

SAN LEANDRO TRANSPORTATION MANAGEMENT ORGANIZATION

Title VI of the Civil Rights Act of 1964 Limited English Proficiency (LEP) Plan

Introduction

Since 2002, the San Leandro Transportation Management Organization has contracted with a transportation provider for operation of the LINKS Shuttle which provides transportation services between BART and the West San Leandro industrial area mornings and afternoons every 15 - 20 minutes. The population is diverse, with some of the riders favoring a language other than English.

Individuals, who have a limited ability to read, write, speak or understand English are limited English proficient, or “LEP.” In compliance with guidance and rules issued by the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964, the San Leandro Transportation Management Organization (SLTMO) will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost.

The LEP Plan starts with an assessment to identify LEP individuals who need assistance. Implementation includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring of the plan.

Determination of Need

In order to prepare this Plan, SLTMO undertook the U.S. Department of Transportation’s four factor LEP analysis, which considers the following:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with SLTMO programs, activities or services.
3. The importance to LEP persons of SLTMO’s program, activities and service.
4. The resources available to SLTMO and overall cost to provide LEP assistance.

The number or proportion of LEP persons served or eligible to be served or likely to be encountered by the program or grantee.

To determine need, SLTMO considered language services needed by current program participants and applicants, as well as outreach to potential participants. In 2014, SLTMO updated the current language needs by evaluating data from the US Census Bureau 2008-2012 American Community Survey (ACS) Five-Year Estimate.

According to ACS, 32% of San Leandrans in 2012 were foreign born. Among people at least five years old living in San Leandro in 2012 47.6% spoke a language other than English at home. Census questionnaires ask respondents to rate their English proficiency, and people's ratings of their own English abilities contribute to LEP statistics. Of those speaking a language other than English, 24.4% indicated they spoke English less than “very well”, persons categorized as the LEP population.

The ACS statistics break down as follows:

ESTIMATED POPULATION	PERCENT OF POPULATION	LANGUAGE CHARACTERISTICS: GENERAL POPULATION
86,890	100%	Total population
80,299	92.4%	Total population 5 years and over
42,077	52.4%	Residents who speak English only at home
38,222	47.6%	Residents who speak a language other than English
19,593	24.4%	Residents who speak English less than "very well"
ESTIMATED POPULATION	PERCENT OF POPULATION	LANGUAGE CHARACTERISTICS: LEP POPULATION
8,109	10%	Spanish-speaking residents who speak English less than "very well"
10,006	12.4%	Asian and Pacific Islanders who speak English less than "very well"
902	0.1%	Other Indo-Europeans who speak English less than "very well"
585	0.007%	Others who speak English less than "very well"
18,067	22.5%	TOTAL LEP POPULATION

Source: US Census Bureau 2011 American Community Survey

According to the above Census data, Spanish and Asian/Pacific Islander (A/PI) persons who speak English less than "very well" each constitute over 5% of the City's population and equal more than 50 persons, a HUD threshold requiring translated documents. Indo-Europeans and others who speak English less than "very well" constitute less than 5% of the population and their numbers are less than the 1,000, HUD threshold for translated documents.

Unfortunately, Census data about the above populations does not provide detailed information about the types of A/PI who speak English less than "very well". Since the Census data treats LEP Asian, Indo European as a monolithic group, this data cannot be used to determine the specific languages eligible to receive translation services.

It is clear, however, that Spanish speakers who speak English less than "very well" are likely to be served by LINKS. Because the City's Spanish LEP population meets HUD's thresholds for recommended provisions of written language assistance (i.e., more than 5% of the eligible population and more than 50 in number), SLTMO will continue to translate vital documents and written notices for this group into Spanish.

Frequency of LEP populations' contact with programs, activities, services.

SLTMO's limited English riders have primarily been Spanish speakers. SLTMO remains committed to gathering input from minority and low-income riders at meetings and through rider surveys. At the request of riders, some of the LINKS outreach material has been translated into the Spanish language. Although Spanish is the language most often requested, administrative staff is prepared to assist Chinese speakers.

Importance to LEP population of programs, services, activities.

The LINKS shuttle service is free to all riders which include minority, low-income, elderly and disabled persons. Written material about the shuttle service and the route is provided in a clear and non-technical format. SLTMO will continue to translate critical information into other languages as needed. On-call staff is available to assist in translating for meetings or for inquiries, upon request.

Resources available to SLTMO and overall cost to provide LEP assistance.

SLTMO provides translation services to allow LEP populations to participate in the SLTMO's planning and service provision. To date, there has not been a significant demand from LEP riders. SLTMO works with advocate groups and employers representing LEP persons to identify needs and concerns. The cost to translate all materials into multiple languages is significant and not currently funded. As a result, SLTMO focuses resources on providing the most critical information in Spanish and having access to individuals who can translate inquiries. SLTMO will continue to expand language accessibility as needed.

Language Assistance Measures. SLTMO uses a number of techniques or practices to provide clear and meaningful information for all interested persons to use the affordable and convenient transportation services provided by LINKS regardless of language barriers. This is done in a number of ways, including:

- Robust use of “visualization” techniques, including maps, charts and photographs to illustrate the LINKS shuttle transportation service.
- Avoid overly complex or technical terms and write in clear, compelling language in a style appropriate to the intended audience.
- Translation of vital documents, including certain news releases, brochures and fact sheets into Spanish.
- Review prior experiences with LEP populations to determine the types of language services that are needed.
- Have staff for on-call assistance (for example, interpreters for public meetings or translating documents).
- Establish competency of translators; have translators available at meetings as requested.
- Work with non-English language media outlets (print or electronic media) to place articles or public service announcements about SLTMO's work or announce participation opportunities.
- Purchase advertising or request public service announcements in non-English language newspapers, radio stations or television stations to promote the LINKS and build ridership.
- Partner with community groups, such as Davis Street Family Resource Center, who can assist in tailoring presentations, ridership survey materials and meeting announcements to meet the language needs of local participants.
- Provide assistance to employers that employ LEP persons and nonprofit community groups who work with LEP persons for such things as co-hosting and conducting meetings with simultaneous translation services to promote LINKS; or assistance with identifying LEP individuals for participation in community focus groups or public meetings.
- Include, as appropriate, limited-English speaking populations in rider surveys by having bilingual staff available to conduct the survey.

Staff Training. SLTMO works to instill its staff with an awareness of and sensitivity to the needs of LEP persons/riders. Staff is trained on procedures for accommodating LEP populations. Some of the items covered include information about LEP guidance from the U.S. Department of Transportation and SLTMO's contract with a language translation firm to assist all staff in translating documents and to obtain translation services for meetings or services. SLTMO staff is taught to be mindful of participants who might be struggling to read complex materials and to converse with them if appropriate as they view the materials rather than assuming they are able to read all the materials.

Notification to LEP or Low Literacy Persons. The public must be informed of their rights under Title VI. This will be done in a number of ways:

- Notification on SLTMO's website.
- Documents or flyers that describe an LEP person's right to access SLTMO's services, translated into other languages, will be available at meetings and the SLTMO office.
- Routine use of language on printed or electronic announcements that alert interested individuals on how to request translation services.

Monitoring and Updating of the LEP Plan. SLTMO will monitor requests for translations and adjust practices to meet demand. The LEP Plan will be updated periodically as needed to reflect significant changes.