

Limited English Proficiency (LEP) Plan

Sacramento County SCT/Link

Introduction

This *Limited English Proficiency Plan* has been prepared to address Sacramento County Department of Transportation's (SacDOT) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills utilizing its transit services under the name SCT/Link. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et se, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its' respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including SacDOT, which receives federal assistance through the U.S. Department of Transportation (U.S. DOT).

Plan Summary

The SacDOT has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by the SCT/Link. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, SacDOT undertook the U.S. DOT four-factor LEP analysis.

Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SCT/Link program, activity or service.*

Table 1 is from the U.S. Census Bureau, 2007-2011 American Community Survey that lists the languages spoken at home and their ability to "speak English very well" for the population within Galt five years and older. Spanish speakers who speak English less than very well comprise 11% of the estimated population and are the

primary LEP persons likely to be involved with SCT/Link programs and transit services. All other LEP groups are less than 68 individuals and fall well below the “safe harbor” numbers of 5% or 1,000 individuals, whichever is lowest.

TABLE 1 - Language Spoken at Home by Ability to Speak English for the Population 5 years and over

2007-2011 American Community Survey 5-Year Estimates

	Sacramento County, California		Galt city, California	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	1,307,603	*****	21,398	+/-349
Speak only English	908,857	+/-5,238	14,494	+/-776
Spanish or Spanish Creole:	175,373	+/-3,656	5,859	+/-664
Speak English "very well"	98,904	+/-2,863	3,514	+/-588
Speak English less than "very well"	76,469	+/-2,590	2,345	+/-459
French (incl. Patois, Cajun):	3,467	+/-465	0	+/-95
Speak English "very well"	3,008	+/-412	0	+/-95
Speak English less than "very well"	459	+/-163	0	+/-95
French Creole:	159	+/-92	0	+/-95
Speak English "very well"	124	+/-88	0	+/-95
Speak English less than "very well"	35	+/-34	0	+/-95
Italian:	2,090	+/-370	14	+/-23
Speak English "very well"	1,700	+/-353	0	+/-95
Speak English less than "very well"	390	+/-145	14	+/-23
Portuguese or Portuguese Creole:	1,882	+/-360	95	+/-69
Speak English "very well"	1,433	+/-307	63	+/-65
Speak English less than "very well"	449	+/-134	32	+/-31
German:	4,330	+/-502	134	+/-82
Speak English "very well"	3,654	+/-460	134	+/-82
Speak English less than "very well"	676	+/-206	0	+/-95
Yiddish:	54	+/-38	0	+/-95
Speak English "very well"	54	+/-38	0	+/-95
Speak English less than "very well"	0	+/-95	0	+/-95
Other West Germanic languages:	732	+/-260	101	+/-130
Speak English "very well"	651	+/-243	93	+/-127
Speak English less than "very well"	81	+/-62	8	+/-16
Scandinavian languages:	414	+/-151	0	+/-95
Speak English "very well"	382	+/-146	0	+/-95
Speak English less than "very well"	32	+/-30	0	+/-95
Greek:	898	+/-293	0	+/-95
Speak English "very well"	637	+/-236	0	+/-95
Speak English less than "very well"	261	+/-113	0	+/-95
Russian:	21,277	+/-2,074	289	+/-386
Speak English "very well"	9,206	+/-1,269	221	+/-304

Speak English less than "very well"	12,071	+/-1,180	68	+/-83
Polish:	688	+/-271	0	+/-95
Speak English "very well"	587	+/-253	0	+/-95
Speak English less than "very well"	101	+/-67	0	+/-95
Serbo-Croatian:	1,612	+/-518	0	+/-95
Speak English "very well"	930	+/-295	0	+/-95
Speak English less than "very well"	682	+/-307	0	+/-95
Other Slavic languages:	11,301	+/-1,534	0	+/-95
Speak English "very well"	4,208	+/-787	0	+/-95
Speak English less than "very well"	7,093	+/-1,025	0	+/-95
Armenian:	1,359	+/-536	0	+/-95
Speak English "very well"	684	+/-322	0	+/-95
Speak English less than "very well"	675	+/-286	0	+/-95
Persian:	5,009	+/-841	0	+/-95
Speak English "very well"	3,128	+/-680	0	+/-95
Speak English less than "very well"	1,881	+/-368	0	+/-95
Gujarati:	1,358	+/-485	0	+/-95
Speak English "very well"	775	+/-343	0	+/-95
Speak English less than "very well"	583	+/-236	0	+/-95
Hindi:	12,501	+/-1,236	138	+/-120
Speak English "very well"	9,277	+/-963	110	+/-111
Speak English less than "very well"	3,224	+/-548	28	+/-46
Urdu:	1,706	+/-550	0	+/-95
Speak English "very well"	1,028	+/-376	0	+/-95
Speak English less than "very well"	678	+/-260	0	+/-95
Other Indic languages:	12,325	+/-1,585	0	+/-95
Speak English "very well"	7,794	+/-1,130	0	+/-95
Speak English less than "very well"	4,531	+/-750	0	+/-95
Other Indo-European languages:	4,143	+/-775	0	+/-95
Speak English "very well"	2,343	+/-520	0	+/-95
Speak English less than "very well"	1,800	+/-379	0	+/-95
Chinese:	29,922	+/-2,178	0	+/-95
Speak English "very well"	12,204	+/-1,233	0	+/-95
Speak English less than "very well"	17,718	+/-1,330	0	+/-95
Japanese:	4,214	+/-556	0	+/-95
Speak English "very well"	2,476	+/-490	0	+/-95
Speak English less than "very well"	1,738	+/-277	0	+/-95
Korean:	4,894	+/-773	0	+/-95
Speak English "very well"	2,362	+/-527	0	+/-95
Speak English less than "very well"	2,532	+/-463	0	+/-95
Mon-Khmer, Cambodian:	2,238	+/-644	0	+/-95
Speak English "very well"	1,093	+/-388	0	+/-95
Speak English less than "very well"	1,145	+/-448	0	+/-95
Hmong:	20,097	+/-1,867	0	+/-95
Speak English "very well"	9,361	+/-1,192	0	+/-95
Speak English less than "very well"	10,736	+/-1,325	0	+/-95

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Thai:	1,772	+/-613	0	+/-95
Speak English "very well"	913	+/-416	0	+/-95
Speak English less than "very well"	859	+/-314	0	+/-95
Laotian:	2,713	+/-649	0	+/-95
Speak English "very well"	1,305	+/-403	0	+/-95
Speak English less than "very well"	1,408	+/-406	0	+/-95
Vietnamese:	20,561	+/-1,580	0	+/-95
Speak English "very well"	8,678	+/-987	0	+/-95
Speak English less than "very well"	11,883	+/-1,032	0	+/-95
Other Asian languages:	10,072	+/-1,146	0	+/-95
Speak English "very well"	6,025	+/-781	0	+/-95
Speak English less than "very well"	4,047	+/-656	0	+/-95
Tagalog:	25,514	+/-1,985	56	+/-47
Speak English "very well"	17,351	+/-1,573	56	+/-47
Speak English less than "very well"	8,163	+/-896	0	+/-95
Other Pacific Island languages:	5,731	+/-747	40	+/-50
Speak English "very well"	3,664	+/-514	2	+/-4
Speak English less than "very well"	2,067	+/-447	38	+/-50
Navajo:	64	+/-54	0	+/-95
Speak English "very well"	60	+/-51	0	+/-95
Speak English less than "very well"	4	+/-10	0	+/-95
Other Native North American languages:	264	+/-143	0	+/-95
Speak English "very well"	205	+/-120	0	+/-95
Speak English less than "very well"	59	+/-70	0	+/-95
Hungarian:	278	+/-142	0	+/-95
Speak English "very well"	235	+/-134	0	+/-95
Speak English less than "very well"	43	+/-47	0	+/-95
Arabic:	3,892	+/-852	178	+/-209
Speak English "very well"	2,895	+/-753	151	+/-198
Speak English less than "very well"	997	+/-280	27	+/-40
Hebrew:	226	+/-144	0	+/-95
Speak English "very well"	189	+/-123	0	+/-95
Speak English less than "very well"	37	+/-44	0	+/-95
African languages:	3,344	+/-882	0	+/-95
Speak English "very well"	2,180	+/-634	0	+/-95
Speak English less than "very well"	1,164	+/-359	0	+/-95
Other and unspecified languages:	272	+/-162	0	+/-95
Speak English "very well"	212	+/-157	0	+/-95
Speak English less than "very well"	60	+/-67	0	+/-95

Source: U.S. Census Bureau, 2007-2011 American Community Survey

21,398

2. *The frequency with which LEP persons come in contact with SCT/Link Transit Services programs, activities or services.*

SacDOT has assessed the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. As discussed above, census data indicate that there is 11% percent of the general population who are primarily Spanish-speaking persons. No other language group who speak English less than very well exceeds 68 individuals. Phone inquiries and staff feedback indicate that SCT/Link transit dispatchers and drivers interact relatively little with people with limited English speaking skills other than Spanish.

3. *The nature and importance of programs, activities or services provided by SCT/Link to the LEP population.*

The provision of public transportation is a vital service, especially for people without access to personal vehicles. Transit ridership is composed mainly of various groups who make up what is often identified as the “transit dependent” population. This category includes elderly persons, youth, persons with disabilities, persons below the poverty level, and households without a private vehicle. Many individuals will fall into more than one group. The SCT/Link Short Range Transit Plan on Chapter 1, page 5, table 2, shows Galt “transit dependent” populations vary between 6 and 18% of the population served.

4. *The resources available to the SCT/Link and overall cost to provide LEP assistance.*

SacDOT assessed its available resources that are currently being used, and those that could be used, to provide language assistance. Notwithstanding the significant cuts in funding for public transportation service, SCT/Link provides a high degree of services for limited English speaking persons.

Safe Harbor Provision

Spanish speakers who speak English less than very well comprise 11% of the estimated population and are the primary LEP persons likely to be involved with SCT/Link programs and transit services. All other LEP groups are less than 68 individuals and fall well below the “safe harbor” numbers of 5% or 1,000 individuals, whichever is lowest.

Limited English Proficiency (LEP) Plan Outline.

There are five areas that comprise the SCT/Link LEP Plan:

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

1. Identifying LEP individuals who need language assistance

How the SCT/Link may identify an LEP person who needs language assistance:

- Examine Customer Service Agent (CSA) and Transit Administration records for language assistance requests that have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- Examine U.S. Census Bureau American Community Survey that lists the languages spoken at home and their ability to “speak English very well” for the population within Galt five years and older.

2. Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services.

- All systems brochures with maps, timetables, and Title VI notifications are available in English and Spanish from literature racks on all vehicles and at the dispatch office.
- A Spanish interpreter is provided at our annual unmet transit needs meeting. The meeting is advertised in Spanish and English on all buses and the local newspapers.
- Trained and qualified telephone information personnel, at least one of whom is English/Spanish bilingual, are present to provide service information and demand response trip reservations during all hours and days of operation.

3. Staff Training

How the SCT/Link will train staff on its role and responsibilities in providing meaningful access to services for LEP persons:

- Provide staff with a description of language assistance services offered by the SCT/Link.
- Provide staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI LEP complaint.

4. Providing Notice to LEP Persons

How SCT/Link will provide Notice to LEP Persons, both oral and written communications:

- Offer general information, such as operation hours of the system, etc., on the SCT/Link customer service line (209-745-3052)
- Professionally translate vital documents (vital documents are defined as those documents without which a person would be unable to access services) to ensure accuracy of information.
- The following written communications will be printed in both English and Spanish:
 - All systems brochures with maps, timetables, and Title VI notifications from literature racks on all vehicles and at the dispatch office.
 - Onboard “take one” flyers containing information about route changes, rider alerts, fare increases and public hearings.
 - Onboard surveys.
 - Non-discrimination policies and information on the local/federal complaint process on the transit website and printed copies available at dispatch office.

5. Monitoring and updating the LEP plan

SacDOT will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when new data becomes available, or when it is clear that higher concentrations of LEP individuals are present in the SCT/Link Transit service area.

How SCT/Link will examine and update the LEP Plan:

- Record and report on the number of LEP persons encountered annually.
- Determine the current LEP population in the service area and whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the SCT/Link’ financial resources are sufficient to fund language assistance resources needed.
- Determine whether the SCT/Link and its contractor have fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.
- Obtain input from customers via onboard surveys.

Dissemination of the SCT/Link LEP Plan

How the SCT/Link' LEP Plan will be disseminated to customers and the community:

A link to the LEP Plan and the Title VI Plan will be included on the SCT/Link website, www.sctlink.com

Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost.