LANGUAGE ASSISTANCE PLAN

August 2015

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EXECUTIVE SUMMARY

Agencies that receive funds from the U.S. Department of Transportation (U.S. DOT) are responsible for providing language assistance measures to limited English proficient (LEP) persons. To ensure compliance, the U.S. DOT developed a four-factor framework to help transit agencies determine the appropriate mix of language assistance and prepare language assistance implementation plans that are consistent with the U.S. DOT LEP Guidance. This implementation plan summarizes the Four Factor analysis conducted; identifies the LEP individuals in our services area; outlines current and future language assistance plans, how the agency trains staff and provides notice to LEP individuals; and details how the plan will be monitored.

Four Factor Analysis

Factor 1: The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee

Factor 2: The frequency with which LEP individuals come in contact with the program

Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives

Factor 4: The resources available to the recipient and costs

Identification of LEP Individuals

Following Factor 1 United States Department of Transportation (U.S. DOT) Guidance, multiple sources including the US Census American Community Survey (ACS), California Department of Education, and the San Diego County Department of Behavioral Health Services were used to determine the number of LEP individuals in San Diego County. According to these findings, more than 230,000 people five years or older speak English less than well. This accounts for 8 percent of the county's population. Spanish speakers make up 73 percent of the LEP population in San Diego County. Vietnamese speakers account for 7 percent, Tagalog 4 percent, and Chinese 2 percent. Eleven other languages with more than 1,000 LEP speakers were identified in the Factor 1 analysis.

Language Assistance Measures

A list of current language measures available for LEP speakers is presented in this report. Those added since the 2012 Language Assistance Plan have been noted. Current language assistance measures were compiled by interviewing and surveying key staff and reviewing relevant material. Input was sought from SANDAG staff, transit operator staff, community based organization (CBO) partners, and through focus groups with LEP persons. Staff and community member recommendations for future language assistance measures also are presented.
**Training Staff**

Following U.S. DOT Guidance, social equity training has been implemented as a result of the Four Factor analysis and Language Assistance Plan efforts completed in 2012. The training provides detailed information about Title VI, staff responsibilities for providing access and information to LEP persons, and more.

**Providing Notice to LEP Persons**

Laid out within this Language Assistance Plan (LAP) are the ways that SANDAG provides notice to LEP persons. Several methods have been added since the 2012 LAP, which are noted in this report.

**Plan Monitoring and Updating**

Lastly, to ensure compliance and practical implementation by all agency staff, this Language Assistance Plan details how monitoring and updating will occur.
INTRODUCTION

About the San Diego Association of Governments (SANDAG)

SANDAG is the regional decision-making agency as well as the technical and informational resource for the San Diego, California area’s 18 incorporated cities and the county government, which collectively make up the association of governments. SANDAG is governed by a Board of Directors composed of elected officials from each of the 19 member agencies. Supplementing the voting members are advisory representatives from Imperial County, the U.S. Department of Defense, California Department of Transportation (Caltrans), San Diego Unified Port District, San Diego County Water Authority, Metropolitan Transit System (MTS), North San Diego County Transit District (NCTD), Southern California Tribal Chairmen’s Association (SCTCA), and Mexico. The agency’s planning boundary is the jurisdictional limits of the County of San Diego; however, it works extra-regionally with agencies in Mexico and throughout southern California. In 2010, the county population was 3,095,313.

SANDAG was originally created as a joint power authority formed under Section 6500 of the California Government Code in 1972 as the Comprehensive Planning Organization. It adopted its current name in 1980 to better reflect its purpose. In 1987, SANDAG added the responsibilities of administering the region’s transportation program, known as TransNet, which is funded by a voter-approved half-cent sales tax.

On January 1, 2003, Senate Bill (SB) 1703 was enacted which changed the structure of SANDAG from a joint powers authority to a state-created regional governmental agency, making it a permanent, rather than voluntary, association of local governments with increased responsibilities and powers. SB 1703 consolidated all transportation planning and development functions into SANDAG so that these activities would occur on a multimodal basis.

The roles and responsibilities of SANDAG, MTS, and NCTD are outlined in a master memorandum of understanding executed on April 23, 2004. SANDAG is responsible for transit planning, development, and construction, while MTS and NCTD are responsible for transit operations. MTS and NCTD also manage small construction projects with SANDAG assistance. SANDAG is responsible for establishing the regional fare policy.

Background

Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) states 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.” In the 1974 case of Lau v. Nichols (414 U.S. 563), the Supreme Court interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate impact on LEP persons.

On August 11, 2000, Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, was signed by President Clinton. It directs federal agencies to examine the services they provide and develop and implement a system by which LEP persons can meaningfully
access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI.

The U.S. DOT published updated guidance for its recipients on December 14, 2005 in the *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons*, (U.S. DOT, Volume 70, Number 239). The guidance states that Title VI and its implementing regulations require that U.S. DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. The guidance also suggests that recipients use the U.S. DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP individuals.

The Federal Transit Administration (FTA) references the U.S. DOT LEP guidance in Circular 4702.1A, *Title VI and Title VI-Dependent Guidelines for FTA Recipients*, which was finalized on April 13, 2007. Chapter IV Part 4 of 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 the provisions of Section VII of the U.S. DOT LEP Guidance. An update to this circular was finalized on October 1, 2012. Chapter III Part 9 of this Circular contains a summary of LEP requirements as they apply to FTA recipients, including steps to take to complete the Four Factor analysis and how to develop a Language Assistance Plan (LAP). The Circular directs recipients to the DOT LEP guidance for additional information. The FTA Office of Civil Rights released a handbook in 2007 for transit providers (*Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons [FTA 2007]*) to give technical assistance for the implementation of the U.S. DOT LEP guidance.

SANDAG supports the U.S. DOT guidance to provide meaningful assistance to LEP speakers. All of the mentioned resources were used to guide the Four Factor analysis and this Language Assistance Plan.

SANDAG has developed this implementation plan to address the needs of the LEP populations in San Diego County. Following U.S. DOT LEP Guidance, included in this report are the following five sections:

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

Further included is a summation of the Four Factor analysis. The Language Assistance Plan was shaped by the Four Factor analysis findings.
Four Factor Analysis

**Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee

Factor 1 analysis findings indicate that eight percent of the population speak English less than well. The top four languages spoken other than English are Spanish (5.89 percent of the total population), Vietnamese (0.53 percent), Tagalog (0.31 percent), and Chinese (0.20 percent). Combined, these four languages cover 86 percent of the LEP population in San Diego.

**Factor 2:** The frequency with which LEP individuals come in contact with the program

Based on CBO interviews, focus groups with LEP individuals, and SANDAG and transit operator staff interviews and surveys, it was determined that LEP individuals regularly come in contact with SANDAG programs and services, especially public transportation. Focus group findings indicated some awareness of other SANDAG programs and services.

<table>
<thead>
<tr>
<th>Table 1</th>
<th>Focus Group Participant Awareness of SANDAG Programs and Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>SANDAG Service or Program</td>
<td>Percent</td>
</tr>
<tr>
<td>Public transportation</td>
<td>78%</td>
</tr>
<tr>
<td>511 website, phone system, and mobile app</td>
<td>16%</td>
</tr>
<tr>
<td>Freeway Service Patrol and Call Box Program</td>
<td>31%</td>
</tr>
<tr>
<td>iCommute</td>
<td>5%</td>
</tr>
<tr>
<td>FasTrak</td>
<td>27%</td>
</tr>
</tbody>
</table>

**Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to people’s lives

Factor 3 further explores Factor 2 research. Findings suggest that access to SANDAG programs, activities, and services are important for LEP persons, as well as staff.

**Factor 4:** The resources available to the recipient and costs

The Four Factor analysis details LEP efforts currently in place and the corresponding resources available to provide strategies to reach LEP populations. Suggestions for additional LEP outreach measures are outlined in Factor 4 as well as consideration of the resources available for these efforts. Findings indicate that SANDAG currently has many resources and strategies for reaching LEP populations in place and that increased efforts should continue to engage larger numbers of LEP persons.
TASK 1: IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

The Factor 1 analysis includes an assessment of the number or proportion of LEP persons in San Diego County and is summarized for Task 1 of this report. Based on the examples included in the federal guidance, SANDAG defined LEP persons as those individuals who either speak English “not well” or “not at all.”

There were several key findings:

- More than 700,000 persons, or 23.4 percent of the San Diego region, are foreign born;
- 38 percent of persons in San Diego County speak a language other than English at home, 16 percent of the County’s population speak English less than “very well” (includes those that speak English “well”, “not well” and “not at all”);
- 8.05 percent speak English less than “well” (includes those that speak English “not well” and “not at all”);
- Spanish is the second most predominant language, other than English, spoken in the region;
- Of the languages spoken in the region, 15 are spoken by more than 1,000 LEP persons;
- San Diego County Public School and Behavioral Health Services data supports the American Community Survey (ACS) data above; and
- Figures for limited English proficient persons have remained consistent with figures from the Factor 1 report completed by SANDAG in 2012.

Table 2
LEP Speakers by Language in San Diego County

<table>
<thead>
<tr>
<th>Language*</th>
<th>LEP Population</th>
<th>Percent of All LEP Speakers</th>
<th>Percent of Total Population (Age Five and Older)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>174,923</td>
<td>73.1%</td>
<td>5.89%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>15,723</td>
<td>6.6%</td>
<td>0.53%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>9,140</td>
<td>3.8%</td>
<td>0.31%</td>
</tr>
<tr>
<td>Chinese</td>
<td>5,857</td>
<td>2.4%</td>
<td>0.20%</td>
</tr>
<tr>
<td>Arabic</td>
<td>5,592</td>
<td>2.3%</td>
<td>0.19%</td>
</tr>
<tr>
<td>Korean</td>
<td>3,464</td>
<td>1.4%</td>
<td>0.12%</td>
</tr>
<tr>
<td>Syriac</td>
<td>2,730</td>
<td>1.1%</td>
<td>0.09%</td>
</tr>
<tr>
<td>Persian</td>
<td>2,252</td>
<td>0.9%</td>
<td>0.08%</td>
</tr>
<tr>
<td>Russian</td>
<td>1,651</td>
<td>0.7%</td>
<td>0.06%</td>
</tr>
<tr>
<td>Mandarin</td>
<td>1,518</td>
<td>0.6%</td>
<td>0.05%</td>
</tr>
<tr>
<td>Japanese</td>
<td>1,477</td>
<td>0.6%</td>
<td>0.05%</td>
</tr>
<tr>
<td>Laotian</td>
<td>1,467</td>
<td>0.6%</td>
<td>0.05%</td>
</tr>
<tr>
<td>Cantonese</td>
<td>1,118</td>
<td>0.5%</td>
<td>0.04%</td>
</tr>
</tbody>
</table>
### LEP Populations

<table>
<thead>
<tr>
<th>Language*</th>
<th>LEP Population</th>
<th>Percent of All LEP Speakers</th>
<th>Percent of Total Population (Age Five and Older)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kushite</td>
<td>1,115</td>
<td>0.5%</td>
<td>0.04%</td>
</tr>
<tr>
<td>Hindi</td>
<td>1,046</td>
<td>0.4%</td>
<td>0.04%</td>
</tr>
</tbody>
</table>

Source: 2013 ACS 3-year Public Use Microdata Sample (PUMS) *Restricted to languages spoken by at least 1,000 limited English speakers.

### LEP Population Sources

Unlike the evaluation of any particular defined geographical area (such as a transit district) the SANDAG analysis includes only one county (San Diego County) which simplified some of the data analysis.

Based on DOT guidance, SANDAG evaluated the following federal, state, and local data sources:

- U.S Census, 2013 American Community Survey (ACS) 3-Year Public Use Micro Sample (PUMS)
- California Department of Education (CDE) English Learner Data, 2013-2014
- San Diego County Department of Mental Health, Database of Interpreter Services, Fiscal Years 2012-2014

### LEP Population Analysis

#### ACS 2011-2013

The U.S. DOT describes limited English proficiency as having a limited ability to read, write, speak, or understand English. The U.S. DOT and FTA (in both the LEP guidance and Title VI circulars), define this population as people who reported that they speak English “not well” or “not at all.” Table 3 shows this analysis for San Diego County. The table shows that the overall LEP population in the County is 8.05 percent of persons age five and older.
The data shown in Table 3 also is available for four language types: Spanish, Indo-European, Asian or Pacific Islander, and Other Languages. This analysis is shown in Table 4, which revealed that the Spanish LEP percentage is the highest at 5.84 percent of the total San Diego County population.

### Table 3

**English Proficiency for the San Diego Region**

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population Age 5 and Older</th>
<th>Speaks English Only</th>
<th>Speaks English “Well” or “Very Well”</th>
<th>Less Than “Well”</th>
<th>Percentage Less than “Well”</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Diego</td>
<td>2,966,752</td>
<td>1,848,070</td>
<td>879,874</td>
<td>238,808</td>
<td>8.05%</td>
</tr>
</tbody>
</table>

Source: 2013 ACS 3-Year Estimates, Table B16004

### Table 4

**English Proficiency by Language Category in the San Diego Region**

<table>
<thead>
<tr>
<th>English Proficiency</th>
<th>Spanish</th>
<th>Indo-European</th>
<th>Asian or Pacific Islander</th>
<th>Other Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Population</td>
<td>% Total Population</td>
<td>Population</td>
<td>% Total Population</td>
</tr>
<tr>
<td>Speak English &quot;Very Well&quot;</td>
<td>416,815</td>
<td>14.05%</td>
<td>68,165</td>
<td>2.30%</td>
</tr>
<tr>
<td>Speak English &quot;Well&quot;</td>
<td>146,495</td>
<td>4.94%</td>
<td>16,382</td>
<td>0.55%</td>
</tr>
<tr>
<td>Limited English Proficient</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speak English &quot;Not Well&quot;</td>
<td>119,119</td>
<td>4.02%</td>
<td>7,541</td>
<td>0.25%</td>
</tr>
<tr>
<td>Speak English &quot;Not at All&quot;</td>
<td>54,265</td>
<td>1.83%</td>
<td>2,231</td>
<td>0.08%</td>
</tr>
<tr>
<td>LEP Subtotal</td>
<td>173,384</td>
<td>5.84%</td>
<td>9,772</td>
<td>0.33%</td>
</tr>
</tbody>
</table>

| Total | 736,694 | 24.83% | 94,319 | 3.18% | 237,970 | 8.02% | 49,699 | 1.68% |
The ACS data includes information about languages spoken by 39 different language groups (but not by ability to speak English per the U.S. DOT guidance definition as previously mentioned). Table 5 shows the top five non-English languages spoken at home in the San Diego region based on data collected from 2011 through 2013 among the total population ages five and older (including both LEP and non-LEP populations). While there were respondents from all 39 language groups, Spanish or Spanish Creole, Tagalog, Vietnamese, Chinese, and Arabic were the primary languages. Compared to the 2012 analysis, these figures represent a slight increase for groups speaking Vietnamese and Arabic at home and slight decreases for Spanish or Spanish Creole, Tagalog, and Chinese. When this analysis was conducted in 2012, Arabic was not on the list and German was.

### Table 5
Languages Spoken at Home in the San Diego Region

<table>
<thead>
<tr>
<th>Language</th>
<th>Language Spoken at Home for the Population Age Five and Older</th>
<th>Percent of Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish or Spanish Creole</td>
<td>736,694</td>
<td>24.83%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>93,144</td>
<td>3.14%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>44,925</td>
<td>1.51%</td>
</tr>
<tr>
<td>Chinese</td>
<td>40,228</td>
<td>1.36%</td>
</tr>
<tr>
<td>Arabic</td>
<td>21,794</td>
<td>0.73%</td>
</tr>
<tr>
<td>All Other Languages</td>
<td>181,897</td>
<td>6.13%</td>
</tr>
</tbody>
</table>

Source: 2013 ACS 3-Year Estimates, Table B16001

Figure 1 shows the presence of all LEP persons in the County using Census tracts 2013 5-Year data. The map illustrates the Census tracts where the proportion of the population speaking English less than “very well” for all languages is greater than 16.25 percent, the service area average. The less than “very well” distinction takes into account bilingual speakers who may speak English well but prefer to speak their native language. Additionally, Census tract data is not available for individual languages other than Spanish with the less than “well” distinction.

Figure 2 shows the presence of all LEP persons in the County using Public Use Microsample Areas (PUMAs) 2013 3-Year data and illustrates where the proportion of the population speaking English less than “well” for all languages is greater than 8.06 percent, the service area average.

Figure 3 shows the Census Tracts where the proportion of LEP Spanish speakers who speak English less than “very well” is greater than 10.91 percent, the service area average.

Figure 4 shows the PUMAs where the proportion of LEP Spanish speakers who speak English less than “well” is greater than 5.89 percent, the service area average.

These findings are comparable to the findings in the 2012 Factor 1 analysis. As with the previous analysis, the proportion of Spanish speakers is far greater than any other language in San Diego County.
Figure 1
All Languages
Limited English Proficient (LEP) Census Tracts

Source: 2013 ACS 5-Year Estimates, Table B16001
Figure 2
All Languages LEP PUMAs

Limited English Proficient (LEP) Public Use Microsample Areas (PUMAs)

All Languages Speak English "Not Well" or "Not at All"

Source: 2013 ACS 3-Year Public Use Microdata Sample
Figure 3
Spanish LEP Census Tracts

Spanish Limited English Proficient (LEP) Census Tracts

LEP Spanish Speak English Less Than "Very Well"

At or Below County Average
Above County Average

The county average for the Spanish-speaking population five years and older that speaks English less than "Very Well" is 10.94%
Figure 4
Spanish LEP PUMAs

Source: 2013 ACS 3-Year Public Use Microdata Sample (PUMS)
California Department of Education English Learner Data

California Department of Education (CDE) English learner data also was analyzed. In particular, the CDE data was used to determine the existence of other prevalent languages that may have fallen under the more vague Census categories such as “Other and Unspecified Languages” and “African Languages.” Table 6 shows the top ten languages other than English and the number of students who identify as speaking those languages at home, along with the associated percentages.

Table 6
English Learner Data for San Diego County Public Schools

<table>
<thead>
<tr>
<th>Language</th>
<th>English Learners by Language</th>
<th>Percent of English Learners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>93,211</td>
<td>81.6%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>3,214</td>
<td>2.8%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>2,705</td>
<td>2.4%</td>
</tr>
<tr>
<td>Arabic</td>
<td>2,573</td>
<td>2.3%</td>
</tr>
<tr>
<td>Chaldean</td>
<td>1,983</td>
<td>1.7%</td>
</tr>
<tr>
<td>Other non-English languages</td>
<td>1,822</td>
<td>1.6%</td>
</tr>
<tr>
<td>Somali</td>
<td>1,174</td>
<td>1.0%</td>
</tr>
<tr>
<td>Mandarin</td>
<td>909</td>
<td>0.8%</td>
</tr>
<tr>
<td>Korean</td>
<td>835</td>
<td>0.7%</td>
</tr>
<tr>
<td>Japanese</td>
<td>730</td>
<td>0.6%</td>
</tr>
</tbody>
</table>

Source: California Department of Education (CDE) English Learner Data for San Diego County, School Year 2013-2014

The majority (82 percent) of limited English speakers are native Spanish speakers. This number is down slightly from 83 percent identified in the 2012 CDE analysis. The analysis of the CDE English Learner data roughly correlates to the analysis of Census LEP speakers (by languages spoken) shown in Table 1. The CDE data, unlike the ACS data, shows that Somali and Chaldean languages are included in the list of the top ten languages for school children. Percentages for these two languages are consistent with the percentages included in the Census data under the names Cushite (Somali, 0.5 percent) and Syriac (Chaldean, 1.1 percent). The Cushitic languages are a branch of the Afro-Asiatic language family spoken primarily in the Horn of Africa (Somalia, Eritrea, Djibouti, and Ethiopia). It is therefore possible that Somali could be substituted for Cushite. Similarly, Syriac is a Middle Eastern language considered Chaldean or Aramaic by the Middle Eastern community.
Table 7 shows the top ten languages requested for translation in fiscal years 2012, 2013, and 2014 through the Department of Behavioral Health Services.

<table>
<thead>
<tr>
<th>Language</th>
<th>Languages by Translation Services Requested</th>
<th>Percent of Translation Services Requested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>21,582</td>
<td>45.0</td>
</tr>
<tr>
<td>Arabic</td>
<td>9,638</td>
<td>20.0</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>6,301</td>
<td>12.7</td>
</tr>
<tr>
<td>Cambodian</td>
<td>3,988</td>
<td>8.7</td>
</tr>
<tr>
<td>Farsi</td>
<td>1,744</td>
<td>2.7</td>
</tr>
<tr>
<td>Laotian</td>
<td>1,542</td>
<td>3.7</td>
</tr>
<tr>
<td>Tagalog</td>
<td>456</td>
<td>1.0</td>
</tr>
<tr>
<td>Somali</td>
<td>392</td>
<td>1.0</td>
</tr>
<tr>
<td>Chaldean</td>
<td>184</td>
<td>0.3</td>
</tr>
<tr>
<td>Mandarin</td>
<td>125</td>
<td>0.3</td>
</tr>
<tr>
<td>Totals</td>
<td>45,952</td>
<td>95.3</td>
</tr>
</tbody>
</table>

Source: San Diego County, Department of Behavioral Health, Interpretation Services, Fiscal Years 2012-2014

The data provided roughly correlates to the ACS identification of LEP individuals by language type. The interpretation services data includes Somali, Chaldean, Cambodian, and Farsi in the top ten, each of which are not identified in the top ten ACS data. As discussed in the CDE analysis, it is possible that Cushite and Somali and Syriac and Chaldean are the same languages. The majority of translation requests tracked by the Department of Behavioral Health Services, 45 percent, are for Spanish. This is consistent with the ACS and CDE data.
CONCLUSION

Findings in this report revealed 15 specific languages in San Diego County with more than 1,000 individuals who are LEP. The languages included in Table 8 were identified through ACS data for individuals who reported speaking English “not well” or “not at all.” This analysis was based on the LEP definition included in U.S. DOT LEP guidance. Those languages and corresponding LEP populations are shown in Table 8 along with the increase or decrease from the 2012 Factor 1 report.

Table 8
Languages in San Diego County with more than 1,000 LEP Persons

<table>
<thead>
<tr>
<th>Language*</th>
<th>LEP Population</th>
<th>Percent of All LEP Speakers</th>
<th>Percent of Total Population (Age Five and Older)</th>
<th>2012 Percentage of All LEP</th>
<th>Increase/Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>174,923</td>
<td>73.1%</td>
<td>5.89%</td>
<td>76.00%</td>
<td>-2.9%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>15,723</td>
<td>6.6%</td>
<td>0.53%</td>
<td>5.60%</td>
<td>1.0%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>9,140</td>
<td>3.8%</td>
<td>0.31%</td>
<td>3.30%</td>
<td>0.5%</td>
</tr>
<tr>
<td>Chinese</td>
<td>5,857</td>
<td>2.4%</td>
<td>0.20%</td>
<td>2.30%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Arabic</td>
<td>5,592</td>
<td>2.3%</td>
<td>0.19%</td>
<td>1.30%</td>
<td>1.0%</td>
</tr>
<tr>
<td>Korean</td>
<td>3,464</td>
<td>1.4%</td>
<td>0.12%</td>
<td>1.20%</td>
<td>0.2%</td>
</tr>
<tr>
<td>Syriac</td>
<td>2,730</td>
<td>1.1%</td>
<td>0.09%</td>
<td>1.50%</td>
<td>-0.4%</td>
</tr>
<tr>
<td>Persian</td>
<td>2,252</td>
<td>0.9%</td>
<td>0.08%</td>
<td>1.20%</td>
<td>-0.3%</td>
</tr>
<tr>
<td>Russian</td>
<td>1,651</td>
<td>0.7%</td>
<td>0.06%</td>
<td>0.60%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Mandarin</td>
<td>1,518</td>
<td>0.6%</td>
<td>0.05%</td>
<td>0.50%</td>
<td>0.1%</td>
</tr>
<tr>
<td>Japanese</td>
<td>1,477</td>
<td>0.6%</td>
<td>0.05%</td>
<td>0.90%</td>
<td>-0.3%</td>
</tr>
<tr>
<td>Laotian</td>
<td>1,467</td>
<td>0.6%</td>
<td>0.05%</td>
<td>0.90%</td>
<td>-0.3%</td>
</tr>
<tr>
<td>Cantonese</td>
<td>1,118</td>
<td>0.5%</td>
<td>0.04%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cushite</td>
<td>1,115</td>
<td>0.5%</td>
<td>0.04%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hindi</td>
<td>1,046</td>
<td>0.4%</td>
<td>0.04%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: 2013 ACS 3-year Public Use Microdata Sample (PUMS) *Restricted to languages spoken by at least 1,000 limited English speakers.

The languages with 1,000 speakers or more have largely remained the same as they were in the 2012 Factor 1 report. Slight increases or decreases were identified and three new languages reached the 1,000 person threshold – Cantonese, Cushite (Somali), and Hindi. One language, Cambodian, dropped below the 1,000 person threshold. Spanish speakers remain the largest LEP population in San Diego County by a significant margin. Outliers identified in the analysis of CDE and County data indicate higher than average pockets of LEP populations who access certain programs and services.

The 15 languages included in Table 9 are further evaluated in Factors 2, 3, and 4 per the recommended U.S. DOT LEP guidance.
TASK 2: LANGUAGE ASSISTANCE MEASURES

Current and future language assistance measures are outlined in this section of the Language Assistance Plan.

To gain insight for potential future language assistance measures, SANDAG interviewed CBOs serving LEP populations and worked with them to host focus groups with LEP individuals in areas throughout the county that were identified as having high proportions of LEP persons. Staff were also surveyed to determine the types of assistance being provided to LEP populations using SANDAG programs and services.

Current Language Assistance Measures - SANDAG

SANDAG staff members were interviewed and materials were reviewed in order to develop the inventory of current language assistance measures. LEP efforts have been put in place by staff working with LEP communities and employees associated with each of the programs or services provided details on what processes are in place to target LEP communities.

Several suggestions from the 2012 Language Assistance Plan were moved from the previous list of future language assistance measures to current measures, as noted below. Some previous recommendations remain on the list of future measures and new recommendations were added to this list as a result of the update to the Four Factor analysis. Many of the suggestions made by limited English speakers who participated in focus groups and community based organization staff who were interviewed are strategies that SANDAG already employs, including working through trusted sources in the community, participating in events where LEP populations are already present, distributing information through social services, reaching LEP parents of children through schools, providing translated information using regionally recognized language, and getting information to LEP populations through ethnic media.

The table below outlines SANDAG programs, activities, or services and the current resource available for limited English proficient (LEP) persons.
<table>
<thead>
<tr>
<th>Program, Activity, or Service</th>
<th>LEP Component</th>
</tr>
</thead>
</table>
| SANDAG Board and Policy Advisory Committee Meetings | • Periodic English/Spanish translation service provided based on agenda topic, likely meeting attendees, or special request  
• Title VI notice of rights and complaint process provided in agendas  
• Agendas state that materials can be made available in alternate languages. This statement is provided in English, Spanish, Tagalog, Vietnamese, and Chinese |
| Regional Planning Efforts | • Interpretation provided at public meetings/workshops based on invited or expected LEP audience  
• Document review notices printed in English and Spanish for projects with a high concentration of affected LEP persons  
• Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of LEP populations  
• Bilingual English/Spanish court reporter present at public meetings and workshops where public comment is requested  
• Fact sheets and comment cards produced in English/Spanish in areas with high concentrations of LEP populations  
• Community-based outreach program to secure participation from underrepresented groups  
• Periodic region-wide public opinion surveys in English/Spanish (new since 2012)  
• Demographic surveys for workshop/community meetings in English/Spanish (new since 2012)  
• Surveys translated to other languages depending on LEP populations in project areas (new since 2012)  
• Social equity data viewer to determine low-income, minority, and LEP populations (new since 2012)  
• CBO database to provide information to organizations that serve LEP groups (new since 2012)  
• Notice of information available in alternate languages used as needed, available in Spanish, Vietnamese, Tagalog, and Chinese (new since 2012) |
<p>| Corridor Planning Efforts                                                                 | • Translation provided at public meetings/workshops based on invited or expected LEP audience |
|                                                                                       | • Notice of planned environmental analysis under CEQA/NEPA provided in English and Spanish |
|                                                                                       | • Some document review notices printed in English and Spanish                                |
|                                                                                       | • Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of LEP populations |
|                                                                                       | • Bilingual English/Spanish court reporter present at public meetings and workshops where public comment is requested |
|                                                                                       | • Fact sheets and comment cards produced in English/Spanish in areas with high concentrations of LEP populations |
|                                                                                       | • Demographic surveys for workshop/community meetings in English/Spanish (new since 2012) |
|                                                                                       | • Surveys translated to other languages depending on LEP populations in project areas (new since 2012) |
|                                                                                       | • Social equity data viewer to determine low-income, minority, and LEP populations (new since 2012) |
|                                                                                       | • CBO database to provide information to organizations that serve LEP groups (new since 2012) |
|                                                                                       | • Notice of information available in alternate languages used as needed, available in Spanish, Vietnamese, Tagalog, and Chinese (new since 2012) |
| 511 Website, Phone System, and Mobile Application                                    | • Google Translate toolbar on website (new since 2012)                                       |
|                                                                                       | • Bilingual English/Spanish IVR (Interactive Voice Recognition) phone system                |
|                                                                                       | • Mobile application in English/Spanish (new since 2012)                                     |
|                                                                                       | • Bilingual English/Spanish operators at Regional Transit and Roadside Assistance service centers |
| Freeway Service Patrol                                                              | • Written and online customer survey produced in English/Spanish                             |
|                                                                                       | • 62 percent of FSP drivers are bilingual, with all but one driver bilingual English and Spanish speakers; one driver is fluent in Chaldean |
|                                                                                       | • Laminated information cards in English, Spanish, Tagalog, Chinese, and Vietnamese, and photo depictions of services offered (new since 2012) |
|                                                                                       | • Spanish language media purchased for marketing campaigns (new since 2012)                  |
|                                                                                       | • Informational brochure and post card translated to Spanish                                |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>
| I-15 Express Lanes | • Bilingual English/Spanish IVR (Interactive Voice Recognition) phone system  
• 33 percent bilingual English/Spanish staff  
• Bilingual staff sent to outreach events in areas with high concentrations of LEP populations (new since 2012)  
• Printed materials (brochures, application forms, marketing material) produced in English/Spanish  
• Google Translate toolbar on website (new since 2012)  
• FasTrak customer surveys translated to Spanish (new since 2012)  
• Spanish language media purchased for marketing campaigns (new since 2012)  
• Notice of information available in alternate languages used as needed, available in Spanish, Vietnamese Tagalog, and Chinese (new since 2012) |
| South Bay Expressway | • 86 percent bilingual English/Spanish customer service representatives  
• Printed materials (brochures, application forms, marketing material) produced in English/Spanish Bilingual staff sent to outreach events in areas with high concentrations of LEP populations  
• Google Translate toolbar on website (new since 2012)  
• English/Spanish automated cash machines at freeway on/off ramps (new since 2012)  
• FasTrak customer surveys translated to Spanish (new since 2012)  
• Spanish language media purchased for marketing campaigns (new since 2012)  
• Notice of information available in alternate languages used as needed, available in Spanish, Vietnamese, Tagalog, and Chinese (new since 2012) |
<table>
<thead>
<tr>
<th>General SANDAG</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Bilingual English/Spanish receptionists on staff to provide assistance on</td>
</tr>
<tr>
<td>the phone and in person</td>
</tr>
<tr>
<td>• Access to language telephone line</td>
</tr>
<tr>
<td>• On call contracts for document translation</td>
</tr>
<tr>
<td>• Internal translation review by native Spanish speakers</td>
</tr>
<tr>
<td>• Agency website and Board Policy No. 009 contain notice of Title VI rights</td>
</tr>
<tr>
<td>and complaint process.</td>
</tr>
<tr>
<td>• Agency website provides notice of the availability of translation of</td>
</tr>
<tr>
<td>SANDAG materials free of charge</td>
</tr>
<tr>
<td>• List of bilingual employees</td>
</tr>
<tr>
<td>• Google Translate toolbar on website (new since 2012)</td>
</tr>
<tr>
<td>• Vital Documents Guidelines to help determine necessary translations</td>
</tr>
<tr>
<td>(new since 2015)</td>
</tr>
<tr>
<td>• Spanish language glossary established (new since 2012)</td>
</tr>
<tr>
<td>• Language added to grant agreements to ensure that LEP requirements are</td>
</tr>
<tr>
<td>met by grantees (new since 2012)</td>
</tr>
<tr>
<td>• Agency Public Participation Plan and Board Policy No. 025</td>
</tr>
<tr>
<td>updated to include information on Language Assistance Plan (new since 2012)</td>
</tr>
<tr>
<td>• Project manager toolkit for SANDAG project managers with tools to</td>
</tr>
<tr>
<td>implement the Language Assistance Plan (new since 2012)</td>
</tr>
<tr>
<td>• “I Speak” cards for staff having public or customer contact (see Appendix</td>
</tr>
<tr>
<td>A) (new since 2012)</td>
</tr>
<tr>
<td>• List of bilingual employees who are willing to assist LEP persons (new</td>
</tr>
<tr>
<td>since 2012)</td>
</tr>
<tr>
<td>• Notice of information available in alternate languages used as needed,</td>
</tr>
<tr>
<td>available in Spanish, Vietnamese, Tagalog, and Chinese (new since 2012)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Transit Fares</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Public notices printed in English/Spanish when fare changes are being</td>
</tr>
<tr>
<td>considered</td>
</tr>
<tr>
<td>• Public comment period, public meeting dates, printed in English/Spanish in</td>
</tr>
<tr>
<td>regional and local newspapers</td>
</tr>
<tr>
<td>• Fare Facts document printed in English/Spanish</td>
</tr>
</tbody>
</table>
The majority of the LEP components mentioned above have hard translation costs associated with them. SANDAG currently has three standing on-call contracts for language translation and interpretation services. An extensive Request for Proposal (RFP) was issued to select these three certified translation firms. Additionally, SANDAG requests regional (Mexican) translations to ensure culturally relevant messages. Of the three on-call contracts, SANDAG had previously established successful working relationships with two of the contracted companies. As a final step in having materials translated, internal native Spanish-speaking staff review documents for accuracy, relevancy, and consistency. Furthermore, when using translation companies for things such as focus groups, moderator training is conducted to ensure SANDAG preferences and styles are used, as well as comprehension of in-depth project information.

Other factors beyond translation costs must be considered, including staff salaries, time spent coordinating efforts, review time by Spanish-speaking employees to ensure translation accuracy, and time spent managing contracts. Time constraints are another consideration in many instances.
Often, a limited amount of time is available to release information. In some cases, by the time SANDAG would be able to translate a notice, the need is no longer there (i.e., construction notices, freeway closures, etc.). While SANDAG may take the time and have resources to translate materials, some limited English speakers are illiterate in their native languages, and translating documents may not be helpful for them. Staff are encouraged to work with CBOs who provide assistance to LEP persons to distribute information regarding SANDAG programs, activities, and services.

**Current Language Assistance Measures – Transit Operators**

SANDAG worked closely with the region’s transit operators, Metropolitan Transit System (MTS) and North County Transit District (NCTD) to obtain input from staff. Similar to the 2012 Four Factor analysis and Language Assistance Plan, access to public transportation emerged as the main theme for LEP populations. Results from CBO interviews, staff interviews, and focus group participants will be shared with both operators. Future language assistance measures identified for transit operators in this report are suggestions only and would not be implemented by SANDAG.

The transit operators offer a wide range of tools for LEP populations that SANDAG does not implement, but has taken into consideration in conducting the Four Factor analysis. Some of these are detailed below.

**Written Language Assistance**

- Bilingual or multilingual versions of:
  - “How to ride” brochures
  - Spanish language fare payment instructions
  - Spanish language system maps and timetables
  - Printed Spanish language service change announcements
  - Spanish language notices pertaining to upcoming events
  - Passenger newsletter
  - Web translations
- As resources become available and materials are updated, more and more pictographs are being used in stations and in vehicles
- Ticket vending machines with Spanish language functions
- Next stop vehicle signage (new since 2012)

**Oral Language Assistance**

- Automated vehicle announcements (new since 2012)
- Bilingual staff
- On-call translation services
- Contracting for interpreters on an “as needed” basis
- Using community volunteers to interpret information
• Using bilingual staff to interpret information on an “as needed” basis
• Access to telephone interpreter services (new since 2012)

Community Outreach

• Train the trainers availability for all CBOs about how to ride transit
• Spanish language TV advertisements
• Spanish language radio advertisements
• Spanish language newspaper advertisements
• Advertisements in ethnic media
• Bilingual staff at all community outreach events
• Translators present at community meetings as needed
• Opportunity for both oral, as well as written, comments

Stations

• Visible bilingual English/Spanish instructions about how to make fare payments
• Visible bilingual English/Spanish schedules, route maps, and information about how to use the system
• Staff awareness regarding availability of translated materials
• Updates to wayfinding signage in English and Spanish (new since 2012)

Vehicles

• Bilingual operators
• Visible bilingual English/Spanish instructions about how to make fare payments
• Visible bilingual English/Spanish schedules, route maps, and information about how to use the system
• Operator awareness that translated information is available
• Bus operators who can provide information in languages other than English

Customer Service

• Bilingual English/Spanish customer service staff as well as Tagalog assistance
• Bilingual English/Spanish IVR utilized
Press/Public Relations

- Working relationships with ethnic media who translate press release content
- Select translated information on website

General

- LAP Committee (new to NCTD since 2012)
- Vital document determination (new to NCTD since 2012)

Future Language Assistance Measures - SANDAG

As a result of the research conducted during the 2012 Four Factor analysis, focus group participants and CBO staff members interviewed offered several recommendations to provide improved access to information and services for LEP populations. Several of these were implemented over the last three years. Other suggestions have yet to be implemented and may never be feasible. Many of the suggestions made during the update for the Factor 1, 2, and 3 analysis associated with this report are reoccurring and measures that SANDAG project managers currently use, when possible. Overall, the majority of suggestions were repeated in the different language LEP focus groups, making the case that the issue of access to information is fairly consistent throughout different speaking LEP communities.

In addition to the suggestions made by LEP persons and CBO staff that provide services for them, included in the updated list are suggestions made by SANDAG staff. Of the suggested ideas, the list below provides consideration for SANDAG staff when planning future LEP outreach efforts. The following suggestions are focused only on SANDAG areas of responsibility.

- Make additional Spanish surveys available for FSP drivers
- Add Chaldean to the list of languages on the laminated driver information card
- Regularly keep count of Spanish callers to the 511 phone system
- Promote SANDAG programs, activities, and services through social service providers, trusted community leaders and groups, community events, and other places where LEP populations are already present including libraries, grocery stores, medical clinics, employers, and more
- Create community specific guidelines and key partner contacts for SANDAG project managers to use when working in neighborhoods with high concentrations of LEP residents
- Increase usage of Spanish language radio and TV announcements when possible
- For new transit construction, ensure that vital transit signage is translated or incorporates design pictographs
- Create Spanish language style guidelines for maximum accuracy and consistency of SANDAG terms when using translation contract companies
- Per impacted community, place multi-language information and notices in publications serving LEP populations to demonstrate SANDAG’s commitment to all stakeholders, to share service-related announcements, and to increase comfort levels regarding access to information in a native language
• Work with LEP serving CBOs to provide information/training about how to ride, purchase fares, and use a Compass Card for LEP populations

Overwhelmingly, findings indicated the best way to reach LEP communities is to work within existing networks in their communities. SANDAG has made efforts to work more closely with CBOs since the last Language Assistance Plan, including bringing groups who serve low-income, minority, and LEP populations under contract. Results in the Factor 2 and 3 analyses also indicate an overall lack of information regarding SANDAG programs and services. Because of this, project managers will continue to be encouraged to provide notice, assistance, and specific outreach for LEP populations by partnering with CBOs.

**Future Language Assistance Measures - Transit Operators**

Close communication between SANDAG, MTS, and NCTD was maintained through the Four Factor analysis research, ensuring a cohesive approach for continued LEP outreach and communication. Specific transit suggestions received through this process are separated below. All the information gathered through focus groups and CBO interviews will be provided to MTS and NCTD for review. The following list is not inclusive of all comments made during the focus groups.

- Provide cultural sensitivity and customer service training to drivers
- Distribute information through trusted sources including social services and community groups and events
- Employ ‘How am I driving today signage?’ aboard vehicles with a multi-lingual customer service telephone line
- Multi-lingual safety and security announcements
- Translated complaint/commendation forms
- “I Speak” card usage in stations
- Translated information on agency websites
- Translated electronic signs
- Translated recorded announcements in stations and in vehicles
- Increased usage of pictographs for information and instructions
- More flexible scheduling
- More buses/greater frequency
- Provide more translated information at bus stops in high LEP neighborhoods
- Hire more bilingual drivers
- Assign bilingual drivers to routes with high LEP concentrations
- Train drivers to provide loud and clear announcements, even in English, as any sort of stop recognition is helpful
- Provide LEP serving CBOs, community centers, temples, churches, etc. bus guides and other transit information
• Provide information for accessing Chinese language information via phone
• Have transit information printed in ethnic newspapers and publicized on ethnic radio
• Partner with CBOs to conduct more trainings on how to use public transit for LEP populations, allowing for greater comfort levels and encouraging use of public transit
• Publicize the availability and instructions for accessing information in languages other than English

The majority of improvements suggested by LEP communities are focused primarily on methods of providing information in native languages. Some of the concerns expressed are reflective of concerns English speaking riders share, such as cleanliness, bus schedules, routes, frequency, and driver courtesy. These suggestions remained consistent with those made during the 2012 Four Factor research.

As findings from Factor 3 suggest, working within established networks in LEP communities to deliver important information and obtain feedback is key. Working closely with existing CBOs would benefit SANDAG, MTS, and NCTD in reaching LEP populations.

TASK 3: TRAINING STAFF

Ongoing training has been implemented at SANDAG since the 2012 Four Factor analysis and Language Assistance Plan were first created. These include:

• Social Equity training with a detailed section on the Language Assistance Plan and how to provide information for LEP persons
• LEP training incorporated into existing annual training
• Periodic reviews to assess the effectiveness of LEP training material and update as necessary
• Language Assistance Guidelines for staff reference

The initial Social Equity staff training took place in 2013 and was conducted by SANDAG legal staff specializing in Title VI requirements. All staff were required to attend. The training included the following elements:

• A summary of Title VI and Environmental Justice laws
• SANDAG responsibilities under the U.S. DOT LEP Guidance
• Information about how to conduct a Social Equity Impact Assessment
• SANDAG obligations as a recipient of federal funds
• The SANDAG complaint procedure
• Overview of SANDAG Board Policy 25 that requires meaningful public input
• A summary of the Four Factor analysis
• A summary of SANDAG’s Language Assistance Plan
A description of the type of language assistance SANDAG currently provides and instructions on how staff can access these products and services

How to respond to calls from LEP persons
How to respond to correspondence from LEP persons
How to respond to LEP persons in person
How to document the needs of LEP persons
How to respond to Civil Rights Act Title VI complaints
Overview of tools available to help LEP persons
Examples of documents that need to be translated

Subsequent follow up with staff who most interact with LEP individuals is conducted to ensure all necessary efforts are being made. This staff includes reception, customer service, and project manager positions.

As previously mentioned, SANDAG worked closely with MTS and NCTD through this Four Factor analysis and Language Assistance Plan implementation. Both of the transit operators are committed to LEP staff training.

**TASK 4: PROVIDING NOTICE TO LEP PERSONS**

SANDAG currently provides notice to LEP individuals in a number of ways. Many of these are referenced in the current language services table and include:

- Translated information for fare changes and other important notices
- Translated project fact sheets documents
- Access to multiple language customer service telephone line
- Press release distribution to ethnic media, who regularly translate material for their audiences
- Interpreters/bilingual staff at community meetings
- Presence at community events with LEP attendees
- Some web translations
- Leveraging community partners to help disseminate notice of availability of language assistance to LEP populations
- Including notices in local newspapers in languages other than English
- Providing notice of the availability of translation services in agenda materials
- English/Spanish Title VI brochure in lobby (new since 2012)
- “I Speak” cards for use at reception desk (new since 2012)
- List of bilingual staff available to assist LEP persons (new since 2012)
- Bilingual staff encouraged to add ‘hablo español’ to nametags at community meetings
• Notice of language services available in Spanish, Vietnamese, Tagalog, and Chinese for project managers to add to materials that are not translated (new since 2012)
• Google Translate toolbar added to all SANDAG websites (new since 2012)
• Bilingual reception staff
• Spanish language media purchased for majority of SANDAG marketing campaigns to promote services and programs to Spanish speaking LEP persons

Vital Documents Guidelines were created to provide employees direction on what documents require translation.

**Vital Document Guidelines**

In accordance with Title VI and Executive Order 13166, SANDAG will take reasonable steps to ensure that LEP persons receive the language assistance necessary to allow them meaningful access to SANDAG programs and services. Under this Guidance, an effective LEP Plan includes the translation of “vital” written materials or Vital Documents into the languages of frequently-encountered LEP groups. Federal funding recipients must determine which vital documents should be translated. Failure to ensure that LEP persons can effectively participate in or benefit from SANDAG programs and activities, by providing language assistance measures or written translations, may violate the prohibition under Title VI against national origin discrimination.

SANDAG has identified Spanish as the only language to meet its language translation threshold. SANDAG’s Vital Documents have been identified as follows:

1. Any document that is critical for obtaining services and benefits, and/or

2. Any document that is required by law. The “vital” nature of a document depends on the importance of the information or service involved, particularly the consequence to the LEP person if the information is neither accurate nor timely.

**Document Prioritization**

These Guidelines determine which documents are vital. Because not all documents have the same importance, SANDAG has ranked Vital Documents into three tiers, according to the urgency of their importance.

Tier 1 documents are the highest priority. These tiers will be evaluated, along with the Language Assistance Plan, regularly. It should be noted that the designation of a document as “vital” may not mean that a word-for-word translation of that document will be required. In some cases, a vital document may be translated by providing a summary of the key information in the document. In other cases, notice of language assistance services may be sufficient.
Tier 1: Critical documents

SANDAG defines Tier 1 documents as follows:

- Those which would prevent LEP individuals from obtaining access to SANDAG programs and services
- Those that, without translation, would deprive LEP persons of an awareness of their legal rights, particularly rights to language assistance

Tier 1 documents include public hearing notices and customer information important to accessing SANDAG services such as:

- Fare and service change notices
- FasTrak user information including customer applications and instructions for how to access services
- Freeway Service Patrol user information including how to access services
- 511 user information including how to access services
- iCommute user information including applications, instructions, and how to access services and programs

Tier 1 also includes basic information necessary to understanding legal rights that can be exercised by LEP person or by persons impacted by SANDAG construction activities. This includes information on Title VI and the right to file a complaint under Title VI.

Translation of these documents will be first priority for SANDAG.

Tier 2: Documents that will enhance access to SANDAG programs and services

Tier 2 includes information that will enhance LEP persons’ customer experience or encourage involvement in the planning process. These documents could include the following:

- Project fact sheets, collateral pieces that are not deemed instructions for use, maps, copy on images that are not deemed instructions for use
- Freeway Service Patrol information that is not deemed to be critical user information including marketing materials, additional collateral outside of instructions for use
- FasTrak information that is not deemed to be critical user information including marketing materials, additional collateral outside of instructions for use, complete promotion terms and conditions
- South Bay Expressway information that is not deemed to be critical user information including marketing materials, additional collateral outside of instructions for use, complete promotion terms and conditions
- 511 information that is not deemed to be critical user information including marketing materials, additional collateral outside of instructions for use, complete promotion terms and conditions
• iCommute information that is deemed not to be critical user information including marketing materials, additional collateral outside of instructions for use, complete promotion terms and conditions

• Public outreach information for Public Participation/Involvement Programs including marketing materials, additional collateral outside of instructions for use

Translation of these and other documents will be based on language requests received and at the discretion of project managers after consultation with the Communications Department.

**Tier 3: Documents that will enhance decision-making and encourage participation**

Tier 3 includes information that will enhance the role that all individuals, regardless of language ability, may play in SANDAG planning efforts. It may include information related to long-term strategic plans such as:

• Information regarding SANDAG Board of Directors and Policy Advisory Committee meetings including agendas and minutes

• Information regarding regional, corridor, and transit planning efforts including study documents and reports

• General SANDAG information including marketing materials, collateral

The form that these translations would take should be determined on a case-by-case basis, as these documents are published. In many cases, translation of an abbreviated summary document may be the most appropriate. In some cases, notice of language assistance may be sufficient. For each tier, SANDAG will examine documents against available resources or alternatives.

**Vital Document Identification**

The determination of the “vital” status of a document is an ongoing process. Documents will evolve and so will their importance. Thus, document classification into the three tiers will need to be reevaluated on a periodic basis. In order to bring continuity in this process, the Communications Department should be consulted for assistance and will coordinate reviews of vital documents. The Office of General Counsel will review these Guidelines on an annual basis and assist the Communications Department with maintaining a list of Vital Documents.

**Language Translation Threshold**

Based on the analysis conducted in Factor 1, Factor 2, and Factor 3 in 2012 and then again in 2015, SANDAG has determined that the only language to meet its language translation threshold is Spanish. As part of the ongoing monitoring and updating process, SANDAG will reevaluate this threshold based on LEP tracking data to determine if additional languages should be added.

With due consideration to resource and time constraints, documents designated as a Vital Document, Tier 1, will be translated into Spanish.

Beyond Spanish, SANDAG will translate documents into additional languages in the following cases:
Four languages: The Notice on Language Assistance Measures and Title VI Policy, Compliant Procedure and Rights under Title VI will be translated into the top four languages other than English identified by the U.S. Census for San Diego County, Spanish, Vietnamese, Tagalog, and Chinese.

Additional languages: On case-by-case basis for significant projects SANDAG may, at its discretion, translate documents into additional languages if the nature of the document and the character of the document’s target audience justify additional translation. Additional languages will be determined by the frequency of encounters with language groups. If SANDAG lacks data on encounters, additional languages may be determined by demographic data and U.S. Department of Transportation guidelines on language translation.

The data analysis in Factor 1 identified 238,808 individuals five years and older who speak English less than “well” (2013 American Community Survey 3-Year Estimates). This figure represents 8 percent of the San Diego County population. Of those limited English speakers, 173,384, or 5.8 percent of the total San Diego County population, are identified as Spanish-speakers. For this reason, SANDAG determined that Spanish meets the Translation Language Threshold.

Vietnamese is the next most spoken language, according to U.S. Census Bureau, 2011-2013 American Community Survey PUMS data. Vietnamese speakers account for 15,723 speakers, or .53 percent of all LEP persons in San Diego County. Thirteen other languages were identified as having more than 1,000 speakers in the Factor 1 analysis. Each of these languages makes up less than one half of one percent of the LEP population. Accordingly, SANDAG determined only one language meets the translation language threshold and this one language is needed in order to serve the most frequently encountered language group (Spanish). SANDAG, MTS, and NCTD staff interviews; focus group participants; and CBO interviews further confirmed that Spanish represents the most populous language group in need of language assistance.

TASK 5: MONITORING/UPDATING THE PLAN

The Four Factor analysis and Language Assistance Plan is monitored and calendared for review every four years.

The plan is monitored using the following measures:

- Staff person assigned to provide day-to-day administration of the Language Assistance Plan to ensure compliance and correct implementation
- Feedback sought from LEP communities and CBOs regarding the effectiveness of the plan
- Staff feedback sought to determine the effectiveness and usefulness of the Language Assistance Plan
- SANDAG procedure requiring all written translation requests are routed through and managed by the Communications office to ensure consistency
- Using LEP Language Assistance Guidelines for all staff
The following is a list of the elements to be reviewed regularly:

- Assessment of the number of LEP persons in the region
- The frequency of encounters with LEP language groups
- Nature and importance of activities to LEP persons
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed
- Assessment of the language needs of LEP individuals in order to determine whether interpreters and/or translated materials are needed
- Assessment of whether existing language assistance services are meeting the needs of LEP individuals
- Assessment of whether staff members understand LEP policies, procedures, and how to access and carry them out
- Assessment of whether language assistance resources and arrangements for those resources are current
- Feedback from LEP communities and community organizations about the Language Assistance Plan

Changes to the Language Assistance Plan will be made based on the input provided from staff, CBOs, and LEP persons.