



**Central New York
Regional Transportation Authority**

Limited English Proficiency (LEP) Plan



Prepared by: Central New York Regional Transportation Authority

In Compliance with: Title VI of the Civil Rights Act of 1964 & Executive Order #13166

September 2019

EXECUTIVE SUMMARY

Providing language assistance to persons with limited English proficiency in a competent and effective manner helps ensure that the Central New York Regional Transportation Authority's (Centro) services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will engender riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among Centro's broader immigrant communities in two important ways:



1. Reaching out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons from Centro that their business is valued; and
2. Developing a community outreach to identify appropriate language assistance measures can also assist Centro in identifying the transportations needs of immigrant populations and ensure that Centro's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.

Table of Contents

Introduction..... 3

The Four Factor Analysis..... 4

 Factor 1: Number and proportion of LEP persons served or encountered in Centro’s eligible services population..... 5

 Factor 2: Frequency with which LEP individuals come into contact with Centro’s programs, activities, and services 7

 Factor 3: Importance to LEP persons of Centro’s programs, activities, and services..... 8

 Factor 4: Resources and associated costs available to recipients 8

Implementing the Plan 9

 Element 1: Identifying LEP persons who need language assistance 9

 Element 2: Providing language assistance measures 10

 Element 3: Training staff..... 15

 Element 4: Providing notice to LEP persons 15

 Element 5: Monitoring/Updating the Plan 16

Figures

Figure1: Centro Service Area 5

Tables

Table 1: Language Spoken at Home for the Population 5 Years and Over by 1,000+ Persons in Centro’s Service Area 6

Table 2: Ability to Speak English by Place in Centro’s Service Area 7

Table 3: Community Organizations that Centro Works with to Assist LEP Individuals 12



INTRODUCTION

About Centro

The Central New York Regional Transportation Authority (Centro), which is the public transportation provider for Onondaga, Oswego, Cayuga, and Oneida counties (including the cities of Syracuse, Oswego, Fulton, Auburn, Rome and Utica) carries approximately 11 million passengers annually on its fleet of 246 buses. Centro currently employs 667 people (including part-time staff).



Our Mission

Centro's mission is to be responsive to the transportation needs of the Central New York community by providing services which are safe, convenient, reliable, and environmentally responsible with a goal of maximizing the taxpayers' return on investment.

The Need for an LEP Plan

Individuals having a limited ability to read, write, speak, or understand English are considered limited English proficient, or "LEP." This language barrier may prevent these individuals from accessing public services and benefits – including public transit services.

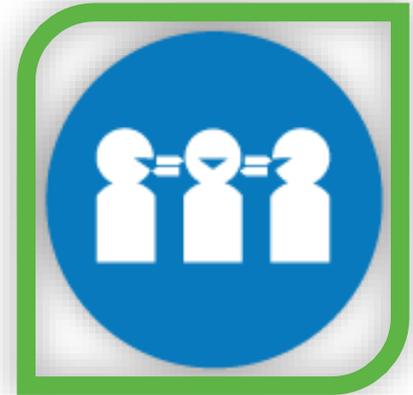
Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166 signed on August 11, 2000, are the federal legislation necessitating LEP Plans from public agencies receiving federal funds.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," requires federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. The Executive Order applies to all federal agencies and all programs and operations of entities that receive funding from the federal government – including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients such as public transit agencies.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” which was published on October 1, 2012. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with provisions of Section VII of the DOT LEP guidance.



Centro’s LEP Plan

As Central New York’s primary public transportation provider, Centro’s transit service area covers four counties – Cayuga, Oneida, Onondaga, and Oswego. As a designated direct recipient of FTA funding, Centro is required to develop and routinely update its LEP Plan as part of its Title VI Program. Based on bus counts, an LEP Plan is required only in Onondaga County; however, Centro has elected to provide a comprehensive LEP Plan that covers all counties within its service area.

Centro’s LEP Plan, which complies with the above-cited regulations, outlines the policies and procedures instituted by Centro to ensure that it is adequately assessing the size, location, and needs of the LEP populations it serves. Providing language assistance in a conscientious and effective manner will help ensure that Centro’s services are safe, convenient, reliable, environmentally responsible, and accessible to LEP persons in the community. In addition, the Plan discusses the means by which language access services are instituted, and how Centro evaluates the effectiveness of these services.

THE “FOUR FACTOR” ANALYSIS

The DOT guidance outlines “four factors” recipients should consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP persons. As a result of conducting the “Four Factor Analysis” Centro is well-positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures, and to confidently respond to requests for LEP assistance from constituents. The four factors Centro analyzed are:

1. The number and proportion of LEP persons served or encountered in Centro’s eligible services population.
2. The frequency with which LEP individuals come into contact with Centro’s programs, activities, and services.
3. The importance to LEP persons of Centro’s programs, activities, and services.
4. The resources and associated costs available to recipients.

Centro's "Four Factor Analysis"

Factor 1: The number and proportion of LEP persons served or encountered in Centro's eligible services population.

For planning purposes, Centro considers its current service area to be the counties of Cayuga, Oneida, Onondaga, and Oswego. Analysis of U.S. Census Bureau 2013-2017 data was conducted to estimate the LEP population in Centro's service area (*see Figure 1*).

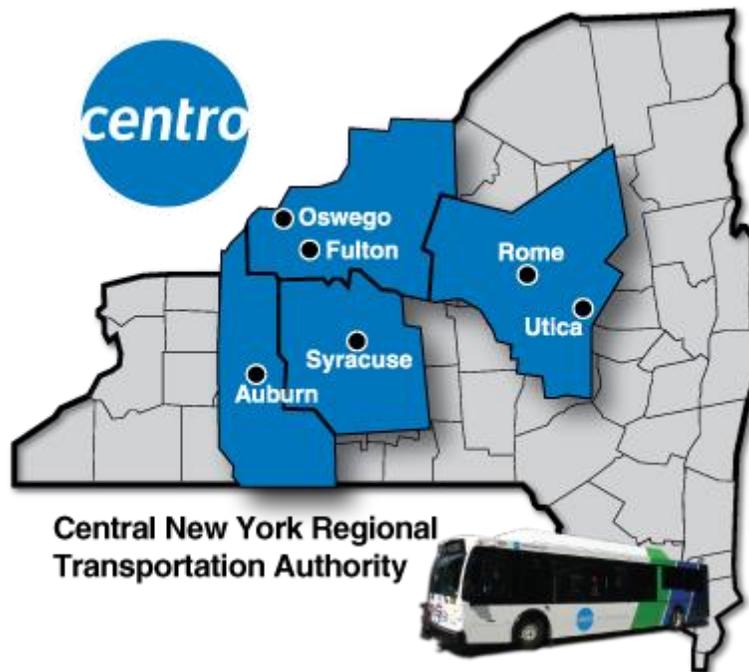


Figure 1: Centro Service Area

Examination of U.S. Census Bureau 2013-2017 C16001 tables, "Language Spoken at Home for the Population 5 Years and Over," by geographic place determined that there are 10 non-English language categories spoken at home by over 1,000 persons in Centro's service area (*see Table 1*). People who speak Spanish at home represent 2.9% of Centro's service area population. The remaining languages were each spoken by less than 3.7% of the population in Centro's service area.

Table 1: Language Spoken at Home for the Population 5 Years and Over by 1,000+ Persons in Centro's Service Area

| Language Spoken at Home | Estimated Number of Speakers | Percentage of Population |
|-------------------------------------|------------------------------|--------------------------|
| Cayuga County | | |
| English | 70,918 | 95.4% |
| Spanish | 1,759 | 2.4% |
| Oneida County | | |
| English | 192,975 | 88.1% |
| Spanish | 7,678 | 3.5% |
| Russian, Polish or Other Slavic | 5,684 | 2.6% |
| Other Indo-European | 2,537 | 1.2% |
| Vietnamese | 1,261 | 0.6% |
| Other Asian and Pacific Island | 4,519 | 2.1% |
| Onondaga County | | |
| English | 394,532 | 89.5% |
| Spanish | 13,642 | 3.1% |
| French, Haitian, or Cajun | 2,155 | 0.5% |
| German or Other West Germanic | 1,476 | 0.3% |
| Russian, Polish or Other Slavic | 4,981 | 1.1% |
| Other Indo-European | 7,082 | 1.6% |
| Chinese (incl. Mandarin, Cantonese) | 4,450 | 1.0% |
| Vietnamese | 2,071 | 0.5% |
| Other Asian and Pacific Island | 3,003 | 0.7% |
| Arabic | 3,169 | 0.7% |
| Other and Unspecified Languages | 2,991 | 0.7% |
| Oswego County | | |
| English | 108,628 | 95.9% |
| Spanish | 1,852 | 1.6% |

U.S. Census Bureau 2013-2017 American Community Survey S1601 tables, "Language Spoken at Home," tables by county were also examined. Using FTA guidelines, the LEP population – the population that speaks English less than "very well" – was estimated by summing the Census responses for Speak English only or speak English "very well" and speak English "less than very well." The data is categorized by the language groups spoken by respondents: "Spanish," "Other Indo-European," "Asian and Pacific Island," or "Other languages."

The study determined that approximately 3.5% (29,663 / 847,416) of the population over the age of 5 in Centro's service area speaks English less than "very well" and, therefore, is characterized as LEP (*see Table 2*). As indicated in the table, the majority of the LEP population (1.2%) speaks Asian and Pacific Island languages.

Table 2: Ability to Speak English by Place in Centro’s Service Area

2013-2017 American Community Survey 5-Year Estimate: Table S1601, “Language Spoken at Home”

| Geographic Area (Place) | Population Age 5+ | Speak Only English | | Speak English Less Than “Very Well” | | | | | | | | Estimated Total LEP Population | |
|-------------------------|-------------------|--------------------|--------------|-------------------------------------|--------------|-------------------------------|-------------|------------------------------------|-------------|-----------------|--------------|--------------------------------|-------------|
| | | | | Spanish | | Other Indo-European Languages | | Asian and Pacific Island Languages | | Other Languages | | | |
| Cayuga County | 74,365 | 70,918 | 95.4% | 704 | 40% | 193 | 18.2% | 102 | 49.5% | 83 | 19.8% | 1,082 | 1.5% |
| Oneida County | 218,948 | 192,975 | 88.1% | 2,358 | 30.7% | 3,671 | 37% | 4,328 | 65% | 588 | 34.4% | 10,945 | 5% |
| Onondaga County | 440,792 | 394,532 | 89.5% | 3,798 | 27.8% | 5,339 | 34% | 5,497 | 51.1% | 1,821 | 29.6% | 16,455 | 3.7% |
| Oswego County | 113,311 | 108,628 | 95.9% | 402 | 21.7% | 578 | 26.1% | 198 | 41.5% | 3 | 2.1% | 1,181 | 1% |
| TOTAL | 847,416 | 767,053 | 90.5% | 7,262 | 0.86% | 9,781 | 1.1% | 10,125 | 1.2% | 2,495 | 0.29% | 29,663 | 3.5% |

Conclusion: Although the ‘Asian and Pacific Island Languages’ category is the largest represented in Table 2, the most prevalent language spoken by LEP persons throughout Centro’s comprehensive service area is Spanish. As a result, Centro has focused its efforts on providing translation and language assistance services to its Spanish-speaking customers.

Factor 2: The frequency with which LEP individuals come into contact with Centro’s programs, activities, and services.

Centro comes into contact with LEP individuals on a regular basis either on its vehicles, via its Call Center, or as a result of scheduled travel training initiatives.

In June of 2019, Centro drivers were asked to complete a short survey to help evaluate the effectiveness of Centro’s current customer language interpretation services. The survey contained questions about driver interaction with Limited English Proficient (LEP) customers. Survey responses received indicated that:

- 86.39% of Centro drivers have encountered customers who speak limited or no English over the past year
- 41% of Centro drivers experienced this between 6 and 25 times and 17% experienced this more than 25 times
- during the encounters, customer attempted to communicate with Centro drivers in their native language 92.75% of the time

Of the drivers surveyed who interacted with customers who spoke languages other than English, 56% spoke Spanish, 14% spoke Bosnian, 10% spoke Chinese, 5% spoke Russian, and 4% spoke French. These percentages are not indicative of Centro’s LEP ridership population; rather, they indicate languages encountered by drivers interacting with LEP customers.



Centro's Call Center also provides customer assistance and travel information via telephone for those seeking to use Centro services. While LEP individuals currently have infrequent and unpredictable contact with Centro's Call Center and services, the small and growing size of the LEP population in Centro's service area will likely increase its future contact with Centro services. As a result, it will be important for Centro to continue monitoring population trends.

When LEP individuals contact Centro's Call Center, a language line interpretation service is available to connect Centro's Call Center employees with interpreters who are able to assist riders with bus schedule information in more than 200 languages. Callers to the Call Center (315-442-3400), as well as visitors at Centro's facilities, who are in need of language assistance are connected to the language line services. This free service is available from 6:30 a.m. to 6:00 p.m., Monday through Friday.

Records indicate that 43 of the 231,979 total calls placed to Centro's Call Center during the past 12 months utilized a Language Line interpretation service. Of the 43 calls received, 39 callers requested information assistance in Spanish, while the remaining 4 callers requested assistance in Arabic, Bosnian and Burmese.

Factor 3: The importance to LEP persons of Centro's programs, activities and services.

Access to public transportation is critical for many to fully participate in society, and Centro provides a range of important transportation options to the community through its fixed-route and paratransit services. Riders use Centro services to assist with multiple travel needs within the community, including trips to work, school, job interviews, grocery stores and retail shops, medical offices, and community service agencies.

The nature and importance of the program can be assessed by the number and frequency by which LEP persons use Centro's services. To make this determination, two methods are employed – the first is through Centro's Travel Training Program, and the second is through regular route surveys.

Centro's travel trainer performs outreach services and maintains an office at the Transit Hub, which is conveniently located within close proximity to many of the community-based organizations that refer LEP individuals to Centro. From this location, the travel trainer has direct contact with the LEP community and can assess the needs of LEP persons. The travel trainer reports back to Centro's Planning and Operations Departments and to the Chief Executive Officer so that the LEP program and its activities can be assessed and modified as appropriate. The various community organizations that Centro works with that assist and refer LEP individuals to Centro, provide feedback on the way in which Centro assist's LEP populations to determine how effectively those individuals are being served.

Factor 4: The resources and associated costs available to recipients.

Because Centro's service area does not have a large LEP population, Centro provides LEP services on a case-by-case basis. This methodology represents a cost-effective method for applying LEP services since they are relatively infrequent. If the population of LEP individuals within Centro's service area was larger, then a wider array of services and materials would be required.

Centro's annual operating budget funds outreach efforts and translation services to effectively communicate with LEP persons in the community. As funding allows, Centro will continue to expand its efforts.

Centro's Marketing & Communication and Human Resource Departments spend approximately \$2,000 annually in bilingual advertising and recruiting placements in local community newspapers. Modest funding is available for translation services, which are typically used for news releases, route information, passenger bulletins, and other marketing efforts targeted at Spanish speaking audiences.

Centro's Call Center annually budgets \$1,000 to support the translation phone service. Annual costs are dependent upon usage.



IMPLEMENTING THE LEP PLAN

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP notes that effective implementation plans typically include the following five elements:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons.
5. Monitoring and updating the Plan.

Centro LEP Plan Implementation

Element 1: Identifying LEP individuals who need language assistance.

As previously documented, Centro utilized data from the U.S. Census Bureau's American Community Survey to determine the number of LEP individuals residing in its four-county service area (Cayuga, Oneida, Onondaga, and Oswego) to whom it provides transit services.

Centro assists LEP individuals on a regular basis through either direct contact with drivers or the Centro Call Center, or via the Centro travel trainer. Centro has not, in general, provided multilingual materials. We do, however, provide interpretive services, upon request, to those using American Sign Language (ASL) at public meetings, and through TTY technology on the telephone.

1. **Census data:** Census 2013-2017 data indicates that Asian and Pacific Island-speaking LEP persons are the primary group requiring language assistance in Centro's service area. In general, the highest concentrations of Asian and Pacific Island-speaking LEP persons are in Oneida and Onondaga Counties.

Centro will continue monitoring and using Census data releases to identify and locate significant and emerging LEP populations.

2. **Customer Satisfaction Survey:** Centro routinely performs survey data collection to help satisfy requirements outlined by the Federal Transit Administration (FTA), which is an arm of the U.S. Department of Transportation. As recipients of federal funds, Centro needs to be accountable to the government on how and why it provides service the way it does.

To comply with the accountability requirement, Centro regularly conducts “Rider Surveys,” which provide detailed information about passenger demographics and travel patterns. These surveys, which include questions to help quantify LEP riders, their travel patterns, and route use provide important information to help further identify and understand the transit needs of transit-dependent LEP persons. Of the on-board surveys conducted, 94.4% identified English as their primary language, 3.6% identified Spanish, 0.3% identified Chinese, 0.2% identified Russian, and 1.6% identified Other.

3. **Documenting Staff Encounters with LEP Persons at Centro Public Meetings:** When open houses or public meetings are held, Centro staff will have interpreters available to help assist LEP persons. While Centro staff may not be able to personally provide translation assistance at the time, the interpreters will be an important asset in identifying language needs for future public events. A continuous record will be kept detailing the primary languages of LEP persons attending Centro’s public meetings.
4. **Tracking Calls to the Language Line:** Centro will continue to monitor and quantify the volume and trends of calls to the translation phone line for language assistance.

Element 2: Providing language assistance measures.

Centro currently employs various methods and strategies to provide LEP customers with information critical to using its services. Many of these efforts focus on reaching Spanish-speaking persons, the second dominant LEP population in Centro’s service area.

Centro’s current and planned efforts to provide language assistance to LEP customers in the future include the following:

1. **Translation services via phone:** Centro has access to interpreters who can assist riders with bus schedule information in more than 200 languages. Callers to the Call Center (315-442-3400), and visitors to Centro’s facilities who are in need of language assistance, are personally connected to the language line services. This free service is available from 6:30 a.m. to 6:00 p.m. Monday through Friday.

2. **Pocket schedules and route maps.** Customer Satisfaction Survey results provide information about routes frequented by LEP riders in need of bilingual printed passenger information. To date, no customer requests have been received regarding alternate language schedules. However, Centro will continue to monitor customer inquiries should this change. Additionally, Centro maintains a mobile app so that customers can access real-time bus tracking on their smartphone. The app allows customers to pinpoint real-time bus locations and see estimated bus arrival times. They can also store favorite routes and stops for easy reference, create customized travel plans, provide feedback with email and photos and identify the Nearest Stops using their phone's Geolocation – all in their native language.
3. **On-Board Announcements:** To accommodate its Spanish-speaking riders, Centro includes automated messages in Spanish regarding service changes and new products. Additional messaging will be identified and automated in applicable alternate languages should the need arise.
4. **Centro Website and social media translation:** To improve contact with LEP populations, Centro's website contains a language translator. Centro schedules and documents can be translated into the native language of the site visitor upon request. Additionally, Centro social media followers can view Centro information in their native language on their mobile devices as a result of the language settings feature.
5. **Critical documents in alternate languages:** Upon request, applications for reduced fare cards for seniors, youths, and persons with disabilities can be made available in alternate languages. An overview of Centro's Title VI Program and a Title VI complaint form are available at: <http://www.centro.org/misc-group/title-vi>
6. **Assisting LEP Persons on-board Centro buses:** If an LEP passenger needs assistance while on-board a Centro bus, recommended approaches to understand and appropriately respond to the passenger's needs and situations are as follows:
 - The driver may inquire if another passenger can serve as a translator.
 - The driver could direct the LEP person to Centro's Call Center for language assistance.
 - More difficult or emergency situations may necessitate contracting Transportation Supervisors or Dispatch for additional help and phone access to language line interpreters.

Table 3 lists organizations that Centro has worked with throughout the community that are in need of translation or interpretation services. In total, 3,229 individuals have been trained on how to utilize Centro's transportation services, 1,229 since Centro's last LEP Plan submission. Official languages of program participants include the following: Amharic, Arabic, Armenian, Burmese, Dari, Dzongkha, Farsi, French, Karen, Karenni, Kinyarwanda, Kurdish, Mali, Nepali, Pashto, Persian, Russia, Somali, Spanish, Swahili, Syriac, Tigrin, Turkmen, Ukrainian, Urdu, and Vietnamese.

Table 3: Community Organizations that Centro Works With to Assist LEP Individuals

| Organization | Assistance Provided | Date Provided | Number of Participants |
|--|---------------------|---------------|------------------------|
| Aurora of Central New York | How-to-Ride | 8/4/16 | 25 |
| Center for New Americans | How-to-Ride | 8/22/16 | 52 |
| Refugee Assistance Program | How-to-Ride | 9/27/16 | 29 |
| Center for New Americans | How-to-Ride | 11/1/16 | 35 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 11/2/16 | 24 |
| Elmcrest | Train-the-Trainer | 12/19/16 | 2 |
| Elmcrest | Train-the-Trainer | 12/21/16 | 2 |
| Center for New Americans | How-to-Ride | 1/10/17 | 50 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 1/18/17 | 11 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 2/8/17 | 18 |
| Center for New Americans | How-to-Ride | 3/2/17 | 14 |
| Huntington Family Center | How-to-Ride | 3/28/17 | 14 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 4/11/17 | 25 |
| Madison-Oneida BOCES | How-to-Ride | 4/11/17 | 25 |
| Refugee Assistance Program | How-to-Ride | 4/19/17 | 15 |
| ARC Oneida Lewis | Train-the-Trainer | 4/20/17 | 11 |
| Solvay High School Special Education Program | How-to-Ride | 4/26/17 | 10 |
| Elmcrest | Train-the-Trainer | 5/1/17 | 1 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 5/10/17 | 11 |
| Center for New Americans | How-to-Ride | 5/15/17 | 12 |
| Unity House of Cayuga County | How-to-Ride | 5/19/17 | 18 |
| ARC of Onondaga | How-to-Ride | 6/13/17 | 31 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 6/14/17 | 15 |
| ARC of Onondaga | How-to-Ride | 6/20/17 | 30 |
| Center for New Americans | How-to-Ride | 7/5/17 | 9 |
| Exceptional Family Resources | How-to-Ride | 7/6/17 | 12 |



| Organization | Assistance Provided | Date Provided | Number of Participants |
|--|---------------------|---------------|------------------------|
| ARC of Onondaga | How-to-Ride | 7/11/17 | 31 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 7/12/17 | 2 |
| ARC of Onondaga | How-to-Ride | 7/21/17 | 28 |
| ARC Oneida Lewis | How-to-Ride | 7/26/17 | 6 |
| Center for New Americans | How-to-Ride | 8/2/17 | 16 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 8/18/17 | 100 |
| The Kelberman Center | Train-the-Trainer | 8/18/17 | 10 |
| Center for New Americans | How-to-Ride | 9/13/17 | 3 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 11/8/17 | 7 |
| Center for New Americans | How-to-Ride | 1/3/18 | 20 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 1/8/18 | 7 |
| ARC Oneida Lewis | How-to-Ride | 2/28/18 | 10 |
| Center for New Americans | How-to-Ride | 3/20/18 | 13 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 3/21/18 | 16 |
| Exceptional Family Resources | How-to-Ride | 4/4/18 | 7 |
| Exceptional Family Resources | How-to-Ride | 4/5/18 | 5 |
| Elmcrest (Casey's Place) | Train-the-Trainer | 4/9/18 | 1 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 5/2/18 | 5 |
| Madison-Oneida BOCES | How-to-Ride | 5/30/18 | 22 |
| Center for New Americans | How-to-Ride | 5/31/18 | 16 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 6/6/18 | 10 |
| Parkway Center (Utica) | Train-the-Trainer | 6/6/18 | 2 |
| Towne Center Retirement Community | How-to-Ride | 6/7/18 | 7 |
| Huntington Family Center | How-to-Ride | 6/14/18 | 8 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 7/11/18 | 8 |
| Center for New Americans | How-to-Ride | 7/17/18 | 11 |
| Aurora of Central New York | How-to-Ride | 7/18/18 | 12 |



| Organization | Assistance Provided | Date Provided | Number of Participants |
|---|---------------------|---------------|------------------------|
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 8/1/18 | 8 |
| Elmcrest (Casey’s Place) | How-to-Ride | 9/14/18 | 11 |
| SUNY ESF | How-to-Ride | 9/17/18 | 2 |
| Center for New Americans | How-to-Ride | 9/18/18 | 11 |
| New York State Office for People With Developmental Disabilities (Rome) | How-to-Ride | 9/26/18 | 15 |
| YMCA of Auburn | How-to-Ride | 10/10/18 | 31 |
| Toomey Supported Independent Living Program | How-to-Ride | 12/11/18 | 6 |
| Girl Scouts of the USA | How-to-Ride | 1/25/19 | 25 |
| Center for New Americans | How-to-Ride | 2/19/19 | 23 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 4/10/19 | 13 |
| Center for New Americans | How-to-Ride | 4/16/19 | 28 |
| Catholic Charities Refugee Resettlement Program | How-to-Ride | 4/17/19 | 47 |
| The Neighborhood Center, Inc. (Utica) | How-to-Ride | 6/4/19 | 10 |
| Liberty Resources Inc. | How-to-Ride | 6/5/19 | 6 |
| ARC of Oneida | How-to-Ride | 6/11/19 | 11 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 6/12/19 | 10 |
| Center for New Americans | How-to-Ride | 6/18/19 | 28 |
| ARC of Oneida (Collegeworks Program @ MVCC) | How-to-Ride | 6/19/19 | 11 |
| Chadwick Residence | How-to-Ride | 6/25/19 | 11 |
| Aurora of Central New York | How-to-Ride | 7/8/19 | 17 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 7/17/19 | 10 |
| Mohawk Valley Resource Center for Refugees | How-to-Ride | 9/11/19 | 11 |
| Mohawk Valley Psychiatric Center | How-to-Ride | 9/18/19 | 11 |

Element 3: Training Staff

In order to establish meaningful access to information and services for LEP individuals, various personnel and departments that regularly interact with the public are trained on how to provide the language assistance services contained within Centro's LEP Plan.

Training efforts include:

- Executive staff are familiarized with the LEP Plan in order to reinforce its importance and ensure its implementation by Centro employees.
- Staff within the Customer Service and Marketing & Communications Departments are familiarized with the LEP Plan, with particular emphasis on LEP outreach efforts at Centro public meetings and community events. Training focuses on using interpreter services in an effort to communicate with and quantify the number of LEP persons attending public meetings and community events.
- The Customer Service Department, which is responsible for the Call Center and the Centro on-site reception area, have periodic refresher training on directing LEP callers and walk-in customers to the phone line for interpretation services.
- The Operations Department trains dispatchers, roadside supervisors, and operators on best practices and procedures for assisting LEP passengers in need of assistance. LEP passenger assistance measures are incorporated into orientation training for new operators, and refresher training for current operators.

Element 4: Providing Notice to LEP Persons

Centro's current and planned measures to inform LEP persons of the availability of language assistance avenues includes, but is not limited to, the following:

- **Placards on buses:** Centro has informational placards on buses in Spanish that inform riders of Centro's language line and translation services.
- **Local non-English newspapers:** Centro will continue to issue media press releases in Spanish, and purchase advertisements in local non-English newspapers publicizing Centro services.
- **Direct engagement with LEP populations and community organizations:** Through working with various community organizations, Centro will seek to identify and engage LEP populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting "How-to-Ride" clinics in partnership with community organizations continues to be a great tool in educating LEP persons on how to use Centro services. Direct engagement with LEP persons will also help Centro learn what additional agency information may need translation.

Element 5: Monitoring/Updating the Plan

Centro will routinely review and update its LEP Plan as necessary. Anticipated updates will include the incorporation of new Census data, LEP ridership trends identified through routine “Customer Satisfaction Surveys,” and public comments about the LEP Plan. Full review of the LEP Plan will occur with each triennial Title VI program submission.