1,024	0.9%	5.2%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

## Smaller Safe Harbor Language Groups

Table 7 shows the PUMAs with at least 1,000 people with limited English proficiency who speak languages other than the five most common languages.

**Table 7**  
**LEP Populations Speaking Other Languages**

PUMA	PUMA Name	Service Area	2020 LEP Population Speaking Other Languages	LEP Population Speaking Other Languages — Percentage of Total Population	LEP Population Speaking Other Languages — Percentage of LEP Population
3301	Allston, Brighton, and the Fenway	Core	4,944	4.2%	32.9%
505	Watertown, Arlington, Belmont, and Winchester	Core	4,839	3.7%	56.9%
508	Malden and Medford	Core	4,605	3.9%	20.7%
4000	Brockton, Stoughton, and Avon	CR	4,540	3.5%	20.0%
503	Waltham, Lexington, Burlington, Bedford, and Lincoln	Core	4,502	3.1%	37.6%
3603	Quincy and Milton	Core	4,453	3.7%	21.7%
3304	Mattapan and Roxbury	Core	4,072	2.9%	15.9%
3306	Revere, Chelsea, and Winthrop	Core	3,957	3.5%	13.6%
3305	Hyde Park, Jamaica Plain, Roslindale, and West Roxbury	Core	3,866	2.7%	20.7%
507	Somerville and Everett	Core	3,856	3.0%	17.1%
506	Cambridge	Core	3,716	3.2%	40.1%

**Table 7 (continued)**  
**LEP Populations Speaking Other Languages**

PUMA	PUMA Name	Service Area	2020 LEP Population Speaking Other Languages	LEP Population Speaking Other Languages — Percentage of Total Population	LEP Population Speaking Other Languages — Percentage of LEP Population
303	Upton, Grafton, Westborough, Shrewsbury, Northborough, Berlin, Boylston, and Clinton	CR	3,589	3.0%	45.1%
3303	Dorchester and South Boston	Core	3,545	2.9%	18.6%
3602	Randolph, Norwood, Dedham, Canton, and Holbrook	Core	3,193	2.6%	27.9%
3302	Downtown Boston, Back Bay, Beacon Hill, Charlestown, East Boston, and the South End	Core	3,008	1.8%	9.4%
504	Framingham, Marlborough, and Natick	CR	2,959	2.0%	16.5%
2800	Woburn, Melrose, Saugus, Wakefield, and Stoneham	Core	2,736	1.9%	33.0%
2400	Southborough, Ashland, Hopkinton, Milford, Holliston, Medway, Millis, and Medfield	CR	2,122	1.7%	28.6%
701	Lawrence, Haverhill, and Methuen	CR	1,837	0.9%	4.9%
301	Gardner, Westminster, Leominster, Fitchburg, and Lunenburg	CR	1,544	1.3%	18.1%

CR = Commuter rail. LEP = Limited English Proficiency. PUMA = Public Use Microdata Area.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

Table 8 shows the languages spoken by at least 1,000 people with limited English proficiency other than the five most common languages in the commuter rail service area.

**Table 8**  
**Other Languages Spoken by LEP Populations**

Language	2020 LEP Speakers	Percentage of Population of Commuter Rail Service Area	Percentage of LEP Population in Commuter Rail Service Area
Russian	13,092	0.23%	2.49%
Arabic	12,023	0.21%	2.29%
Khmer	9,896	0.17%	1.88%
French	7,827	0.14%	1.49%
Italian	6,724	0.12%	1.28%
Kabuverdianu	6,197	0.11%	1.18%
Greek	5,362	0.09%	1.02%
Korean	5,253	0.09%	1.00%
Hindi	4,853	0.08%	0.92%
Albanian	4,736	0.08%	0.90%
Gujarati	4,189	0.07%	0.80%
Japanese	3,206	0.06%	0.61%

**Table 8 (continued)**  
**Other Languages Spoken by LEP Populations**

Language	2020 LEP Speakers	Percentage of Population of Commuter Rail Service Area	Percentage of LEP Population in Commuter Rail Service Area
Polish	3,118	0.05%	0.59%
Nepali	2,349	0.04%	0.45%
Bengali	2,083	0.04%	0.40%
Farsi	2,030	0.04%	0.39%
Akan (including Twi)	1,928	0.03%	0.37%
Punjabi	1,577	0.03%	0.30%
Turkish	1,573	0.03%	0.30%
Telugu	1,502	0.03%	0.29%
Armenian	1,432	0.03%	0.27%
Tamil	1,405	0.02%	0.27%
Thai	1,384	0.02%	0.26%
Tagalog	1,277	0.02%	0.24%
Urdu	1,236	0.02%	0.24%
Amharic	1,205	0.02%	0.23%
Swahili	1,162	0.02%	0.22%
German	1,140	0.02%	0.22%
Lao	1,099	0.02%	0.21%

LEP = Limited English Proficiency.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

## Languages by Line and Mode

Table 9 shows the top five languages spoken by people with limited English proficiency who live within the MBTA service area, and how many people speak each of those languages. The data were calculated for each line and mode by drawing a quarter-mile buffer around all stations, intersecting the buffer with PUMAs, and counting the number of people with limited English proficiency who speak each language in the intersecting PUMAs.

**Table 9**  
**Speakers of Languages by Line and Mode**

Mode	Route or Line	Spanish	Chinese	Portuguese	Haitian	Vietnamese	Arabic	Russian	Kabu-verdianu	Khmer
Bus	All routes	125,980	57,630	31,775	35,729	17,393	--	--	--	--
RT	Blue Line	41,338	8,084	3,477	--	1,027	1,918	--	--	--
RT	Green Line	55,945	23,898	10,635	14,469	--	--	5,114	--	--
RT	Orange Line	59,727	26,317	15,509	17,471	3,954	--	--	--	--
RT	Red Line and Mattapan Line	54,103	34,431	12,215	12,868	11,149	--	--	--	--
CR	Fairmount	47,249	10,642	--	13,826	6,773	--	--	2,415	--
CR	Fitchburg	42,239	19,549	12,142	3,652	--	2,414	--	--	--
CR	Foxboro	27,918	12,616	3,612	5,192	8,544	--	--	--	--
CR	Franklin	52,591	20,164	5,457	16,714	9,356	--	--	--	--
CR	Greenbush	27,483	22,429	3,738	3,499	9,782	--	--	--	--



**Table 9 (continued)**  
**Speakers of Languages by Line and Mode**

Mode	Route or Line	Spanish	Chinese	Portuguese	Haitian	Vietnamese	Arabic	Russian	Kabu-verdianu	Khmer
CR	Haverhill	64,186	19,990	10,119	4,168	3,135	--	--	--	--
CR	Kingston	28,311	22,699	4,993	3,893	10,075	--	--	--	--
CR	Lowell	33,925	22,083	11,406	4,165	--	--	--	--	6,045
CR	Middleboro-Lakeville	33,573	23,880	7,263	17,558	12,379	--	--	--	--
CR	Needham	50,380	18,314	3,693	14,188	7,032	--	--	--	--
CR	Newburyport-Rockport	73,987	11,936	12,812	3,594	--	3,210	--	--	--
CR	Providence-Stoughton	59,592	21,125	11,668	28,358	9,854	--	--	--	--
CR	Worcester	52,914	24,004	16,109	--	10,471	--	6,453	--	--
Ferry	All routes	47,644	11,482	4,606	3,000	7,605	--	--	--	--

CR = Commuter rail. RT = Rapid transit. LEP = Limited English Proficiency.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

Table 10 shows the top five languages spoken by people with limited English proficiency who live around each MBTA line and the percentage of those people who speak each of the top five languages. The data were calculated for each line or mode by drawing a quarter-mile buffer around all stations on that line or mode, intersecting the buffer with PUMAs, counting people with limited English proficiency speaking each language in the intersecting PUMAs, and dividing by the total number of those people in the intersecting PUMAs.

**Table 10**  
**Languages by Line and Mode, Percentage of LEP Population**

Mode	Route or Line	Spanish	Chinese	Portuguese	Haitian	Vietnamese	Arabic	Russian	Kabu-verdianu	Khmer
Bus	All routes	35%	16%	9%	10%	5%	--	--	--	--
RT	Blue Line	68%	13%	6%	--	2%	3%	--	--	--
RT	Green Line	40%	17%	8%	10%	--	--	4%	--	--
RT	Orange Line	39%	17%	10%	11%	3%	--	--	--	--
RT	Red Line and Mattapan Line	34%	22%	8%	8%	7%	--	--	--	--
CR	Fairmount	50%	11%	--	15%	7%	--	--	3%	--
CR	Fitchburg	40%	18%	11%	3%	--	2%	--	--	--
CR	Foxboro	39%	18%	5%	7%	12%	--	--	--	--
CR	Franklin	40%	15%	4%	13%	7%	--	--	--	--
CR	Greenbush	34%	28%	5%	4%	12%	--	--	--	--
CR	Haverhill	52%	16%	8%	3%	3%	--	--	--	--
CR	Kingston	33%	27%	6%	5%	12%	--	--	--	--
CR	Lowell	32%	21%	11%	4%	--	--	--	--	6%
CR	Middleboro-Lakeville	29%	20%	6%	15%	11%	--	--	--	--
CR	Needham	44%	16%	3%	12%	6%	--	--	--	--
CR	Newburyport-Rockport	57%	9%	10%	3%	--	2%	--	--	--
CR	Providence-Stoughton	36%	13%	7%	17%	6%	--	--	--	--
CR	Worcester	37%	17%	11%	--	7%	--	4%	--	--
Ferry	All routes	55%	13%	5%	3%	9%	--	--	--	--

CR = Commuter rail. RT = Rapid transit. LEP = Limited English Proficiency.  
Source: 2016–20 American Community Survey Five-year Public Use Microdata Sample.

## Qualitative Analysis Techniques

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

## Conclusions for Factor 1

The MBTA has used quantitative, qualitative, and spatial analyses to estimate the total number and proportion of LEP people in its service area and to identify areas that have high concentrations of LEP people. The top five language groups—Spanish, Chinese, Portuguese, Haitian Creole, and Vietnamese—represent nearly 76 percent of the total LEP population.

Due to the size of these top LEP language groups, the MBTA can identify geographic areas and transit services where there is a prevalence of these LEP populations, allowing the MBTA to be proactive in disseminating multilingual information in those areas. The MBTA has studied the smaller LEP safe harbor populations that comprise the remaining 24% of language groups. To effectively reach these populations with vital information as well as instructions for making requests for additional language assistance, the MBTA relies on a coordinated strategy and information-sharing to reach these language groups wherever they exist across the system. This approach emphasizes informing members of LEP communities that language services are available and how to make specific requests for them while also disseminating vital information across all safe-harbor languages to strive to achieve a basic level of communication regarding MBTA services, both in regular operation as well as understanding how to handle emergencies, service disruptions, or other such events. When it is possible to identify concentrations among these smaller communities in connection with MBTA projects and initiatives, the MBTA makes reasonable efforts to provide translated materials. In addition to these standardized translation strategies, the MBTA provides notification that documents can be translated into additional languages upon request. For additional information or to request language assistance, the public can visit the MBTA's language assistant services at [www.mbta.com/language-services](http://www.mbta.com/language-services)

## Factor 2: The Frequency of Contact

The MBTA uses the following data and analysis methods to evaluate the frequency with which LEP individuals come into contact with the MBTA:

- Evaluation of Call Center metrics
- Evaluation of customer website browser primary language preferences and visits to the MBTA website
- Analysis of paratransit records

## Call Center

The Call Center houses several staff who are fluent in Spanish. The Call Center provides telephone translation service in all languages via a language assistance line.

Since June 2018, the MBTA has contracted with a private vendor to assume operations of the MBTA Call Center. The call center is open Monday – Friday 6:30 AM – 8:00 PM, and weekends 8:00 AM – 4:00 PM.

The MBTA has compiled Call Center data on the use of Language Line for calendar years 2019 - 2022. This data is shown in Table 11. The majority, 98%, of all calls requiring language assistance were in Spanish. There were significantly fewer calls across the smaller safe harbor populations that reside within the MBTA service areas being referred for Language Line interpretation assistance.

**Table 11: Call Center Referrals to Language Line**

Language	2019	2020	2021	2022	Total
Spanish	6,373	4,935	5,998	4,838	22,144
Albanian	0	2	0	0	2
Amharic	0	0	1	2	3
Arabic	6	3	3	3	15
Cantonese	4	6	9	2	21
Cape Verde Creole	2	1	1	3	7
Chinese	7	9	5	6	27
French	2	4	3	1	10
Greek	4	3	1	1	9
Haitian Creole	6	9	12	24	51
Italian	1	0	0	0	1
Japanese	1	1	0	0	2
Korean	0	3	2	2	7
Mandarin	5	5	15	18	43
Nepali	1	2	0	2	5
Polish	0	0	0	1	1
Portuguese	21	9	24	30	84
Romanian	0	2	0	0	2
Russian	7	16	12	20	55
Somali	3	0	0	0	3
Vietnamese	3	0	2	0	5

## Website Analytics Based on Preferred Language and Locale Settings

The MBTA can distinguish between categories of visitors to its website by the language that an individual's Web browser identifies as its primary language.

Data from the MBTA website analytics for calendar year 2022 indicate that most visits (97.47%) to the MBTA's website are on browsers that are set to English as the primary language. The next two most commonly set alternative languages are Spanish (0.86% of all visits) and Chinese (0.52% of all visits), followed by French, German, Japanese, Portuguese, and Korean.

While there were fewer non-English-language requests to the MBTA website in 2020 and 2021

compared to previous years' reports, this was also true for English-language speakers, and for the total number of visitors overall to the website. These numbers increased in 2022, and the decrease in overall usage can likely be attributed to the COVID-19 pandemic.

The number of visitors reveals a greater statistical representation of LEP persons using technology than is shown in the population data from the ACS for the MBTA service area. One reason for this difference is that website data reveal the preferences of people living outside of the MBTA's service area, including visitors to the region who are interested in using public transit.

Within Table 12, below, the MBTA has outlined data on the number of visits to the MBTA website based on preference language on an annualized basis. From this data, there are clear indications over a number of years, from 2020 to 2022 of numerous "hits" that reflect recurring visits to the website by a consistent yet small number of LEP individuals among many visits across the broader LEP community. Across nearly half of the 28 Safe Harbor language groups in the MBTA service area, it is evident that we have annualized website visits far in excess of the population numbers for these groups in the MBTA service area.

There are also a significant number of other visits, of up to 37,546 from 2020-2022, among the "Other Languages" grouping, reflecting a significant number of potentially other smaller language groups. Recurring visits are evident among the other language groups. It is noteworthy that the MBTA has not received complaints about the information obtained from the web among foreign language users.

This data compels the conclusion that among many safe harbor communities, there is both consistent and recurring use of the MBTA website among LEP individuals, whether in Massachusetts or abroad. This reality does not speak to the quality of the translations of the MBTA website, although our research indicates that the efforts by Google and other machine translation service providers to improve translation accuracy have improved significantly in recent years. While this is not a preferred method for communication, the lack of complaints and evidence of use of this resource indicate that customers are in fact using the MBTA website and finding good results, even if the translations are not completely accurate. In conducting this element in the four-factor analysis, ODCR staff reached out to the Director of Customer Communications in the Customer Experience Department and confirmed that the MBTA has not received complaints or inquiry about the quality of the Google translation software.

**Table 12  
Number and Percentage of Visits by the Browser Setting for Preferred Language during Visits to the MBTA Website**

Language	Number of Visits (2020)	Percentage of Visits (2020)	Number of Visits (2021)	Percentage of Visits (2021)	Number of Visits (2022)	Percentage of Visits (2022)
English	17,021,482	97.40%	22,089,166	97.52%	33,977,306	97.47%
Spanish	173,936	1.00%	224,933	0.99%	300,891	0.86%
Chinese	98,146	0.56%	135,784	0.60%	179,580	0.52%
French	34,589	0.20%	40,952	0.18%	96,055	0.28%
German	15,271	0.09%	19,193	0.08%	58,514	0.17%
Japanese	18,663	0.11%	21,734	0.10%	40,969	0.12%
Portuguese	38,008	0.22%	37,755	0.17%	64,907	0.19%
Korean	12,679	0.07%	17,467	0.08%	31,389	0.09%
Italian	8,163	0.05%	10,710	0.05%	24,830	0.07%
Russian	11,863	0.07%	12,490	0.06%	15,416	0.04%
Arabic	3,978	0.02%	2,061	0.01%	2,247	0.01%
Turkish	2,951	0.02%	3,949	0.02%	5,535	0.02%

**Table 12 (continued)****Number and Percentage of Visits by the Browser Setting for Preferred Language during Visits to the MBTA Website**

Language	Number of Visits (2020)	Percentage of Visits (2020)	Number of Visits (2021)	Percentage of Visits (2021)	Number of Visits (2022)	Percentage of Visits (2022)
Swedish	1,843	0.01%	1,921	0.01%	5,264	0.02%
Vietnamese	3,085	0.02%	3,950	0.02%	4,121	0.01%
Polish	2,501	0.01%	2,075	0.01%	4,452	0.01%
Hebrew	937	0.01%	2,022	0.01%	3,929	0.01%
Danish	1,202	0.01%	1,472	0.01%	4,447	0.01%
Greek	1,799	0.01%	1,738	0.01%	2,497	0.01%
Czech	979	0.01%	1,029	0.00%	2,216	0.01%
Finnish	727	0.00%	1,033	0.00%	2,585	0.01%
Thai	1,571	0.01%	3,330	0.01%	1,920	0.01%
Hungarian	752	0.00%	800	0.00%	1,069	0.00%
Norwegian	866	0.00%	1,015	0.00%	2,095	0.01%
Catalan	457	0.00%	533	0.00%	1,716	0.00%
Indonesian	1,095	0.01%	803	0.00%	346	0.00%
Dutch/Flemish	3,252	0.02%	3,603	0.02%	8,365	0.02%
Romanian	784	0.00%	956	0.00%	987	0.00%
Albanian	830	0.00%	426	0.00%	618	0.00%
Other Languages	13,527	0.08%	9,130	0.04%	14,889	0.04%
<b>Total</b>	<b>17,475,936</b>	<b>100.00%</b>	<b>22,652,030</b>	<b>100.00%</b>	<b>34,859,155</b>	<b>100.00%</b>

**Paratransit (THE RIDE) Data for LEP Individuals**

To ensure language access for LEP populations eligible for paratransit service through The RIDE, the MBTA informs potential customers of the availability of this service in multiple languages. Key publications meant to inform the public about this service, such as the “RIDE Guide,” include instructions in multiple languages on how to secure language assistance in seeking The RIDE service.

The RIDE application is available in Spanish, Russian, Haitian Creole, Cape Verdean, Portuguese, Vietnamese, and Chinese. The application is available in both by paper and electronically. If an applicant requests another language not already translated, the Mobility Center offers to either send a translated application in 3-5 business days (the time it takes to translate) or have the customer complete the application during their appointment with an interpreter present.

The RIDE Guide, in its entirety, has been translated into Spanish, Chinese, Portuguese, Vietnamese, Haitian Creole, Russian, French, Italian, Arabic, and Khmer.

Additionally, a one-page brochure disseminated by the Mobility Center maintains translated versions of the brochures in the preferred languages of Spanish, Arabic, Simplified Chinese, French, Haitian Creole, Italian, Khmer, Portuguese, Russian and Vietnamese. LEP individuals interested in The RIDE service are directed to contact The RIDE via phone with real-time interpretation and verbal document translation provided by Language Line.

The MBTA tracks the use of this service. When sampling records over a 12-month period from November 1, 2021 – October 31, 2022, The RIDE received an average of 159 calls from potential LEP customers, per month. Although some of these calls may be repeat calls to finalize eligibility



from the same LEP individuals, the consistent averages provide a sense that LEP individuals are effectively making contact with and transacting business with the RIDE to seek out this important service and are receiving the assistance they need.

For the most part, the languages on these calls align with the top LEP language groups in the MBTA service area. A handful of additional languages have also been requested and the Language Line service was able to provide interpretation in those instances (23 different languages were requested during the 12-month period sampled above).

Minutes	Language	Number of Calls
61	Arabic	8
5	Armenian	1
14	Bengali	2
7	Bosnian	1
29	Cape Verdean Creole	4
16	Chinese	1
18	Chinese Cantonese	3
129	Chinese Mandarin	12
3	Farsi	1
87	French	5
158	French Creole	14
72	Greek	6
1,347	Haitian Creole	111
40	Hindi	3
9	Italian	1
12	Korean	1
9	Polish	2
1,593	Portuguese (Brazil)	163
4	Portuguese Creole	1
863	Russian	88
14,263	Spanish	1,462
10	Urdu	1
179	Vietnamese	15
<b>18,928</b>		<b>1,906</b>

In addition, a three-month sample of in person appointments for August, September and October 2022 indicates that 86 interviews were conducted in a requested language other than English.

Language	Aug-22	Sep-22	Oct-22
Spanish	10	30	22
Haitian Creole	3	5	2
Cape Verdean	1	2	0
Cantonese	0	1	0
Russian	1	4	1
Vietnamese	1	1	1
Mandarin	0	0	1
<b>Totals</b>	<b>16</b>	<b>43</b>	<b>27</b>

The MBTA will continue to monitor LEP participation in The Ride service from applications for eligibility through service-related data to demonstrate LEP utilization. Ultimately, current language access efforts and data tracking sources suggest that LEP individuals are effectively reaching out to and communicating with The RIDE.

## **Conclusions for Factor 2**

Though LEP people represent a small percentage of all riders on the MBTA system, significant numbers of Spanish-speaking LEP customers request translation services through MBTA customer information channels, including the website and customer communications call center. The frequency of contact among the other top language groups is significantly lower than for Spanish speaking LEP individuals. For the smaller LEP safe-harbor language groups, there are also indications that a number of individuals, including international visitors and/or residents within the MBTA service area, make recurring contact with the MBTA based on their browser language selection preferences in coming to the MBTA website.

There are also strong indications of recurring reliance on the MBTA website among Massachusetts-based LEP individuals, though this does not directly indicate a high frequency of contact but rather an effective website translation as a mechanism to address these low-volume and infrequent multilingual needs. While the MBTA's web-based information is not translated exactly, the repeated visits and the lack of customer complaints indicate that this resource plays an important role in communicating with MBTA customers, while interpretation and translation services continue to be needed, based on the vital nature of the information to be conveyed. Further, the MBTA has established a strategy for outreach, based on our understanding that can lead to improving communication with all MBTA customers.

## **Factor 3: The Importance to LEP Persons of the Program, Activity, or Service Provided by the MBTA**

The MBTA sought feedback from internal and external stakeholders to identify issues that LEP customers encountered while riding on the MBTA. This showed the services that were deemed the most critical to LEP persons: fares and tickets, routes and schedules, and safety and security. These areas were chosen because language barriers could limit a person's ability to fully benefit from MBTA services or, in some cases, they could place a person in physical danger.

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

The last several language assistance plans were focused on implementing language assistance strategies that met these needs. To confirm, and or update, these priorities the MBTA is actively pursuing the potential of hosting a series of staff focus groups from various operating areas within the organization. This approach will offer the opportunity to engage in more detailed conversations with front line staff on their interactions with LEP riders.

### **Conclusions for Factor 3**

It is apparent that the MBTA has an important role to play in the lives of people with limited proficiency in English, many of whom are transit dependent. The top priorities for critical information remain fares and tickets, routes and schedules, and safety and security.

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

The fourth and final factor looks at associated costs and resources available to the MBTA to provide language assistance services. The MBTA has demonstrated its ability to allocate the necessary resources for successfully implementing a multi-year Language Access Plan (LAP). Under this plan, the MBTA has been able to translate and disseminate vital documents across program areas and still allocate sufficient resources to respond to individual language assistance requests beyond the commitments made in the LAP. The MBTA continues to follow a decentralized approach to allocating resource to this task, meaning each department (especially those with public facing responsibilities) has an annual budget line item dedicated to covering the costs of language services. Anecdotally, we have found over the last couple of years that these departments tend to spend on average about \$5,000 per year, whereas the civil rights office allocates additional funds to adequately cover these costs, typically in the range of \$20,000 - \$30,000.

This decentralized approach to budgeting for language assistance allows the MBTA to adapt to new developments, and effectively communicate with LEP customers in the event of an emergency or unexpected scenario. As one example, the MBTA took steps to ensure understanding among LEP customers at the outset of the Orange Line shutdown from August 19 to September 18, 2022, to complete five years' worth of track and signal replacement and maintenance as well as other projects to bring the line into a state of good repair in an unprecedented 30-day timeframe. The purpose was to improve safety, increase reliability, and provide smoother trips for riders.

The MBTA enlisted the services of UMass Translation Center and Global Link to provide written translations for certain materials such as Riders Guides discussed further herein, flyers, one-pagers, and digital and A-frame signage at all stops along the Orange Line. The languages selected for translation of the Rider's Guide and flyers reflected commitments made in the MBTA Language Access Plan to provide vital information in the top languages in the service area as well as responses to specific requests for additional language support. For instance, the Rider's Guide was translated to Nepali as requested by the City of Somerville. The full list of languages provided included Simplified and Traditional Chinese, Portuguese, French, Haitian Creole, Arabic, Vietnamese, Cabo Verdean Creole, Somali, Nepali, and Spanish. The translated flyers are available on [www.boston.gov/departments/mayors-office/orange-line-shutdown-boston](http://www.boston.gov/departments/mayors-office/orange-line-shutdown-boston).

Additionally, the City of Boston provided a multilingual Accessibility Guide for the Orange Line shutdown in English, Spanish, Haitian Creole, Simplified Chinese, and Traditional Chinese. Lastly, using Google Translate, website visitors had the ability to translate the project-specific website into thirteen non-English languages.

## Conclusions for Factor 4

The MBTA's current language access strategy for written communications consists of two key prongs – providing basic system-access related information into all safe-harbor languages in the service area and making additional important information available in top LEP languages and/or those languages implicated by local service and/or project-related activities. This strategy to written information sharing is further bolstered by the MBTA's additional investment in real-time telephonic translation and the availability of interpreters to address not only the variety of in-person interactions the LEP customers may have with the MBTA, but to also provide an additional strategy for conveying written information, through interpreters, to LEP customers. There are significant costs associated with this multi-disciplinary approach to language access and there are instances where language access related investments need to be distributed across more than one fiscal year. However, this does not prevent the MBTA from taking reasonable steps to provide meaningful access to LEP individuals, it simply requires a coordinated and sustained effort over time to achieve a maximum level of effectiveness.

## Concluding Remarks

The MBTA continues to rely on the qualitative and quantitative analyses that inform the Authority's "four factor analysis." The results of this analysis inform the MBTA's current, multi-faceted, approach to addressing written and verbal multi-lingual communication needs of customers. Key features of this approach include disseminating vital information for accessing MBTA services in all safe-harbor languages as well as providing additional key information in top LEP languages. These written communication strategies are further enhanced by flexible verbal communication resources, such as real-time telephonic interpretation and the provision of interpreters. Informal language strategies, like machine translation, are not relied upon for communicating vital information to the public, but usage statistics indicate that customers are consistently and successfully accessing information through these mechanisms. And lastly, the MBTA continues to train project managers to provide localized language supports to LEP populations impacted by capital projects. The MBTA continues to rely on community partnerships to assist in disseminating vital information to LEP populations and for providing feedback on the effectiveness of various language access strategies. While current funding strategies appear to be sustainable to support this approach to language access, the MBTA will continue to monitor these resources and consider adjustments and/or efficiencies if presented.

The remainder of this document describes:

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

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## II. Language Assistance Measures

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

- Call Center staff training on use of Language Line real-time telephonic interpretation in 200+ languages, including all safe-harbor languages in the MBTA service area.
- Deployment of privately contracted Transit Ambassadors, some of whom are multilingual, to provide customer assistance at key transit stations. These contractors, and in-house customer service assistants, are equipped with computer tablets that can access the MBTA website, have “I speak” cards that can be used with customers and can contact the Call Center to access Language Line real time assistance for limited English proficient customers.
- A number of Transit Ambassadors speak a second language, including Arabic, Cape Verdean Creole, French, French Creole, German, Haitian Creole, Kriollo, Patois, Polish, Portuguese and Spanish. These contracted employees are strategically deployed, as resources and scheduling permits, so that their location will provide linkages to the LEP communities the MBTA services.
- MBTA Customer Service Attendants, some of whom are multilingual, directly engage with customers, and have access to the Call Center and Language Line in real time.
- Provision of notice for on-demand translation and interpretation service contracts for meetings, and interpretation and translation of written materials on timely requests, depending on the nature of the event or initiative.
- Electronic applications for the MBTA’s free/reduced fare program (Senior, Transportation Access Pass, Youth Pass, and Blind Access), are available in Portuguese, Simplified Chinese, Traditional Chinese, and Spanish.
- The paper application for the Transportation Access Pass is available in Spanish, French, Haitian Creole, Portuguese, Simplified Chinese, Traditional Chinese, and Vietnamese.
- MBTA employee training programs for new hires and existing employees, which include modules on Title VI Responsibilities, LEP Policies and Procedures, and Anti-discrimination and Harassment Prevention.
- “Engage” mapping software that allows MBTA staff and outreach coordinators to make instant comparisons of construction projects, transportation services, demographics (including populations of LEP individuals), and the proximity of accessible meeting places. This software is important to assess community impact and to assist with public participation planning.
- Sustained communications and ongoing relationships with a number of community organizations that directly serve LEP populations and have working knowledge of neighborhood conditions and specific needs. These can be important resources in communicating with LEP individuals and engaging minority and low-income groups in MBTA policy-making and planning initiatives.
- Machine-translated content for the MBTA’s website via Google Translate and highlighted on the MBTA home page. Google’s machine-based translation provides translations for all the “safe harbor” languages in the MBTA’s service area. The MBTA recognizes the inaccuracies of machine-based translations and therefore does not rely on it to provide vital information to the public.
- The MBTA has created a dedicated [webpage](#) for customers to understand how we provide language assistance. This webpage can be accessed directly from the MBTA homepage.

- Blue Line station announcements provide service and courtesy information in Spanish aurally and visually via LED signs.
- Safety and security information, including wayfinding, is provided at stations using universal symbols.
- Automated fare collection kiosks provide fare media and information in Spanish and Chinese, in addition to English.
- Service diversion notices are posted in those languages indicated by a four-factor analysis of local impacts of the change.
- Major-service- and fare-change information that has systemwide impacts is distributed in multiple languages, including Spanish, Portuguese, Chinese, Haitian Creole, and Vietnamese. For major service and fare change information that impacts a segment of the service area, translations are determined based on the presence of LEP populations in the impacted area.
- The MBTA Transit Police has contracted with vendor, Language Line to provide interpreter services. All officers, including Transit Police dispatchers, have 24-hour access to the service, which provides immediate translation service in more than 200 languages.
- Notices of Title VI rights, complaint forms, and complaint procedures are translated in Arabic, Chinese (simplified and traditional), French, Haitian Creole, Italian, Khmer, Portuguese, Russian, Spanish, and Vietnamese, and are available on the MBTA website. Additional languages are available upon request. A condensed version of the Notice is posted across the MBTA service area, subject to current space limitations.
- Interpretation and translated materials are provided at public meetings. Public meetings covering topics with systemwide impacts proactively offer ASL, Chinese, and Spanish interpretation services, and additional languages are available upon request. Contact information for requesting language and accessibility accommodations are part of all public meeting notices.
- MBTA departments have been advised of the responsibility to obtain work orders with private vendors that provide translation services, when needed. MBTA staff is advised to make arrangements for translator services at least five business days prior to an event.
- The MBTA provides outreach, including notice and press information using local media. Publications are selected based on the impacted area and include media publications serving minority and non-English speaking communities.
- Beyond the website as an information access point for LEP persons, a number of mobile transit applications (apps) for accessing and navigating the MBTA transit system have been developed by third-party developers. The MBTA publishes authoritative data that many app developers use and make available to riders in multiple languages. For example, the “TransitApp” software application is available in English, French, German, Italian, Portuguese, and Spanish. The Transit App is used by around 60,000 MBTA riders every weekday and offers passengers real-time updates for buses and trains, step-by-step navigation, trip planning, transit schedules, and city maps. This app has also integrated methods of accessing bike-sharing, carsharing, and ride hailing when public transit is unavailable.
- The Office of Diversity and Civil Rights (ODCR) actively provides technical assistance and guidance to all departments on Title VI issues, including assistance in serving LEP customers.



## **Strategy to Improve Communication and Support to Smaller Safe Harbor Groups**

The MBTA Office of Diversity and Civil Rights worked closely with the Massachusetts Office for Refugees and Immigrants (MORI) to form a new vital document explaining how to utilize MBTA services, including access to language assistance. MORI suggested on a one-page flyer on the basics of how to ride the different services the MBTA provides such as the bus/train transit systems.

The flyer idea was adopted and professionally translated to provide accessibility to the LEP population. The translated flyer is available in all languages that reach the safe harbor threshold of 5% or 1,000 persons, totaling forty-four languages. The flyers are available on the MBTA website, and a distribution strategy for announcing the availability of the flyer to community partners is currently being developed and will be implemented once the strategy is finalized.

MBTA's mission is to provide accessible, non-discriminatory, fair, and safe public transportation. Through this flyer, the MBTA is informing the public, including those who have limited English skills, about basic details of riding the T. Riders are assisted, whomever they may be, to ride the bus and train systems comfortable and effectively, as well as understand their rights. This flyer is the embodiment of the mission and the distribution of the flyer will connect and spread awareness to the public.

### **MBTA Vital Materials for Translation**

Vital materials are defined as information or documents that are critical for accessing MBTA programs, services, and activities, and they are prioritized for translation and distribution. Additional materials considered non-vital may be translated by MBTA departments upon request. The MBTA has prioritized documents and other communications for translation across the following three tiers:

- Tier 1: Safety, Security, and Legal Rights Information
- Tier 2: Vital Customer Access Information
- Tier 3: Information Critical to Customer Involvement and Outreach

The languages selected in each Tier either represent the vast majority of LEP populations in the service area, or are tailored to meet identified language needs. For example, the MBTA Basics flyer was translated into all safe harbor languages because the flyer was designed to provide critical information to all LEP riders. In addition to these standardized translation strategies, the MBTA provides notification that documents can be translated into additional languages upon request. For additional information or to request language assistance, the public can visit the MBTA's language assistant services at [www.mbta.com/language-services](http://www.mbta.com/language-services). ODCR monitors complaints, call center statistics, and website analytics which all suggest this is an effective strategy.

#### **Tier 1—Safety, Security, and Civil Rights:**

The documents listed in Tier 1 have been prioritized because the information to be shared is considered critical for customer safety and for exercising one's rights.

This includes:

- Emergency Instructions, Announcements, and Postings
- Title VI Notice to the Public
- Title VI Complaint Procedures
- Title VI Complaint Forms

The Title VI Notice to the Public, Title VI Complaint Procedures, and Title VI Complaint Form have been translated into Spanish, Portuguese, Haitian Creole, French, Simplified and Traditional Chinese, Vietnamese, Russian, Arabic, Italian, and Khmer.

In the event of an emergency, including unplanned disruptions, instructions (both audio and physical postings) are translated based on the LEP populations impacted by the emergency. An analysis of LEP population data by line and mode has been performed and is available for reference.

### **Tier 2—Information Critical to Access:**

Tier 2 includes materials that are critical to support customer access to the MBTA's transit system. These documents include information about the MBTA, fare information, major service and fare change related information, routes and schedules, service alerts, and paratransit information.

The MBTA has defined the following materials as providing system access information:

- “MBTA Basics” flyer – services, fares, hours of operation, emergencies, reduced fare programs, paratransit, etc. The flyer has been translated into forty-four safe harbor languages.
- Major service and fare change information: For major service and fare changes, documents and meeting materials are translated based on the LEP populations impacted by the changes. For systemwide changes, translations are provided in the top five LEP languages including Spanish, Portuguese, Haitian Creole, Chinese, and Vietnamese. In all cases, additional translations are provided upon request, and public meeting notifications include instructions for requesting additional language assistance.
- The Transit Access Pass Application is available both electronically and in hard copy. The electronic application is available in Spanish, Portuguese, and Chinese. The paper version is available in Spanish, Portuguese, Chinese, French, Haitian Creole, Portuguese, and Vietnamese.
- THE RIDE acceptance letter is translated based on the language needs of the applicant which are determined during the in person in take process.
- The RIDE application is available in Spanish, Russian, Haitian Creole, Portuguese, Vietnamese, Chinese, and other languages upon request.
- Notification of planned disruptions are translated into languages based on the presence of LEP populations in the impacted service area. To assist in the identification of LEP populations an analysis of LEP population data by line and mode has been performed and is available for reference.

### **Tier 3—General Information for Customer Involvement:**

Tier 3 relates to information important to encourage or invite customer participation in decision-making processes to improve the MBTA's system and services. These documents help customers play a role in decision-making processes that can empower community groups to voice their opinions or concerns. Outreach materials are made available in the languages of those populations impacted by the project. For projects with systemwide impacts, the MBTA translates materials into at least the top five languages in the service area.

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## III. Training Programs for MBTA Personnel

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The MBTA's Title VI training strategy provides tailored training at four distinct levels: one for all frontline staff with direct contact with the public, one for high-level managers, one for project managers, and one for any Title VI or civil rights liaisons. The objective of these trainings is to fit the specific needs of each department to ensure the message is delivered and internalized by staff and subsequently applied in a meaningful way as they carry out their daily job functions.

The following section provides a summary outline of the training programs that the MBTA has in place. Training is facilitated with the overall goal of informing, supporting, and providing the necessary information, tools, and guidance in understanding and appreciating the Title VI requirements.

### **New-Hire Orientation**

The MBTA's Human Resources Department provides orientation training for all new MBTA employees. Included within the orientation is a presentation by the ODCR of the Authority's policies and obligations to promote fairness, diversity, and inclusion for all employees and customers to ensure compliance with federal and state civil rights laws and regulations, including Executive Order #13166.

The Office of Diversity and Civil Rights training for new MBTA employees covers the Authority's policies and federal and state civil rights obligations related to diversity, nondiscrimination, inclusive public engagement, and workplace practices. New hires are trained in the importance of being professional, sensitive, and responsive, as well as on the need to treat all customers with equal respect regardless of language spoken. The Title VI element of the presentation includes a focus on staff responsibilities to eliminate language barriers for LEP customers looking to access the system.

### **Anti-Discrimination and Harassment Prevention (ADHP)**

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

This mandatory training is offered in separate sessions for supervisors and non-supervisory employees. Managers and supervisors are required to take the training every two years; all frontline employees must complete the one-day training every three years. The training includes a discussion of workplace scenarios, including interactions with customers who are unable to speak English.

### **Training of Customer Service Representatives**

The MBTA trains Call Center Representatives about their nondiscrimination responsibilities and the tools and protocols in place to assist passengers with limited English proficiency. The MBTA utilizes a private vendor, called Exela Technologies, to operate the Call Center. The Call Center has access to Language Line, which offers real-time interpretation in over 200 languages to help customers who are LEP.

The objective of this training is to help raise Call Center Representatives' awareness of the policies and procedures regarding Title VI requirements.

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

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

### **MBTA Title VI Training for Transit Ambassadors**

Transit Ambassadors play a vital role to help transform the customer experience by using technology and other resources to assist riders with fare products, scheduling, and navigating the system. However, before being deployed into stations, Transit Ambassadors participate in a robust training curriculum that involves a comprehensive presentation on preventing discrimination and assisting persons with limited English proficiency.

The Title VI training module concentrates on two core areas that Transit Ambassadors are likely to encounter in the train station. The first is an introduction to Title VI and handling discrimination complaint situations, where they are given instructions on routing discrimination complaints from the public to the Office of Diversity and Civil Rights. The second core area focuses on assisting LEP customers using the tools they have available to communicate with customers who speak a different language.

In 2022 training modules were updated to include information on the MBTA's obligations for providing language assistance, including the requirement to perform a four-factor analysis and data on the presence of LEP populations in the MBTA service area.

### **MBTA Title VI Training for Customer Service Agents, Instructors, and Hub Monitors**

ODCR participates in the recertification-training curriculum for Customer Service Agents, Training Instructors, and Hub Monitors. Each of these roles involves providing customer service and interacting with diverse passengers in stations across the service area. The Title VI training program is similar to the one offered to Transit Ambassadors and CSAs on handling discrimination complaints and assisting LEP customers. However, some positions such as the Hub Monitors and Training Instructors do not carry tablets and cannot access the MBTA's Civil Rights webpage or utilize Google Translate to help them in the field with short interactions. Instead, the personnel in these roles use printed versions of the "I speak" card to identify the customer's spoken language and then connect with via landline phones in the stations to contact the Call Center and Language Line assistance.

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## **IV. Providing Notice to LEP Persons**

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The MBTA relies on a variety of methods and media in communicating its notice and the availability of language assistance to customers and the general public. These include:

- Public meetings and hearing notices;
- Postings on [www.mbta.com](http://www.mbta.com);
- Major publications, including but not limited to the Capital Investment Plan, Public Engagement Plan, and Service and Fare Equity Analyses;
- Station and stop postings;
- Schedules and system maps;
- Distribution through community-based neighborhood organizations including those serving or representing minority and low-income groups;
- Call Center phone line;
- Transit Police dispatch phone line; and
- Press releases, including distribution to outlets serving minority and low-income neighborhoods.

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## **V. Monitoring and Updating the Language Assistance Plan**

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On an ongoing basis, the MBTA reviews the effectiveness of the Language Assistance Plan using strategies that may include, but are not limited to the following:

- Solicit direct feedback from CBOs and other stakeholders by distributing a questionnaire or holding focus group sessions on communicating with LEP individuals;
- Assess the demographic composition of the MBTA service area using the most current census data or data collected from community organizations;
- Measure the actual frequency of contact by LEP persons by collecting information from the Customer Care Call Center, the MBTA website translation, and frontline operations staff interviews;
- Partnering with other Boston-region organizations and participation in regional forums and events focused on issues of diversity and social equity. Such regional collaborations include the MetroFuture planning workshops and task forces headed by the Metropolitan Area Planning Council; and
- Changes by the MBTA to this Language Assistance Plan as needed; at a minimum every three years. The three-year update will coincide with the MBTA's Title VI Program submittal to the FTA.