

# **Appendix D**

## **Language Assistance Plan**

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**Regional Transit**  
Language Assistance Plan

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**Updated**

**March 24, 2017**

Pursuant to Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), Federal Transit Administration (FTA) funding recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

RT provides essential mobility for LEP persons. RT therefore takes steps to ensure access to the benefits, services, information and other important portions of RT programs and activities for LEP populations.

In order to best ensure the most meaningful access to RT programs, services and activities for LEP populations, RT has conducted a Four Factor Analysis in accordance with federal guidance as an input to this Language Assistance Plan (LAP) and associated program development.

With implementation of this LAP, RT is also committed to a Public Participation Plan (PPP) which allows all persons to effectively participate in RT's decision-making process and which combined with this LAP constitute RT's official policy and evidence of compliance with FTA directives on language assistance and public participation.

## Four Factor Analysis

In order to best ensure the most meaningful access to RT programs, services and activities for LEP populations, RT conducted a Four Factor Analysis in 2014, as suggested in the federal guidance to assist with LAP program development. This report updates the 2014 report.

The updated analysis began in the winter of 2016 with research and data collection from multiple sources, and continued with telephone and staff interviews, as well as surveying efforts conducted in January and February 2017. The following four factors have been utilized in language access planning throughout the development of the LEP program, also known as a Language Assistance Plan (LAP):

**Factor 1** - *Estimate the number or proportion of LEP persons served or encountered in the eligible service population.*

**Factor 2** - *Assess the frequency with which LEP persons come in contact with RT programs, activities or services.*

**Factor 3** - *Assess the importance to LEP Persons of RT's programs, activities and services.*

**Factor 4** - *Evaluate the resources available to RT and overall cost to provide LEP assistance.*

### **FACTOR 1:**

*Estimate the number or proportion of LEP persons served or encountered in the eligible service population.*

The guidance states: “the greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.”

RT has utilized the following data sources to obtain information in determining the largest and most common languages spoken in Sacramento County by LEP persons:

- ♦ US Census Bureau's 2011-2015 American Community Survey (ACS)
- ♦ California Department of Education

Findings are shown below in Table D.1

**Table D.1**  
**LEP Persons in Sacramento County**  
**by Primary Language Spoken**

| Language   | Persons | Percent |
|------------|---------|---------|
| Spanish    | 72,018  | 5.3%    |
| Chinese    | 21,025  | 1.5%    |
| Vietnamese | 13,133  | 1.0%    |
| Russian    | 12,989  | 1.0%    |
| Hmong      | 9,586   | 0.7%    |

*Note that Chinese totals include Mandarin and Cantonese dialects.*  
Source: U.S. Census Bureau, 2011-2015 American Community Survey (ACS)

Factors Two, Three, and Four provide more specifics about these LEP populations and how they can be provided language assistance in a cost-effective manner.

The following table shows the number of English Language Learners in Sacramento County primary and secondary schools, which also identifies the languages that may need to be included in RT's LEP/LAP efforts.

**Table D.2**  
**English Language Learners**  
**in Sacramento County K-12 Schools**

| Language Name | Total LEP Students | Percent of Total |
|---------------|--------------------|------------------|
| Spanish       | 23,186             | 55.11%           |
| Hmong         | 3,650              | 8.67%            |
| Russian       | 2,809              | 6.68%            |
| Chinese       | 1,777              | 4.22%            |
| Vietnamese    | 1,583              | 3.76%            |
| Punjabi       | 1,087              | 2.58%            |
| All Others    | 9,070              | 21.56%           |

*Source: Language Census Data - 2015-16 School Year, California Department of Education*  
Mandarin and Cantonese have been combined into "Chinese" for comparability with U.S. Census Bureau data.

**FACTOR 2:**

*The frequency with which LEP persons come in contact with RT programs, activities or services.*

- and -

**FACTOR 3:**

*The importance to LEP Persons of RT's program, activities and services.*

RT has utilized the following data sources to obtain information in determining the frequency in which LEP persons come in contact with RT programs, activities, and services, and the importance to LEP persons of RT's program, activities, and services:

- ♦ RT On-Board Survey data
- ♦ RT Operator Survey data
- ♦ RT Customer Service Representative Survey data
- ♦ Language Interpretation Service Statistics
- ♦ Community organizations serving LEP constituents

**On-Board Survey:**

In April 2013, an on-board passenger survey was conducted for the Sacramento region on all fixed routes and days along seven transit systems. Trained surveyors distributed and collected self-administered questionnaires to all participating passengers. The questionnaires were available in five different languages, including Spanish, Chinese, Russian, Vietnamese and Hmong. Survey responses were researched and analyzed by a contracted transit marketing agency, which provided RT with region-specific demographics. As shown in Figure D.1, an estimated 3 percent of RT riders self-assessed their understanding of English as "not well."

**Operator Survey:**

To obtain information about RT's LEP passengers, staff provided an optional survey for operators in January 2017. The survey was designed to collect information pertaining to RT's LEP passengers directly from the first point of contact.

The top five routes that reportedly serve a large number of LEP passengers include:

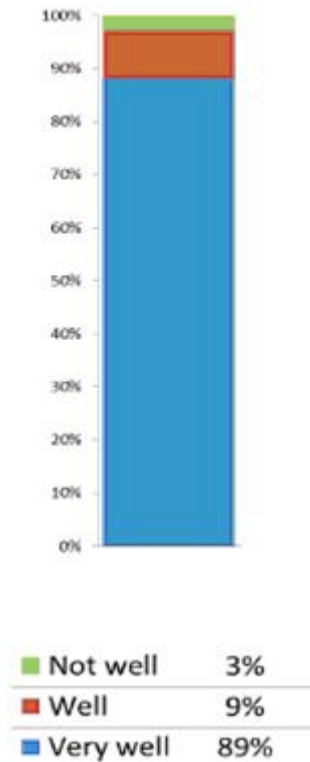
- Route 51 - Stockton/Broadway
- Route 23 - El Camino
- Routes 67/68 - Franklin/44th Street/MLK
- Routes 80/84 – Watt Avenue/Elkhorn//North Highlands
- Route 81 - Florin/65th Street

Route 51 is RT's highest ridership route, with approximately 4,100 average daily boardings<sup>1</sup>. This route travels from downtown Sacramento to Florin Towne Center via Broadway and Stockton Boulevard. Operators reported many LEP passengers speaking a variety of languages, primarily Chinese, Hmong, and Spanish along this route, which corresponds with the large Asian and Spanish communities in the area.

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<sup>1</sup> Source: Monthly Ridership Report, Sep 2015-Sep 2016

**Figure D.1**  
**Self-Rated Proficiency in English**



*Source: 2013 On-Board Survey*

Route 23 is also reported to have a high number of LEP passengers, primarily speaking Spanish and Russian. This route carries an average of 2,000 daily passengers<sup>2</sup>, and travels between Sunrise Mall transit center and Arden/Del Paso light rail station via El Camino Avenue and Arden Way, which is an area with a growing Russian community.

Routes 67 and 68 are interlining routes, with ridership at approximately 1,300 average daily passengers<sup>2</sup>. They both travel between Florin Town Center and Arden Fair Mall, with one going along Franklin Boulevard, and the other going along M.L. King Jr. Boulevard. According to RT operators, both routes carry a good number of LEP passengers; a majority of them being Spanish-speaking. The Latino population is fairly large along several miles of Franklin Boulevard, which has multiple destinations especially dedicated for this group, i.e. bakeries, grocery stores, etc.

Routes 80 and 84 carry approximately 1,100 and 900 average daily passengers, respectively, traveling along Watt Avenue to the northern portion of Sacramento, known as North Highlands and Antelope. RT operators observed these two routes to carry a high number of Russian

speaking LEP passengers, which matches the large Russian presence in both North Highlands and Antelope.

Route 81 is another high ridership route in a dense neighborhood, with approximately 3,000 average daily riders<sup>2</sup>. This route travels from University/65<sup>th</sup> Street light rail station to Florin Road and Riverside Boulevard via 65<sup>th</sup> Street and Florin Road. This route serves two light rail stations and one transit center, and operators report a high number of Spanish-speaking LEP passengers.

Most commonly asked questions from LEP passengers include:

- How to travel to their destination
- Questions pertaining to fares
- Where their stop is

To assist in communicating with LEP passengers, a majority of RT operators choose to alert the LEP passenger(s) to their stop, use diagrams or maps to explain information, and point to the fare decal on the vehicle. Some operators reported positive results from asking other passengers for assistance with communication.

#### **Customer Service Representative (CSR) Survey:**

In addition to RT operator feedback, the RT Customer Service Representatives were also provided with an optional survey about the importance of RT's programs, activities and services to LEP persons.

Approximately 67% of the CSR's have at least weekly contact with an LEP passenger. During these telephone contacts, the most common languages they are asked to have translated include Russian, Spanish and Chinese.

#### **Language Interpretation Service:**

When translation is requested through the call-center, RT's Customer Service Representatives (CSRs) utilize a third-party telephone interpretation service called TeleLanguage. Through this service, the CSR's are able to provide route, fare and schedule information to LEP callers. The following provides detailed information about the contact frequency between LEP persons and RT.

Since June 2014, the CSR's have taken 482 calls using the TeleLanguage phone service. The following information is a breakdown of the total number of calls by language:



**Table D.3  
Language Line Use by Language**

|                       |                      |
|-----------------------|----------------------|
| Spanish - 295 calls   | Portuguese - 3 calls |
| Russian - 51 calls    | Korean - 3 calls     |
| Mandarin - 50 calls   | Amharic - 1 calls    |
| Cantonese - 33 calls  | Dari - 1 call        |
| Vietnamese - 23 calls | Hebrew – 1 call      |
| Arabic – 11 calls     | Hmong – 1 call       |
| Farsi – 5 calls       | Karen – 1 call       |
| Laotian – 3 calls     | Urdu – 1 call        |

**Community Organization Outreach:**

RT conducted telephone interviews and in-person outreach sessions in 2014 with members of community organizations that serve LEP constituents. The agencies that were contacted and/or participated are involved in services including, but not limited to, translation and interpretation services, immigration services, refugee resettlement, foreign-language media, adult English as a second language classes, etc. Follow-up interviews were held with several of these organizations in 2016 and 2017 to update RT's plan.

Interviewees were asked about the LEP populations they serve, including languages spoken, trends in age, education and economic status, areas of familiarity, popular destinations and neighborhoods, as well as where the demand for public transit services exist. Participating agencies include:

*One World for Love and Peace:*

Provides referral and information services to Arab immigrants and refugees in Sacramento in terms of job search assistance, housing, health, legal, counseling, tutoring and translation services through different kinds of media, in partnership with local organizations.

*Opening Doors, Inc.:*

Empowers refugees, immigrants, human trafficking survivors from Mexico, Latin America, Iraq and Russia, and underserved Sacramento area residents by providing safe places, skills development, and connections to community resources, assisting clients to build financial and personal assets while maintaining their cultural identity and individual goals.

*Russian American Media:*

Organization for major multicultural community events regularly attended by many key business, community and political leaders, as well as thousands of children and young people; devoted to improving the prosperity of the Russian-speaking and other local ethnic communities.

*Slavic Community Center of Sacramento:*

Slavic social services and cultural orientation by providing Russian and Ukrainian individuals information on education options; immigration services; document preparation; financial and educational assistance and support; citizenship classes and applications; and translation and interpretation services.

*Southeast Asian Assistance Center:*

Mental health services provided to refugees, immigrant citizens, asylees, adults, elderly, families, and youth, such as interpretation to limited-English-speaking refugees and immigrants from Vietnam, Cambodia, China, Russia, Mexico and Latin America.

*California Hispanic Resource Council:*

Assists Hispanic, Russian, Chinese, Vietnamese and Hmong individuals with immigration issues, such as processing family Visa petitions, and handling status adjustment, citizenship, and other immigration matters.

*Asian Resources Inc.:*

Provides multiple social services for the Vietnamese, Chinese, Hispanic, African, Russian and Ukrainian communities, including job seeking assistance, vocational training, English-as-a-Second-Language classes, referrals to child care programs, translation, resources and referrals, and assistance with completing forms and applications for various programs.

*Crossings TV:*

Provides locally-oriented, produced and marketed multi-cultural programming and content in Russian, Chinese, Punjabi, Hindi, Vietnamese, Tagalog and Hmong, efficiently linking its targeted audiences and commercial, non-commercial and governmental entities.

From these interviews, staff was able to identify specific communities of the service area and match them to bus routes and rail stations to provide more focused outreach when and where it is needed. The interview results demonstrate how RT can customize our assistance approach for each LEP group by having identified the LEP groups and how frequently they come in contact with RT programs, activities and/or services.

**Language:****Notes:**

Spanish

Immigrants from Mexico and Latin America, and other Spanish speaking groups reside in many Sacramento area neighborhoods, including South Sacramento centered on Franklin Boulevard between 12<sup>th</sup> Avenue and 47<sup>th</sup> Avenue, Downtown Sacramento, Oak Park, Stockton Boulevard, North Highlands, Foothill Farms, El Camino, Natomas, Del Paso Heights and Northgate. Some members of the Spanish-speaking LEP population depend on RT services; however, many in this group are also able to, and choose to drive due to high fares, low frequency and insufficient service. The transit-dependent individuals in this LEP group, however, find RT's service and programs important, as they rely heavily on it for their transportation needs. RT's translated materials and outreach is known to be extremely beneficial for this group, and proves to increase awareness.

Chinese

Chinese-speaking populations include both Mandarin and Cantonese languages. A large number of Chinese-speaking LEPs reside in and around South Sacramento, near Stockton Boulevard, the Land Park area, and the Greenhaven-Pocket area. This group is generally comfortable using public transit, and

largely resides in areas with adequate transit service. Many are in frequent contact with RT's services and they appear to take advantage of translated materials provided by RT in order to ride the system, especially the younger generation, who has proven to do well with accessing information through social media channels.

#### Russian

The Russian community includes many older immigrants from the former Soviet Union, as well as a growing second generation population. Many Russian and Ukrainian-speaking neighborhoods are located near Greenback Lane, Auburn Boulevard, Antelope Road, Rancho Cordova, and North Highlands. The population is generally comfortable using transit and the older generation tends to be more dependent on public transit and more comfortable with traditional printed media rather than electronic communications.

#### Vietnamese

Sacramento's largest Vietnamese population is located in the "Little Saigon" community in South Sacramento. This community includes a two-mile stretch between Fruitridge Road and Florin Road on Stockton Boulevard and is home to hundreds of restaurants, stores, and salons. Much of the Vietnamese LEP population is dependent upon and comfortable using transit.

#### Hmong

The Hmong population in Sacramento County is among the highest in the country, along with the City of Fresno. A majority of the Hmong community is located in South Sacramento near or along Meadowview Road, Mack Road, and Detroit Boulevard. Susan B. Anthony Elementary School, which is located on Detroit Boulevard, is home to the only Hmong dual-language immersion program on the West Coast. Most of the Hmong community is considered low-income; therefore, RT services and programs are important to this community.

#### Punjabi

Although RT has not yet observed a great amount of contact with this population with respect to transit services, the Punjabi community in Sacramento County has reached the safe harbor provision of 5 percent, or 1,000 persons; therefore, Punjabi is now included in RT's LAP as a language in which vital documents are to be translated. Punjabi is spoken by individuals originating from an area in Northern India, and includes a group mostly known by their religion, called Sikh. Yuba City in nearby Sutter County, which is located along the Sacramento River in the Sacramento Valley, holds one of the largest Punjabi-American communities outside the Punjab state of India. This LEP population is predominantly located in the southern portion of Sacramento County, closer to the City of Elk Grove, with the Elk Grove Unified School District holding approximately 57 percent of the total student population. Outreach to this group, and contact from this group has been minimal, as most are located in an area where they may be utilizing transit in Elk Grove.

**FACTOR 4:**

*Evaluate the resources available to RT and overall cost to provide LEP assistance.*

RT's Fiscal Year 2017 budget totals \$162 million. RT's total budget for Marketing and Communications is \$2.4 million, including labor, materials, and expenses. Customer Service and Customer Advocacy (i.e., complaints) total another \$1.7 million in labor, materials, and expenses.

Language assistance impacts RT's budget in the following ways:

- Costs of translation into five languages
- Costs for live telephone interpretation services
- Costs for interpreters at Board meetings and hearings, when requested
- Additional printing costs for key documents
- Additional administrative and training costs
- Additional costs for outreach labor and materials for potentially impactful construction projects in LEP areas

Direct costs for written translation, telephone interpretation, and in-person interpretation for public meetings total \$41,000 over four years. Since 2014, RT staff has been providing key documents for customers in English and five additional languages:

- Spanish
- Chinese
- Vietnamese
- Russian
- Hmong

Written Chinese is considered readable for both Mandarin and Cantonese-speaking populations. Written Russian is also considered readable for both Russian-speaking and Ukrainian-speaking populations. Hmong lacks a written language; however, RT translates into a written version of the spoken language, using English letters and phonics.

Beginning with adoption of this updated Language Assistance Plan, RT will begin translating key documents into Punjabi.

Key documents include information on fares, fare changes, and service changes, as well as RT's Title VI notice, which is displayed in all vehicles. RT also produces flyers, mailings, and uses a variety of other methods to reach LEP populations for potentially impactful construction projects.

See RT's Public Participation Plan for details and examples of RT's public information offerings.