

DENTON COUNTY TRANSPORTATION AUTHORITY

Language Access Plan

Updated July 2026



Prepared as part of DCTA's Title VI Program

1. Purpose and Scope	3
2. Legal and Planning Framework.....	3
3. Language Assessment Analysis	3
3.1 Number or Proportion of LEP Individuals	3
3.2 Frequency of Contact.....	4
3.3 Nature and Importance of Services	4
3.4 Resources and Costs	5
4. Language Priorities	5
Table 1. Language Priority Framework	5
5. Providing Language Assistance	6
5.1 Identifying a Language Need	6
5.2 Interpreting.....	7
5.3 Boundaries for Bilingual Staff	7
6. Written Translation and Essential Documents	8
6.1 Essential Documents.....	8
6.2 Translation Process	8
7. Time-Sensitive Communications.....	9
8. Staff Training.....	9
9. Data Collection, Monitoring, and Plan Updates.....	10
10. Complaints and Plan Administration	10
11. Implementation Priorities.....	10
Table 2. Implementation Priorities	10
Appendix A. Data Sources and Limitations	11
Appendix B. Priority Language Counts Used for Planning	11
Table B-1. Priority Language Counts Used for Planning.....	11
Appendix C. Glossary	12

1. Purpose and Scope

Denton County Transportation Authority (DCTA) adopted this Language Access Plan (Plan) as part of its Title VI Program. The Plan describes how DCTA will provide meaningful access to programs, services, and activities for individuals with limited English proficiency (LEP). It applies to DCTA staff, contractors, and public-facing service channels, including fixed-route bus and A-train services, GoZone and other on-demand services, Access/paratransit, customer service, public meetings, service alerts, Title VI processes, and public information.

An individual with LEP does not speak English as a primary language and has a limited ability to read, write, speak, or understand English. DCTA provides language assistance free of charge. This Plan is intended to be used with DCTA's Title VI Program, complaint procedures, customer service procedures, and emergency communications procedures.

2. Legal and Planning Framework

DCTA receives federal financial assistance and must take reasonable steps to provide meaningful access to individuals with limited English proficiency, consistent with Title VI of the Civil Rights Act of 1964, U.S. Department of Transportation regulations at 49 CFR Part 21, and applicable Federal Transit Administration (FTA) requirements and guidance. DCTA evaluates language needs through a Language Assessment Analysis in FTA Circular 4702.1B and updates this Plan as demographic and operational information changes.

The FTA Safe Harbor provision identifies a strong evidence base for translating essential written information when a language group reaches 5 percent or 1,000 persons, whichever is less, of the population eligible to be served or likely to be encountered.

3. Language Assessment Analysis

3.1 Number or Proportion of LEP Individuals

ACS 2024 Table B16001 reports 79,603 Denton County residents age 5 and older who speak a language other than English at home and speak English less than "very well," or 8.08 percent of the county population age 5 and older. This countywide measure is the primary demographic source used for this Plan. It is a planning proxy, not a measure of DCTA riders or a count by route, stop, station, municipality, or program.

Spanish is the largest LEP language group (43,824 persons). ACS 2024 Table B16001 also identifies more than 1,000 LEP individuals in Korean, Telugu, Vietnamese, Chinese (including Mandarin and Cantonese), Malayalam, Kannada, or other Dravidian languages, other languages of Asia, Tagalog (including Filipino), Urdu, Nepali, Marathi, or other Indic languages, and Bengali. Table 1 gives the planning action for every language or language group, and Appendix B, Table B-1 gives the underlying LEP counts. Because several ACS entries are grouped categories, DCTA will confirm the specific language requested before commissioning written translations within those categories.

DCTA will maintain Hakha Chin assistance based on its prior Plan commitments and known community presence. Hakha Chin is not reported as a standalone language in ACS 2024 Table B16001, so its written-translation priority will be reviewed with operational data, community input, and actual requests.

3.2 Frequency of Contact

A staff survey conducted in June 2026 found that the majority of respondents reported contact with individuals with limited English proficiency at least monthly, including variances of reported contact, ranging from daily to weekly and monthly. Staff identified encounters in Spanish, Hindi, Chinese, Arabic, Korean, Farsi, Vietnamese, Urdu, Tagalog, and Hakha Chin, with some languages encountered weekly or daily. LanguageLine records also identified Spanish as the language most frequently requested through telephonic interpreting.

DCTA should consistently track language encounters across all service channels, including the language requested, frequency of contact, type of assistance provided, and service area involved. This tracking is essential for understanding the actual frequency and range of language needs and for guiding decisions about interpreting services, translated information, staff training, and future resource planning.

3.3 Nature and Importance of Services

DCTA provides transportation services that riders may rely on to reach employment, schools, medical appointments, grocery stores, social service agencies, and other essential destinations. These services include fixed-route bus service, A-train service, GoZone, paratransit, and related customer-service functions.

A language barrier may prevent a rider from understanding how to use a service, make a trip, respond to a service change, or exercise a right.

Important information includes:

- fares, payment methods, and reduced-fare programs;
- routes, schedules, stops, transfers, and trip-planning information;
- detours, delays, cancellations, and service disruptions;
- safety instructions and emergency information;
- paratransit eligibility, application requirements, scheduling, and appeal rights;
- complaint procedures and Title VI information;
- notices about service changes, public hearings, and opportunities for public comment; and
- instructions provided during customer-service interactions.

The importance of language assistance varies by the type of information and the consequences of a communication failure. A delay in translating general promotional information may have limited consequences. In contrast, unclear safety instructions, service-disruption notices, paratransit eligibility decisions, or complaint procedures may prevent a rider from traveling, accessing an essential service, or exercising a legal right.

Language access is necessary to support meaningful access to transportation services, programs, and decisions that directly affect riders. DCTA will give priority to language assistance for information and interactions that affect safety, access to transportation, eligibility for services, legal rights, or a rider's

ability to complete a trip. Assistance should be provided in a clear and timely manner and through a method appropriate to the situation, such as qualified interpreting services, translated written information, or another approved language-access resource.

3.4 Resources and Costs

DCTA currently has telephonic interpreting through LanguageLine, translated materials in Spanish and Hakha Chin, I-SPEAK Cards, Title VI and LEP procedures, website machine translation functionality, and staff training. The assessment identified administrative gaps rather than a lack of core resources: inconsistent use of language identification tools and LanguageLine; informal use of machine translation, family members, and other ad hoc methods; limited public notice that free assistance is available; no documented process for identifying, maintaining, and updating essential-document translations; limited multilingual procedures for urgent operational communications; and limited tracking of language needs. This Plan directs DCTA to address those gaps, use existing resources more consistently, and provide written translations based on language need, document importance, demand, and available resources.

4. Language Priorities

DCTA will provide qualified telephonic interpreting, without charge, in any language requested when needed for meaningful access. Table 1 sets the written-translation, interpreting, outreach, and monitoring actions for Spanish; Hakha Chin; Korean; Telugu; Vietnamese; Chinese (including Mandarin and Cantonese); Malayalam, Kannada, or other Dravidian languages; Other languages of Asia; Tagalog (including Filipino); Urdu; Nepali, Marathi, or other Indic languages; and Bengali. Appendix B, Table B-1 records the applicable ACS LEP counts. These priorities do not limit assistance in other languages.

Table 1. Language Priority Framework

Planning category	Language or ACS language group	Required planning action
Primary written translation	Spanish	Maintain translations of all essential documents and provide interpreting across public-facing channels.
Existing commitment	Hakha Chin	Maintain existing translated essential documents and provide interpreting or translation as supported by requests, community input, and available resources.
Phased essential-document planning	Korean; Telugu; Vietnamese; Chinese, including Mandarin and Cantonese; Tagalog, including Filipino; Urdu; Bengali	Provide interpreting and include each language in phased essential-document translation planning for high-priority rider materials, informed by demand and document importance.

Planning category	Language or ACS language group	Required planning action
Specific-language confirmation before translation	Malayalam, Kannada, or other Dravidian languages; Other languages of Asia; Nepali, Marathi, or other Indic languages	Provide interpreting. Track the exact language requested before commissioning written translations.
Monitor for interpreting and outreach	Hindi; Tamil; Arabic; Gujarati; Yoruba, Twi, Igbo, or other West African languages; other requested languages	Provide interpreting upon request and review recurring demand, staff encounters, and community input for outreach and future planning.

The language priorities are countywide planning priorities, not route-level or municipal LEP counts. Supporting PUMA analysis identifies broad planning patterns: Telugu and Tamil near Little Elm/The Colony/Frisco West; Hindi and Korean near Flower Mound/Highland Village; Chinese and Arabic near Denton/Corinth; Korean and Vietnamese near Carrollton/North Dallas; Korean and other Asian languages in Lewisville; and West African languages and Arabic in Outer Denton City. DCTA will use these patterns to inform outreach, interpreter planning, staff preparation, and monitoring.

5. Providing Language Assistance

5.1 Identifying a Language Need

Staff must offer free language assistance when a customer requests assistance in a language other than English, has difficulty communicating in English, or otherwise appears to need language assistance to access DCTA services. When the customer's language is not known, staff must use DCTA's approved language-identification tool to allow the customer to identify the language they speak. Staff should document the language requested when feasible and in accordance with DCTA approved procedures.

DCTA will update its I-SPEAK Cards to clearly state that language assistance is available at no cost. The tool should reflect the languages identified through current demographic data, staff reports, and documented customer encounters, including the languages and language groups listed in Appendix B.

DCTA will also post and maintain clear notices informing customers that free language assistance is available. DCTA shall use a short message, such as

"Free language assistance is available, including interpreting services and translated information. Call [phone number] or ask a DCTA staff member for help in your language."

This notice should be provided in DCTA's priority languages.

The notice should appear on DCTA's website, at customer service locations, in Title VI materials, in public-meeting materials, and in key rider documents. DCTA will periodically review the notice wording and placement to confirm that the information remains visible, accurate, and current.

For public meetings, DCTA will include the multilingual notice informing attendees of language assistance options in meeting invites, registration forms, and other outreach materials and provide a reasonable way to request assistance. Staff will document advance requests, including the language needed, the type of assistance requested or provided, and any follow-up required. The absence of an advance request does not remove DCTA's responsibility to provide reasonable language assistance when a need is identified shortly before or during the meeting.

5.2 Interpreting

DCTA will maintain access to qualified over-the-phone interpreting through LanguageLine or another approved vendor. Staff should use interpreting services for customer service, dispatch, scheduling, complaint intake, eligibility-related communication, public meetings, safety issues, and other important interactions. For planned meetings or events, the responsible department will identify likely language needs in advance and arrange qualified interpreters or translated materials when reasonable.

- DCTA staff should arrange qualified interpreting services as soon as a language need is identified. Customers must not be asked to return with their own interpreter.
- When using over-the-phone interpreting, staff must follow DCTA's approved connection procedure, identify the language needed, introduce the participants, explain the purpose of the interaction, and confirm that the interpreter can hear and understand all speakers.
- Staff must speak directly to the customer rather than to the interpreter. They should use short, clear statements, pause after each complete thought, and allow the interpreter to interpret the entire exchange. All questions, responses, and relevant side comments must be interpreted. Staff must not ask the interpreter to provide an opinion, explanation, or recommendation outside the interpreter's role.
- Machine translation, family members, companions, and children must not be used in place of a qualified interpreter for any communication involving safety, eligibility, complaints, legal rights, confidential information, or other matters in which accuracy is important.
- Staff must still inform the customer that qualified interpreter services are available at no cost. If the customer voluntarily requests assistance from an adult family member or friend, accompanying them, they may assist with a brief, routine, and low-risk interaction. DCTA must still record the language being interpreted and be ready to provide interpreting services, in case a Limited English Proficient person changes their mind. Children must not be used to interpret except in a genuine emergency while qualified assistance is being arranged.

5.3 Boundaries for Bilingual Staff

DCTA may utilize bilingual staff who speak English and a non-English language at proficient levels to support communication within the scope of their assigned job duties. A bilingual employee is not automatically a qualified interpreter or translator.

Before bilingual staff is approved to communicate directly in a non-English language as part of their job duties, DCTA must assess and document their proficiency in that language through a standardized

language-proficiency test or other approved assessment process provided by a third-party testing provider. Staff may be identified as bilingual for DCTA purposes only after their proficiency has been verified and recorded.

Tested bilingual staff may communicate directly with an individual in another language when the communication is within their defined role and within their tested language proficiency, subject-matter knowledge, and training. They must not be asked to interpret or translate outside their assigned duties solely because they speak another language.

Bilingual staff must not interpret between two or more parties unless they have received interpreter training, demonstrated interpreting competency, and been authorized by DCTA to provide interpreting services. When parties do not share a common language, DCTA will use a qualified interpreter unless the bilingual staff member is also qualified and authorized to interpret.

Bilingual staff may not translate essential documents or create public-facing translations unless they received the appropriate training and were tested and authorized to translate following DCTA's approved translation and review process.

DCTA shall maintain a roster of tested and approved bilingual staff and identify their functions. The roster shall be updated on a regular basis, at least annually.

6. Written Translation and Essential Documents

6.1 Essential Documents

DCTA will identify documents that contain information a person needs to access or use DCTA services, understand their rights or responsibilities, respond to a DCTA decision or action, or protect their health or safety. DCTA will review documents for these criteria before they are issued or substantially revised.

Examples include:

- route, fare, payment, service, and rider-access information needed to use DCTA services;
- access/paratransit and reduced-fare applications, eligibility notices, policies, and instructions;
- Title VI notices, complaint forms, complaint procedures, and language-assistance notices;
- service change, detour, closure, safety, and emergency information when the message is important to rider action; and
- public-meeting notices, agendas, and participation information when language need or the meeting's purpose makes translation necessary

6.2 Translation Process

Before submitting a document for translation, the requesting department will provide the final English source, language or languages needed, intended audience, deadline, delivery format, digital accessibility needs, and any required terminology. The document owner and designated language access contact will determine whether the document is essential, using the criteria in Section 6.1 and the language-priority

framework in Appendix B. DCTA will use qualified translators and an appropriate review process for essential documents. DCTA will maintain a current inventory showing the English source title, language, version or revision date, location, owner, and date each translation was reviewed.

When an essential document is updated in English, the document owner must notify the designated language access contact and determine whether corresponding translations require revision before the new English version is released or as soon as practicable for urgent information. DCTA will not treat automated website translation as a replacement for professional translation of essential, legal, safety, or other high-stakes content. If DCTA continues to use Google Translate on its website, it shall display a clear disclaimer in English and in the language selected by the user. The disclaimer will state that Google Translate is provided for convenience, automated translations may contain errors, and the English version is the official version of the website content. It will also explain how users can request free language assistance when they need help understanding DCTA information or services.

7. Time-Sensitive Communications

DCTA will consider language access when communicating service disruptions, detours, closures, safety notices, and emergencies. Departments responsible for these communications will use clear English source messages and provide information in other languages through the fastest reasonable method available, based on the urgency of the message, the languages of affected riders, and available resources.

DCTA will give priority to communications that require immediate rider action or affect safety, access to transportation, or service availability. For recurring notices, DCTA may prepare translated message templates in its priority languages and update them as needed. When DCTA makes an urgent announcement in English, it will provide the same information in other languages through qualified interpreters when translated written materials are not available or are not enough to communicate the message clearly. Interpreter assistance will be free to the customer and provided as quickly as reasonably possible.

8. Staff Training

DCTA will provide language access training to public-facing employees, supervisors, relevant contractors, and new employees as part of onboarding. Refresher training will be provided at least annually and when procedures or resources change. Training will include interactive and practical section, using the approved language-identification tool and over-the-phone interpreting procedure.

Training will cover:

- how to identify a language need and offer free assistance;
- how to access LanguageLine or another approved over-the-phone interpreter, including how to identify the language, introduce the call, speak directly to the customer, use short segments, pause for interpretation, and protect confidentiality;
- how to work effectively with an interpreter and when not to use machine translation, informal interpreters, family members, companions, children, or untrained bilingual staff;

- when translation may be needed and how to submit a request; and
- how to document language assistance activity, requests for document translation, and language-access complaints.

9. Data Collection, Monitoring, and Plan Updates

DCTA will track language access activity across customer service, dispatch and scheduling, GoZone, Access/paratransit, complaints, public meetings, service alerts, and other public-facing programs. At minimum, records should capture the requested or identified language, assistance provided, communication channel, service or program, general location when available, date, whether LanguageLine or another interpreter was used, and whether the interaction involved an essential document, safety issue, complaint, or important service matter. Records should not include unnecessary personal information.

The designated language access contact, with Marketing and Communications, Planning, Operations, Customer Experience, and other relevant departments, will review the data at least annually. The review will consider interpreter use, requests for document translation, complaints, staff feedback, public-meeting requests, website activity, community input, and changes in demographic data. DCTA will use the review to adjust language priorities, update translated materials, identify training needs, and document actions taken.

DCTA will review this Plan at least every three years, during Title VI Program updates, and sooner when major service changes, significant demographic changes, regulatory requirements, recurring language needs, complaints, or monitoring data show that an update is needed.

10. Complaints and Plan Administration

A person who believes DCTA did not provide appropriate language assistance may file a complaint through DCTA's Title VI complaint process. Staff who receive a language-access complaint must provide language assistance needed to complete the complaint, forward it to the Title VI office or designated recipient under DCTA procedure, and document the language-access issue for monitoring.

DCTA's Executive Team designates the Title VI administrator or other written designee to oversee this Plan. The designee will coordinate annual monitoring, maintain the translated-document inventory and language-assistance records, work with departments on corrective action, and report material findings to DCTA leadership.

11. Implementation Priorities

Table 2. Implementation Priorities

Timeframe	Action
Within 90 days	Name the language access designee; publish a multilingual free-language-assistance notice; issue a simple tracking form; refresh staff training on language access services and procedures; revise I-SPEAK Cards

Timeframe	Action
Within 6 months	Complete the essential-document inventory; establish procedures for translation of document, including version-control; create a process for urgent messaging; begin phased translation implementation beyond Spanish and Hakha Chin.
Annually	Review language assistance data, staff training, language priorities, translated materials, community input, and public notice placement; document adjustments and budget needs.
At each Plan update	Reassess the Language Assessment Analysis, demographic data, Safe Harbor considerations, operational language data, essential documents, complaints, and implementation results.

Appendix A. Data Sources and Limitations

This Plan relies on DCTA documents and operational information, LanguageLine records for August 2024–December 2025, staff language access survey results, ACS 2024 Table B16001, and supporting 2020–2024 ACS/PUMA geographic data. The staff survey is qualitative input, not a representative measure of all DCTA staff. LanguageLine records are useful evidence of actual use but do not capture all interactions, and DCTA did not have detailed language data by rider, route, stop, station, city, ZIP code, program, or service area. PUMA findings describe broad household-language patterns and are not individual LEP counts. DCTA will refine this Plan as it collects more operational language-access data.

Appendix B. Priority Language Counts Used for Planning

Table B-1. Priority Language Counts Used for Planning

Language or ACS language group	Denton County residents age 5+ who speak English less than "very well"
Spanish	43,824
Korean	6,511
Telugu	3,477
Vietnamese	2,804
Chinese, including Mandarin and Cantonese	2,626
Malayalam, Kannada, or other Dravidian languages	2,375
Other languages of Asia	1,966
Tagalog, including Filipino	1,926
Urdu	1,498
Nepali, Marathi, or other Indic languages	1,166
Bengali	1,045

Table B-1 uses U.S. Census Bureau, 2024 ACS Table B16001. Grouped categories must not be treated as one spoken language for written translation.

Appendix C. Glossary

Bilingual staff: DCTA staff whose proficiency in English and another language has been assessed and documented. Tested bilingual staff may communicate with LEP individuals directly within their assigned duties, but are not qualified as interpreters unless they also meet DCTA's interpreter training, competency, and authorization requirements.

High stakes communication: Communication involving safety, eligibility, complaints, confidentiality, legal rights or obligations, discipline, or another matter where an error could materially affect a customer or DCTA.

Interpretation / interpreting: Listening to a communication in one language and verbally rendering it into another language while retaining the same meaning.

Language assistance services: Services that help individuals communicate across languages, including interpreting and translation.

Limited English proficiency (LEP): A limited ability to read, speak, write, or understand English because English is not the individual's primary language.

Over-the-phone interpreting (OPI): is a telephonic call connecting two parties that speak different languages with a professional interpreter. The interpreter acts as an intermediary, listening to each person and verbally rendering the message into the target language.

Priority language: A language or language group identified in this Plan for translation planning, interpreting, outreach, or monitoring based on DCTA's Language Assessment Analysis. Priority status does not limit assistance in other languages.

Qualified interpreter: An individual assessed for language proficiency, trained in interpreter ethics, modes, modalities, applicable terminology, and protocols, and competent to interpret in the mode needed for the interaction.

Translation: The conversion of written text from a source language into an equivalent written text in a target language.

Essential document: A printed or electronic document containing information needed to access or participate in DCTA services, understand rights or responsibilities, respond to an action, or protect health or safety.